

# California Central Coast Veterans Cemetery Project

## CEQA Findings of Fact

SCH #2018111030

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**JUNE 20 2019**

**STATE CLEARINGHOUSE**

**JUNE 2019**

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## Chapter 1.0 Introduction

These findings have been prepared for the proposed California Central Coast Veteran Cemetery (CCCVC) Project, for which an Environmental Impact Report/Environmental Assessment (EIR/EA) was prepared pursuant to California Environmental Quality Act (CEQA, California Public Resources Code [PRC], Section 21000, et seq.). The proposed project consists of implementation of the 2015 Master Plan and the construction and operation of Phase 2 of the CCCVC. These findings have been prepared to comply with the requirements of CEQA (PRC Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.).

CEQA (PRC Section 21000 et seq.) generally requires that a lead agency must take reasonable efforts to mitigate or avoid significant environmental impacts when approving a project. CEQA Guidelines Section 15092(b) requires that one of the following findings or actions be completed for each significant impact of a project: (1) the significant impact is mitigated to a less-than-significant level pursuant to the mitigation measures identified in the EIR; or (2) if there is a residual significant impact after implementation of mitigation measures identified in the EIR, a Statement of Overriding Considerations is completed, supported by substantial evidence in the administrative record, which includes the documents, materials, and other evidence.

In order to effectively evaluate any potentially significant environmental impacts of a proposed project, an EIR must be prepared. The EIR is an informational document that serves to inform the decision-makers and the general public of any potentially significant environmental impacts. The preparation of an EIR also serves as a medium for identifying possible methods of minimizing any significant effects and describing and analyzing reasonable alternatives to the project.

On behalf of the State of California (State), the California Department of General Services – Real Estate Services Division (DGS) and the California Department of Veterans Affairs (CalVet) prepared an EIR/EA for the proposed project in accordance with the requirements of CEQA and the CEQA Guidelines. CalVet, with the assistance from DGS, is the lead State agency responsible for the preparation of the EIR under CEQA for the proposed project. The CCCVC Project would be constructed with funds awarded through the Veterans Cemetery Grants Service offered by the U.S. Department of Veterans Affairs (USDVA), which requires the proposed project to comply with National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] 1501), as applicable, to satisfy the regulatory requirements of the USDVA. Therefore, a joint CEQA and NEPA document has been prepared, consisting of an EIR in satisfaction of CEQA and an EA in satisfaction of NEPA. The USDVA is acting as lead Federal agency in accordance with the requirements of NEPA and to ensure that the Draft EIR/EA and underlying administrative record support the USDVA decision-making and disclosure process.

These findings are organized as follows:

**Findings for Less-Than-Significant Impacts and those identified as No Impact:** This section provides CalVet’s findings associated with impacts identified as “no impact” or “less than significant” in the EIR/EA.

**Findings for Significant, Potentially Significant, and Cumulatively Significant Impacts Reduced to Less Than Significant through Mitigation Measures:** This section provides CalVet’s findings with respect to impacts identified as significant or potentially significant that are reduced to less than significant through the adoption of feasible mitigation measures identified in the EIR/EA. These findings are made pursuant to PRC Section 21081(a) and CEQA Guidelines Section 15091.

**Findings Associated with Project Alternatives:** This section sets forth CalVet’s findings with respect to alternatives to the project that were evaluated in the Final EIR/EA. These findings are made pursuant to PRC Section 21081(a) and CEQA Guidelines Section 15091.

**Mitigation Monitoring and Reporting Program:** This section includes the Mitigation Monitoring and Reporting Program (MMRP) for mitigation measures proposed for adoption. In adopting these findings, CalVet hereby commits to implement the MMRP pursuant to CEQA Guidelines Section 15097. The MMRP is included in **Appendix A**.

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. The EIR for the proposed project did not identify any significant and unavoidable impacts that would result from the proposed project. Therefore, findings pursuant to PRC Section 21081(b) and CEQA Guidelines Section 15093 are not required.

Public Resources Code Section 21081 and CEQA Guidelines Section 15091 state that no public agency shall approve or carry out a project for which a certified EIR identifies one or more significant environmental effects of the project, unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings, which must be supported by substantial evidence in the record, include:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

When making the findings required in subdivision (1), the agency shall also adopt a program for reporting on or monitoring the changes required in the project to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

The mitigation measures required of the CCCVC Project are listed in the MMRP (**Appendix A**). The MMRP is adopted concurrently with these findings, as required by CEQA Section 21081.6(a)(1), and will be implemented throughout all phases of the project, including design, construction, and operation. CalVet will use the MMRP to track compliance with all mitigation measures.

These findings constitute CalVet’s evidentiary and policy basis for its decision to approve the proposed CCCVC Project in a manner consistent with CEQA. These findings are not merely informational, but constitute a binding set of obligations that will come into effect when CalVet approves the project (Public Resources Code Section 21081.6(b)). The mitigation measures identified as feasible and within CalVet’s authority to implement for the approved project become part of the MMRP. CalVet will enforce implementation of the mitigation measures. CalVet, upon review of the Final EIR/EA (which includes the Draft EIR/EA) and based on all the information and evidence in the administrative record, hereby makes the findings set forth herein.

## Chapter 2.0 Project Description

### 2.1 BACKGROUND AND NEED FOR THE PROJECT

#### 2.1.1 2008 Development Master Plan

As part of the Defense Base Realignment and Closure Act of 1990 (BRAC), Fort Ord was downsized and realigned in 1991 and officially closed in 1994. An initiative to develop a veterans cemetery at the former Fort Ord began a few weeks after announcement in 1991 of the BRAC (RHAA and Whitson Engineers, 2008). Since the late 1990s, the Cities of Seaside and Marina and the County have been involved in the effort to develop the CCCVC, which has been partly coordinated through the County Veterans' Citizen Advisory Committee (CAC), a group of individuals from various municipal, civic, and veterans' contingents. As originally proposed in the 1993 Fort Ord Reuse Group Base Reuse Plan and later codified in the Fort Ord Reuse Authority (FORA) Base Reuse Plan (Reuse Plan) in 1997, a 178-acre area was designated in support of the construction of a CCCVC (EMC Planning Group, Inc. and EDAW, Inc. [EMC and EDAW], 1997; RHAA and Whitson Engineers, 2008). In 2008, the 2008 Master Plan was prepared in support of this effort. The 2008 Master Plan proposed five planned land use areas within the 178-acre area, as described below:

- CCC Veterans Cemetery: It was determined that less than 79 acres (approximately 78.7 acres) was needed to meet the burial demands of for the next 100 years. Currently, 84.4 acres have been allocated for the CCCVC, which is located in the central portion of the 178-acre area.
- Ancillary Facilities: These facilities include two separate parcels for ancillary uses in support of the proposed cemetery. A 1.5-acre parcel located adjacent to the proposed cemetery on the north would include a Veterans Hall, cultural history museums, a non-denominational chapel, and facility parking. A 2-acre parcel located adjacent and south of the proposed cemetery would include construction of an amphitheater with a capacity of 300 people and additional parking.
- Development Area with Habitat Restoration Opportunity: Approximately 45 acres within the southern portion of the 178-acre area would be designated as a Development Area with Habitat Restoration Opportunity (DAHRO).
- Endowment Fund Opportunity Parcel. The most northern portion of the 178-acre area would be developed to support the finances needed for the endowment fund required for the cemetery's operations and maintenance costs, including off-site improvements.
- Anticipated Right-of-Way Dedication Areas. Right-of-way (ROW) for road improvements and other infrastructure.

#### 2.1.2 Phase 1

Phase 1 involved the development of approximately 16.9 acres within the northwestern corner of the larger 84.4-acre site. Phase 1 included burial facilities, administrative and maintenance facilities, a committal shelter for burial services, supporting roads and infrastructure (including entry roads and features, electric, telecommunications, sewer, and a storm water retention basin), and additional elements to honor veterans, including a memorial walk with one memorial wall, flag plaza, and ceremonial entry. An Initial Study/Environmental Assessment (IS/EA) was prepared for the Phase 1 project in 2014 and adopted in 2015 (ECORP, 2014). Mitigation Measure BIO-6 from the IS/EA and MMRP requires, among other obligations, identifying an off-site oak woodland restoration area and planting 398 coast live oak trees. CalVet has identified a potential off-site restoration area on County property and is currently

negotiating the use of the area with the County to implement this mitigation measure. The mitigation proposal has County support and CalVet is currently working with the County to develop the terms of the agreement. Construction of Phase 1 of the CCCVC was completed in 2016 and it is currently in operation.

### **2.1.3 Need**

California is home to 2.7 million military veterans, slightly more than one-third of whom are World War II and Korean Conflict veterans. For this group of citizens, the availability of veteran-specific burial space is an issue of ever-increasing significance. California is home to nine cemeteries operated by the National Cemetery Administration of the U.S. Department of Veterans Affairs (USDVA) and two cemeteries operated by CalVet. Six cemeteries operated by the National Cemetery Administration and one cemetery operated by CalVet have open burial space; the Bakersfield National Cemetery, located in Arvin approximately 200 miles from the Project site, Fort Rosecrans National Cemetery, located in San Diego approximately 400 miles from the Project site, the Riverside National Cemetery, located in Riverside approximately 370 miles from the Project site, the San Joaquin Valley National Cemetery, located in Gustine (Merced County) approximately 125 miles from the Project site, the Miramar National Cemetery, located in San Diego approximately 430 miles from the Project site, the Sacramento Valley National Cemetery, located in Dixon approximately 160 miles from the Project site, and the Northern California Veterans Cemetery, located in Igo (Shasta County) approximately 320 miles from the Project site. There is a demonstrated need for a veterans cemetery to serve the Monterey Bay Region of California given the number of veterans in this region and the lack of a veterans cemetery in proximity to this region. The CCCVC is intended to serve the anticipated needs of veterans and eligible dependents for the next 100 years from counties within a 75-mile radius, ranging from the San Francisco Bay Area to San Luis Obispo, but is not limited to those areas.

## 2.2 PROJECT OBJECTIVES

The 2015 Master Plan objectives include:

- Provide burial space for, but not limited to, Monterey County Region veterans anticipated for the next 100 years;
- Provide a phased approach to the development of the cemetery that allows for flexibility over time to respond to demand and available funding;
- Fulfill the vision of providing a veterans cemetery at the former largest military base on the west coast, where many veterans were likely to have served;
- Create a monument to commemorate the service and sacrifice of California State Veterans; and
- Incorporate the visual qualities and characteristics of the local landscape and native vegetation, working with the existing site features as much as possible, while meeting the programmatic needs.

The Phase 2 objectives include:

- Provide burial space for, but not limited to, Monterey County Region veterans anticipated for the next 10 years;
- Increase burial options by providing in-ground crypts and in-ground cremains burial sites; and
- Incorporate the visual qualities and characteristics of the local landscape and native vegetation, working with the existing topography and open areas with existing native vegetation as much as possible, while meeting the programmatic needs.

## 2.3 CHARACTERISTICS OF THE PROJECT

### Proposed 2015 Master Plan

The 2015 Master Plan lays out the process and strategy for the implementation of the entire CCCVC over the next 100 years. The cemetery would be completed in phases; Phase 1 is already completed and in operation. While it is anticipated that each phase would accommodate burial needs for approximately ten years, phases would be implemented based on demand and available funding. For the purposes of this analysis, it is assumed that future phases would be implemented every ten years with build-out occurring in 2101. Through its National Cemetery Administration (NCA) State Cemetery Grants Program (SCGP), the USDVA would provide funds for the design and construction of the cemetery. The 2015 Master Plan has been developed to include the content requirements published by the NCA.

The overall design intent of the site plan is to create a monument to the service and sacrifice of California State Veterans. Part of this goal is accomplished through the inclusion of features that would make a lasting and memorable impression on veterans visiting the cemetery. The cemetery would have a combination of burial facilities to meet veterans' needs, including columbaria, standard burial plots, oversized plots, and a scatter garden.

At full build-out, the cemetery would supply 105,560 gravesites with 81,040 columbaria and 25,450 casket burial sites – enough to serve the anticipated needs of veterans for the next 100 years. For cremated remains, burial would be in niches in freestanding double columbarium walls arranged in courts. In addition to burial sites, the 2015 Master Plan includes memorials walls for those who do not desire burial on-site but want to be memorialized as a veteran. Each wall would consist of 40 plaques in five rows mounted on a stucco wall. Wall sections would be added as demand increased.

The cemetery layout is designed to enhance the visitor experience by preserving much of the oak woodland and yet maintain an intuitive layout pattern. The main visitor facilities are easily found near the entrance within the Phase 1 development area. In the 2015 Master Plan, a loop road organizes the spaces within the cemetery, with smaller loops and cul-de-sacs branching off the main loop. The burial sections and columbaria are organized around these smaller loops. The landscape design incorporates the USDVA mission of sustainability by using drought tolerant native plantings and incorporating the natural oak woodlands and coastal scrub. These plants reflect the character of Seaside and the surrounding region of the County and meet the necessary demand of low water usage. Oak trees would be preserved wherever possible, including locating columbaria within the oak woodland and preserving oak woodland between burial sections to reduce potential impacts. Where major grading is proposed, new oaks would be planted to maintain the sense of immersion in an oak woodland throughout the cemetery. Approximately 31 acres would be preserved within the 84.4-acre cemetery site, consisting of approximately 17 acres of oak woodland.

Phase 1 of the CCCVC provided the majority of the upfront improvements and established a foundation and structure for future cemetery phases. Water, sewer, electric, and telephone infrastructure was constructed as part of Phase 1 and minimal connections would be required in future phases of the 2015 Master Plan. Nearly all the existing site runoff and a small amount of off-site runoff currently collect in the existing retention basin constructed as part of Phase 1; however, future phases would be required to capture and accommodate runoff on-site. Future roadway improvements consist of loops and cul-de-sacs to provide access to the additional columbaria, flag plaza, and burial sites. Future roadways would generally be 24-foot wide (face of curb to face of curb), which is the NCA standard. In some cases, roadways may be larger (29-foot wide) to provide emergency access and access compliance.

