California State University Monterey Bay Stadium Expanded Use Project

Final Environmental Impact Report

State Clearinghouse No. 2025021013

Prepared for the California State University, Board of Trustees and California State University Monterey Bay

September 2026

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Preface to the Final EIR

In compliance with California Environmental Quality Act (CEQA) Guidelines Section 15132, this document serves as the Final Environmental Impact Report (Final EIR) for the proposed California State University Monterey Bay (CSUMB) Stadium Expanded Use Project (proposed project) (State Clearinghouse [SCH] No. 2025021013). This Final EIR has been prepared under the direction of the California State University (CSU) Board of Trustees (Board of Trustees), acting as the lead agency, in accordance with the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15000, et seq.). In accordance with Sections 15087 and 15105 of the CEQA Guidelines, the Board of Trustees and CSUMB circulated the Draft EIR for a 45-day public review and comment period starting on May 15, 2026, and ending on June 29, 2026. State CEQA Guidelines Section 15132 requires that the Final EIR consist of the following components:

1. The Draft EIR or a revision of the Draft EIR;
2. Comments and recommendations received on the Draft EIR either verbatim or in summary;
3. A list of persons, organizations, and public agencies commenting on the Draft EIR;
4. Response from the Lead Agency to significant environmental points raised in the review and consultation process; and,
5. Any other information added by the lead agency.

The Final EIR contains the public comments received on the Draft EIR for the proposed project, as well as all written responses to those comments. A list of the persons, organizations, and public agencies that commented on the Draft EIR is provided in the **Comments and Responses to Comments** chapter of the document. This Final EIR contains clarifications and revisions made to the Draft EIR text and figures based on the comments received; the Draft EIR in its entirety with revisions is attached.

Introduction

This preface, which serves as an introduction to the Final EIR for the proposed project, provides an overview of the Final EIR and its contents; a summary of the public review and decision process; and a summary of the changes made to the Draft EIR text in response to comments and community input received during the public comment period.

Public Review and Decision Process

The Board of Trustees, acting as lead agency, prepared a Draft EIR to inform decisionmakers and the public of the potential significant environmental effects associated with the proposed project. As indicated previously, the Board of Trustees circulated the Draft EIR for public review and comment for a period of 45 days, starting on May 15, 2026, and ending on June 29, 2026. A Public Notice of Availability was published in a newspaper of general circulation, posted at the project site, and provided to all organizations and individuals previously requesting notice. CSUMB provided copies of the complete Draft EIR with appendices to the State Clearinghouse, which, in turn, distributed the Draft EIR to all interested state

agencies for review and comment. The Board of Trustees and CSUMB also posted the Draft EIR online at CSUMB's Campus Planning webpage (https://csumb.edu/departments/facilities/planning/) and made a hard copy of the Draft EIR available for public review during the comment period at the following locations:

- CSUMB Library (Reference Desk), on the CSUMB campus
- CSUMB Facilities Management Office, on the CSUMB campus

Agencies, interested persons, and organizations had the opportunity to submit their written comments on the Draft EIR during the public review period. Comment letters received on the Draft EIR, reproduced in their entirety, and responses to those comments are provided in the **Comments and Responses to Comments** section of the Final EIR, which follows this preface.

CEQA Guidelines Section 15088(c) specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required for comments regarding the merits of the proposed project or on issues not related to potential physical environmental impacts and/or the Draft EIR's analysis of such impacts. Comments on the merits of the proposed project or other comments that do not raise environmental issues are nevertheless included within the record for consideration by the Board of Trustees as part of the proposed project approval process.

Although some of the comments have resulted in revisions to the text or figures of the Draft EIR (please refer to **Chapters 1.0, Introduction**, through **7.0, List of Preparers and Persons Consulted**, of this Final EIR), none of the changes constitute "significant new information," which would require recirculation of the Draft EIR. in CEQA Guidelines Section 15088.5(a) defines "Significant new information" as follows:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances have arisen from comments on the Draft EIR; therefore, recirculation is not required. As described in **Revisions to Draft EIR** below, none of the revisions result in a new significant impact or in a substantial increase in the severity of an environmental impact that cannot otherwise be reduced to less than significant with the identified mitigation measures. As required by CEQA Guidelines Section 21092.5 and CEQA Guidelines Section 15088(b), at least 10 days before consideration of the Final EIR for certification, CSUMB provided a written proposed response (electronic copy) to each public agency that submitted written comments on the Draft EIR.

The Board of Trustees will consider this Final EIR prior to a decision on whether to approve the proposed project. If the Board of Trustees decide to approve the proposed project, they must first certify that the

Final EIR was completed in compliance with CEQA's requirements, was reviewed and considered by the Board of Trustees, and reflects its independent judgment and analysis, as required by CEQA Guidelines Section 15090. The Board of Trustees would then be required to adopt findings of fact on the disposition of each significant environmental impact, as required by CEQA Guidelines Section 15091. If significant and unavoidable impacts (those that cannot feasibly be mitigated to less than significant) would result from implementing the proposed project, the proposed project may be approved by the Board of Trustees through issuance of a Statement of Overriding Considerations explaining in writing the specific economic, social, or other considerations that it believes, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; State CEQA Guidelines Section 15093). A mitigation monitoring and reporting program, which is required by CEQA Guidelines Section 15091(d) would be considered and adopted by the Board of Trustees in conjunction with any project approval.

Revisions to Draft EIR

Chapters 1.0, Introduction, through **7.0, List of Preparers and Persons Consulted,** of this Final EIR contain clarifications and revisions made to the Draft EIR text and figures based on the comments received. Where applicable and warranted, appendices also contain clarifications and revisions. This Final EIR displays additional text as <u>underlined</u> and removed text as ~~strikethrough~~. Amended figures contain a note stating the date the revision took place. The following list summarizes the substantive changes made to the Draft EIR since public review. All changes are incorporated into the Final EIR and are identified in the **Comments and Responses to Comments** chapter.

Chapter 1.0, Introduction

- S**ection 1.5, Project Approval and Permitting**, and **Section 1.6, Scope and Content of the Final EIR**, have been amended to accommodate the structure of the Final EIR as opposed to the public Draft EIR. Specifically, language referring to the Draft EIR has been changed to past tense, and new language describing the **Preface to the Final EIR** and **Comments and Responses to Comments** chapters have been added.

Section 4.1, Aesthetics

- The description and analysis under **Impact AES-3** regarding effects from nighttime lighting has been updated to reflect the temporary nature of event lighting and emphasizes that the event lighting would be at field level and within existing stadium infrastructure, and, therefore, screened from nearby development (please refer to **Section 4.1.4, Impacts and Mitigation**).

- The Field Lighting Impacts Report, contained in **Appendix B**, has been revised to include an analysis of nearby developments including The Dunes on Monterey Bay, The Projects at Main Gate, the New Fort Ord Courthouse, and the Campus Town Specific Plan. Figure 2 of **Appendix B** has also been revised to show an overlay of the light spill summary produced by CSUMB Stadium. The revisions to **Appendix B** are consistent with the discussion provided in **Section 4.1, Aesthetics**, of the Final EIR.

- The text was revised to correct a spelling error noted by a commenter on page 4.1-14 of the Final EIR.

Section 4.2, Air Quality

- **Section 4.2.1, Environmental Setting**, has been updated with minor text revisions in reference to "criteria air pollutants."

- **Table 4.2-1** has been amended to reflect an update to the National Standard for fine particulate matter.

- **Section 4.2.3, Regulatory Setting**, has been updated to include additional air quality regulations set by MBARD that may be applicable to the proposed project.

- **Section 4.2.4, Impacts and Mitigation,** has been revised under **Impact AQ-2** to include Best Management Practices as a design feature to further reduce construction PM_{10} emissions in compliance with MBARD Rule 402.

Section 4.3, Biological Resources

- **Mitigation Measure BIO-3** has been updated to reflect changes to the survey buffer area. Additionally, in response to CDFW's comment letter, this measure reflects changes to the "no-disturbance buffer."

Section 4.11, Noise and Vibration

- **Section 4.11.4, Impacts and Mitigation**, has been revised to specifically identify the New Fort Ord Courthouse located at "Receiver 8." Similarly, **Figures 4.11-1** and **4.11-2** have been revised to identify the New Fort Ord Courthouse.

- The Noise Analysis, contained in **Appendix F**, has been revised to identify the New Fort Courthouse as "Receiver 8." The revisions to **Appendix F** are consistent with the discussion provided in **Section 4.11, Noise and Vibration**, of the Final EIR.

Section 4.14, Transportation

- **Section 4.14.1, Environmental Setting**, has been revised to reflect existing and planned pedestrian and bicycle facilities adjacent to the proposed project site.

- **Mitigation Measure TR-4** has been revised to add an additional carsharing resource recommended by MST.

- **Section 4.14.6, References**, has been revised to update the resource citations to reflect current and accessible web hyperlinks.

Section 4.15, Utilities and Public Services

- The discussion and solid waste calculations (please refer to **Tables 4.15-3** through **4.15-8**) provided under **Impact UTL-4** have been revised to reflect an error in the conversion factor.

Chapter 6.0, Cumulative Impacts and Other CEQA Considerations

- The Draft EIR previously used the term "Monterey County Courthouse" when referring to the approved courthouse project overseen by the Judicial Council of California. This terminology has been revised for consistency with the edits in the **Comments and Responses to Comments** Chapter and with the nomenclature used in the Judicial Council's Final EIR (SCH No. 2022070304). As such, **Table 6.1**, **Figure 6.1**, and pages 6.0-5, 6.0-9 and 6.0-23 have been revised to use the term "New Fort Ord Courthouse."

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FINAL
ENVIRONMENTAL IMPACT REPORT
FOR THE
CALIFORNIA STATE UNIVERSITY MONTEREY BAY STADIUM EXPANDED USE PROJECT

Final Environmental Impact Report

SCH No. 2025021013

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Acronyms and Abbreviations

Acronym or Abbreviation	Definition
3CE	Central Coast Community Energy
µg/m3	Micrograms Per Cubic Meter
AAM	Annual Arithmetic Mean
AASHE STARS	Association for the Advancement of Sustainability in Higher Education Sustainability Tracking, Assessment & Rating System
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
ADT	Average Daily Traffic
AFV	Alternative Fuel Vehicles
AFY	Acre Feet Per Year
Alquist-Priolo Act	Alquist-Priolo Earthquake Fault Zoning Act
AMBAG	Association of Monterey Bay Area Governments
AMBIENT	AMBIENT Air Quality and Noise Consulting
AMCs	Asbestos Containing Materials
AQMP	Air Quality Management Plan
BI	Beneficial Impact
BO	Biological Opinion
Board of Trustees	Board of Trustees of the California State University
BSC	Building Standards Commission
Btu	British Thermal Units
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEMS	California Office of Emergency Services
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Protection
CalGreen	California Green Buildings Standards
California CAA	California Clean Air Act
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Code (Title 24)
CCA	California Coastal Act
CCAA	California Collegiate Athletic Association
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act

Acronym or Abbreviation	Definition
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CGS	California Geologic Survey
CH_4	Methane
CHRIS	California Historical Resources Information System
CIWMB	California Integrated Waste Management Board
CLTC	California Lighting Technology Center
CNEL	Community Noise Equivalent Level
CNDDB	California Natural Diversity Database
CNPPA	California Native Plant Protection Act
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
CRCT	Costanoan Rumsen Carmel Tribe
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Ranks
CSU	California State University
CSUMB	California State University Monterey Bay
CWA	Clean Water Act
dB	Decibels
dBA	A-Weighted Decibels
DD&A	Denise Duffy and Associates, Inc.
DOC	California Department of Conservation
DOD	Department of Defense
DPM	Diesel Particulate Matter
Draft EIR	Draft Environmental Impact Report
DRRP	Diesel Risk Reduction Plan
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EIA	US Energy Information Administration
EO	Executive Order
EPA	US Environmental Protection Agency
EPAct	Energy Policy Act of 1992
EQ ZAPP	Earthquake Hazards Zone Application
ESA	Endangered Species Act
ESHA	Environmentally Sensitive Habitat Areas
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
FIMA	Flood Insurance and Mitigation Administration

Acronym or Abbreviation	Definition
FIP	Federal Implementation Plan
Fort Ord HMP	Fort Ord Installation-Wide Multispecies Habitat Management Plan
FOST	Findings of Suitability to Transfer
FTA	Federal Transit Authority
FTE	Full Time Equivalent
GHG	Greenhouse Gas
GPD	Gallons Per Day
GSP	Groundwater Sustainability Plan
GWP	Global Warming Potential
H_2S	Hydrogen Sulfide
HAPs	Hazardous Air Pollutants
HCP	Habitat Conservation Plans
Hz	Hertz
HFC	Hydrofluorocarbons
HMP	Habitat Management Plan
Hz	Hertz
L_{dn}/DN:	Day-Night Average Noise Level
L_{eq}	Energy Equivalent Noise Level
LID	Low Impact Development
L_{max}	Maximum Noise Level
L_{min}	Minimum Noise Level
LRA	Local Responsibility Area
LS	Less-Than-Significant
LSM	Less-Than-Significant With Mitigation
LUST	Leaking Underground Storage Tanks
M1W	Monterey One Water
MBARD	Monterey Bay Air Resources District
MBFC	Monterey Bay Football Club
MBTA	Migratory Bird Treaty Act
MCRFD	Monterey County Regional Fire District
MCWD	Marina Coast Water District
MCWRA	Monterey County Water Resources Agency
MGD	Million Gallons Per Day
MIRA	Monterey Institute for Research in Astronomy
MLD	Most Likely Descendent
MMRP	Mitigation Monitoring and Reporting Program
MMT	Million Metric Tons
MND	Mitigated Negative Declaration
MOU	Memorandum of Understanding
mph	Miles Per Hour
MPO	Metropolitan Planning Organization
MPRECC	Monterey Peninsula Regional Emergency Coordination Center
MRZ	Mineral Resource Zone

Acronym or Abbreviation	Definition
MS4	Small Municipal Separate Storm Sewer Systems
MST	Monterey Salinas Transit
MT	Metric Tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCAA	National Collegiate Athletic Association
NCCAB	North Central Coast Air Basin
NCCP	Natural Community Conservation Plan
NESHAPs	National Emission Standards For Hazardous Air Pollutants
NF_3	Nitrogen Trifluoride
NFIP	National Flood Insurance Program
NHTSA	National Highway Traffic Safety Administration
NI	No Impact
NMFS	National Marine Fisheries Service
N_2O	Nitrous Oxide
NO_2	Nitrogen Dioxide
NO_x	Oxides of Nitrogen
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWIC	Northwest Information Center located at Sonoma State University
O_3	Ozone
OC3	Otter Cross Cultural Center
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PAHs	Polycyclic Aromatic Hydrocarbons
Pb	Lead
PCBs	Polychlorinated Biphenyls
PERP	Portable Equipment Registration Program
PFAs	Polyfluorinated Alkylated Substances
PFCs	Perfluorocarbons
PG&E	Pacific Gas and Electric
PM	Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Coarse Particulate Matter
ppb	Parts Per Billion
ppm	Parts Per Million
PPV	Peak Particle Velocity
POMFD	Presidio of Monterey Fire Department
PRC	Public Resource Code

Acronym or Abbreviation	Definition
proposed project	Stadium Expanded Use Project
PV	Photovoltaic
RCRA	Resource Conservation and Recovery Act
ReGen Monterey	Monterey Regional Waste Management District
ROG	Reactive Organic Gas
RPS	Renewables Portfolio Standard
RWD	Reports of Waste Discharge
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCH	State Clearinghouse
SDC	Seismic Design Category
SEL	Sound Exposure Level
sf	Square-foot
SF_6	Sulfur Hexafluoride
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SLCP Strategy	Short-Lived Climate Pollutant Reduction Strategy
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMARA	Surface Mining and Reclamation Act
SO_2	Sulfur Dioxide
SO_4^{2-}	Sulfates
SR	State Route
SRA	State Responsibility Area
SU	Significant Unavoidable
SVGB	Salinas Valley Groundwater Basin
SVBGSA	Salinas Valley Basin Groundwater Sustainability Agency
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
TAMC	Transportation Agency for Monterey County
TDM	Transportation Demand Management Program
TMP	Transportation Management Plan
TOG	Total Organic Gases
TSCA	Toxic Substances Control Act
UCD	University of California, Davis
UPD	University Police Department
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
USL	United Soccer League
USLC	United Soccer League Championship

Acronym or Abbreviation	Definition
VCM	Vinyl Chloride
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WY	Water Year
ZNE	Zero Net Energy

Comments and Responses to Comments

Introduction

This chapter includes the responses to public comments received on the Draft EIR for the proposed project. Specifically, this chapter includes a list of all agencies, organizations, and individuals who submitted comments on the Draft EIR during the 45-day public review period (May 15, 2026, through June 29, 2026), the comment letters reproduced in their original format, and responses to each environmental issue raised during the review period.

List of Commenters

This section lists all the agencies, organizations, and people who submitted comments on the Draft EIR during the public review period that closed on June 29, 2026. Persons who submitted written comments are grouped according to whether they represent a state or local public agency or Native American Tribe. **Table RTC-1** provides a comment identifier (i.e., identification letter), identifies the name of the commenter, and lists the date the Board of Trustees and CSUMB received each letter. **Table RTC-1** organizes each comment letter alphabetically within the following categories:

- State Agencies
- Local Agencies
- Native American Tribes

Table RTC-1
Draft EIR Commenters

Comment No.	Name of Commenter	Date
State Agencies		
A	California Department of Fish and Wildlife (CDFW)	June 26, 2026
B	Judicial Council of California (Judicial Council)	June 29, 2026
Local Agencies		
C	City of Seaside	June 29, 2026
D	Marina Coast Water District (MCWD)	June 26, 2026
E	Monterey Bay Air Resources District (MBARD)	June 16, 2026
F	Monterey-Salinas Transit (MST)	June 23, 2026
G	Transportation Agency for Monterey County (TAMC)	June 22, 2026
Native American Tribes		
H	Amah Mutsun Tribal Band of Mission San Juan Bautista	May 19, 2026

Response to Comments

This section summarizes each comment from the letters received followed by a response. Comment letters in their original form are provided in **Appendix H**. Individual comments are bracketed and numbered and correspond to the numbered comments summarized in this section. Section 15088(a) of the CEQA Guidelines requires a lead agency to evaluate comments on environmental issues and provide written responses to all significant environmental issues raised. Therefore, the emphasis of the responses is on significant environmental issues raised by the commenters (CEQA Guidelines Section 15204[a]). Acronyms used in this section are defined upon their first use in the EIR and are also provided in the list of acronyms included in a previous section of the document.

STATE

Letter A - California Department of Fish and Wildlife

Comment A-1 The commenter states that they received the Draft EIR for the proposed project and appreciate the opportunity to provide comments and recommendations on the proposed activities that may affect California fish and wildlife resources.

Response A-1 This comment is introductory in nature and does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment A-2 The commenter summarizes CDFW's role as a Trustee Agency under CEQA and their authority over conservation, protection, and management of fish, wildlife, native plants, and habitat in the State of California. The commenter also states that CDFW has a statutory responsibility to provide biological expertise during public agency environmental review.

Response A-2 The Board of Trustees and CSUMB acknowledge CDFW's role as a Trustee Agency under CEQA and recognize their statutory responsibility to provide biological expertise during the public review period. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment A-3 The commenter summarizes CDFW's role as a Responsible Agency under CEQA and states that CDFW may need to exercise regulatory authority to the extent that the proposed project may result in take of protected species.

Response A-3 Please refer to **Responses A-8** through **A-13** below related to special-status species. The Board of Trustees and CSUMB will comply with the California Endangered Species Act during construction and operation of the proposed project, as applicable. No changes to the Draft EIR are necessary in response to this comment.

Comment A-4 The commenter states that CDFW has jurisdiction over actions with the potential to disturb or destroy active nests or result in unauthorized take of birds.

Response A-4 The Board of Trustees and CSUMB recognize CDFW's authority over actions with the potential to disturb or destroy active nests which result in unauthorized take of avian species. **Section 4.3.5, Impacts and Mitigation**, of the Draft EIR discusses the proposed project's potential impact on protected avian species and their nests during construction of the proposed stadium improvements. As discussed in this section, CSUMB would implement the requirements of **Mitigation Measure BIO-3**. **Mitigation Measure BIO-3** is commensurate with the measures provided by the commenter (please refer to **Comment A-12** below) and no additional mitigation is necessary for protected avian species. However, **Mitigation Measure BIO-3** has been revised to include the commenter's recommended pre-construction survey area and construction no-disturbance buffer for nesting raptors (500 feet) and other nesting

avian species (250 feet). The Final EIR includes text clarifying the qualified biologist's responsibilities if a variance from the established construction no-disturbance buffers is warranted. For the full text revision, please refer to page 4.3-15 of the Final EIR.

Comment A-5 The commenter states that any species, regardless of official federal or state designation, which can be shown to meet the criteria of endangered, rare, or threatened under CEQA Guidelines Section 15380, should be fully considered in the environmental analysis for the proposed project.

Response A-5 The Draft EIR adequately evaluates biological resources and potential impacts to special-status species, consistent with the requirements of CEQA Guidelines Section 15380. The biological resources analysis was not limited to species with formal federal or state listing status. Rather, the analysis considered species that meet the definitions of rare, threatened, or endangered under CEQA Guidelines Section 15380.

As part of preparation of the Draft EIR, DD&A biologists conducted reconnaissance-level and focused botanical surveys of the proposed project site to document existing biological conditions and identify special-status species and sensitive biological resources that are present or have the potential to occur within the proposed project area. The results of these surveys were evaluated in conjunction with a review of relevant existing data and literature sources commonly used in biological resource assessments. These sources included regional CNDDB occurrences, the U.S. Fish and Wildlife Service IPaC Resource List, the CNPS Inventory of Rare and Endangered Plants of California, the National Wetlands Inventory, and the National Hydrography Dataset, as well as applicable information from the CDFW. The review considered species listed, proposed for listing, or candidates for listing under the federal Endangered Species Act and CESA, as well as CDFW species of special concern and other species that could meet the criteria for consideration under CEQA Guidelines Section 15380. Please refer to the definition of special-status species provided in **Appendix D** of the Final EIR.

The methodology and data sources used to evaluate special-status species are described in **Section 4.3.3, Methodology**, of the Draft EIR and in the Biological Resources Report (**Appendix D**). Based on the field surveys and review of existing information, the Biological Resources Report identified Monterey spineflower, raptors, and other protected avian species as the special-status species present or with the potential to occur in the vicinity of the proposed project site. The Draft EIR then evaluated the potential for project-related impacts to these resources and incorporated **Mitigation Measures BIO-1**, **BIO-2**, and **BIO-3** to reduce potentially significant impacts to a less than significant level during construction activities (please refer to **Section 4.3.4, Impacts and Mitigation**, of the Draft EIR).

Accordingly, the Draft EIR appropriately considered biological resources, including species that may qualify as rare, threatened, or endangered under CEQA Guidelines Section 15380, regardless of whether they have been formally designated as threatened or endangered under federal or state law. No changes to the Draft EIR are necessary in response to this comment.

Comment A-6 The commenter summarizes the proposed project activities, location, and objective as stated in the Draft EIR and associated noticing documents provided during the public review period for the proposed project.