Operations and maintenance (O&M) would consist of similar activities as those currently conducted for the existing developed cemetery (i.e., Phase 1). Maintenance activities would include: landscaping such as trimming and replanting of trees, shrubs, groundcover, or perennials, as needed; trash and debris removal; cleaning and repainting buildings and structures as needed; irrigation repair (until landscaping is established by phase); cleaning and repairing storm drainage facilities, including the existing retention basin, and maintenance of oil water separator; maintenance of roads, parking, and fencing. Each State cemetery is managed by CalVet personnel in conformance with national, state, and regional policies, goals, and objectives. Typical operation activities include burial or inurnment of veterans and eligible family members and the placement and maintenance of a grave marker or niche cover.

## **Proposed Phase 2**

Phase 2 is proposed within approximately 4.4 acres adjacent to the Phase 1 development, located within the larger 84.4-acre cemetery property owned by the State. Based on demand and available funding, the burial facilities and site location proposed for Phase 2 differ from that described in the Proposed 2015 Master Plan. Based on demand and funding, the facilities in Phase 2 were revised to accommodate 2,000 crypts and 1,700 in-ground cremains, as compared to a combination of 2,875 casket burials and 9,800 columbaria proposed in the 2015 Master Plan. During the preliminary design and planning process, a preference for certain design features and desire to reduce impacts to the natural landscape resulted in further revision to the proposed combination of burial facilities and site layout, as described herein.

The proposed Phase 2 project description is based primarily on the 35% Schematic Design Plans for Phase 2 and the 35% Schematic Design – Design Narrative and Program Information prepared by Huitt-Zollars, Inc. and RHAA Landscape Architects. The proposed Phase 2 facilities have been designed in a manner that takes advantage of the topography and open areas within the existing native vegetation to reduce costs and minimize impacts to the site. Phase 2 of the CCCVC would include the following on-site improvements:

- 1,000 In-Ground Cremains;
- 1,791 Standard Crypts;
- 40 Oversize Crypts;
- Supporting roads and infrastructure; and
- Two memorial walls.

No new structures or mechanical systems are proposed in Phase 2.

The 35% Schematic Design Plans include a minimum of 111 coast live oak trees to be planted on-site. The plan includes various tree and shrub plantings, including species that are either native to the site or have proven successful in the Phase 1 planting areas. The design strategy employs primarily California coastal native plants, as well as some adapted non-invasive trees, shrubs, groundcovers, and perennials that require no irrigation once established. These plants reflect the character of Seaside and the County, and would meet the necessary requirement for low water usage. Approximately 1.2 acres would be preserved within the Phase 2 site, including approximately 1 acre of oak woodland. Phase 2 irrigation would tie into the existing irrigation mainline. New irrigation valves would be installed and controlled by the site's existing Rainbird ESP-LXD Controller, which can be expanded for use with up to 200 stations. The current irrigation system makes use of 71 stations.

All runoff from Phase 2 development would drain into the existing retention basin located along Parker Flats Cut-Off Road. The existing retention basin was converted from a natural depression during Phase 1 to serve as an earth borrow site and was not designed as a flood control basin for any specific event.

Therefore, Phase 2 includes improvements to the retention basin to contain the 100-year flood volume from Phases 1 and 2 with a 100-year maximum water surface elevation of 283 feet.

Construction of Phase 2 is anticipated to begin in late 2019 or early 2020 and would take approximately 13 months. Construction activities would require various equipment including, but not limited to, chipper/grinder, dump truck, loader, water truck, bulldozer, compactor, excavator, paving machine, delivery trucks, steel wheel compactor, backhoes, trenchers, golf carts or “gators,” and concrete truck and related paving equipment. Approximately 4.4 acres would be temporarily impacted during construction to provide staging areas for equipment and supplies, access, and stockpiling. The existing maintenance complex would be used for staging and stockpiling to reduce temporary impacts to existing vegetation.

O&M during Phase 2 would consist of similar activities as those currently conducted for the existing developed cemetery (i.e., Phase 1) and as described above for the 2015 Master Plan.

### **2.3.1 Discretionary Actions**

Prior to approving the CCCVC Project, or any alternative project, CalVet is required to undertake CEQA review including:

- Certification of the EIR
- Adoption of findings and MMRP

For the implementation of Phase 2 of the 2015 Master Plan, actions from the following responsible agencies pursuant to CEQA Guidelines Sections 15381 will be required:

#### **State Agencies**

- State Architect Approval for Americans with Disabilities Act by the Division of the State Architect
- Office of the State Fire Marshal
- California Department of Parks and Recreation, Office of Historic Preservation
- Central Coast Regional Water Quality Control Board (Region 3)

#### **Regional and Local Agencies**

- City of Seaside Municipal Code – Chapter 15.34 for potential unexploded ordinance risk
- Monterey County Code – Chapter 16.10 for potential unexploded ordinance risk

## Chapter 3.0 Procedural History

- DGS, on behalf of CalVet, prepared and filed a Notice of Preparation (NOP) for the EIR/EA with the California State Clearinghouse under State Clearinghouse Number 2018111030 on November 14, 2018, for the CCCVC Project for a 30-day review period, which ended on December 14, 2018. In addition to the State Clearinghouse, the NOP was sent to responsible agencies, trustee agencies, local agencies, State agencies, Federal agencies, interested parties and organizations, and private organizations and individuals that could have interest in the project. The NOP was available at the Monterey County Clerk's Office, on the project website <https://www.cccvcproject.com/>, at the project site, and at the DGS Environmental Services Section Office at 707 3<sup>rd</sup> Street, Fourth Floor, West Sacramento, CA 95605. The availability of the NOP was advertised in the local newspapers (*Salinas Californian*, *Monterey County Weekly*, and *The Monterey Herald*). In addition, an email inviting attendees to the public meeting was circulated to a list of 155 individuals, community members, agencies, and non-governmental organizations who may be interested in the proposed project. The email and NOP also included information on how to access the project website and comment on the proposed project.
- A scoping meeting was held on November 27, 2018, from 6:00 PM to 8:00 PM at the Community Center at Soper Field, 220 Coe Avenue Seaside, CA 93955, to provide agencies and the public with the opportunity to learn more about the project and to provide input as to the issues that should be addressed in the EIR/EA. At the meeting, a presentation was given to describe the proposed project and to discuss key environmental issues identified in preliminary analyses, and receive input from public agencies and members of the public on the scope of issues that should be addressed in the EIR/EA.
- On April 17, 2019, the Draft EIR/EA was distributed for a 47-day public review period to responsible and trustee agencies, interested groups, and individuals. The public review period for the Draft EIR/EA ended on June 3, 2019. A Notice of Availability (NOA) of the Draft EIR/EA was placed on-site and in local newspapers (*Monterey County Weekly* and *The Monterey Herald*) informing the general public of the availability of the Draft EIR/EA and a public meeting. The Draft EIR/EA was available at the Monterey County Library – Seaside Branch, 550 Harcourt Avenue, Seaside, California 93955, the Monterey County Library- Marina Branch, 190 Seaside Circle, Marina, California, at the project site, and on the project website <https://www.cccvcproject.com/>. In addition, an email with the NOA inviting attendees to the public meeting was circulated to a list of 155 individuals, community members, agencies, and non-governmental organizations who may be interested in the proposed project. The email and NOA also included information on how to access the project website and comment on the proposed project.
- DGS, on behalf of CalVet and USDVA, held a public meeting on May 14, 2019, from 6:00 PM to 8:00 PM at the Community Center at Soper Field, 220 Coe Avenue Seaside, CA 93955 to consider the Draft EIR/EA. Written public comments on the Draft EIR/EA were taken at this hearing.
- DGS received 169 written comments on the Draft EIR/EA during the comment period from the agencies, organizations, and members of the public listed in Table 2-1 of the Final EIR/EA. The Final EIR/EA contains responses to these comments, including a summary of each comment and the complete comment letter. Based on the comments received, edits were made to the Draft EIR/EA as set forth in Chapter 3 of the Final EIR/EA. Responses to public agency comments were provided to each commenting public agency on June 5, 2019.

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## Chapter 4.0 Record of Proceeding

In accordance with CEQA Section 21167.6(e), the record of proceedings for CalVet's decision on the proposed CCCVC Project includes, without limitation, the following documents:

- The NOP (November 14, 2018) and all other public notices issued by DGS in conjunction with the scoping period for the proposed project (provided in Appendix A of the Draft EIR/EA in CD format);
- All comments submitted by agencies or members of the public during the scoping comment period on the NOP (provided in Appendix A of the Draft EIR/EA in CD format);
- The Draft EIR/EA (April 17, 2019) for the project (State Clearinghouse No. 2018111030);
- All comments submitted by agencies or members of the public during the comment period on the Draft EIR/EA (provided in Chapter 2 of the Final EIR/EA);
- Responses to agency comments on the Draft EIR/EA provided to each commenting public agency on June 5, 2019;
- The Final EIR/EA (June 13, 2019) for the project, including comments received on the Draft EIR/EA and responses to those comments as well as revisions to the Draft EIR/EA;
- Documents cited or referenced in the Draft and Final EIR/EAs;
- The Mitigation Monitoring and Reporting Program (MMRP) for the project (Appendix A to these findings);
- All findings and resolutions adopted by CalVet in connection with the project and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared by DGS and CalVet, consultants to DGS and CalVet, or responsible or trustee agencies with respect to CalVet's compliance with the requirements of CEQA and with respect to CalVet's action on the project;
- All documents submitted to DGS and CalVet by other public agencies or members of the public in connection with the project up through final consideration of project approval;
- All minutes and/or verbatim transcripts, as available, of all public meetings held by DGS and CalVet in connection with the project;
- Any documentary or other evidence submitted to DGS and CalVet at such public meetings; and
- Any other materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

The official custodian of the documents comprising the record of proceedings is the Department of General Services, Environmental Services Section, located at 707 3<sup>rd</sup> Street, Fourth Floor, West Sacramento, CA 95605. All files have been available to the Secretary and the public for review in considering these findings and whether to approve the project.

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before circulation. New information added to an EIR is not "significant" unless the EIR is changes in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect that the project proponent declines to implement. The Guidelines provide examples of significant new information under this standard. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. CalVet finds that the EIR/EA does not contain significant new information as defined by the Guidelines and, therefore, recirculation of the EIR/EA is not required.

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## Chapter 5.0 Findings Required Under CEQA

Sections 5.1 through 5.4 below contain CalVet’s findings with respect to the environmental impacts of the project pursuant to the requirements of PRC Section 21081 and CEQA Guidelines Sections 15091 and 15097.

The Final EIR/EA, consisting of the Draft EIR/EA, comments on the Draft EIR/EA, responses to comments on the Draft EIR/EA, and revisions to the Draft EIR/EA, are hereby incorporated by reference into these findings without limitation. This incorporation is intended to address the scope and nature of mitigation measures, the basis for determining the significance of impacts, the comparative analysis of alternatives, and the reasons for approving the project.

These findings are based upon substantial evidence in the entire record before CalVet. These findings refer to the Notice of Preparation (NOP) or Final EIR/EA where the material appears in either of those documents. Otherwise, references are to the Draft EIR/EA. The references to certain pages or sections of the EIR set forth in these findings are for ease of reference only and are not intended to provide an exhaustive list of the evidence relied upon for these findings. These findings do not repeat the full discussions of environmental impacts contained in the EIR.

### 5.1 LESS-THAN-SIGNIFICANT IMPACTS AND AREAS OF NO IMPACT

The Secretary agrees with the characterization in the Final EIR/EA with respect to issue areas identified as “no impact” and those impacts identified as “less than significant” and finds that those impacts have been described accurately and are less than significant as so described in the Final EIR/EA. The Secretary also agrees with determinations made in the Draft EIR/EA “Issues or Potential Impacts Not Discussed Further” sections that identified issue areas or thresholds of significance either are not applicable to the CCCVC Project and that no impact related to the issue area or threshold of significance would occur.

This finding applies to the following impacts evaluated in the Final EIR/EA and determined to result in “no impact” or determined to be “less than significant.”

#### Aesthetics, EIR Section 3.2

- Impact AES-1: Have a substantial adverse effect on a scenic vista (less than significant)
- Impact AES-2: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (less than significant)
- Impact AES-3: Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (less than significant)
- Cumulative aesthetics impacts (less than significant)

#### Air Quality, EIR Section 3.3

- Impact AQ-1: Conflict with or obstruct implementation of any applicable air quality plan (less than significant)
- Impact AQ-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation (less than significant)
- Impact AQ-3: 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) (less than significant)

- Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations (less than significant)
- Impact AQ-5: Create objectionable odors affecting a substantial number of people (less than significant)
- Cumulative air quality impacts (less than significant)

#### **Biological Resources, EIR Section 3.4**

- Impact BIO-2: 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 CDFW or USFWS (less than significant for 2015 Master Plan, no impact for Phase 2)
- Impact BIO-3: 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 nursery sites (less than significant)
- Impact BIO-5: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (less than significant)
- Cumulative biological resource impacts (less than significant)

#### **Cultural and Tribal Resources, EIR Section 3.5**

- Cumulative cultural and tribal resource impacts (less than significant)

#### **Energy, EIR Section 3.6**

- Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy (less than significant)
- Impact ENG-2: Conflict with State or Local Plans (less than significant)
- Cumulative energy impacts (less than significant)

#### **Geology and Soils, EIR Section 3.7**

- Impact GEO-1: Directly or indirectly cause 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 (less than significant)
- Impact GEO-2: Result in substantial soil erosion or the loss of topsoil (less than significant)
- Impact GEO-3: 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 (less than significant)
- Cumulative geology and soils impacts (less than significant)

#### **Greenhouse Gas Emissions, EIR Section 3.8**

- Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (less than significant)
- Cumulative greenhouse gas emissions impacts (less than significant)

**Hazards and Hazardous Materials, EIR Section 3.9**

- Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (less than significant)
- Impact HAZ-2: 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 (less than significant)
- Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (less than significant)
- Impact HAZ-4: 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 create a significant hazard to the public or the environment (less than significant)
- Impact HAZ-5: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires (less than significant)
- Cumulative hazards and hazardous materials impacts (less than significant)

**Hydrology and Water Quality, EIR Section 3.10**

- Impact HYD-1: Impact water quality due to earthmoving or alteration of drainage patterns (less than significant)
- Impact HYD-2: Result in groundwater depletion or interfere substantially with recharge (less than significant)
- Cumulative hydrology and water quality impacts (less than significant)

**Land Use and Planning, EIR Section 3.11**

- Impact LU-1: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (less than significant)
- Cumulative land use and planning impacts (less than significant)

**Noise, EIR Section 3.12**

- Impact NOI-2: Expose persons to or generation of excessive groundborne vibration or groundborne noise levels (less than significant)
- Cumulative noise impacts (less than significant)

**Public Services, EIR Section 3.13**

- Impact PS-1: Result in 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 public services, including emergency services (less than significant)
- Impact PS-2: Result in 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 public services, including schools and libraries (less than significant)
- Impact PS-3: Result in 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 public services, including parks and recreation (less than significant)

- Cumulative public services impacts (less than significant)

#### **Socioeconomics and Environmental Justice, EIR Section 3.14**

- Impact SEJ-1: Affect employment, industry, or commerce, including requiring the displacement of business or farms (beneficial impact)
- Impact SEJ-2: Substantially affect property values or the local tax base (less than significant)
- Impact SEJ-3: Cause a disproportionate effect on minority, low-income, elderly, disabled, transit-dependent, or other specific interest group(s) (less than significant)
- Impact SEJ-4: Cause an adverse effect on a minority or low-income area as defined by the EPA (less than significant)
- Cumulative socioeconomic and environmental justice impacts (less than significant)

#### **Transportation, EIR Section 3.15**

- Cumulative transportation impacts (less than significant)

#### **Utilities and Service Systems, EIR Section 3.16**

- Impact UT-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (less than significant)
- Impact UT-2: Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (less than significant)
- Impact UT-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (less than significant)
- Impact UT-4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (less than significant)
- Cumulative utilities and service system impacts (less than significant)

## 5.2 SIGNIFICANT IMPACTS SUFFICIENTLY REDUCED THROUGH MITIGATION MEASURES

The Secretary agrees with the characterization in the Final EIR/EA with respect to all impacts identified as “significant” or “potentially significant” that will be reduced to less-than-significant levels with implementation of the mitigation measures identified in the Final EIR/EA and MMRP. In accordance with CEQA Guidelines Section 15091(a), a specific finding is made for each impact and its associated mitigation measures in the discussions below.

### 5.2.1 Biological Resources

**Impact BIO-1:** 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 CDFW or USFWS.

#### Mitigation Measures

##### Mitigation Measure BIO-1: HMP Species Salvage

Prior to each future phase of the 2015 Master Plan, including Phase 2, CalVet shall require that a biological survey of development sites be conducted by a qualified biologist to determine if the development could potentially impact HMP species or potential habitat. A report describing the results of the surveys will be provided to CalVet prior to any ground disturbing activities. The report will include, but not be limited to 1) a description of the biological conditions at the site; 2) identification of the potential for HMP species to occur or HMP species observed, if any; and 3) maps of the locations of HMP species or potential habitat, if observed.

If HMP species that do not require take authorization from the USFWS or CDFW are identified within the development site, salvage efforts for these species will be evaluated by a qualified biologist in coordination with CalVet to further reduce impacts per the requirements of the HMP and Programmatic BO. Where salvage is determined feasible and proposed, seed collection should occur from plants within the development site and/or topsoil should be salvaged within occupied areas to be disturbed. Seeds should be collected during the appropriate time of year for each species by qualified biologists. The collected seeds and topsoil should be used to revegetate temporarily disturbed construction areas and reseeded and restoration efforts on- or off-site, as determined appropriate by the qualified biologist CalVet. For HMP species that require take authorization from the USFWS or CDFW, any additional salvage measures identified in the take authorization(s) shall be followed.

##### Mitigation Measure BIO-2: ESA and CESA Compliance

If HMP or other species that require take authorization from the USFWS and/or CDFW are identified within the development site, CalVet will comply with the ESA and CESA and obtain necessary authorizations prior to construction of each phase of the 2015 Master Plan, including Phase 2.

Due to the presence and potential presence of Federally listed species on the 2015 Master Plan site and Federal nexus (i.e., Federal funding), the USDVA, acting as the NEPA lead agency for the proposed project, shall be required to initiate a Section 7 consultation with the USFWS and prepare a written analysis in the form of a Biological Assessment (BA) to determine whether their actions may affect a listed or proposed species and designated and proposed critical habitat for each future phase. Based on the BA, the USFWS will issue a BO regarding likely impacts as a result

of implementing the proposed future phase. Any further avoidance and minimization measures that may be required as a component of the BA will be implemented.

For potential impacts to State listed species, CalVet will comply with the CESA and consult with the CDFW to determine whether authorization for the incidental take of the species is required prior to construction. If it is determined that authorization for incidental take is required from the CDFW, CalVet will obtain an incidental take permit at the project-level prior to ground-disturbing activities. Permit requirements typically involve preparation and implementation of a mitigation plan and mitigating impacted habitat at a 3:1 ratio through preservation and/or restoration, as described above. CalVet would be required to retain a qualified biologist to prepare a mitigation plan, which will include, but is not limited to, identifying avoidance and minimization measures; mitigation strategy, including a take assessment, compensatory mitigation lands, and success criteria; and funding assurances. CalVet would be required to implement the approved plan and any additional permit requirements.

Alternatively, if the State listed species is covered under the Fort Ord HCP, CalVet can wait to implement the phase, including any ground-disturbing activities, until the Fort Ord HCP is approved and base-wide state incidental take permits are issued. If CalVet chooses the base-wide permit alternative, project-specific, project-specific incidental take permits will not be necessary; however, all applicable requirements of the HCP will be implemented.

### **Mitigation Measure BIO-3: Construction Best Management Practices**

The following best management practices will be implemented during all identified phases of construction (i.e., pre-, during, and post-) to reduce impacts to special-status plant and wildlife species for each phase of the 2015 Master Plan, including Phase 2:

- prior to any construction activities. The qualified biologist will meet with the construction crew at the onset of construction at the project site to educate the construction crew on the following: 1) the appropriate access route(s) in and out of the construction area and review project boundaries; 2) how a biological monitor will examine the area and agree upon a method which will ensure the safety of the monitor during such activities, 3) the special-status species that may be present; 4) the specific mitigation measures that will be incorporated into the construction effort; 5) the general provisions and protections afforded by USFWS and CDFW; and 6) the proper procedures if a special-status species is encountered within the project site.
- Trees and vegetation not planned for removal or trimming will be protected prior to and during construction to the maximum possible through the use of exclusionary fencing, such as hay bales for herbaceous and shrubby vegetation, and protective wood barriers for trees. Only certified weed-free straw will be used to avoid the introduction of non-native, invasive species. A biological monitor will supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.
- Protective fencing will be placed prior to and during construction to stop construction equipment and personnel from impacting vegetation outside of work limits. A biological monitor will supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.

- Following construction, disturbed areas will be restored to pre-project contours to the maximum extent possible and revegetated using locally-occurring native species and native erosion control seed mix, per the recommendations of a qualified biologist.
- Grading, excavating, and other activities that involve substantial soil disturbance will be planned and implemented in consultation with a qualified hydrologist, engineer, or erosion control specialist, and will utilize standard erosion control techniques to minimize erosion and sedimentation to native vegetation (pre-, during, and post-construction).
- No firearms will be allowed on the project site at any time.
- All food-related and other trash will be disposed of in closed containers and removed from the project area at least once a week during the construction period, or more often if trash is attracting avian or mammalian predators. Construction personnel will not feed or otherwise attract wildlife to the area.

#### **Mitigation Measure BIO-4: Construction-Phase Monitoring**

The applicant will retain a qualified biologist to monitor all ground disturbing construction activities (i.e., vegetation removal, grading, excavation, or similar activities) to protect any special-status species encountered for each phase of the 2015 Master Plan, including Phase 2. Any handling and relocation protocols of special-status wildlife species will be determined in coordination with CDFW prior to any ground disturbing activities, and will be conducted by a qualified biologist with appropriate scientific collection permit. After ground disturbing project activities are complete, the qualified biologist will train an individual from the construction crew to act as the on-site construction biological monitor. The construction biological monitor will be the contact for any special-status wildlife species encounters, will conduct daily inspections of equipment and materials stored on site and any holes or trenches prior to the commencement of work, and will ensure that all installed fencing stays in place throughout the construction period. The qualified biologist will then conduct regular scheduled and unscheduled visits to ensure the construction biological monitor is satisfactorily implementing all appropriate mitigation protocols. Both the qualified biologist and the construction biological monitor must work through the State Inspector to cease construction contractor work and/or redirect project activities to ensure protection of resources and compliance with all environmental permits and conditions of the project. The qualified biologist and the construction monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the project. The log will also include any special-status wildlife species observed and relocated.

#### **Mitigation Measure BIO-5: Non-Native, Invasive Species Controls**

The following measures will be implemented for each phase of the 2015 Master Plan, including Phase 2, to reduce the introduction and spread of non-native, invasive species:

- Any landscaping or replanting required for the project will not use species listed as noxious by the California Department of Food and Agriculture (CDFA) or invasive by the California Invasive Plant Council (Cal-IPC).
- Bare and disturbed soil will be landscaped with CDFA recommended seed mix or plantings from locally adopted species to preclude the invasion on noxious weeds in the project site.
- Construction equipment will be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds, before mobilizing to arrive at the construction site and before leaving the construction site.

- All non-native, invasive plant species will be removed from disturbed areas prior to replanting.

#### **Mitigation Measure BIO-6: Project-Specific Biological Resources Studies (Non-HMP Species)**

CalVet shall require that a biological survey of each future phase of the 2015 Master Plan be conducted by a qualified biologist to determine if the development could potentially impact a special-status species or their habitat. A report describing the results of the surveys will be provided to CalVet prior to any ground disturbing activities. The report will include, but not be limited to: 1) a description of the biological conditions at the site; 2) identification of the potential for special-status species to occur or special-status species observed, if any; 3) maps of the locations of special-status species or potential habitat, if observed; and 4) recommended mitigation measures, if applicable.

- If special-status species are determined not to occur at the development site, no additional mitigation is necessary.
- If special-status species are observed or determined to have the potential to occur, the project biologist shall recommend measures necessary to avoid, minimize, and/or compensate for identified impacts. Measures may include, but are not limited to, revisions to the project design and project modifications, pre-construction surveys, construction buffers, construction best management practices, monitoring, non-native species control, restoration and preservation, and salvage and relocation.

#### **Mitigation Measure BIO-7: Pre-Construction Surveys for Protected Avian Species**

Construction activities that may directly (e.g., vegetation removal) or indirectly (e.g., noise/ground disturbance) affect protected nesting avian species will be timed to avoid the breeding and nesting season. This measure shall be implemented for each phase of the 2015 Master Plan, including Phase 2. Specifically, vegetation and/or tree removal can be scheduled after September 16 and before January 31. Alternatively, a qualified biologist will be retained by the project applicant to conduct pre-construction surveys for nesting raptors and other protected avian species within 500 feet of proposed construction activities if construction occurs between February 1 and September 15. Pre-construction surveys will be conducted no more than 14 days prior to the start of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August). Because some bird species nest early in spring and others nest later in summer, surveys for nesting birds may be required to continue during construction to address new arrivals, and because some species breed multiple times in a season. The necessity and timing of these continued surveys will be determined by the qualified biologist based on review of the final construction plans and in coordination with the CDFW, as needed.

If raptors or other protected avian species nests are identified during the pre-construction surveys, the qualified biologist will notify the project applicant and an appropriate no-disturbance buffer will be imposed within which no construction activities or disturbance should take place (generally 500 feet in all directions for raptors; other avian species may have species-specific requirements) until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.

#### **Mitigation Measure BIO-8: Pre-Construction Special Status Plant Surveys**

A qualified biologist shall be retained to conduct special-status plant survey(s) according to USFWS, CDFW, and CNPS protocols for during the appropriate identification period(s) to

determine their presence within the Phase 2 site. The biologist shall prepare a report that provides the results of the survey, and, if found the number and locations of individuals/populations identified within the site. If no special-status plant species are found, no further mitigation is necessary. If special-status plant species are found, the following measures shall be implemented:

- Individuals shall be avoided to the maximum extent possible.
- For impacts to the HMP species within the development site that do not require take authorization from USFWS or CDFW, salvage efforts for these species will be evaluated by a qualified biologist in coordination with the contractor to further reduce impacts per the requirements of the HMP and BO, in accordance with Mitigation Measure BIO-1.
- If non-HMP special-status plant species are observed and if avoidance is not feasible, species shall be replaced at a 1:1 success ratio for the acreage or individuals impacted (depending on species impacted) and a Rare Plant Restoration Plan shall be prepared by a qualified biologist and implemented. The plan shall include, but is not limited to, the following:
  - A description of the baseline conditions of the habitats within the work site, including the presence of any special-status species, their locations, and densities;
  - Procedures to control and/or eliminate non-native invasive species within the work site;
  - Provisions for ongoing training of facility maintenance personnel to ensure compliance with the requirements of the plan;
  - A detailed description of on-site and/or off-site restoration areas, salvage of seed and/or soil bank, plant salvage, seeding and planting specifications, including, if required by the CDFW, increased planting ratio to ensure the 1:1 success ratio; and
  - A monitoring program that describes annual monitoring efforts which incorporate success criteria and contingency plans if success criteria are not met.