Response A-6 The commenter accurately summarizes the proposed activities, location, and objective of the proposed project. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment A-7 The commenter states that CDFW is providing the following comments to assist the Board of Trustees in identifying and/or mitigating significant or potentially significant, direct or indirect impacts on fish and wildlife resources. The commenter notes that CDFW also provided comments on the Notice of Preparation (NOP) for the proposed project in a letter dated May 9, 2025.

Response A-7 This statement introduces CDFW's comments and recommendations for the proposed project. Page 4.3-1 of the Draft EIR summarizes all comments received during the NOP period that were relevant to the analysis of biological resources. The analysis presented in the Draft EIR was informed by a Biological Resources Report that evaluated potential impacts to special-status species in accordance with CEQA Guidelines (provided as **Appendix D** to the Draft EIR). Please refer to **Response A-8** through **Response A-13,** which address the environmental concerns raised by CDFW.

Comment A-8 The commenter summarizes the Draft EIR's findings regarding special-status species and associated mitigation measures. The commenter expresses concern that the proposed mitigation measures may not adequately reduce potential impacts to less than significant or avoid unauthorized take of special-status species, including Crotch's bumble bee, Western bumble bee, seaside bird's-beak, and Monterey gilia.

Response A-8 Please refer to **Response A-5**, above. A comprehensive Biological Resources Report evaluated the potential for special-status species to occur within the vicinity of the project site and potential impacts from the proposed project (please refer to **Appendix D**). The following provides details on the species identified in CDFW's comment.

Crotch's Bumble Bee and Western Bumble Bee: The Biological Resources Report determined that both Crotch's bumble bee and Western bumble bee are unlikely to occur in the vicinity of the proposed project site. Marginal habitat is present within the project site for Crotch's bumble bee and Western bumble bee. However, the proposed project site does not contain an adequate source of nectar for the entire life cycle of these species. Furthermore, the Biological Resources Report determined that the proposed project site is outside of the current range of the Western bumble bee.

As discussed in **Response A-5** above, the conclusions in the Biological Resources Report rely on data from primary literature sources (i.e., the regional CNDDB occurrences, the IPaC Resource List, the CNPS Inventory of Rare and Endangered Vascular Plants of California, the National Wetlands Inventory, and the National Hydrography Dataset) from USFWS and CDFW for species listed, proposed for listing,

or candidates for listing under the federal ESA and CESA, as well as CDFW species of special concern. Conclusions regarding the potential presence of special-status species are also supported by surveys of the proposed project site conducted by qualified biologists (please refer to **Section 4.3.3, Methodology**, of the Final EIR and **Appendix D**). The Biological Resources Report determined that the proposed project would be unlikely to impact species that are unlikely to occur or have a low potential to occur in the vicinity of the proposed project site. Therefore, the Biological Resources Report recommended that no further evaluation of Crotch's bumble bee and Western bumble bee was necessary. No changes to the Draft EIR are necessary in response to this comment.

Seaside Bird's-Beak and Monterey Gilia: Please refer to **Response A-5** for discussion of the methodology used during preparation of the Biological Resources Report for the proposed project. Qualified biologists conducted focused botanical surveys of the proposed project site in April and May of 2025, and did not observe the presence of seaside bird's-beak or Monterey gilia. Additionally, the literature sources evaluated during preparation of the Biological Resources Report did not indicate the historic presence of either seaside bird's-beak or Monterey gilia. No changes to the Draft EIR are necessary in response to this comment.

Comment A-9 The commenter summarizes the conclusions in the Draft EIR and Biological Resources Report stating that Crotch's bumble bee and Western bumble bee are unlikely to occur within or immediately adjacent to the proposed project site. The commenter states that, during the NOP comment period, CDFW recommended that a biologist conduct a habitat assessment as part of surveys for the Draft EIR. The commenter states that the Biological Resources Report does not specify how the biologists conducted the habitat assessment for these species and does not specify whether the habitat assessment included data from site visits within the proposed project site and the surrounding landscape to observe and document potential habitat. As such, the commenter recommends the proposed project implement three (3) mitigation measures requiring that the proposed project conduct a habitat assessment, conduct pre-construction surveys, and receive avoidance and take authorization to avoid or minimize impacts to Crotch's bumble bee and Western bumble bee.

Response A- 9 Additional mitigation measures specific to Crotch's bumble bee and Western bumble bee are not warranted because suitable habitat for these species is not present within the proposed project site or in adjacent areas that could reasonably be affected by proposed project activities.

As described in the Draft EIR and Biological Resources Report (**Appendix D**), DD&A biologists conducted reconnaissance-level and focused botanical surveys of the proposed project site to evaluate existing biological conditions and identify special-status species and suitable habitat. The surveys, together with a review of relevant biological databases and literature, did not identify suitable habitat for Crotch's bumble bee or Western bumble bee within or immediately adjacent to the proposed project site.

The only component of the proposed project that would involve new development is the gated event storage and staging area. This area is highly disturbed and has been subject to historical development and ongoing human use. Additionally, the proposed project site consists of one (1) vegetation type: ruderal/disturbed. This habitat has low biological value, is generally dominated by non-native plants, and consists of relatively low-quality habitat from a wildlife perspective (see page 4.3-2 of the Draft EIR). The site does not contain the vegetation, foraging resources, nesting opportunities, or other habitat characteristics necessary to support Crotch's bumble bee or Western bumble bee. Further, the proposed project site is outside the current range of the Western bumble bee. The remainder of the proposed project site is either already developed and actively used, or would not be subject to new development.

Because the proposed project site and adjacent areas lack suitable habitat for these species, the biological surveys did not identify habitat that could support their occurrence, and the proposed project site is outside of the current range of the Western bumble bee, proposed project activities would not result in impacts to Crotch's bumble bee or Western bumble bee. Accordingly, the additional species-specific mitigation measures requested by the commenter are not necessary to reduce proposed project impacts to these species. The Draft EIR's existing biological resources analysis and mitigation measures adequately address the potential for impacts to special-status species consistent with CEQA Guidelines Section 15380. No changes to the Draft EIR are necessary in response to this comment.

Comment A-10 The commenter summarizes the Draft EIR and Biological Resources Report's findings that Monterey spineflower is present at the proposed project site, and that the 2025 focused biological surveys did not observe Monterey gilia or seaside bird's-beak. The commenter states that the Draft EIR does not provide results documenting the efforts of the plant surveys, and states that the surveys may have been too early in the year to adequately identify seaside bird's-beak. The commenter states that the proposed project site contains suitable habitat for special-status plant species including Monterey spineflower, Monterey gilia, and seaside bird's-beak. The commenter recommends further biological resource surveys during the survey seasons occurring immediately prior to construction using the Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities. The commenter requests that the proposed project implement two (2) mitigation measures to avoid or minimize potential impacts to special-status plant species consisting of conducting pre-construction surveys and receiving avoidance and take authorization for special-status plant species.

Response A-10 Please refer to **Responses A-5** and **A-8** for discussion of the methodology used during preparation of the Biological Resources Report for the proposed project. Qualified biologists conducted focused botanical surveys of the proposed project site in April and May of 2025, and did not observe the presence of seaside bird's-beak or Monterey gilia. The surveys were conducted in accordance with applicable survey protocols, including those referenced by the commenter, and the Biological Resources Report considered relevant literature and available information regarding historic or documented occurrences of these species. Please refer to **Section 4.3.3 Methodology** of the Final EIR. No seaside bird's-beak or Monterey gilia were observed during the

focused surveys of the proposed project site, and the literature sources reviewed for the Biological Resources Report did not identify historic occurrences of either species at the proposed project site.

Accordingly, the additional species-specific mitigation measures requested by the commenter are not necessary to reduce proposed project impacts to these species. The Draft EIR's existing biological resources analysis and mitigation measures adequately address the potential for impacts to special-status species consistent with CEQA Guidelines Section 15380. No changes to the Draft EIR are necessary in response to this comment.

Comment A-11 The commenter recommends that ground-disturbing activities occur during the bird non-nesting season and states that if ground- or vegetation-disturbing activities occur during the nesting season, the Board of Trustees and CSUMB must comply with the Migratory Bird Treaty Act or relevant Fish and Game Code. The commenter recommends that the proposed project require pre-construction surveys for active nests no more than 10 days prior to the start of ground-disturbing or vegetation-disturbing activities to maximize the probability that nests are detected. The commenter further recommends that surveys cover a sufficient area accounting for direct and indirect effects from construction activities (i.e., nest destruction, noise, vibration, and movement of workers or equipment). Additionally, the commenter requests that the proposed project retain a qualified biologist to establish a behavioral baseline for nesting bird species and evaluate all construction monitoring observations against the established behavioral baseline. In the event that nesting bird behaviors change during construction, the commenter requests that all construction activities stop and CDFW be consulted for additional avoidance and minimization measures.

Response A-11 As stated in **Mitigation Measure BIO-3**, CSUMB is required to retain a qualified biologist to conduct preconstruction bird surveys and oversee avoidance and minimization measures during construction if such activities occur during the breeding season (please refer to **Section 4.3.4, Impacts and Mitigation**). Implementation of **Mitigation Measure BIO-3** will avoid or minimize potential impacts on nesting avian species to a less than significant level. The preventive measures contained in this mitigation measure are designed to comply with the Migratory Bird Treaty Act and Fish and Game Code. No changes to the Draft EIR are necessary in response to this comment.

Comment A-12 The commenter recommends that **Mitigation Measure BIO-3** be revised to increase the no-disturbance buffer from 300 feet to a minimum of 500 feet around active non-listed raptor nests and implement a minimum buffer of 250 feet around active non-listed bird nests if continuous monitoring is infeasible. The commenter states that these buffers should remain throughout construction activities that occur during the breeding season. The commenter requests that the qualified biologist consult with CDFW in advance of implementing any variance from these no-disturbance buffers.

Response A-12 The Final EIR evaluates potential impacts to nesting raptors and other protected avian species. **Mitigation Measure BIO-3** is commensurate with the measures provided by

the comment and no additional mitigation is necessary for protected avian species. However, **Mitigation Measure BIO-3** has been revised to include the commenter's recommended pre-construction survey area and construction no-disturbance buffer for nesting raptors (500 feet) and other nesting avian species (250 feet). The Final EIR includes text clarifying the qualified biologist's responsibilities if a variance from the established construction no-disturbance buffers is warranted. For the full text revision, please refer to page 4.3-15 of the Final EIR.

Comment A-13 The commenter states that the CNDDB is populated with voluntary submission records and that species may be present in locations not depicted in the CNDDB, but where suitable habitat exists. The commenter further states that biological surveys are warranted to determine whether or not a special-status species may be present at the proposed project site.

Response A-13 Comment acknowledged. The CNDDB is a widely accepted tool used by qualified biologists and lead agencies to identify special-status species with potential to occur in a project area. In addition to database review, qualified biologists conducted biological field surveys to confirm the presence or absence of special-status species and sensitive habitats to the extent feasible. Field observations were used to ground-truth database finding and to refine the assessment of species potential to occur on the proposed project site. As discussed in the Draft EIR, reconnaissance-level and focused rare-plant surveys were conducted in June 2021, and again in April and May of 2025. These surveys and review of literature and data sources, including the CNDDB, supported the analysis. No additional biological surveys are warranted, and no changes to the Draft EIR are necessary in response to this comment.

Comment A-14 The commenter requests that any special-status species and natural communities detected during biological resources surveys for the proposed project be reported to the CNDDB.

Response A-14 Comment acknowledged.

Comment A-15 The commenter states that the proposed project would have an impact on fish and/or wildlife species and that the proposed project is subject to CDFW filing fees payable upon filing the Notice of Determination.

Response A-15 Comment acknowledged.

Comment A-16 The commenter states their appreciation for the opportunity to comment on the Draft EIR, provides resources for survey and monitoring protocols for sensitive species, and lists contact information for further coordination with CDFW. The commenter also notes that a mitigation monitoring and reporting program (MMRP) table corresponding with the above recommended mitigation measures is attached to the comment letter.

Response A-16 Comment acknowledged. The Draft EIR identifies mitigation measures to reduce potential impacts to special-status species to less than significant. The mitigation measures identified in the Draft EIR will be incorporated into the proposed project's

MMRP, which will be adopted as part of the proposed project approval process to ensure implementation and monitoring of the required measures.

Letter B - Judicial Council of California

Comment B-1 The commenter states that the Judicial Council has reviewed the Draft EIR and has identified potential project impacts related to the planned New Fort Ord Courthouse on parcel APN 031-151-013-000 (SCH No. 2022070304) as well as the surrounding area.

Response B-1 This comment is introductory in nature. CSUMB appreciates the Judicial Council's review of the Draft EIR, and the following responses address the specific topics raised in comments. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment B-2 The commenter states that the proposed project's operational transportation, greenhouse gas, noise, and public services impacts may significantly impact operations at the New Fort Ord Courthouse. The commenter requests that the proposed project coordinate with the Judicial Council to provide "detailed traffic and noise plans" and provide advance notification of events to minimize conflicts with the court calendar.

Response B-2 The Draft EIR addresses operational impacts with respect to Transportation (**Section 4.14**), Greenhouse Gas Emissions (**Section 4.7**), Noise and Vibration (**Section 4.11**), and Public Services (**Section 4.12**). The EIR also discusses the proposed project's cumulative operational impacts and evaluates other concurrent projects, including the proposed New Fort Ord Courthouse that is the focus of the Judicial Council's comment letter (please refer to **Chapter 6.0, Cumulative Impacts and Other CEQA Considerations**). CSUMB is prepared to communicate construction updates and share its calendar of major events when those are made public. No changes to the Draft EIR are necessary in response to this comment, and the following responses address each of the Judicial Council's expressed environmental concerns in detail.

Comment B-3 The commenter summarizes the proposed project's significant and unavoidable greenhouse gas, noise, and transportation impacts during operation, and notes that the New Fort Ord Courthouse site is located approximately 700 feet from the CSUMB athletic field. The commenter also states that the Judicial Council plans for construction of the New Fort Ord Courthouse to occur from 2027 to 2029. The commenter requests that the Draft EIR be revised to account for cumulative impacts of the two (2) projects during overlapping construction, including traffic, vehicle miles travelled, greenhouse gas emissions, criteria air pollutant emissions, and noise.

Response B-3 The Draft EIR adequately evaluated the proposed project's impacts when considered with other cumulative projects. Please refer to **Chapter 6.0, Cumulative Impacts and Other CEQA Considerations**. Moreover, the New Fort Ord Courthouse was identified as a "past, present, and reasonably foreseeable project" considered in the cumulative analysis (please refer to **Table 6-1** and **Figure 6-1** of the Final EIR). As detailed throughout the Draft EIR, the proposed project consists of both limited physical improvements to the CSUMB Stadium and the expanded use of the CSUMB Stadium.

As required by CEQA Guidelines Section 15378, the Draft EIR evaluates the whole of the proposed action, including both the physical improvements and the expanded use, in assessing the proposed project's potential contribution to cumulative impacts. Accordingly, the cumulative analysis considers the effects of the proposed project as a whole, rather than treating the physical improvements and expanded use as separate projects or actions. However, as discussed in **Section 4.14, Transportation**, construction would only be undertaken for the very limited physical improvements proposed at the CSUMB Stadium, which include the 1.25-acre gated event storage and staging area and proposed locker room and shower facilities and permanent restroom facilities. Though construction may occur, wholly or in part, concurrently with construction of the courthouse, as is acknowledged on page 4.14-23 of **Section 4.14 Transportation** of the Draft EIR, construction would be temporary and would result in fewer than 110 vehicle trips per day. Activities causing less than 110 vehicle trips per day is assumed to cause a less than significant impact (please refer to OPR's Technical Advisory on Evaluation Transportation Impacts screening threshold). Given the limited amount of construction anticipated for the proposed project and the project-level finding that construction related VMT would result in a less than significant impact, construction of the proposed project would not result in a substantial contribution to cumulative VMT effects. Accordingly, while the cumulative analysis evaluates the proposed project as a whole, construction-related activities would not independently result in a significant cumulative VMT impact.

Please refer to **Responses B-6** and **B-7** for more detailed responses to the Judicial Council's comments about Greenhouse Gas Emissions and Air Quality, respectively. The Draft EIR's evaluation of air quality, GHG emissions, and noise impacts adequately evaluates the potential effects of the proposed project when considered with other cumulative projects. The Draft EIR, and more specifically **Table 6-1** and **Figure 6.1**, identified Receptor No. 17 as the "Monterey County Courthouse" (please refer to page 6.0-5 of the Draft EIR). To maintain consistent terminology, the Final EIR has been revised to use the term "New Fort Ord Courthouse." For the full text revisions, please refer to Chapter **6.0, Cumulative Impacts and Other CEQA Considerations**, **Figure 6-1** and pages 6.0-5, 6.0-9 and 6.0-23 of the Final EIR.

As discussed in the Draft EIR, the air quality analysis evaluates project-generated emissions using applicable MBARD significance thresholds and concludes that construction and operational emissions would not result in a cumulatively considerable impact (please refer to page 6.0-13 of the Draft EIR). The GHG analysis evaluates the proposed project's contribution to cumulative global GHG emissions, including emissions associated with increased VMT, and concludes that the proposed project would result in a significant and unavoidable cumulative impact (please refer to page 6.0-18 of the Draft EIR). Similarly, the noise analysis evaluates operational noise associated with project-generated traffic and stadium events. The analysis concludes that increased traffic associated with the expanded use of the stadium could result in significant and unavoidable cumulative noise impacts along certain roadways (please refer to pages 6.0-22 and 6.0-23 of the Final EIR).

Comment B-4 The commenter states that New Fort Ord Courthouse operations will occur between 8:00 am and 5:00 pm and that two (2) driveways on Divarty Street are planned for site

access. The commenter requests that the Draft EIR include a comprehensive impact assessment of the potential transportation impacts that may affect New Fort Ord Courthouse operations and identify appropriate mitigation measures to preserve public transit access routes, traffic management plans, and maintenance of rideshare and taxi drop-off areas near courthouse entrances. Additionally, the commenter requests that the Draft EIR discuss how event-day traffic management plans, road closures, and overflow-parking enforcement will protect access for jurors, judicial officers, in-custody transport, attorneys, and the public.

Response B-4 The Draft EIR adequately evaluates the potential transportation impacts associated with the proposed project, including both project-specific and cumulative transportation effects. The analysis considers the proposed project's potential effects on vehicle travel and circulation and evaluates measures to reduce reliance on single-occupancy vehicle travel and promote multimodal transportation options.

The Draft EIR identifies **Mitigation Measures TR-1** through **TR-6** to reduce potential transportation-related effects. These measures are intended to minimize vehicle trips, encourage alternative modes of transportation, and reduce transportation-related impacts associated with project operations. The mitigation framework is designed to be implemented and adapted as the proposed project is developed and as transportation practices, regional transportation programs, and available multimodal opportunities evolve.

The Draft EIR adequately evaluated the proposed project's transportation-related effects consistent with the applicable CEQA thresholds of significance. Specifically, the analysis evaluates whether the project would: (1) conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, bicycle, and pedestrian facilities; (2) conflict or be inconsistent with CEQA Guidelines Section 15064.3 regarding VMT; (3) substantially increase hazards due to a geometric design feature or incompatible uses; or (4) result in inadequate emergency access. Accordingly, the Draft EIR appropriately focuses on the transportation effects relevant to these CEQA thresholds. The commenter's request for the Draft EIR to identify specific traffic management plans, public transit access routes, rideshare and taxi drop-off areas, event-day road closures, and overflow-parking enforcement measures is not necessary to adequately evaluate the proposed project's transportation impacts under CEQA. These operational details are appropriately addressed during implementation of the proposed project and may be refined based on the final project design, courthouse operating conditions, event schedules, applicable transportation programs, and coordination with affected agencies and service providers. The Draft EIR is not required to prescribe specific future traffic management procedures where the physical transportation impacts of the proposed project have been adequately evaluated, and mitigation measures have been identified.

Moreover, implementation of **Mitigation Measures TR-1** through **TR-6** would provide a framework for addressing transportation conditions as the proposed project is implemented, including changes in transportation practices and regional programs intended to reduce single-occupancy vehicle use. These measures would help

maintain access and support multimodal transportation while minimizing project-related transportation effects.

While the commenter's concern that event attendees could use parking relied upon for the courthouse's daily operations is acknowledged, parking availability or a potential parking shortfall, in and of itself, is not a transportation impact under CEQA. As discussed in **Response B-5** below, CSUMB will provide clearly marked signage to direct event attendees to available campus parking areas and adequate event-related parking is provided on CSUMB's campus (please refer to **Table 3-1** on page 3.0-1 of the Final EIR). Additionally, the existing parking areas currently support operation of the CSUMB Stadium, which has a ticketed capacity of approximately 6,000 attendees. Since the proposed project would not increase the capacity of the stadium, the existing parking facilities would be sufficient to support the proposed expanded use of the stadium. Moreover, implementation of **Mitigation Measures TR-1** through **TR-6** would reduce single-occupancy vehicle use and support multimodal transportation, thereby reducing vehicle trips and associated parking demand.

Accordingly, the Draft EIR adequately evaluates the proposed project's transportation impacts, including cumulative effects, and identifies appropriate mitigation measures consistent with CEQA Guidelines Sections 15130 and 15126.4. The specific traffic and access management procedures identified by the commenter are implementation-level considerations and are not necessary for inclusion in the Draft EIR. No changes to the Draft EIR are necessary in response to this comment.

Comment B-5 The commenter requests that the Draft EIR include a discussion of how event traffic will be contained to the existing parking lots (located on APNs 031-101-017-000 and 031-101-045-000) to prevent spillover to the New Fort Ord Courthouse site.

Response B-5 Parking is not a metric by which environmental impacts are measured under CEQA, although it is acknowledged that it represents a concern for neighboring land uses. The stadium will provide clearly marked signage directing event attendees to available parking areas, and signs prohibiting neighborhood parking during events will be posted in surface parking areas to direct attendees to designated event parking. These parking management measures are design features of the proposed project and are not mitigation measures intended to address a transportation impact because parking availability is not a metric used to evaluate the significance of transportation impacts under CEQA. The available parking supply is anticipated to be adequate to accommodate event-related demand since there would be no increase in the seated capacity of the stadium (please refer to **Response B-4**). Therefore, the proposed project is not anticipated to result in parking spillover into surrounding areas. These parking management measures are design features of the proposed project and are not mitigation measures intended to address a transportation impact because parking availability is not a metric used to evaluate the significance of transportation impacts under CEQA. The Draft EIR evaluates the proposed project's transportation-related effects consistent with the applicable CEQA thresholds of significance. Therefore, this comment does not identify a deficiency in the Draft EIR's environmental analysis, and no changes to the Draft EIR are necessary in response to this comment.

Comment B-6 The commenter expresses concern regarding the proposed project's significant and unavoidable vehicle greenhouse gas emissions and potential effects on regional emissions and climate. The commenter requests that the Draft EIR address whether event-day combustion emissions and increased vehicle idling could affect outdoor air quality, mechanical-system intake locations, and public access to the New Fort Ord Courthouse.

Response B-6 The Draft EIR appropriately evaluates the proposed project's potential air quality and GHG emissions impacts, including emissions associated with mobile sources and proposed project operations (please refer to **Section 4.2** and **Section 4.7** of the Draft EIR). The proposed project site is located within the jurisdiction of MBARD, which, consistent with other air districts throughout California, is responsible for maintaining compliance with applicable federal and state ambient air quality standards. MBARD has established significance thresholds under CEQA to assist lead agencies in evaluating potential project-related air quality and GHG impacts. As described in the Draft EIR, the proposed project would not exceed applicable MBARD significance thresholds for criteria air pollutants and would comply with all applicable MBARD rules and regulations. Accordingly, the proposed project would not result in a significant impact on local or regional air quality.