**Mitigation Measure BIO-9: Pre-Construction Surveys for Special-Status Bats:**

To avoid and reduce impacts to hoary bat and Townsend’s big-eared bat, CalVet will retain a qualified bat specialist or wildlife biologist to conduct site surveys during the reproductive season (May 1 through September 15) to characterize bat utilization of the site and potential species present (techniques utilized to be determined by the biologist) prior to any vegetation removal. This measure shall be implemented for each phase of the 2015 Master Plan, including Phase 2. Based on the results of these initial surveys, one or more of the following will occur:

- If it is determined that bats are not present at the site, no additional mitigation is required.
- If it is determined that bats are utilizing the site and may be impacted by the proposed project, pre-construction surveys will be conducted within 100 feet of construction limits no more than 30 days prior to any tree removal. If, according to the bat specialist, no bats or bat signs are observed in the course of the pre-construction surveys, tree removal may proceed. If bats and/or bat signs are observed during the pre-construction surveys, the biologist will determine if disturbance will jeopardize the roost (i.e., maternity, foraging, day, or night).
- If a single bat and/or only adult bats are roosting, removal of trees may proceed after the bats have been safely excluded from the roost. Exclusion techniques will be determined by

the biologist and depend on the roost type; the biologist will prepare a mitigation plan for provision of alternative habitat to be approved by CDFW.

- If an active maternity roost is detected, avoidance is preferred. Work in the vicinity of the roost (buffer to be determined by biologist) will be postponed until the biologist monitoring the roost(s) determines that the young have fledged and are no longer dependent on the roost. The monitor will ensure that all bats have left the area of disturbance prior to initiation of limbing and/or removal of trees. If avoidance is not possible and a maternity roost must be disrupted, a depredation permit would be required prior to removal of the roost.

#### **Mitigation Measure BIO-10: Pre-Construction Surveys for Monterey Dusky-Footed Woodrat**

Not more than thirty (30) days prior to the start of construction (including vegetation removal), a qualified biologist shall conduct a survey of the project sites to locate existing Monterey dusky-footed woodrat nests. This measure shall be implemented for each phase of the 2015 Master Plan, including Phase 2. All Monterey dusky-footed woodrat nests shall be mapped and flagged for avoidance. Graphics depicting all Monterey dusky-footed woodrat nests shall be provided to the construction contractor. Any Monterey dusky-footed woodrat nests that cannot be avoided shall be relocated according to the following procedures:

Each active nest shall be disturbed by the qualified biologist to the degree that the woodrats leave the nest and seek refuge elsewhere. After the nests have been disturbed, the nest sticks shall be removed from the impact areas and placed outside of areas planned for impacts. Nests shall be dismantled during the non-breeding season (between October 1 and December 31), if possible. If a litter of young is found or suspected, nest material shall be replaced and the nest left alone for 2-3 weeks, after this time the nest will be rechecked to verify that young are capable of independent survival before proceeding with nest dismantling

**Finding:** Implementation of Mitigation Measures BIO-1 through BIO-10, which has been required, will reduce potentially significant impacts to sensitive or special-status species to a less-than-significant level. Specifically, Mitigation Measures BIO-1 and BIO-2 would require biological surveys and, if applicable, salvage HMP species or ESA and CESA compliance for impacts to listed species. Mitigation Measures BIO-3 through BIO-6 have been identified to reduce potentially significant impacts to non-HMP special-status species and habitat through implementation of construction best management practices and non-native invasive species controls. Mitigation Measures BIO-7 through BIO-10 require pre-construction surveys to identify the presence of special-status species and their habitat. These measures would reduce potentially significant impacts to various special-status species to a less-than-significant level through a combination of implementing protective measures during all phases of construction; education; monitoring; and avoidance, preservation, and protection. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA page 3.4-31 through 3.4-43)

**Impact BIO-4:** Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

#### **Mitigation Measure**

##### **BIO-6: Project-Specific Biological Resources Studies (Non-HMP Species)**

Summarized above.

**BIO-11: Oak Tree Protection and Replacement Measures**

For each phase of the 2015 Master Plan, including Phase 2, impacts to coast live oak trees shall be avoided and minimized through site design and protection during construction. To maximize tree retention and protection, a forester, arborist, or other tree care professional shall be involved with early design and planning for each phase and shall be involved in the review and development of final grading and construction plans wherever trees occur within the site or at the grading margins. To avoid unintended impacts to trees outside the construction area, the following tree protection measures shall be implemented:

- Temporary construction fencing shall be placed at approximately 10 feet from the trunk and no grading, trenching, or vegetative alteration shall occur within this environmental exclusion zone. Grading, vegetation removal, and other ground disturbing construction activities may not commence until the project forester has inspected and approved the protective fencing installed by the contractor. No equipment or materials, including soil, shall be stored within the established environmental exclusion zone. Prior to grading within 25 feet of retained trees, the project forester, arborist or other tree care professional shall be consulted to determine whether pruning is necessary to protect limbs from grading equipment.
- To avoid soil compaction from damaging the roots, heavy equipment shall not be allowed to drive over the root area. If deemed necessary and approved by the forester, equipment may drive across one side of the tree. To reduce soil compaction, wood chips shall be spread 6-12 inches deep to disperse the weight of equipment and plywood sheets shall be placed over the wood chips for added protection. Mulch shall not be placed within 6 to 8 inches of tree trunks or rootballs to avoid fungus, disease, and pests.
- Roots exposed by excavation must be pruned and recovered as quickly as possible to promote callusing, closure, and healthy regrowth.
- Retained trees shall be watered periodically in accordance with species need to promote tree health. Transplanted trees and their intended planting areas shall be pre-watered. Post planting watering shall be done as needed to assure establishment.
- When phase design is completed, an estimate of the appropriate number of replacement trees shall be made based on available planting space. These replacement trees (minimum five-gallon specimens) shall be planted along boundaries and within landscape areas. Planting density for replacement trees shall be accurately detailed to allow for some unavoidable mortality over time.
- Transplants are encouraged and shall be credited on a 3:1 basis. Final replanting numbers may be modified by additional tree retention and should be made part of the final landscaping plan.

**BIO-12: Coast Live Oak Tree and Woodland Protection**

Mitigation Measure BIO-6, Project-Specific Biological Resources Studies, requires biological surveys and an assessment of potential impacts to sensitive biological resources prior to construction of future phases of the 2015 Master Plan. During the implementation of Mitigation Measure BIO-6, a qualified biologist shall determine whether coast live oak trees/woodland would be impacted by each proposed phase. If coast live oak trees/woodland have the potential to be impacted, a qualified biologist will provide a description of the conditions of the trees and habitat that may be impacted and quantify the individuals and/or acreage that may be impacted for inclusion in the Project-Specific Biological Resources Study required by Mitigation Measure BIO-6. The impact analysis shall take into consideration tree retention, relocation, and replacement

proposed for each phase. A qualified biologist will include a summary of coast live oak trees/woodland impacted by phase to date in the study and verify that the impacts that the oak mitigation continues to meet a 1:1 mitigation ratio. If impacts to coast live oak trees/woodland in a future phase would exceed a 1:1 mitigation ratio based on the available oak woodland that would be preserved on-site, the phase may either be redesigned to avoid or reduce impacts to meet a 1:1 mitigation ratio, or additional mitigation (e.g., including off-site preservation, on-site or off-site restoration, or payment of in-lieu fees) would be required. A qualified biologist will identify potential mitigation strategies to meet a 1:1 mitigation ratio in the study, and the appropriate mitigation strategy shall be determined and initiated prior to construction of the subject phase. Potential mitigation strategies may include, but are not limited to:

1. Off-site oak woodland preservation areas: opportunities may include coast live oak woodland habitat within or adjacent to the former Fort Ord. However, off-site preservation areas shall not include any lands conserved as part of the Fort Ord Oak Woodland Conservation Area, once approved. In addition, authorization to utilize the site by the land owner would be required and the mitigation area must be preserved in perpetuity through a conservation easement or other appropriate land use restriction.
2. On-site or off-site restoration: opportunities may include restoration of coast live oak woodland habitat within or adjacent to the former Fort Ord. Two potential on-site areas that could serve as suitable planting sites include, but are not limited to: 1) a disturbed area at the intersection of Parker Flats Road, Parker Flats Cut-Off, and Normandy Road; and 2) a disturbed area between the Administrative Building and entrance driveway. Off-site mitigation areas would be subject to the same conditions listed in mitigation strategy #1.
3. Payment of in-lieu fees to the County and/or Seaside to fund a “fair share” of the cost to manage and monitor the Fort Ord Oak Woodland Conservation Area, once approved. The fair share cost shall be based on the acreage required to meet the 1:1 mitigation ratio exceed in the phase.

**Finding:** Implementation of Mitigation Measures BIO-6, BIO-11, and BIO-12, which has been required, will reduce potentially significant impacts to coast live oak trees/woodlands to a less-than-significant levels by requiring tree protection and replacement measures. Consistent with, Mitigation Measure BIO-6 biological resource studies will be conducted before each phase. If coast live oak or woodland are impacted, Mitigation Measures BIO-11 and BIO-12 would require avoidance, protection, or mitigation. With the implementation of Mitigation Measures BIO-6, BIO-11, and BIO-12, impacts to coast live oak trees/woodlands will be reduced to a less-than-significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA pages 3.4-45 through 3.4-51 and Final EIR/EA page 3.2-1 through 3.2-3)

## 5.2.2 Cultural and Tribal Resources

**Impact CTR-1:** Cause a substantial adverse change in the significance of a historical or archaeological resource.

### Mitigation Measure

### **Mitigation Measure CTR-1: Unanticipated Discovery**

A. If subsurface deposits believed to be cultural or human in origin are discovered during construction, then all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgement. A Native American monitor, following the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites established by the Native American Heritage Commission, shall be required if the nature of the unanticipated discovery is prehistoric.

Work cannot continue within the no-work radius until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either: 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the NRHP or CRHR.

B. If a potentially-eligible resource is encountered, then the archaeologist and lead agency shall arrange for either: 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility. If found to be eligible for either the NRHP or CRHR, then adverse effects (under Section 106) and significant impacts (under CEQA) would be resolved/mitigated through data recovery excavations to the extent of obtaining enough information to address applicable research questions. If data recovery is necessary, a data recovery plan will be prepared, reviewed by the lead agency, and implemented. Determinations of eligibility and completion of data recovery (if necessary) shall be formally documented in writing and submitted to the lead agency as verification that the provisions in CEQA/NEPA for managing unanticipated discoveries have been met.

### **Mitigation Measure CTR-2: Cultural Sensitivity Training**

A. Worker Awareness Training will be developed and conducted prior to any construction operations for future phases, including Phase 2. The training program will inform crew members of the potential for archaeological finds and the protocols to be followed in the event of the discovery of archaeological materials. The program will be presented by a Professional Archaeologist and include an ALERT Sheet with visual aids with a focus on archaeological objects and other cultural materials that could be present within the project site. The training will also provide protocols in the event of an unexpected discovery and points of contact in the event of an unexpected find including Native American burials. The training will include a briefing to supervisory construction personnel and "tailgate" training to field personnel.

**Finding:** Implementation of Mitigation Measures CTR-1 and CTR-2, which has been required, will reduce potential impacts to significant historical or archaeological resources to less-than-significant levels. Specifically, these mitigation measures require, in the case of an unanticipated discovery, evaluation of the potentially significant artifact and proper curation if significant artifacts are recovered as well as cultural sensitivity training for all construction personnel active on the project site. With the implementation of Mitigation Measures CTR-1 and CTR-2, the impact to significant historical or archaeological resources will be reduced to a less-than-significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA pages 3.5-18 through 3.5-20)

**Impact CTR-2:** Disturb any human remains, including those interred outside of dedicated cemeteries.

### Mitigation Measure

#### Mitigation Measure CTR-3: Discovery of Human Remains

In the event that evidence of human remains is discovered, construction activities within 100 meters of the discovery shall be halted or diverted and the requirements of Mitigation Measure CTR-1 will be implemented. In addition, the County Coroner shall be notified in accordance with provisions of PRC Sections 5097.98-99. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four hours of the determination, as required by California Health and Safety Code Section 7050.5(c) and PRC 5097. The NAHC shall identify the person or persons it believes to be most likely descended (MLD) from the deceased Native American (PRC Section 5097.98). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).

**Finding:** Implementation of Mitigation Measure CTR-3, which has been required, will reduce potential impacts to previously undiscovered human remains to less-than-significant levels. Specifically, this mitigation measure requires work to stop if suspected human remains are found, communication with the County Coroner, and the proper identification and treatment of the remains consistent with the California Health and Safety Code Section 7050.5(c) and PRC 5097. With the implementation of Mitigation Measure CTR-3, the impact to previously undiscovered human remains will be reduced to a less than significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA pages 3.5-20 through 3.5-21)

### 5.2.3 Geology and Soils

**Impact GEO-4:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### Mitigation Measure

#### Mitigation Measure CTR-1: Unanticipated Discovery

Summarized above.

#### Mitigation Measure CTR-2: Cultural Sensitivity Training

Summarized above.

**Finding:** Implementation of Mitigation Measures CTR-1 and CTR-2, which has been required, will reduce the potentially significant impacts to a unique paleontological resource or site or unique geologic feature to a less-than-significant level. As outlined above, Mitigation Measures CTR-1 and CTR-2 reduce impacts to resources accidentally discovered. With the implementation of Mitigation Measures CTR-1 and CTR-2, impacts to a unique paleontological resource or site or unique geologic feature will be reduced to a less-

than-significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA page 3.7-12)

## 5.2.4 Hydrology and Water Quality

**Impact HYD-3:** Risks due to location within a 100-year flood hazard area.

### Mitigation Measure

#### Mitigation Measure HYD-1: Drainage Basin Analysis

Prior to construction of Phase 3 or subsequent phases of the 2015 Master Plan, further analysis shall be completed by CalVet to confirm that the retention basin has the capacity to contain runoff from a 100-year storm event. If it is determined that the size of the retention basin is not adequate, design of that phase shall include modifications to the retention basin design to increase its capacity to the adequate size. In addition, the project proponent shall consult with the City of Seaside to submit a Letter of Map Revision (LOMR) request to FEMA to revise flood elevation included in FIRM Map #06053C0195H, based on the findings of the analysis.

**Finding:** Implementation of Mitigation Measure HYD-1, which has been required, will reduce the potential impacts associated with risks due to location within a 100-year flood hazard area to a less-than-significant level. Specifically, Mitigation Measure HYD-1 requires an analysis and if applicable, modifications, to the retention basin design. With this analysis and implementation of any identified modifications, the impacts associated with flood hazards will be reduced to a less-than-significant level. With the implementation of Mitigation Measure HYD-1, impacts associated with risks due to location within a 100-year flood hazard area will be reduced to a less-than-significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA page 3.10-21 through 3.10-22)

## 5.2.5 Noise

**Impact NOI-1:** Expose 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 and/or have substantial temporary, periodic, or permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

### Mitigation Measure

#### Mitigation Measure NOI-1: Construction Noise Reduction Measures

The following measures shall be implemented to reduce construction-generated noise levels:

- Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and between the hours of 9:00 a.m. and 7:00 p.m. on weekends and legal holidays.
- Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.

- When not in use, all construction equipment and haul trucks shall be turned off and shall not be allowed to idle. Clear signage that posts this requirement shall be provided for workers at the entrances to the site.
- Construction equipment and material staging areas shall be located at the furthest distance possible from nearby residential land uses.
- To the extent possible, heavy-duty haul truck trips required for project construction should be scheduled during the non-peak hours of the day.

**Finding:** Implementation of Mitigation Measure NOI-1, which have been required, will substantially reduce construction noise and noise exposure at noise-sensitive receptors by limiting the hours of construction, requiring proper equipment use, and locating noise-generating equipment away from sensitive land uses. With the implementation of these construction noise-reduction measures the impact of construction noise and noise exposure at noise-sensitive receptors will be reduced to a less-than-significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA page 3.12-17 through 3.12-20)

## 5.2.6 Transportation

**Impact TR-1:** Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

### Mitigation Measure

#### Mitigation Measure TR-1: Construction Traffic Management Plan

Prior to the commencement of construction activities for Phase 2 and future phases, CalVet or designated representative shall prepare a Construction Traffic Management Plan and submit plan to the City of Seaside and/or County Engineer. The plan shall:

- Designate construction vehicle access routes to the project site that avoid roads with potential sensitive receptors (Normandy Road). The preferred designated access route to the project site should be via Gigling Road to Parker Flats Road.
- Identify proper safety precautions to avoid safety impacts to sensitive receptors if access to the project site via Normandy Road is unavoidable. Access to the project site shall not occur directly before or directly after school hours.

#### Mitigation Measure TR-2: Operational Traffic Management

To reduce potential safety impacts during the operation of Phase 2 and future phases of the CCCVC:

- Identify preferred routes to the CCCVC site which do not make use of Normandy Road between General Jim Moore Boulevard and Parker Flats Road.
- Publicize and encourage the use of the identified alternative routes on the CCCVC facility information (i.e., website, pamphlet, and brochures).

#### Mitigation Measure TR-3: Signal Timings and Phasing Adjustments

If the Northeast Southwest Arterial Connector Roadway is in operation at the time the construction of Phase 4 of the CCCVC is proposed, CalVet will coordinate with the City of Seaside to adjust signal timing and signal phasing to improve intersection operations at General Jim

Boulevard & Coe Avenue and reduce AM peak hour delay. The signal timings and signal phasing will be adjusted prior to operation of Phase 4 of the CCCVC.

**Mitigation Measure TR-4: Pedestrian and Bicycle Facility Improvements**

ADA compliant sidewalks and crosswalks, as well as bicycle parking, shall be designed and constructed as part of Phase 3 development of the CCCVC to address the gap in the sidewalk network along the project frontage and just west of the Normandy Road & Parker Flats Cut-Off Road intersection. The improvements will be constructed in compliance with adopted City of Seaside and County standards.

**Mitigation Measure TR-5: Special Event Management Plan**

CalVet shall prepare and implement a Special Event Transportation Management Plan during special events at the cemetery. The plan shall be submitted to the City of Seaside and/or County Engineer for review and approval for issuance of a Special Event Permit. The plan shall include:

- Designated off-site parking facilities;
- A traffic flow plan to direct motorists from access roads to identified off-site parking facilities; and
- A description of the shuttle service system to transport special event attendees to and from established parking areas.

**Finding:** Implementation of Mitigation Measures TR-1 through TR-5, which has been required, will reduce the potential impacts due to conflict with program plan, ordinance or policy addressing the circulation system to a less-than-significant level. Specifically, the project would generate construction and operational traffic which may contribute to traffic impacts on Normandy Road at times when students are traveling to and from school. This potentially significant impact would be reduced to a less-than-significant level through implementation of Mitigation Measures TR-1 and TR-2. Potential impacts to the intersection of General Jim Boulevard and Coe Avenue would be reduced to a less-than-significant level through implementation of Mitigation Measure TR-3, which would improve signal timing and result in a lower average vehicle delay. Due to the lack of connectivity, the project may conflict with existing and proposed pedestrian and bicycle facilities. This potentially significant impact would be reduced with implementation of Mitigation Measure TR-4, which would require construction of the recommended pedestrian facilities. In addition, special events would attract an appreciable number of vehicles to the site, which could result in an increased demand of overflow parking on the adjoining streets. These impacts would be reduced with implementation of Mitigation Measure TR-5, which would require a Special Event Management Plan. With the implementation of Mitigation Measures TR-1 through TR-5, the impact on the circulation system will be reduced to a less-than-significant level. CalVet, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental impact identified in the Final EIR/EA. (Draft EIR/EA page 3.15-13 through 3.15-28)

### **5.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS**

For this project, no impacts were identified as significant and unavoidable.

## 5.4 FINDINGS REGARDING PROJECT ALTERNATIVES

PRC Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The same statute states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.”

CEQA Guidelines require that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly obtain the basic objectives of the project...” (CEQA Guidelines Section 15126.6[a]). The lead agency has the discretion to determine how many alternatives constitute a reasonable range and that an EIR need not present alternatives that are incompatible with fundamental project objectives. Additionally, CEQA Guidelines Section 15126.6(a) provides that an EIR need not consider alternatives that are infeasible. CEQA Guidelines Section 15126.6(f)(1) provides that among the factors that may be taken into account when addressing the feasibility of alternatives are “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.” CEQA Guidelines Section 15126.6(f) states that the range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The Draft EIR/EA analysis considered a reasonable range of alternatives.

### 5.4.1 Alternatives Considered but Not Evaluated Further

The Draft EIR/EA disclosed that there were four alternatives considered by CalVet but rejected during the planning or scoping process (see discussion in Draft EIR/EA in Chapter 2.0 Proposed Project and Alternatives, page 2.5-1 through 2.5-2). The following represents a brief description of the alternatives considered but eliminated from further consideration.

CalVet considered implementation of the CCCVC 2008 Development Master Plan. The 2008 Master Plan does not incorporate Phase 1 of the CCCVC as built. As a result, the plan is outdated and does not reflect current conditions. In addition, the site plan has a greater development footprint than the 2015 Master Plan, which would result in increased environmental impacts. The 2008 Master Plan does not meet the objective to “incorporate the visual qualities and characteristics of the local landscape and native vegetation, working with the existing site features as much as possible, while meeting the programmatic needs.” It also would not avoid or substantially reduce one or more potentially significant impacts of the proposed project. For these reasons, this alternative was not carried forward in the Draft EIR/EA analysis.

CalVet also considered different locations, given the difficulty of mitigating for impacts to large areas of coast live oak woodland, steep topography of the site, and unknown munitions hazards. Based on these public comments, an alternative was developed that reduces the 2015 Master Plan footprint and was analyzed in the Draft EIR/EA (please refer to Section 2.4.2., Alternative 2: Reduced CCCVC 2015 Master Plan). One suggested alternative location was the former Beach Ranges on the former Fort Ord. This site is property of the California Department of Parks and Recreation (California State Parks) and designated as a State Park (the Fort Ord Dunes State Park). Relocating the in-ground burials to this site may result in an increase in environmental impacts due to the presence of special-status species within the park and the site could be subject to sea level rise and coastal erosion. In addition, there would be significant legal challenges in changing the use of that public site. The State owns the 84-acre CCCVC property and Phase 1 has been completed. It would also be difficult for the State to acquire additional property elsewhere

when it has already been provided a sufficient acreage to develop the CCCVC. It would be most logical to keep the cemetery on one property to reduce environmental impacts. As described in the Draft EIR/EA, the potential impacts associated with unknown military munitions were evaluated and determined to be less than significant. The property has been remediated and the State would be required to prepare and implement plans and procedures related to reducing impacts from unexploded ordinance. For these reasons, this alternative was not carried forward in the Draft EIR/EA analysis.

In addition, CalVet considered Phase 2 “Alternative 1,” which most closely followed the 2015 Master Plan for the burial development north of the existing roadway. To meet the originally outlined quantity of 1,700 in-ground cremains, the development would extend deep within the northern hillside, requiring the elimination of many coast live oak trees and heavy regrading. The development would also require reallocating area previously planned for future columbaria as in-ground cremains. The alternative proposed 2,000 crypts and 1,700 in-ground cremains. This alternative would require the removal of 466 trees. This alternative would result in an increase in environmental impacts and would not meet the Phase 2 objective of incorporating “the visual qualities and characteristics of the local landscape and native vegetation, working with the existing topography and open areas with existing native vegetation as much as possible, while meeting the programmatic needs.” Therefore, this alternative was not carried forward for analysis in the Draft EIR/EA.

Finally, CalVet considered Phase 2 “Alternative 2,” which explored smaller groupings of in-ground cremains to in-fill the open space surrounding the existing memorial walk. This alternative would result in a larger development footprint, and, thus, result in an increase in ground-disturbance activities. The development would require some regrading of the adjacent hillside and removal of 403 trees. The alternative proposed 2,000 crypts, 1,700 in-ground cremains. This alternative would require visitors to walk through the memorial walk in order to access the new burials. It provided minimal buffer from the cortege area, memorial walk, and main entrance road. This alternative would not avoid or substantially reduce one or more potentially significant impacts of the proposed project. For these reasons, this alternative was not carried forward in the Draft EIR/EA analysis.

#### **5.4.2 Alternatives Evaluated in the EIR**

The Draft EIR/EA evaluated a reasonable range of alternatives to the proposed project (Alternative 1). Fully evaluated alternatives included:

- Alternative 2: Reduced CCCVC 2015 Master Plan;
- Alternative 3: CCCVC 2015 Master Plan – Modified Phase 2; and
- Alternative 4: No Action Alternative

The Secretary finds that a good faith effort was made to evaluate all reasonable alternatives to the project that could feasibly obtain its basic objectives, even when the alternatives might impede the attainment of the objectives or might be more costly. The Secretary also finds that all reasonable alternatives were reviewed, analyzed, and discussed in the review process of the Final EIR/EA and the ultimate decision on the project.

Based on independent review and consideration of the information on alternatives in the Draft EIR/EA and in the record, CalVet determined that the proposed project, Alternative 1, is the environmentally superior alternative under CEQA and provides the best balance between satisfaction of the project objectives and mitigation of environmental impacts, as described in analyzed in the Draft EIR/EA and Final EIR/EA. The remaining alternatives were not selected for the reasons described below.

### **ALTERNATIVE 2: Reduced CCCVC 2015 Master Plan**

**Description:** Alternative 2, Reduced CCCVC 2015 Master Plan Alternative, was developed to accommodate the recommended 100-year count, which would be approximately 69,560 burials. The final burial count in the Proposed CCCVC 2015 Master Plan exceeds the recommended 100-year count by approximately 36,000 burials, as set forth by the USDVA (2015 Master Plan, page 42; 2008 Master Plan, page 1-1 of Volume I and page 6.0-A3 of Volume II). Alternative 2 would reduce the number of phases and overall footprint of the 2015 Master Plan. Phases 8 and 9 would be reduced, and Phases 10 and 11 would be eliminated. However, the completion of the Flag Plaza on top of Artillery Hill and its access road would remain in the plan.

**Summary of Impacts:** Alternative 2, Reduced CCCVC 2015 Master Plan Alternative, would have the smallest development footprint compared to the other alternatives, resulting in a reduction in environmental impacts. However, Alternative 2 would result in the same potentially significant environmental impacts as Alternative 1, the proposed project, and would require the same mitigation measures to reduce impacts to a less-than-significant level. Similar to the proposed project, Alternative 2 would not result in any significant and unavoidable impacts.

**Finding:** The Secretary finds that implementing Alternative 2, the Reduced CCCVC 2015 Master Plan Alternative, would not meet the project objectives because it would not provide a phased approach to the development of the cemetery that allows for flexibility over time to respond to demand and available funding and, thus, may not fulfill the objective of providing burial space for, but not limited to, Monterey County Region veterans anticipated for the next 100 years to the extent to which the proposed project would. Alternative 2 would result in the same potentially significant environmental impacts as Alternative 1, the proposed project, and would require the same mitigation measures to reduce impacts to a less-than-significant level. Therefore, Alternative 2 would not meet all the objectives of the proposed project and would not significantly reduce any of the environmental impacts of the proposed project. The Secretary finds that because Alternative 2 would not fulfill the 2015 Master Plan and Phase 2 objectives to the extent to which the proposed project would, and would not substantially lessen the environmental impacts of the proposed project, the Secretary rejects Alternative 2.

### **ALTERNATIVE 3: CCCVC Master Plan – Modified Phase 2**

**Description:** Alternative 3 was developed to accommodate CalVet and USDVA's original request that Phase 2 provide 2,000 crypts and 1,700 in-ground cremains, an increase of 869 burials from the proposed project. The plots sizes would be the same and this alternative would be located in the same general area as the proposed project. However, this alternative incorporates smaller groupings of in-ground cremains to in-fill the open space surrounding the existing memorial walk as well as in-fill around the future columbaria. Therefore, this alternative would have a larger disturbance footprint compared to the proposed project. The grading quantities would be similar to the proposed project since both include a similar development footprint on the adjacent hillside, and a similar number of coast live oak trees as the proposed project would be impacted. This concept would require visitors to walk through the memorial walk in order to access the new burials and provides minimal buffer from the cortege area, memorial walk, and main entrance road.

**Summary of Impacts:** Alternative 3, CCCVC Master Plan – Modified Phase 2 Alternative, would increase the severity of many environmental impacts as compared to the proposed project because the disturbance footprint would be larger. However, construction and operational activities are anticipated to be similar to the proposed project and, therefore, all potentially significant environmental impacts would be mitigated to a less-than-significant level similar to the proposed project. There would not be any significant and unavoidable impacts, similar to the proposed project.