The Draft EIR's air quality analysis accounts for emissions associated with project-related vehicle activity. Although event-day traffic and associated vehicle idling could result in localized increases in vehicle emissions, the proposed project would not generate emissions exceeding applicable MBARD significance thresholds (please refer to **Section 4.2.4.2** of the Draft EIR**).** Therefore, the potential for event-related vehicle emissions to adversely affect local air quality, including air quality in areas used to approach the courthouse, has been adequately evaluated in the Draft EIR. Because the proposed project would not result in a significant air quality impact, additional project-specific mitigation measures addressing vehicle idling, mechanical-system intake locations, or public approaches to the courthouse are not warranted under CEQA.

With respect to GHG emissions and climate change, the Draft EIR provides a comprehensive evaluation of the proposed project's consistency with applicable state climate policies, including the California Air Resources Board's 2022 Scoping Plan. The Draft EIR evaluates the proposed project's consistency with the relevant elements of the Scoping Plan and identifies measures incorporated into the proposed project to reduce GHG emissions. The proposed project would comply with applicable energy-efficiency requirements and would implement additional measures intended to reduce mobile-source emissions, including the Traffic Management Plan and Traffic Demand Management program identified in the Draft EIR.

The Draft EIR acknowledges that the proposed project's GHG emissions would constitute a significant and unavoidable impact even after implementation of feasible mitigation measures. This conclusion does not mean, however, that the proposed project would result in a significant air quality impact from event-day vehicle activity or idling. GHG emissions and criteria air pollutant impacts are evaluated using different regulatory frameworks and significance thresholds. The Draft EIR

appropriately evaluates both impact categories and identifies feasible measures to reduce emissions to the extent practicable.

Accordingly, the Draft EIR adequately evaluates potential air quality and GHG impacts associated with the proposed project, including emissions from project-related vehicle activity. The proposed project would not exceed applicable MBARD significance thresholds and would comply with applicable air quality regulations and energy-efficiency requirements. No changes to the Draft EIR are necessary in response to this comment.

Comment B-7 The commenter states that court proceedings are noise-sensitive activities requiring predictable acoustic conditions, and states that the New Fort Ord Courthouse will be located approximately 700 feet to the closest athletic field and approximately 1,300 feet to the CSUMB Stadium. The commenter expresses concern that event-related public-address systems, crowd noise, and post-event egress traffic would be audible inside the New Fort Ord Courthouse. The commenter requests that the Draft EIR be revised to provide modeled noise contours at the courthouse property line and at the planned building footprint of the courthouse to address projected noise levels from the public-address system and crowd noise. The commenter also requests that the Draft EIR identify which of the proposed events would overlap with courthouse operations occurring Monday through Friday, 8:00 am to 5:00 pm.

Response B-7 Predicted exterior noise-level contours associated with the proposed project are depicted in **Figures 4.11-1** and **4.11-2** (please refer to pages 4.11-16 and 4.11.17 of the Draft EIR). The courthouse site is included in these figures. Predicted exterior noise levels at nearby land uses are depicted in **Table 4.11-10** (please refer to pages 4.11-16 and 4.11.18 of the Draft EIR). The courthouse site was represented as *Receiver 8*, albeit incorrectly labeled in **Figures 4.11-1** and **4.11-2** and in **Table 4.11-10**. **Figures 4.11-1** and **4.11-2** and **Table 4.11-10** have been updated to reflect the courthouse site. Predicted noise levels are representative of operational noise levels associated with events during which amplified sound systems would be used, including crowd noise. As noted in the Draft EIR and to ensure a conservative analysis, stadium events were modeled assuming that events having the highest noise-generating potential, such as an all-day festival, could occur continuously between the hours of 7:00 a.m. and 10:00 p.m. For the full text of the revisions, please refer to pages 4.11-16, 4.11-17, 4.11-18, and **Appendix F** of the Final EIR.

As depicted in **Figures 4.11-1** and **4.11-2** and summarized in **Table 4.11-10**, predicted exterior noise levels at the eastern property line of the courthouse site would range from 58 to 61 dBA CNEL. Based on the preliminary site plan contained in the *New Fort Ord Courthouse EIR* (SCH No. 2022070304), the courthouse building would be located approximately 300 feet west of the eastern property line of the courthouse site.[1] Based on the noise modeling included in the *New Fort Ord Courthouse EIR* and assuming a courthouse building setback distance of approximately 300 feet from the eastern property line, predicted exterior noise levels at the nearest (eastern) façade

[1] Judicial Council of California. April 6, 2023. *New Fort Ord Courthouse Draft EIR*. SCH No. 2022070304. Available online at: https://courts.ca.gov/system/files/file/fort-ord-courthouse-draft-compiled-deir.pdf.

of the courthouse building associated with proposed stadium events would be 57 dBA CNEL or less. While the Draft EIR does state that operation of the storage and staging area would primarily generate noise during the daytime hours (please refer to page 4.11-21 of the Final EIR), noise generated by events may occur during daytime and nighttime events. Regardless, because proposed stadium events would not occur over a 24-hour period, the predicted noise level of 57 dBA CNEL would also be representative of the highest predicted average-hourly noise level associated with proposed stadium events.

Predicted Stadium Noise Levels in Comparison to Applicable Noise Standards

As noted in **Table 4.11-6** of the Draft EIR, the City of Seaside has established an exterior noise-level standard of 70 dBA CNEL for public facilities, with an interior noise-level standard of 50 dBA CNEL. The City of Seaside's noise standards are summarized in **Table 4.11-6** (please refer to page 4.11-11 of the Final EIR).

As discussed above, predicted noise levels associated with proposed stadium events would range from 58 to 61 dBA CNEL at the eastern boundary of the courthouse site. Assuming a maximum noise level of 61 dBA CNEL at the eastern boundary of the courthouse site, predicted exterior noise levels at the nearest (eastern) façade of the courthouse building would be 57 dBA CNEL. Predicted noise levels associated with proposed stadium events would, therefore, not exceed the City of Seaside's applicable exterior noise-level threshold of 70 dBA CNEL for public facilities. As a result, additional analysis of project-related exterior noise impacts is not required.

Based on a predicted exterior noise level of 57 dBA CNEL at the courthouse building, as discussed above, and assuming an exterior-to-interior noise-level reduction of 25 dBA, predicted interior noise levels within the courthouse attributable to the proposed project would be approximately 32 dBA CNEL. Predicted interior noise levels would not exceed the City of Seaside's interior noise-level standard of 50 dBA CNEL for public facilities, nor would the predicted interior noise levels exceed the more stringent interior noise-level standard of 45 dBA CNEL. As noted in the Draft EIR, an interior noise standard of 45 dBA is typically recommended for uses within which interior activities would be considered noise sensitive. As a result, additional analysis of project-related noise impacts is not required.

Predicted Stadium Noise Levels in Comparison to Existing & Projected Ambient Noise Levels

Based on noise-measurement data derived from the *New Fort Ord Courthouse EIR*, ambient noise levels at the New Fort Ord Courthouse site measured 58.4 dBA L_{dn}/CNEL at measurement location LT-01, which was located south of Divarty Street, within the western portion of the courthouse site. The *New Fort Ord Courthouse Draft EIR* also identified existing traffic noise levels of 60.6 dBA at 50 feet from 2nd Avenue, South of Divarty Street, along the eastern boundary of the courthouse site. It is also worth noting that the New Fort Ord Courthouse site is located largely within the

existing 60 dBA CNEL noise contour of SR 1, which is located west of the New Fort Ord Courthouse site.[2]

As discussed earlier, the highest predicted noise levels at the courthouse façade associated with the proposed stadium events would be 57 dBA. Predicted noise levels associated with proposed stadium events would not exceed the existing noise levels identified in the *New Fort Ord Courthouse EIR* of 58.4 and 60.6 dBA. It is important to note that these existing noise levels, as identified in the *New Fort Ord Courthouse EIR,* do not include the contribution of noise from future courthouse-related on-site noise-generating activities, such as on-site parking lot activities, air conditioning/ventilation systems, and landscape maintenance activities. As a result, actual ambient noise levels at this location with operation of the New Fort Ord Courthouse would be higher. Therefore, the proposed project's operational contribution to ambient noise levels at the New Fort Ord Courthouse site would be comparable to existing levels, as those are already higher, prior to courthouse operation, than modeled future noise impacts from operation of the proposed project. This conclusion is consistent with the evaluation presented in the Draft EIR, which found that noise generated by operation of the proposed expanded use would be below thresholds established by the City of Seaside and City of Marina (please refer to **Section 6.2.12** of the Final EIR, and page 4.11-5 of the Final EIR). It should be noted that the CSUMB Stadium and adjacent athletic facilities have been established and used for athletic and university-related events for many years. Campus-hosted events, including commencement ceremonies pre-date the MBFC matches, which began in 2022. These types of events are, therefore, not new or unanticipated uses of the stadium or adjacent athletic facilities. Rather, the Draft EIR evaluated the expansion of these uses. As a result, additional analysis of project-related noise impacts is not required. No changes to the Draft EIR are necessary in response to this comment.

Comment B-8 The commenter states that courts provide essential public services, and requests revisions to the Draft EIR to account for the proposed project's potential impacts on New Fort Ord Courthouse operations.

Response B-8 CEQA Guidelines Appendix G requires consideration of public services where a project could "result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives." Implementation of the proposed project, consisting of construction and operation of stadium improvements and expanded use of the existing CSUMB Stadium, would not increase the demand for courthouse services requiring construction of a new courthouse or expansion of an existing courthouse. Therefore, the proposed project would not require new or expanded courthouse facilities, the construction of which could cause a significant environmental impact. No changes to the Draft EIR are necessary in response to this comment. CSUMB

[2] City of Seaside. October 2023. *Seaside 2040 General Plan Draft Environmental Impact Report. Figure 4.11-1, Existing Noise Contours.* Available online at: https://www.ci.seaside.ca.us/DocumentCenter/View/14842/Seaside-2040-DEIR-with-Appendices_ocrPDF?bidId=.

acknowledges that the Judicial Council seeks to ensure a quiet environment for the courthouse's occupants, within which important courthouse proceedings may be conducted in an uninterrupted manner. CSUMB is committed to working with its neighbors to ensure its operations do not disrupt off-campus neighboring operations. While no significant project-related noise impacts on the courthouse are anticipated, CSUMB will share forthcoming stadium use events to the courthouse tenant and/or Judicial Council for their awareness.

Comment B-9 The commenter requests a construction plan informed by consultation between the Judicial Council and CSUMB during construction planning phases. The commenter also requests the proposed project establish advanced coordination requirements for major construction activities and programmed events.

Response B-9 The Board to Trustees and CSUMB are committed to establishing a neighborly and communicative relationship between the Judicial Council and the functions and activities occurring on CSUMB property, particularly within the CSUMB Stadium and adjacent athletic fields. This includes coordination and updates on construction and major event operations, as necessary and appropriate. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment B-10 The commenter expresses appreciation for the opportunity to review and comment on the Draft EIR and provides contact information for future coordination.

Response B-10 This comment presents the Judicial Council's closing remarks and provides contact information for continued coordination. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

LOCAL

Letter C - City of Seaside

Comment C-1 The commenter states their appreciation for the opportunity to review and comment on the Draft EIR. The commenter also notes the City's ongoing partnership with CSUMB and recognizes the importance of the stadium as a community, athletic, and event asset.

Response C-1 This comment is introductory in nature as it summarizes the City of Seaside's partnership with CSUMB. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment C-2 The commenter states that the following comments are intended to help clarify the environmental analysis, support regional coordination, and ensure that the proposed expanded use of the stadium is compatible with surrounding land uses and infrastructure.

Response C-2 The following responses address the City of Seaside's comments in more detail as they raise specific environmental issue areas discussed in the EIR. This introductory comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the EIR are necessary in response to this comment.

Comment C-3 The commenter states that the Draft EIR acknowledges that existing lighting would remain unchanged, but the duration of evening events and use of lighting would increase. The commenter notes that the analysis presented under **Impact AES-3** references existing sensitive receptors, including the Campus Town Specific Plan; however, **Appendix B** does not include an analysis of the Campus Town Specific Plan development. The commenter requests that **Appendix B** be revised to include an analysis of potential lighting impacts with respect to the Campus Town Specific Plan development.

Response C-3 The proposed project does not include a substantial source of new permanent lighting, but identifies that temporary event lighting may be utilized (please refer to page 3.0-10 of the Final EIR). Additionally, the proposed expanded use of the stadium reflects the more frequent events as acknowledged by the commenter. **Appendix B** has been revised to include an analysis of the Campus Town Specific Plan development (please refer to Section 6 and Section 9 of **Appendix B**). Additionally, Figure 2 in **Appendix B** has been updated to show an overlay of the light spill summary produced by the stadium lighting. As discussed in Section 6 of **Appendix B**, the CSUMB Stadium field sits several feet below grade and the existing lighting poles sit at roughly the same height as the those on the adjacent baseball field to the south and soccer fields to the southwest. These adjacent athletic fields regularly utilize lighting in the evenings; therefore, the additional usage of the existing light poles at CSUMB stadium would be similar to existing conditions. Any additional temporary lighting fixtures

would be located at field level, and the associated light sources (i.e., luminaires) would not be visible from nearby residential developments. The stadium and intervening topography would screen these fixtures from view. As described on page 3.0-10 of **Chapter 3.0, Project Description**, temporary lighting may include event lighting already used in the parking lot for security and safety, as well as lighting needed for non-athletic events, such as LED stage lighting and portable light towers. The proposed project would also include new, predominantly interior lighting associated with the new locker room and shower facilities and permanent restroom facilities. The revisions to **Appendix B** are consistent with the discussion provided in **Section 4.1, Aesthetics**, of the Draft EIR. The discussion in **Section 4.1, Aesthetics**, has been revised in response to this comment to provide additional details on temporary lighting. For the full text revision, please refer to page 4.1-14 of the Final EIR.

Comment C-4 The commenter identifies a spelling error on page 4.1-14, paragraph 1, line 7 in reference to "Design Guidelines."

Response C-4 The Final EIR has been corrected to address the spelling error noted by the commenter. For the full text revision, please refer to page 4.1-14 of the Final EIR.

Comment C-5 The commenter summarizes the findings in the Draft EIR that nighttime noise levels at *Receiver 7* in Table 9 of **Appendix F** are close to the City of Seaside's established noise threshold. The commenter requests that the project description be revised to clarify the maximum number of hours of operation for amplified sound, and requests that the Draft EIR consider measures for volume reduction or corrective actions if operational noise emissions exceed the thresholds identified in the City of Seaside's General Plan.

Response C-5 As noted on page 4.11-10 of the Draft EIR, as a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plan and ordinances for the City of Seaside. However, the Draft EIR summarized General Plan guidelines and goals and municipal code policies relevant to development-related noise from the City of Seaside for informational purposes only, and to provide context for the analysis of potential impacts from noise. The use of amplified sound systems would be regulated by the City of Seaside's Municipal Code, Section 9.12.030, which establishes hourly limitations of 7:00 a.m. and 10:00 p.m. As noted in the Draft EIR and to ensure a conservative analysis, stadium events were modeled assuming that events having the highest noise-generating potential, such as an all-day festival, would occur continuously between the hours of 7:00 a.m. and 10:00 p.m., consistent with the hourly limitations noted in the City of Seaside's Municipal Code (please refer to page 4.11-14 and 4.11-15 of the Final EIR). The Draft EIR determined that predicted noise levels, even from the events generated by larger events (e.g., Winter Festival and weekend concerts) would not exceed the City of Seaside's noise standards. As a result, additional analysis of project-related noise impacts is not required. No changes to the Draft EIR are necessary in response to this comment.

Comment C-6 The commenter notes that **Table 3-1** of the Draft EIR identifies 1,680 available parking spots in six (6) different parking lots. The commenter states that the Draft EIR does

not appear to identify the location of these lots or state whether all of these lots would be made available for event parking. The commenter states that the Draft EIR does not provide evidence or operational assumptions to support the conclusion that existing parking facilities can support up to 6,000 attendees.

Response C-6 Please refer to **Response B-5,** above. Parking is not a metric by which environmental impacts are measured under CEQA, although it is acknowledged that it represents a concern for a neighboring land use. The stadium will provide clearly marked signage directing event attendees to available parking areas, and signs prohibiting neighborhood parking during events will be posted in surface parking areas to direct attendees to designated event parking (please also refer to **Responses B-4** and **B-5**). The available parking supply is anticipated to be adequate to accommodate event-related demand since the proposed project would not increase the seated capacity of the stadium. Therefore, parking spillover into surrounding areas is not anticipated to result from the proposed project. These parking management measures are design features of the proposed project and are not mitigation measures intended to address a transportation impact because parking availability is not a metric used to evaluate the significance of transportation impacts under CEQA. Moreover, implementation of **Mitigation Measures TR-1** through **TR-6** would reduce single-occupancy vehicle use and support multimodal transportation, thereby reducing vehicle trips and associated parking demand. No changes to the Draft EIR are necessary in response to this comment.

Comment C-7 The commenter requests that **Mitigation Measures TR-1** through **TR-6** be revised to encourage event attendees to use transportation alternatives to minimize unintended parking impacts on nearby neighborhoods and developments.

Response C-7 **Mitigation Measures TR-1** through **TR-6** require CSUMB to revise the existing TMP and TDM program currently used to monitor and reduce traffic impacts at CSUMB Stadium to account for the proposed expanded use of the stadium. To that end, **Mitigation Measure TR-1** requires CSUMB to amend the TMP and TDM program and develop a plan to reduce traffic generated by special events by shifting the mode of travel from single-occupancy vehicle travel to alternative transportation (i.e., public transit, carpooling, cycling, and walking). **Mitigation Measure TR-4** provides specific measures that will be in place prior to the expanded use of the stadium. These measures include incentives for attendees to bike, use MST transit services, use campus shuttle services, use carsharing and ridesharing services, and use the e-scooter share program available on campus. Additionally, **Mitigation Measures TR-2**, **TR-5**, and **TR-6** provide CSUMB with the flexibility to monitor and adapt the TMP and TDM programs to achieve the performance standards established in **Mitigation Measure TR-3**. Since the Board of Trustees and CSUMB cannot directly control how attendees and employees travel to and from CSUMB Stadium, these mitigation measures offer incentives to both encourage multimodal transportation options, discourage single-occupancy vehicle use, and provide CSUMB flexibility to adapt their monitoring approach over time.

Furthermore, the proposed project would not increase the seated capacity of CSUMB Stadium (please refer to **Response C-6).** The stadium will provide clearly marked

signage to direct event attendees to available parking areas as it has done for past events, and the available parking supply was determined to be adequate to accommodate event-related demand. Therefore, parking spillover into surrounding areas is not anticipated to result from the proposed project. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

The Board to Trustees and CSUMB are committed to establishing a neighborly and communicative relationship between the City of Seaside and the functions and activities occurring on CSUMB property, particularly within the CSUMB Stadium and adjacent athletic fields. This includes regular coordination and updates on construction and event operations, as necessary and appropriate.

Comment C-8 The commenter recommends additional coordination with agencies with respect to the anticipated increase in water and wastewater demand at the stadium. The commenter requests confirmation that the projected increases have been reviewed in relation to existing infrastructure serving the area and assurance that the proposed project will not cause downstream issues for the City of Seaside's infrastructure, planned development, or related service systems.

Response C-8 The Draft EIR evaluated anticipated water and wastewater use during implementation of the proposed project in **Section 4.15, Utilities and Service Systems**.

Water: The proposed project would extend existing water lines at the stadium to accommodate the proposed locker room and shower facilities and permanent restroom facilities and increase the overall water use of CSUMB Stadium. As noted on page 4.15-13 of the Final EIR, the proposed expanded use of the existing stadium would have a water demand of approximately 8.45 AFY, and this estimated water demand would be further reduced with water conservation measures identified in the 2022 CSUMB Master Plan Guidelines (please refer to **Section 4.15.4, Impacts and Mitigation**, of the Final EIR).

The Marina Coast Water District (MCWD) allocated CSUMB 1,035 AFY of potable water. Considering full buildout of the Master Plan, CSUMB expects to have approximately 404 AFY remaining from the initial 1,035 AFY allocation (please refer to **Section 4.15.1, Environmental Setting**, of the Final EIR). The projected use of 8.45 AFY of potable water during operation of the proposed project would be well within CSUMB's remaining water allocation. Since the projected water demand would not exceed CSUMB's remaining water allocation, CSUMB does not anticipate negative downstream consequences on the City of Seaside's water supply or conflicts with planned development or related service systems.

Wastewater: The proposed project would also extend the existing wastewater lines at the stadium to accommodate the proposed locker room and shower facilities and permanent restroom facilities. **Section 4.15, Utilities and Service Systems**, estimated that the proposed project would generate approximately 8.45 AFY of wastewater, commensurate with the anticipated water demand. 8.45 AFY of wastewater is

equivalent to 2,753,404 gallons per year, which averages out to approximately 7,543 gallon per day. The capacity at the regional wastewater treatment facility is 11 million gallons per day (please refer to pages 4.15-13 and 4.15-14 of the Final EIR). The anticipated increase of 7,543 gallons per day represents approximately 0.07 percent of the remaining capacity at the regional wastewater treatment plant. In addition, the existing wastewater infrastructure serving the CSUMB campus conveys wastewater north through the City of Marina. Therefore, the proposed project's anticipated increase in wastewater generation would not reasonably be expected to affect wastewater infrastructure serving the City of Seaside.

Based on the available water allocation, existing water and wastewater infrastructure, and available regional wastewater treatment capacity, the Final EIR adequately evaluated the proposed project's potential effects on water and wastewater service systems. The proposed project would not require water supplies beyond CSUMB's remaining allocation, would not exceed available wastewater treatment capacity, and would not reasonably be expected to result in adverse effects on the City of Seaside's infrastructure, planned development, or related service systems. No changes to the Draft EIR are necessary in response to this comment.

Comment C-9 The commenter identifies that the Draft EIR shows existing solid waste generation of approximately 0.2478 tons annually and post-project solid waste generation of 3,192,009 tons per year. The commenter requests that CSUMB verify the solid waste calculations, identify whether the applicable factor is pounds per visitor or pounds per 100 visitors, and correct the solid waste calculations, as necessary.

Response C-9 The commenter is correct in noting that the solid waste application factor for Public Venues and Events is expressed in pounds per 100 visitors. The Final EIR has been revised to correct these calculations and the discussion. Based on the revised calculations, the proposed project would generate approximately 1.3 tons per day with a 35 percent diversion rate, as opposed to 110 tons per day as erroneously calculated in the Draft EIR. This revision represents a reduction in the anticipated amount of solid waste generated by the proposed expanded use of the stadium and does not present a new potentially significant impact. For the full text revision, please refer to pages 4.15-18 through 4.15-21 of the Final EIR.

Comment C-10 The commenter states their appreciation for continued coordination with CSUMB and looks forward to further collaboration on the proposed project. The commenter also provides their contact information for future communications.