**Finding:** The Secretary finds that implementing Alternative 3, CCCVC Master Plan – Modified Phase 2 Alternative, would meet the objectives of the 2015 Master Plan and Phase 2 by providing additional burial space for the regional. However, Alternative 3 would have a larger disturbance footprint and, therefore, greater potential impacts. Further, Alternative 3 is not environmentally superior to the proposed project, but rather would result in the same potentially significant but mitigatable impacts. The Secretary rejects Alternative 3 because it would not substantially lessen the environmental impacts of the proposed project.

#### **ALTERNATIVE 4: No Action Alternative**

**Description:** Under the No Action Alternative, the proposed project would not be constructed and no physical changes to the site would occur. There would be no change in the current availability of veteran-specific burial space in the State of California. The gravesite capacity would eventually be depleted at the CCCVC and veterans and their families in the Monterey Bay Region would be underserved in the future. Furthermore, the No Action Alternative would create a hardship for the survivors of deceased veterans for attending the funeral and for grave visitation, because of the distances between homes and the burial sites. If veterans and their families must resort to private burials, they are deprived of the honor and privilege bestowed upon them by a grateful nation for their service to their country. In addition, there would not be any in-ground burial facilities at the CCCVC, which would not meet the Phase 2 objective to increase burial options by providing in-ground crypts and in-ground cremains burial facilities.

**Summary of Impacts:** Alternative 4, the No Action Alternative, would avoid the project's significant mitigable impacts, except for impacts associated with risks due to the project's location within a 100-year flood hazard area which would still be considered a less than significant impact with mitigation. Overall, the environmental impacts would be less than those that would occur with the proposed project because no additional development would occur. However, as outlined above, the No Action Alternative would result in fewer gravesites and an eventual gravesite deficit, which in turn would create a hardship for survivors of deceased veterans for attending the funeral and for grave visitation, either due to financial hardship of purchasing private gravesites or due to distances between homes and the burial sites. In addition, the No Action Alternative would not be consistent with the objectives of the 2015 Master Plan or Phase 2 because it would not provide burial space for, but not limited to Monterey County Region veterans anticipated for the next 10 (or 100) years.

**Finding:** Under Alternative 4, No Action Alternative, the project would not be approved, and no development would occur. This would avoid all environmental effects of the project. However, the No Action Alternative would not meet most of the 2015 Master Plan or Phase 2 objectives because it would not provide burial space for, but not limited to, Monterey County Region veterans anticipated for the next 100 years, provide a phased approach to the development of the cemetery that allows for flexibility over time to respond to demand and available funding, and increase burial options by providing in-ground crypts and in-ground cremains burial sites. Therefore, the Secretary finds that because Alternative 4 would not meet the project objectives, the Secretary rejects Alternative 4.

## Chapter 6.0 MITIGATION MONITORING AND REPORTING PROGRAM

CalVet prepared a Mitigation Monitoring and Reporting Program (MMRP) for the project (Appendix A). The mitigation measures recommended by the Final EIR/EA and incorporated into the project are specific and enforceable. As appropriate, some mitigation measures define performance standards to ensure no significant environmental impacts occur. The MMRP adequately describes conditions, implementation, verification, and reporting requirements to ensure the project complies with the adopted mitigation measures. The MMRP ensures that the mitigation measures are in place, as appropriate, throughout the life of the project. The mitigation measures described in Appendix A are incorporated into these findings as conditions of the approvals required for the project.

Pursuant to PRC Section 21081.6 and CEQA Guidelines Section 15097, the Secretary, in adopting these findings, also adopts the MMRP. CalVet will use the MMRP to track compliance with project mitigation measures. A MMRP Reporting form will be prepared for each mitigation measure; an example form is attached as Appendix B. The MMRP will remain available for public review during the compliance period. The MMRP is attached to and incorporated into the proposed project and is adopted in conjunction with certification of the EIR and adoption of these Findings of Fact. In the event of any conflict between these findings and the MMRP with respect to the requirements of an adopted mitigation measure, the more stringent measure shall control, and shall be incorporated automatically into both the findings and the MMRP.

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## Chapter 7.0 REFERENCES

- ECORP Consulting, Inc. 2014. *Final Initial Study and Mitigated Negative Declaration/Environmental Assessment and Response to Comments, California Central Coast Veterans Cemetery Project – Phase 1*. June 2014.
- EMC Planning Group, Inc. and EDAW, Inc. 1997. *Fort Ord Reuse Plan Volumes 1, 2, 3, and 4*. Prepared for the Fort Ord Reuse Authority [FORA]. Available online at: <<https://www.fora.org/BRP.html>>.
- RHAA and Whitson Engineers. 2008. *Final Draft Development Master Plan, California Central Coast Veterans Cemetery, Fort Ord*. Prepared for the Redevelopment Agency of Monterey County.

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**Appendix A**  
**Mitigation, Monitoring, and Reporting Program**

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# MITIGATION MONITORING & REPORTING PROGRAM

## California Central Coast Veterans Cemetery Project – 2015 Master Plan and Phase 2

### Introduction

In accordance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), an Environmental Impact Report/Environmental Assessment (EIR/EA) was prepared that identifies potential adverse impacts related to construction and operation of the California Central Coast Veterans Cemetery Project (CCCVC) Project – 2015 Master Plan and Phase 2 (proposed project). The EIR/EA identifies mitigation measures that would reduce or eliminate these impacts.

Section 21081.6 of the Public Resources Code and Sections 15091(d) and 15097 of the State CEQA Guidelines and NEPA require public agencies to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. A Mitigation Monitoring Reporting Plan (MMRP) is required for the proposed project, because the EIR/EA identified potentially significant adverse impacts related to construction and operation activities, and mitigation measures have been identified to mitigate these impacts. Adoption of the MMRP will occur along with approval of the proposed project.

### Purpose of the Mitigation Monitoring and Reporting Plan

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed according to schedule and maintained in a satisfactory manner during the construction and operation of the proposed project, as required. The MMRP may be modified by the California Department of Veterans Affairs (CalVet) during project implementation, as necessary, in response to changing conditions or other project refinements. The MMRP table below has been prepared to assist the responsible parties in implementing the MMRP. This table identifies the category of significant environmental impact(s), individual mitigation measures, monitoring and mitigation timing, responsible person/agency for implementing the measure, monitoring and reporting procedure, and notation space to confirm implementation of the mitigation measures. The numbering of the mitigation measures follows the numbering sequence in the Draft EIR/EA.

### Roles and Responsibilities

CalVet, as the CEQA lead agency, is responsible for the oversight of compliance of the mitigation measures in the MMRP.

### Mitigation Monitoring and Reporting Plan

The following describes the column categories identified in the MMRP table:

- **Mitigation Measure** – This column lists the mitigation measures by number.
- **Project Component/Activity/Timing/Frequency/Agency Coordination** – This column lists the project component the mitigation measure applies to, activity(ies) to be monitored for each mitigation measure, the timing of each activity, the frequency of monitoring for each activity, and identification of any outside agency coordination.
- **Implementation Responsibility/Verification** – This column identifies the entity responsible for complying with the requirements of the mitigation measure and provides space for verification initials and date.
- **Responsibility for Oversight of Compliance/Verification** – This column provides the agency responsible for oversight of the mitigation implementation, and is to be dated and initialed by the agency representative based on the documentation provided by the construction contractor or through personal verification by agency staff.
- **Comments** – this column provides space for written comments, if necessary.

**MITIGATION MONITORING & REPORTING PROGRAM**  
**California Central Coast Veterans Cemetery Project – 2015 Master Plan and Phase 2**

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**MITIGATION MONITORING & REPORTING PROGRAM**  
**California Central Coast Veterans Cemetery Project – 2015 Master Plan and Phase 2**