Response C-10 This comment presents the City of Seaside's closing remarks and provides contact information for continued collaboration. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Letter D - Marina Coast Water District

Comment D-1 The commenter notes that MCWD has reviewed the Draft EIR and provided comments. The commenter also summarizes MCWD's role as a regional water and sanitary sewer service provider and as the Groundwater Sustainability Agency (GSA) for the portion of the Salinas Valley Groundwater Basin near the City of Marina. Additionally, the commenter states that MCWD owns and operates the infrastructure serving both CSUMB and the stadium site.

Response D-1 This comment is introductory in nature. The comment summarizes MCWD's role as a regional water and sanitary sewer provider, and as the regional GSA. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment D-2 The commenter requests that CSUMB provide final 100 percent design plans to the MCWD Engineering Department for review and approval prior to construction.

Response D-2 CSUMB will coordinate with MCWD on project plans and construction activities affecting MCWD service infrastructure. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment D-3 The commenter looks forward to future coordination with CSUMB and provides contact information for MCWD's Engineering Department to facilitate the requested review process.

Response D-3 This comment presents closing remarks and provides contact information for coordination on the requested design plans. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Letter E - Monterey Bay Air Resources District

Comment E-1 The commenter states their appreciation for providing MBARD with the opportunity to provide comments on the Draft EIR.

Response E-1 This comment is introductory in nature as MBARD expresses their appreciation for the opportunity to review and comment on the Draft EIR. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment E-2 The commenter notes that page 4.2-1 of the Draft EIR contains a text error. The text should be revised from “criteria for air pollutants” to “criteria air pollutants.”

Response E-2 The Final EIR has been corrected to address the text error noted by the commenter. For the full text revision, please refer to page 4.2-1 of the Final EIR.

Comment E-3 The commenter notes that the EPA revised the Annual Arithmetic Mean (AAM) for Fine Particulate Matter ($PM_{2.5}$) in 2024 from 12.0 µg/m^3 to 9.0 µg/m^3, and provides a link to the rule change in the Federal Register. The commenter states that **Table 4.2-1** of the Draft EIR should be updated to reflect the 2024 AAM for $PM_{2.5}$.

Response E-3 The Board of Trustees and CSUMB have reviewed the resource provided by the commenter and updated the Final EIR accordingly. For the full text revision, please refer to **Table 4.2-1** on page 4.2-5 of the Final EIR.

Comment E-4 The commenter summarizes the Draft EIR’s findings that construction of the proposed stadium improvements would result in 11.6 lbs./day of PM_{10} emissions, which is below MBARD’s 82 lbs./day threshold. The commenter recommends implementation of Best Management Practices to further reduce PM_{10} emissions during construction in compliance with MBARD Rule 402 (Nuisance) and consistency with MBARD’s CEQA guidelines. Specifically, the commenter recommends implementation of the following best management practices, as applicable:

- Water all active construction areas at least twice daily, with watering frequency based on the type of operation, soil conditions, and wind exposure.
- Prohibit grading activities during periods of high winds (greater than 15 mph).
- Cover all trucks transporting dirt, sand, or other loose materials.
- Cover inactive material storage piles.
- Maintain at least 2 feet of freeboard in haul trucks.

- Apply chemical soil stabilizers to inactive construction areas, including disturbed areas that remain unused for at least four consecutive days.

Response E-4 The Board of Trustees and CSUMB have reviewed the existing text and best management practices identified by the commentor and have revised the Final EIR to include the recommended measures. For the full text revision, please refer to page 4.2-20 of the Final EIR.

Comment E-5 The comment expresses support for the proposed project's incorporation of electric vehicle infrastructure goals and recommends including publicly available dual-port Level 2 & DC fast-charge charging stations throughout the proposed project area to encourage a reduction in criteria air pollutants and GHGs. The commenter also recommends that the Board of Trustees and CSUMB focus charging station efforts in the nearby stadium parking lots and, as applicable, time installation of these charging stations with construction of the proposed stadium improvements.

Response E-5 The comment does not identify a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. The Draft EIR adequately evaluates the proposed project's potential transportation, air quality, and GHG emissions impacts and identifies measures to reduce VMT and associated emissions.

Although electric vehicle charging stations are not a specific physical improvement evaluated as part of the proposed project, the installation of electric vehicle charging infrastructure on the campus is considered under the 2022 CSUMB Master Plan Guidelines. The Vehicular Circulation Plan identifies the need for electric vehicle charging stations at multimodal transportation hubs and identifies a future multimodal hub within the Athletics and Recreation District of the campus. Implementation of a multimodal hub and associated electric vehicle charging infrastructure would occur as part of implementation of the 2022 CSUMB Master Plan Guidelines and is separate from the proposed project. The environmental effects associated with implementation of the 2022 CSUMB Master Plan Guidelines were evaluated separately in the CSUMB Master Plan EIR (SCH No. 2017051042).

Additionally, the TMP and TDM program identified in the Draft EIR (please refer to **Mitigation Measures TR-1** through **TR-6**) are designed to be adaptive and can incorporate new measures, technologies, and incentives to reduce VMT and support multimodal transportation as they become available (please also refer **to Response C-7**). Accordingly, opportunities to incorporate electric vehicle charging infrastructure in the vicinity of the stadium can be considered through these existing planning and transportation programs and through implementation of the 2022 CSUMB Master Plan Guidelines.

The commenter's recommendations regarding the type, location, and timing of electric vehicle charging stations do not identify an environmental impact or deficiency in the Draft EIR requiring additional analysis or mitigation. No changes to the Draft EIR are necessary in response to this comment.

Comment E-6 The commenter summarizes the Draft EIR's analysis of operational GHG emissions and the role of **Mitigation Measures TR-1** through **TR-6** in reducing VMT and associated mobile-source emissions. The commenter recommends revisions to **Mitigation Measures TR-3** and **TR-5** to strengthen VMT reduction requirements, establish performance deadlines and consequences for not meeting performance standards, and provide opportunities for public review of annual monitoring results and subsequent decisions. The commenter also recommends that the Draft EIR substantiate the VMT reductions attributed to **Mitigation Measures TR-1** through **TR-6** using transportation strategies and methodologies identified in the California Air Pollution Contral Officers Association guidance.

Response E-6 Based on observed data from MBFC matches, the average vehicle occupancy for match day spectators is about 2.5 persons per vehicle, meaning that most spectators carpool to and from events. The project includes a reasonable vehicle trip reduction based on existing observations. The feasible mitigation measure is the implementation of the TMP and TDM plan and there are no additional feasible mitigation measures to fully mitigate the VMT impact, which is considered significant and unavoidable. No changes to the Draft EIR are necessary in response to this comment.

Comment E-7 The commenter states that the *Freeman Stadium Renovations Project* includes changes to sidewalks, crosswalks, and bicycle infrastructure immediately surrounding the stadium, but not in a way that connects the stadium to surrounding alternative transportation pathways. The commenter states that the sidewalk and crosswalk improvements discussed in the *Freeman Stadium Renovations Project* do not encourage multi-modal transportation. The commenter recommends including sidewalk, crosswalk, and bicycle infrastructure improvements in the design phase of the proposed project by incorporating the stadium as a destination in the existing network of public trails and pathways to effectively achieve VMT reductions.

Response E-7 The proposed project's improvements evaluated in the Draft EIR are limited to the footprint of the existing CSUMB Stadium and the proposed event storage and staging area. The expanded use of the CSUMB Stadium requires very limited physical improvements (i.e., a new 1.25-acre gated event storage and storage area and interior improvements within the existing fieldhouse). As such, the proposed project is predominantly an operational change, increasing the frequency of events held at the stadium. The proposed project does not include construction of off-site transportation facilities or regional transportation infrastructure. However, CSUMB is in the process of designing and constructing transportation improvements as part of the buildout of the Master Plan, analyzed under the CSUMB Master Plan EIR (SCH No. 2017051042). The TMP and TDM program are designed to be adaptive and will incorporate new transportation infrastructure as these improvements are introduced. Existing transit and pedestrian facilities, together with the adaptive TMP and TDM program and planned implementation of the 2022 CSUMB Master Plan Guidelines, provide opportunities to support future multimodal transportation improvements (please also refer to Response C-7). While pedestrian and bicycle improvements in the TMP will better connect pedestrians and bicycles to the surrounding parking lots and the

proposed multimodal hub, these improvements will not directly reduce VMT. No changes to the Draft EIR are necessary in response to this comment.

Comment E-8 The commenter expresses concern that the distance between the nearest public transit stop and the stadium, as well as the condition of the connecting pedestrian route, may discourage transit use and present pedestrian safety concerns. The commenter recommends establishing shuttle or expanded transit service to the stadium and improving pedestrian connections between transit stops and the stadium.

Response E-8 The comment does not identify a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. The Draft EIR evaluates transportation impacts associated with the proposed expanded use and improvements to CSUMB Stadium and includes **Mitigation Measures TR-1** through **TR-6** to reduce transportation-related impacts by promoting multimodal transportation and reducing VMT.

CSUMB currently operates a campus shuttle service connecting major parking areas with academic, administrative, and co-curricular destinations. The nearest transit stop to the existing stadium is the 4th Avenue/Alumni & Visitor's Center stop, located approximately 0.35 miles from the general admission stadium entrance and approximately 0.16 miles from the northern parking facilities within the Athletics and Recreation District (please refer to **Figure RTC-1** on the following page). The stop is also served by MST Routes 17, 18, and 25. As CSUMB implements the 2022 CSUMB Master Plan Guidelines, additional shuttle services and multimodal facilities are planned within the Athletics and Recreation District.

Title: Pedestrian Route - Transit Center to Stadium Entrance

Date	7/23/2026
Scale	N/A
Project	2024-84

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
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Figure
RTC-1

These improvements are separate from the proposed project and were evaluated as part of the CSUMB Master Plan EIR (SCH No. 2017051042).

The project's TDM program is designed to be adaptive. As required by **Mitigation Measure TR-2**, CSUMB will modify TDM measures as needed throughout the life of the proposed project to achieve the required VMT reduction objective. Accordingly, future transit facilities and services can be incorporated into the TMP and TDM program as they become available. **Mitigation Measure TR-3** also includes operation of the campus shuttle service and recognizes the existing agreement with MST as measures to encourage multimodal transportation and reduce single-occupancy vehicle travel (please also refer to **Response C-7**).

The commenter's concern regarding pedestrian connectivity is also addressed by existing facilities. Sidewalks along 4th Avenue and Divarty Street provide a defined pedestrian connection between the transit stop and the intersection of 4th Avenue, General Jim Moore Boulevard, and Divarty Street. Existing crosswalks at this intersection connect pedestrians to a paved trail within the Athletics and Recreation District, which provides access to the existing parking facilities serving CSUMB Stadium.

The proposed project does not include construction of off-site transportation facilities or regional transportation infrastructure. Accordingly, the specific transit and pedestrian improvements recommended by the commenter are not components of the proposed project. Nevertheless, existing transit and pedestrian facilities, together with the adaptive TMP and TDM program and planned implementation of the 2022 CSUMB Master Plan Guidelines, provide opportunities to support future multimodal transportation improvements. No changes to the Draft EIR are necessary in response to this comment.

Comment E-9 The commenter states that the Board of Trustees and CSUMB must comply with Rule 201 and request a permit from MBARD prior to operating a generator, boiler, or other stationary source of air pollutants defined as any stationary piston-type internal combustion engine greater than or equal to 50 brake horsepower.

Response E-9 The Board of Trustees and CSUMB acknowledge that the proposed project must comply with MBARD Rule 201. The proposed project will notify MBARD and seek permit approval prior to operation of stationary source equipment with a piston-type internal combustion engine greater than or equal to 50 brake horsepower. The Final EIR has been revised to include MBARD Rule 201. For the full text revision, please refer to page 4.2-15 of the Final EIR.

Comment E-10 The commenter states that the Board of Trustees and CSUMB must notify MBARD within two (2) working days prior to operating registered equipment under California Air Resources Board's Portable Equipment Registration Program on-site for more than five (5) days. The commenter also states that portable equipment not registered with California Air Resources Board may be subject to a permit.