Mitigation Measure	Project Component/Activity/ Timing/Frequency/ Agency Coordination	Implementation Responsibility/ Verification	Responsible Party for Oversight of Compliance/ Verification	Comments
<b>Biological Resources</b>				
<p><b>BIO-1: HMP Species Salvage</b></p> <p>Prior to each future phase of the 2015 Master Plan, including Phase 2, CalVet shall require that a biological survey of development sites be conducted by a qualified biologist to determine if the development could potentially impact HMP species or potential habitat. A report describing the results of the surveys will be provided to CalVet prior to any ground disturbing activities. The report will include, but not be limited to 1) a description of the biological conditions at the site; 2) identification of the potential for HMP species to occur or HMP species observed, if any; and 3) maps of the locations of HMP species or potential habitat, if observed.</p> <p>If HMP species that do not require take authorization from the USFWS or CDFW are identified within the development site, salvage efforts for these species will be evaluated by a qualified biologist in coordination with CalVet to further reduce impacts per the requirements of the HMP and Programmatic BO. Where salvage is determined feasible and proposed, seed collection should occur from plants within the development site and/or topsoil should be salvaged within occupied areas to be disturbed. Seeds should be collected during the appropriate time of year for each species by qualified biologists. The collected seeds and topsoil should be used to revegetate temporarily disturbed construction areas and reseeded and restoration efforts on- or off-site, as determined appropriate by the qualified biologist CalVet. For HMP species that require take authorization from the USFWS or CDFW, any additional salvage measures identified in the take authorization(s) shall be followed.</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Conduct biological surveys and plant salvage.</p> <p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with CNPS, CDFW, and USFWS.</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p> <p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	
<p><b>BIO-2: ESA and CESA Compliance</b></p> <p>If HMP or other species that require take authorization from the USFWS and/or CDFW are identified within the development site, CalVet will comply with the ESA and CESA and obtain necessary authorizations prior to construction of each phase of the 2015 Master Plan, including Phase 2.</p> <p>Due to the presence and potential presence of Federally listed species on the 2015 Master Plan site and Federal nexus (i.e., Federal funding), the USDVA, acting as the NEPA lead agency for the proposed project, shall be required to initiate a Section 7 consultation with the USFWS and prepare a written analysis in the form of a Biological Assessment (BA) to determine whether their actions may affect a listed or proposed species and designated and proposed critical habitat for each future phase. Based on the BA, the USFWS will issue a BO regarding likely impacts as a result of implementing the proposed future phase. Any further avoidance and minimization measures that may be required as a component of the BA will be implemented.</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Prepare BA and conduct Section 7 consultation. Implement mitigation included measures in BO.</p> <p>Consult with CDFW and obtain an incidental take permit, if necessary. Implement mitigation measures included in the permit.</p>	<p>CalVet and USDVA</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p>For potential impacts to State listed species, CalVet will comply with the CESA and consult with the CDFW to determine whether authorization for the incidental take of the species is required prior to construction. If it is determined that authorization for incidental take is required from the CDFW, CalVet will obtain an incidental take permit at the project-level prior to ground-disturbing activities. Permit requirements typically involve preparation and implementation of a mitigation plan and mitigating impacted habitat at a 3:1 ratio through preservation and/or restoration, as described above. CalVet would be required to retain a qualified biologist to prepare a mitigation plan, which will include, but is not limited to, identifying avoidance and minimization measures; mitigation strategy, including a take assessment, compensatory mitigation lands, and success criteria; and funding assurances. CalVet would be required to implement the approved plan and any additional permit requirements.</p> <p>Alternatively, if the State listed species is covered under the Fort Ord HCP, CalVet can wait to implement the phase, including any ground-disturbing activities, until the Fort Ord HCP is approved and base-wide state incidental take permits are issued. If CalVet chooses the base-wide permit alternative, project-specific, project-specific incidental take permits will not be necessary; however, all applicable requirements of the HCP will be implemented.</p>	<p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> USFWS and/or CDFW.</p>			
<p><b>BIO-3: Construction Best Management Practices</b></p> <p>The following best management practices will be implemented during all identified phases of construction (i.e., pre-, during, and post-) to reduce impacts to special-status plant and wildlife species for each phase of the 2015 Master Plan, including Phase 2:</p> <ul style="list-style-type: none"> <li>A qualified biologist will conduct an Employee Education Program for the construction crew prior to any construction activities. The qualified biologist will meet with the construction crew at the onset of construction at the project site to educate the construction crew on the following: 1) the appropriate access route(s) in and out of the construction area and review project boundaries; 2) how a biological monitor will examine the area and agree upon a method which will ensure the safety of the monitor during such activities, 3) the special-status species that may be present; 4) the specific mitigation measures that will be incorporated into the construction effort; 5) the general provisions and protections afforded by USFWS and CDFW; and 6) the proper procedures if a special-status species is encountered within the project site.</li> <li>Trees and vegetation not planned for removal or trimming will be protected prior to and during construction to the maximum possible through the use of exclusionary fencing, such as hay bales for herbaceous and shrubby vegetation, and protective wood barriers for trees. Only certified weed-free straw will be used</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Implement construction best management practices.</p> <p><b>Timing:</b> Prior to, during, and post construction.</p> <p><b>Frequency:</b> Ongoing during construction of each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>	<p><b>Project Contractor</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p> <p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p>to avoid the introduction of non-native, invasive species. A biological monitor will supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.</p> <ul style="list-style-type: none"> <li>• Protective fencing will be placed prior to and during construction to stop construction equipment and personnel from impacting vegetation outside of work limits. A biological monitor will supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.</li> <li>• Following construction, disturbed areas will be restored to pre-project contours to the maximum extent possible and revegetated using locally-occurring native species and native erosion control seed mix, per the recommendations of a qualified biologist.</li> <li>• Grading, excavating, and other activities that involve substantial soil disturbance will be planned and implemented in consultation with a qualified hydrologist, engineer, or erosion control specialist, and will utilize standard erosion control techniques to minimize erosion and sedimentation to native vegetation (pre-, during, and post-construction).</li> <li>• No firearms will be allowed on the project site at any time.</li> <li>• All food-related and other trash will be disposed of in closed containers and removed from the project area at least once a week during the construction period, or more often if trash is attracting avian or mammalian predators. Construction personnel will not feed or otherwise attract wildlife to the area.</li> </ul>				
<p><b>BIO-4: Construction-Phase Monitoring</b></p> <p>The applicant will retain a qualified biologist to monitor all ground disturbing construction activities (i.e., vegetation removal, grading, excavation, or similar activities) to protect any special-status species encountered for each phase of the 2015 Master Plan, including Phase 2. Any handling and relocation protocols of special-status wildlife species will be determined in coordination with CDFW prior to any ground disturbing activities, and will be conducted by a qualified biologist with appropriate scientific collection permit. After ground disturbing project activities are complete, the qualified biologist will train an individual from the construction crew to act as the on-site construction biological monitor. The construction biological monitor will be the contact for any special-status wildlife species encounters, will conduct daily inspections of equipment and materials stored on site and any holes or trenches prior to the commencement of work, and will ensure that all installed fencing stays in place throughout the construction period. The qualified biologist will then conduct regular</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Monitor ground disturbing and construction activities.</p> <p><b>Timing:</b> Prior to and during construction.</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p>scheduled and unscheduled visits to ensure the construction biological monitor is satisfactorily implementing all appropriate mitigation protocols.</p> <p>Both the qualified biologist and the construction biological monitor must work through the State Inspector to cease construction contractor work and/or redirect project activities to ensure protection of resources and compliance with all environmental permits and conditions of the project. The qualified biologist and the construction monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the project. The log will also include any special-status wildlife species observed and relocated.</p>	<p><b>Frequency:</b> Ongoing during construction of each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with CDFW.</p>			
<p><b>BIO-5: Non-Native, Invasive Species Controls</b></p> <p>The following measures will be implemented for each phase of the 2015 Master Plan, including Phase 2, to reduce the introduction and spread of non-native, invasive species:</p> <ul style="list-style-type: none"> <li>Any landscaping or replanting required for the project will not use species listed as noxious by the California Department of Food and Agriculture (CDFA) or invasive by the California Invasive Plant Council (Cal-IPC).</li> <li>Bare and disturbed soil will be landscaped with CDFA recommended seed mix or plantings from locally adopted species to preclude the invasion on noxious weeds in the project site.</li> <li>Construction equipment will be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds, before mobilizing to arrive at the construction site and before leaving the construction site.</li> <li>All non-native, invasive plant species will be removed from disturbed areas prior to replanting.</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Implement measures to reduce the introduction and spread of non-native, invasive species.</p> <p><b>Timing:</b> During construction.</p> <p><b>Frequency:</b> Ongoing during each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>	<p><b>Project Contractor</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	
<p><b>BIO-6: Project-Specific Biological Resources Studies (Non-HMP Species)</b></p> <p>CalVet shall require that a biological survey of each future phase of the 2015 Master Plan be conducted by a qualified biologist to determine if the development could potentially impact a special-status species or their habitat. A report describing the results of the surveys will be provided to CalVet prior to any ground disturbing activities. The report will include, but not be limited to: 1) a description of the biological conditions at the site; 2) identification of the potential for special-status species to occur or special-status species observed, if any; 3) maps of the locations of special-status species or potential habitat, if observed; and 4) recommended mitigation measures, if applicable.</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Conduct biological surveys and implement recommended mitigation measures.</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<ul style="list-style-type: none"> <li>If special-status species are determined not to occur at the development site, no additional mitigation is necessary.</li> <li>If special-status species are observed or determined to have the potential to occur, the project biologist shall recommend measures necessary to avoid, minimize, and/or compensate for identified impacts. Measures may include, but are not limited to, revisions to the project design and project modifications, pre-construction surveys, construction buffers, construction best management practices, monitoring, non-native species control, restoration and preservation, and salvage and relocation.</li> </ul>	<p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>			
<p><b>BIO-7: Pre-Construction Surveys for Protected Avian Species</b></p> <p>Construction activities that may directly (e.g., vegetation removal) or indirectly (e.g., noise/ground disturbance) affect protected nesting avian species will be timed to avoid the breeding and nesting season. This measure shall be implemented for each phase of the 2015 Master Plan, including Phase 2. Specifically, vegetation and/or tree removal can be scheduled after September 16 and before January 31. Alternatively, a qualified biologist will be retained by the project applicant to conduct pre-construction surveys for nesting raptors and other protected avian species within 500 feet of proposed construction activities if construction occurs between February 1 and September 15. Pre-construction surveys will be conducted no more than 14 days prior to the start of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August).</p> <p>Because some bird species nest early in spring and others nest later in summer, surveys for nesting birds may be required to continue during construction to address new arrivals, and because some species breed multiple times in a season. The necessity and timing of these continued surveys will be determined by the qualified biologist based on review of the final construction plans and in coordination with the CDFW, as needed.</p> <p>If raptors or other protected avian species nests are identified during the pre-construction surveys, the qualified biologist will notify the project applicant and an appropriate no-disturbance buffer will be imposed within which no construction activities or disturbance should take place (generally 500 feet in all directions for raptors; other avian species may have species-specific requirements) until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Conduct pre-construction surveys for avian nesting species and implement mitigation measures as necessary.</p> <p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with CDFW.</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p><b>BIO-8: Pre-Construction Special-Status Plant Surveys</b></p> <p>A qualified biologist shall be retained to conduct special-status plant survey(s) according to USFWS, CDFW, and CNPS protocols for during the appropriate identification period(s) to determine their presence within the Phase 2 site. The biologist shall prepare a report that provides the results of the survey, and, if found the number and locations of individuals/populations identified within the site. If no special-status plant species are found, no further mitigation is necessary. If special-status plant species are found, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• Individuals shall be avoided to the maximum extent possible.</li> <li>• For impacts to the HMP species within the development site that do not require take authorization from USFWS or CDFW, salvage efforts for these species will be evaluated by a qualified biologist in coordination with the contractor to further reduce impacts per the requirements of the HMP and BO, in accordance with <b>Mitigation Measure BIO-1.</b></li> <li>• If non-HMP special-status plant species are observed and if avoidance is not feasible, species shall be replaced at a 1:1 success ratio for the acreage or individuals impacted (depending on species impacted) and a Rare Plant Restoration Plan shall be prepared by a qualified biologist and implemented. The plan shall include, but is not limited to, the following: <ul style="list-style-type: none"> <li>– A description of the baseline conditions of the habitats within the work site, including the presence of any special-status species, their locations, and densities;</li> <li>– Procedures to control and/or eliminate non-native invasive species within the work site;</li> <li>– Provisions for ongoing training of facility maintenance personnel to ensure compliance with the requirements of the plan;</li> <li>– A detailed description of on-site and/or off-site restoration areas, salvage of seed and/or soil bank, plant salvage, seeding and planting specifications, including, if required by the CDFW, increased planting ratio to ensure the 1:1 success ratio; and</li> <li>– A monitoring program that describes annual monitoring efforts which incorporate success criteria and contingency plans if success criteria are not met.</li> </ul> </li> </ul>	<p><b>Component:</b> Phase 2</p> <p><b>Activity:</b> Conduct special-status plant surveys and implement mitigation measures as necessary.</p> <p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per Phase 2.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with CNPS, CDFW, and USFWS.</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p><b>BIO-9: Pre-Construction Surveys for Special-Status Bats</b></p> <p>To avoid and reduce impacts to hoary bat and Townsend’s big-eared bat, CalVet will retain a qualified bat specialist or wildlife biologist to conduct site surveys during the reproductive season (May 1 through September 15) to characterize bat utilization of the site and potential species present (techniques utilized to be determined by the biologist) prior to any vegetation removal. This measure shall be implemented for each phase of the 2015 Master Plan, including Phase 2. Based on the results of these initial surveys, one or more of the following will occur:</p> <ul style="list-style-type: none"> <li>• If it is determined that bats are not present at the site, no additional mitigation is required.</li> <li>• If it is determined that bats are utilizing the site and may be impacted by the proposed project, pre-construction surveys will be conducted within 100 feet of construction limits no more than 30 days prior to any tree removal. If, according to the bat specialist, no bats or bat signs are observed in the course of the pre-construction surveys, tree removal may proceed. If bats and/or bat signs are observed during the pre-construction surveys, the biologist will determine if disturbance will jeopardize the roost (i.e., maternity, foraging, day, or night).</li> <li>• If a single bat and/or only adult bats are roosting, removal of trees may proceed after the bats have been safely excluded from the roost. Exclusion techniques will be determined by the biologist and depend on the roost type; the biologist will prepare a mitigation plan for provision of alternative habitat to be approved by CDFW.</li> <li>• If an active maternity roost is detected, avoidance is preferred. Work in the vicinity of the roost (buffer to be determined by biologist) will be postponed until the biologist monitoring the roost(s) determines that the young have fledged and are no longer dependent on the roost. The monitor will ensure that all bats have left the area of disturbance prior to initiation of limbing and/or removal of trees. If avoidance is not possible and a maternity roost must be disrupted, a depredation permit would be required prior to removal of the roost.</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Conduct pre-construction surveys for special-status bats and implement mitigation measures as necessary.</p> <p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with CDFW.</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	
<p><b>BIO-10: Pre-Construction Surveys for Monterey Dusky-Footed Woodrat</b></p> <p>Not more than thirty (30) days prior to the start of construction (including vegetation removal), a qualified biologist shall conduct a survey of the project sites to locate existing Monterey dusky-footed woodrat nests. This measure shall be implemented for each phase of the 2015 Master Plan, including Phase 2. All Monterey dusky-footed woodrat nests shall be mapped and flagged for avoidance. Graphics depicting all</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Conduct pre-construction surveys for Monterey dusky-</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/>	

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<p>Monterey dusky-footed woodrat nests shall be provided to the construction contractor. Any Monterey dusky-footed woodrat nests that cannot be avoided shall be relocated according to the following procedures:</p> <ul style="list-style-type: none"> <li>Each active nest shall be disturbed by the qualified biologist to the degree that the woodrats leave the nest and seek refuge elsewhere. After the nests have been disturbed, the nest sticks shall be removed from the impact areas and placed outside of areas planned for impacts. Nests shall be dismantled during the non-breeding season (between October 1 and December 31), if possible. If a litter of young is found or suspected, nest material shall be replaced and the nest left alone for 2-3 weeks, after this time the nest will be rechecked to verify that young are capable of independent survival before proceeding with nest dismantling.</li> </ul>	<p>footed woodrat and implement mitigation measures as necessary.</p> <p><b>Timing:</b> No more than 30 days prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> N/A</p>	<p>Date</p>	<p>Date</p>	
<p><b>BIO-11: Oak Tree Protection and Replacement Measures</b></p> <p>For each phase of the 2015 Master Plan, including Phase 2, impacts to coast live oak trees shall be avoided and minimized through site design and protection during construction. To maximize tree retention and protection, a forester, arborist, or other tree care professional shall be involved with early design and planning for each phase and shall be involved in the review and development of final grading and construction plants wherever trees occur within the site or at the grading margins. To avoid unintended impacts to trees outside the construction area, the following tree protection measures shall be implemented:</p> <ul style="list-style-type: none"> <li>Temporary construction fencing shall be placed at approximately 10 feet from the trunk and no grading, trenching, or vegetative alteration shall occur within this environmental exclusion zone. Grading, vegetation removal, and other ground disturbing construction activities may not commence until the project forester has inspected and approved the protective fencing installed by the contractor. No equipment or materials, including soil, shall be stored within the established environmental exclusion zone. Prior to grading within 25 feet of retained trees, the project forester, arborist or other tree care professional shall be consulted to determine whether pruning is necessary to protect limbs from grading equipment.</li> <li>To avoid soil compaction from damaging the roots, heavy equipment shall not be allowed to drive over the root area. If deemed necessary and approved by the forester, equipment may drive across one side of the tree. To reduce soil compaction, wood chips shall be spread 6-12 inches deep to disperse the weight of equipment and plywood sheets shall be placed over the wood chips for added protection. To reduce soil compaction, wood chips shall be spread 6-12 inches</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Implement tree protection measures to minimize and avoid impacts to coast live oak trees.</p> <p><b>Timing:</b> Prior to and during construction.</p> <p><b>Frequency:</b> Ongoing during construction of each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p> <p><b>Project Arborist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p>deep to disperse the weight of equipment and plywood sheets shall be placed over the wood chips for added protection. Mulch shall not be placed within 6 to 8 inches of tree trunks or rootballs to avoid fungus, disease, and pests.</p> <ul style="list-style-type: none"> <li>• Roots exposed by excavation must be pruned and recovered as quickly as possible to promote callusing, closure, and healthy regrowth.</li> <li>• Retained trees shall be watered periodically in accordance with species need to promote tree health. Transplanted trees and their intended planting areas shall be pre-watered. Post planting watering shall be done as needed to assure establishment.</li> <li>• When phase design is completed, an estimate of the appropriate number of replacement trees shall be made based on available planting space. These replacement trees (minimum five-gallon specimens) shall be planted along boundaries and within landscape areas. Planting density for replacement trees shall be accurately detailed to allow for some unavoidable mortality over time.</li> <li>• Transplants are encouraged and shall be credited on a 3:1 basis. Final replanting numbers may be modified by additional tree retention and should be made part of the final landscaping plan.</li> </ul>				
<p><b>BIO-12: Coast Live Oak Tree and Woodland Protection</b></p> <p><b>Mitigation Measure BIO-6, Project-Specific Biological Resources Studies</b>, requires biological surveys and an assessment of potential impacts to sensitive biological resources prior to construction of future phases of the 2015 Master Plan. During the implementation of <b>Mitigation Measure BIO-6</b>, a qualified biologist shall determine whether coast live oak trees/woodland would be impacted by each proposed phase. If coast live oak trees/woodland have the potential to be impacted, a qualified biologist will provide a description of the conditions of the trees and habitat that may be impacted and quantify the individuals and/or acreage that may be impacted for inclusion in the Project-Specific Biological Resources Study required by <b>Mitigation Measure BIO-6</b>.</p>	<p><b>Component:</b> 2015 Master Plan</p> <p><b>Activity:</b> Prepare an inventory of coast live oak trees and implement mitigation measures as necessary.</p> <p><b>Timing:</b> Prior to construction.</p>	<p><b>Project Biologist</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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<p>The impact analysis shall take into consideration tree retention, relocation, and replacement proposed for each phase. A qualified biologist will include a summary of coast live oak trees/woodland impacted by phase to date in the study and verify that the impacts that the oak mitigation continues to meet the 1:1 mitigation ratio. If a future phase would exceed the 1:1 mitigation ratio of the acreage coast live oak woodland preserved on-site, the phase may be designed to avoid or additional mitigation (e.g., including off-site preservation, on-site or off-site restoration, or payment of in-lieu fees) would be required. A qualified biologist will identify potential additional mitigation strategies in the study, and the appropriate mitigation strategy shall be determined and initiated prior to construction of the future phase that would exceed the mitigation ratio. Potential mitigation strategies may include:</p> <ul style="list-style-type: none"> <li>• Opportunities for off-site oak woodland preservation areas may include coast live oak woodland habitat within or adjacent to the former Fort Ord. However, off-site preservation areas shall not include any lands conserved as part of the Fort Ord Oak Woodland Conservation Area, once approved.</li> <li>• On-site or off-site restoration of coast live oak woodland habitat within or adjacent to the former Fort Ord. Two potential on-site areas that could serve as suitable planting sites include, but are not limited to: 1) a disturbed area at the intersection of Parker Flats Road, Parker Flats Cut-Off, and Normandy Road; and 2) a disturbed area between the Administrative Building and entrance driveway.</li> <li>• Payment of in-lieu fees to the County and/or Seaside to fund a portion of the management and monitoring of the Fort Ord Oak Woodland Conservation Area, once approved, in order to satisfy phase-specific mitigation required if the on-site coast live oak impacts exceed a 1:1 mitigation ratio exceeded in the phase.</li> </ul>	<p><b>Frequency:</b> Once per each phase of each future phase of the 2015 Master Plan.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>			

**MITIGATION MONITORING & REPORTING PROGRAM**  
**California Central Coast Veterans Cemetery Project – 2015 Master Plan and Phase 2**

Mitigation Measure	Project Component/Activity/ Timing/Frequency/ Agency Coordination	Implementation Responsibility/ Verification	Responsible Party for Oversight of Compliance/ Verification	Comments
<b>Cultural and Tribal Resources</b>				
<p><b>CTR-1: Unanticipated Discovery</b></p> <p>A. If subsurface deposits believed to be cultural or human in origin are discovered during construction, then all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgement.</p> <p>A Native American monitor, following the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites established by the Native American Heritage Commission, shall be required if the nature of the unanticipated discovery is prehistoric.</p> <p>Work cannot continue within the no-work radius until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either: 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the NRHP or CRHR.</p> <p>B. If a potentially-eligible resource is encountered, then the archaeologist and lead agency shall arrange for either: 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility. If found to be eligible for either the NRHP or CRHR, then adverse effects (under Section 106) and significant impacts (under CEQA) would be resolved/mitigated through data recovery excavations to the extent of obtaining enough information to address applicable research questions. If data recovery is necessary, a data recovery plan will be prepared, reviewed by the lead agency, and implemented. Determinations of eligibility and completion of data recovery (if necessary) shall be formally documented in writing and submitted to the lead agency as verification that the provisions in CEQA/NEPA for managing unanticipated discoveries have been met.</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Avoid or mitigate impacts to unanticipated cultural discovery.</p> <p><b>Timing:</b> During construction.</p> <p><b>Frequency:</b> Ongoing during construction of each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with the SHPO and the NAHC.</p>	<p style="text-align: center;"><b>Project Contractor</b></p> <hr/> <p style="text-align: center;">Initials</p> <hr/> <p style="text-align: center;">Date</p>	<p style="text-align: center;"><b>CalVet</b></p> <hr/> <p style="text-align: center;">Initials</p> <hr/> <p style="text-align: center;">Date</p>	
		<p style="text-align: center;"><b>Project Archaeologist</b></p> <hr/> <p style="text-align: center;">Initials</p> <hr/> <p style="text-align: center;">Date</p>		
<p><b>CTR-2: Cultural Sensitivity Training:</b></p> <p>A <i>Worker Awareness Training</i> will be developed and conducted prior to any construction operations for future phases, including Phase 2. The training program will inform crew members of the potential for archaeological finds and the protocols to be followed in the event of the discovery of archaeological materials. The program will be presented by a Professional Archaeologist and include an ALERT Sheet with visual aids with a focus on archaeological objects and other cultural materials that could be present within the project site. The training will also provide protocols in the event of</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Prepare and implement a Worker Awareness Training for potential archeological finds and protocols.</p>	<p style="text-align: center;"><b>Project Contractor</b></p> <hr/> <p style="text-align: center;">Initials</p> <hr/> <p style="text-align: center;">Date</p>		



**MITIGATION MONITORING & REPORTING PROGRAM**  
**California Central Coast Veterans Cemetery Project – 2015 Master Plan and Phase 2**

Mitigation Measure	Project Component/Activity/ Timing/Frequency/ Agency Coordination	Implementation Responsibility/ Verification	Responsible Party for Oversight of Compliance/ Verification	Comments
<b>Hydrology and Water Quality</b>				
<p><b>HYD-1: Drainage Basin Analysis</b></p> <p>Prior to construction of Phase 3 or subsequent phases of the 2015 Master Plan, further analysis shall be completed by CalVet to confirm that the retention basin has the capacity to contain runoff from a 100-year storm event. If it is determined that the size of the retention basin is not adequate, design of that phase shall include modifications to the retention basin design to increase its capacity to the adequate size. In addition, the project proponent shall consult with the City of Seaside to submit a Letter of Map Revision (LOMR) request to FEMA to revise flood elevation included in FIRM Map #06053C0195H, based on the findings of the analysis.</p>	<p><b>Component:</b> 2015 Master Plan</p> <p><b>Activity:</b> Determine if the capacity of the drainage basin is adequate for each future phase of the 2015 Master Plan, and implement mitigation measures if necessary.</p> <p><b>Timing:</b> Prior to construction of Phase 3 and subsequent phases of the 2015 Master Plan.</p> <p><b>Frequency:</b> Once per each future phase of the 2015 Master Plan.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with the City of Seaside.</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	
<b>Noise</b>				
<p><b>NOI-1: Construction Noise Reduction Measures</b></p> <p>The following measures shall be implemented to reduce construction-generated noise levels:</p> <ul style="list-style-type: none"> <li>• Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and between the hours of 9:00 a.m. and 7:00 p.m. on weekends and legal holidays.</li> <li>• Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Implement measures to reduce construction-generated noise impacts.</p> <p><b>Timing:</b> During construction.</p>	<p>Project Contractor</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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**California Central Coast Veterans Cemetery Project – 2015 Master Plan and Phase 2**

Mitigation Measure	Project Component/Activity/ Timing/Frequency/ Agency Coordination	Implementation Responsibility/ Verification	Responsible Party for Oversight of Compliance/ Verification	Comments
<p>manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.</p> <ul style="list-style-type: none"> <li>• When not in use, all construction equipment and haul trucks shall be turned off and shall not be allowed to idle. Clear signage that posts this requirement shall be provided for workers at the entrances to the site.</li> <li>• Construction equipment and material staging areas shall be located at the furthest distance possible from nearby residential land uses.</li> <li>• To the extent possible, heavy-duty haul truck trips required for project construction should be scheduled during the non-peak hours of the day.</li> </ul>	<p><b>Frequency:</b> Ongoing during construction of each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>			
<b>Transportation</b>				
<p><b>TR-1: Construction Traffic Management Plan</b> Prior to the commencement of construction activities for Phase 2 and future phases, CalVet or designated representative shall prepare a Construction Traffic Management Plan and submit plan to the City of Seaside and/or County Engineer. The plan shall:</p> <ul style="list-style-type: none"> <li>• Designate construction vehicle access routes to the project site that avoid roads with potential sensitive receptors (Normandy Road). The preferred designated access route to the project site should be via Gigling Road to Parker Flats Road.</li> <li>• Identify proper safety precautions to avoid safety impacts to sensitive receptors if access to the project site via Normandy Road is unavoidable. Access to the project site shall not occur directly before or directly after school hours.</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Prepare and implement a Construction Traffic Management Plan to reduce construction-related traffic impacts.</p> <p><b>Timing:</b> Prior to construction.</p> <p><b>Frequency:</b> Once per each phase of the 2015 Master Plan, including Phase 2.</p> <p><b>Outside Agency Coordination:</b> City of Seaside and/or County Engineer.</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	
<p><b>TR-2: Operational Traffic Management</b> To reduce potential safety impacts during the operation of Phase 2 and future phases of the CCCVC:</p>	<p><b>Component:</b> Phase 2 2015 Master Plan</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p>	

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Mitigation Measure	Project Component/Activity/ Timing/Frequency/ Agency Coordination	Implementation Responsibility/ Verification	Responsible Party for Oversight of Compliance/ Verification	Comments
<ul style="list-style-type: none"> <li>Identify preferred routes to the CCCVC site which do not make use of Normandy Road between General Jim Moore Boulevard and Parker Flats Road.</li> <li>Publicize and encourage the use of the identified alternative routes on the CCCVC facility information (i.e., website, pamphlet, and brochures).</li> </ul>	<p><b>Activity:</b> Implement operational traffic management to reduce safety impacts during operation.</p> <p><b>Timing:</b> During operation of the CCCVC.</p> <p><b>Frequency:</b> Ongoing during project operations.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>	<hr/> <p>Date</p>	<hr/> <p>Date</p>	
<p><b>TR-3: Signal Timings and Phasing Adjustments</b></p> <p>If the Northeast Southwest Arterial Connector Roadway is in operation at the time the construction of Phase 4 of the CCCVC is proposed, CalVet will coordinate with the City of Seaside to adjust signal timing and signal phasing to improve intersection operations at General Jim Boulevard &amp; Coe Avenue and reduce AM peak hour delay. The signal timings and signal phasing will be adjusted prior to operation of Phase 4 of the CCCVC.</p>	<p><b>Component:</b> 2015 Master Plan (Phase 4)</p> <p><b>Activity:</b> Adjust signal timing and phasing to improve peak hour intersection operations on major roads.</p> <p><b>Timing:</b> Prior to operation of Phase 4.</p> <p><b>Frequency:</b> Once.</p> <p><b>Outside Agency Coordination:</b> City of Seaside.</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p><b>CalVet</b></p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

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Mitigation Measure	Project Component/Activity/ Timing/Frequency/ Agency Coordination	Implementation Responsibility/ Verification	Responsible Party for Oversight of Compliance/ Verification	Comments
<p><b>TR-4: Pedestrian and Bicycle Facility Improvements</b></p> <p>ADA compliant sidewalks and crosswalks, as well as bicycle parking, shall be designed and constructed as part of Phase 3 development of the CCCVC to address the gap in the sidewalk network along the project frontage and just west of the Normandy Road &amp; Parker Flats Cut-Off Road intersection. The improvements will be constructed in compliance with adopted City of Seaside and County standards.</p>	<p><b>Component:</b> 2015 Master Plan (Phase 3)</p> <p><b>Activity:</b> Design and construct bicycle ADA compliant sidewalks and crosswalks as well as bicycle parking.</p> <p><b>Timing:</b> Prior to and during construction of Phase 3.</p> <p><b>Frequency:</b> Once.</p> <p><b>Outside Agency Coordination:</b> Possible coordination with the City of Seaside and County of Monterey.</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	
<p><b>TR-5: Special Event Management Plan</b></p> <p>CalVet shall prepare and implement a Special Event Transportation Management Plan during special events at the cemetery. The plan shall be submitted to the City of Seaside and/or County Engineer for review and approval for issuance of a Special Event Permit. The plan shall include:</p> <ul style="list-style-type: none"> <li>• Designated off-site parking facilities;</li> <li>• A traffic flow plan to direct motorists from access roads to identified off-site parking facilities; and</li> <li>• A description of the shuttle service system to transport special event attendees to and from established parking areas.</li> </ul>	<p><b>Component:</b> Phase 2 2015 Master Plan</p> <p><b>Activity:</b> Prepare and implement a Special Event Transportation Management Plan.</p> <p><b>Timing:</b> Prior to and during operations.</p> <p><b>Frequency:</b> Ongoing during project operations.</p> <p><b>Outside Agency Coordination:</b> N/A.</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>CalVet</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	

## **Appendix B**

### **Mitigation Monitoring and Reporting Program Reporting Form**

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**MITIGATION MONITORING AND REPORTING PROGRAM**  
**California Central Coast Veterans Cemetery**  
**REPORTING FORM**

**DATE:**

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Location: <input type="checkbox"/> Onsite	Project Phase: <input type="checkbox"/> Prior to Construction	Applicable to: <input type="checkbox"/> Phase 2
<input type="checkbox"/> Offsite (give location)  _____	<input type="checkbox"/> During Construction	<input type="checkbox"/> 2015 Master Plan
_____	<input type="checkbox"/> Post Construction	

---

Impact Issue(s):

- |   |  |
|---|--|
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural and Tribal Resources |
| <input type="checkbox"/> Geology and Soils    | <input type="checkbox"/> Hydrology and Water Quality   |
| <input type="checkbox"/> Noise                | <input type="checkbox"/> Transportation                |

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Applicable Mitigation Measure(s):

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Description of Implementation Activity:

Specialist: \_\_\_\_\_  
 Name Discipline Firm

Specialist: \_\_\_\_\_  
 Name Discipline Firm

Implementation Action Items:	Scheduled for Completion	Completion Date	Approved by
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Disposition:

- Mitigation measure(s) implemented. No further action required.
- Mitigation measure(s) partially implemented. Further action required.  
Explain below; attach additional sheets if necessary.
- Mitigation measure(s) partially implemented. No further action required.  
Explain below; attach additional sheets if necessary.
- Noncompliance with mitigation measures. Further action required.  
Explain below; attach additional sheets if necessary.
- Mitigation unnecessary. No further action required.  
Explain below; attach additional sheets if necessary.
- Verification of environmental compliance for project.

Comments/Revisions:  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Completed by:	Approved by:
Name _____	Name _____
Title _____	Title _____
Date _____	Date _____