Response E-10 The Board of Trustees and CSUMB will notify MBARD no less than two (2) working days prior to operating registered equipment under CARB's Portable Equipment Registration Program on-site for more than five (5) days. The Board of Trustees and CSUMB will ensure that the proposed project operates in compliance with state law, and all applicable requirements will be included in the construction specifications for the proposed project. No changes to the Draft EIR are necessary in response to this comment.

Comment E-11 The commenter states their appreciation for the opportunity to comment on the proposed project and provides contact information for further coordination.

Response E-11 This comment presents MBARD's closing remarks and provides contact information for continued collaboration. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Letter F - Monterey-Salinas Transit

Comment F-1 The commenter summarizes MST's services in providing public transportation throughout Monterey County and the long-standing partnership with CSUMB. The commenter notes that MST looks forward to continued collaboration with CSUMB.

Response F-1 This comment is introductory in nature as it summarizes MST's services and existing relationship with CSUMB. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment F-2 The commenter summarizes MST's existing service routes that serve CSUMB consisting of Lines 17, 18, and 25. The commenter also describes the importance of the 4th Avenue/Alumni & Visitor's Center stop as a key transfer point for MST routes. The commenter details the planned MST SURF! Busway and Bus Rapid Transit project that will provide frequent zero-emission bus services to the County and new mobility hub at 5th Street featuring multimodal amenities. The commenter also states that the CSUMB Wave Shuttle will have the opportunity to use the new 5th Street mobility hub and encourages future collaboration between CSUMB and MST.

Response F-2 This comment summarizes MST's existing Lines 17, 18, and 25, which provide public transit services to CSUMB. These bus service lines intersect with the 4th Avenue/Alumni & Visitor Center transit stop located in walking distance to the stadium. The EIR discuss the existing MST bus service lines 17, 18, and 25 in **Section 4.14.1, Environmental Setting** (please refer to page 4.14-4 through 4.14-6 of the Final EIR). This comment does not raise a specific issue regarding the adequacy or accuracy of the EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

The Board of Trustees and CSUMB would implement **Mitigation Measures TR-1** through **TR-6** designed to implement, monitor and adapt a TMP and TDM program to encourage multimodal transportation. Such multimodal transportation would include the continued partnership with MST, including the existing program that provides universal access on the MST bus network for all active CSUMB ID card holders, three (3) supplemental campus-serving and subsidized bus routes, and funding for a shared transit marketing student intern as specified in **Mitigation Measure TR-4** (please refer to page 4.14-16 of the Final EIR). Consistent with **Mitigation Measures TR-1** and **TR-2**, the TMP and TDM program are designed to adapt over the life of the project, and future MST services, such as the MST SURF! project, will be incorporated into the TMP and TDM program to help reduce VMT over time (please refer to pages 4.14-15 and 4.14-22 of the Final EIR). No changes to the Draft EIR are necessary in response to this comment.

Comment F-3 The commenter supports the Draft EIR's TDM strategies and recommends incorporating MST's regional vanpool program into the TDM program. The commenter also recommends prioritizing bicycle and pedestrian infrastructure

connections to existing and planned transit stops and coordinating early on future multimodal improvements.

Response F-3 The comment supports the TDM strategies identified in **Section 4.14, Transportation**, of the Final EIR and recommends incorporating MST's Commute with Enterprise regional vanpool program into the project's TDM program. In response to this comment, the Board of Trustees and CSUMB have revised **Mitigation Measure TR-4** to include the Commute with Enterprise vanpool program among the TDM measures required to be implemented prior to operation of the proposed project. The revised **Mitigation Measure TR-4** is provided on pages 4.14-17 and 4.14-18 of the Final EIR.

The commenter's recommendations regarding bicycle and pedestrian infrastructure and coordination on future multimodal improvements do not identify a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. The Draft EIR is narrowly focused on the potential environmental impacts associated with the proposed expanded use and improvements to CSUMB Stadium. Bicycle and pedestrian infrastructure improvements associated with broader campus development and implementation of the 2022 CSUMB Master Plan Guidelines are separate from the proposed project and were evaluated as part of the CSUMB Master Plan EIR (SCH No. 2017051042).

CSUMB is committed to long-term coordination with MST and continued planning for bicycle, pedestrian, and transit infrastructure consistent with campuswide transportation policies and implementation of the 2022 CSUMB Master Plan Guidelines. Future multimodal improvements may be incorporated into the proposed project's adaptive transportation programs as appropriate. No changes to the Draft EIR are necessary in response to this comment.

Comment F-4 The commenter restates MST's commitment to their continued partnership with CSUMB to provide services to the campus. The commenter also provides their contact information for continued coordination.

Response F-4 This comment presents closing remarks and provides contact information for continued collaboration. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Letter G - Transportation Agency For Monterey County

Comment G-1 The commenter summarizes TAMC's role as the regional transportation and congestion management agency for Monterey County, and states that TAMC staff has reviewed the Draft EIR. The commenter summarizes their understanding of the proposed project, noting the increase in use of and planned improvements to the CSUMB Stadium, concluding that proposed activities transform the stadium into a higher-intensity regional venue. The commenter also highlights the projected increase in VMT per service population of 69.47 VMT and the estimated 5.96 million annual VMT as the primary drivers of the proposed project's environmental impacts.

Response G-1 This comment is introductory in nature as it summarizes TAMC's regional authority and restates findings from the Draft EIR. Therefore, no changes to the Draft EIR are necessary in response to this comment.

Comment G-2a The commenter requests that **Section 4.14.1.2, Project Site Setting**, be revised to include the 2018 Monterey County Bike Network Map from the 2018 Monterey County Active Transportation Plan. The commenter notes that this plan is currently being updated and recommends the proposed project reference the new Active Transportation Plan following adoption of said plan. The commenter states that inclusion of this plan is necessary to demonstrate the availability of feasible non-auto travel options that could reduce VMT.

Response G-2a The inclusion of the 2018 Monterey County Bike Network Map does not alter the environmental impact conclusions or significant determination in the Draft EIR. The Final EIR provides a discussion of existing pedestrian and bike facilities in the vicinity of the project site. Specifically, **Section 4.14.1.2, Project Site Setting**, identifies that existing bike lanes and separated bike paths and trails exist on Lightfighter Drive, General Jim Moore Boulevard, 2nd Avenue, and Divarty Street. This section also discusses the existing short-term bike racks (LEED compliant) for bicycle parking and E-scooter parking at CSUMB Stadium (please refer to page 4.14-4 of the Draft EIR). Additional descriptions pertaining to the bike and pedestrian facilities in proximity to the proposed project site have been included the Final EIR. As required under **Mitigation Measure TR-1** through **TR-6**, CSUMB would implement, monitor, and adapt a TMP and TDM program designed to encourage multimodal transportation (please refer to **Response C-7**), which may reflect and align with the updated Monterey County Active Transportation Plan that this comment references. Accordingly, the information contained in the referenced map is adequately addressed through the existing discussion of pedestrian and bicycle facilities in the Final EIR, and inclusion of the map would not provide additional information necessary to evaluate the proposed project's transportation impacts. For the full text revision, please refer to page 4.14-4 of the Final EIR.

Comment G-2b The commenter requests that **Section 4.14.1.2, Project Site Setting**, be revised to include the Fort Ord Regional Trail and Greenway (FORTAG) map given the proposed project site's proximity to the FORTAG CSUMB Loop South Segment. The commenter

states that inclusion of this map is necessary to demonstrate the availability of feasible non-auto travel options that could reduce VMT.

Response G-2b As discussed in **Response G-2a** above, CSUMB and the Board of Trustees would implement mitigation measures that monitor and adapt the TMP and TDM program to encourage multimodal transportation. The TMP and TDM program consist of strategies that utilize existing transportation services and infrastructure in the vicinity of the proposed project that encourage bicycling, walking, carpooling, and public transit (please also refer to **Response C-7**). These measures rely on previous multimodal planning efforts evaluated, described, and planned for in the CSUMB Master Plan EIR (SCH No. 2017051042) and 2022 CSUMB Master Plan Guidelines, including the FORTAG CSUMB Loop South Segment. Accordingly, the information contained in the referenced map is adequately addressed through the existing discussion of pedestrian and bicycle facilities in the Final EIR, and inclusion of the map would not provide additional information necessary to evaluate the proposed project's transportation impacts. No changes to the Draft EIR are necessary in response to this comment.

Comment G-2c The commenter requests that the EIR describe how the proposed project site would connect to and interact with the FORTAG system, including discussion of existing and planned access points, pedestrian and bicycle connectivity between the stadium and trail, and potential use of the trail network by event attendees. The commenter states that the recommended analysis of the FORTAG network is necessary to demonstrate the availability of feasible non-auto travel options that could reduce VMT.

Response G-2c Please refer to **Response G-2b** above. The Transportation Study (please refer to **Appendix G** of the Final EIR) determined that the average spectator travel distance to proposed stadium events would be approximately 13 miles. Therefore, the Transportation Study conservatively estimated VMT based on the presumption that people would rely on automotive transportation and concluded that the proposed project would result in a significant and unavoidable VMT impact. Since the alignment of the proposed FORTAG network in the vicinity of CSUMB has yet to be determined, it would be speculative for the Final EIR to describe connections and interactions with the FORTAG network. Once constructed, the planned FORTAG alignment through CSUMB will contribute to the campus' overall planning efforts to encourage multimodal transportation to and from campus. As described in **Section 4.14.4, Impact Analysis**, the proposed mitigation measures require implementation of an adaptive TMP and TDM program to reduce VMT over time in part by incorporating new services and facilities that encourage alternative forms of transportation. No changes to the Draft EIR are necessary in response to this comment.

Comment G-3a The commenter suggests more explicit discussion of regional active transportation facilities that could support the service population and reduce VMT under **Mitigation Measure TR-4** (e.g., bike parking amenities between the project site and FORTAG CSUMB Loop South Segment). The commenter specifically recommends that the EIR identify existing bicycle amenities, describe bicycle storage and micromobility staging areas, and identify clear and safe connections to regional transportation facilities in

the vicinity of the project site. The commenter further recommends that these elements be included as additional mitigation measures.

Response G-3a The Final EIR discusses existing bike facilities in **Section 4.14.1.2, Project Site Setting**, on page 4.14-4. The Board of Trustees and CSUMB have amended the text in the Final EIR to provide more clarity as to the location and type of bike facilities mentioned in the environmental setting. Additionally, bike racks and E-scooter parking are currently available on-site to those who choose to bike or ride their scooters to events at the stadium. For the full text of these revisions, please refer to page 4.14-4 of the Final EIR.

As discussed in **Responses G-2a** and **G-2b** above, the evaluation of VMT is based on existing and reasonably foreseeable transportation factors such as infrastructure, services, and service population. The Board of Trustees and CSUMB found it to be speculative to estimate the percentage of attendees that would rely on multimodal forms of transportation (i.e., biking, walking, public transit, rideshare) given the limited infrastructure and services available, the relative isolation of the proposed project site, and the lack of control over how individuals choose to travel to CSUMB stadium. The provision of bike facilities (e.g., parking, lanes and trails, linkages, service centers) is part of the long-term planning of CSUMB's Master Plan build out. CSUMB as an institution is committed to long-term collaboration with TAMC on matters regarding transportation planning. However, an analysis of off-site bike facilities, linkages, and use of local trail networks is not feasible or relevant to the narrow scope of the proposed project.

Comment G-3b The commenter requests that **Mitigation Measure TR-4** include quantifiable performance standards for non-automotive travel modes (e.g., transit, bicycling, walking, and carpooling). The commenter contends that establishing mode share targets is necessary to demonstrate the effectiveness of the TDM program in reducing VMT.

Response G-3b **Mitigation Measure TR-4** lists alternative transportation services and programs that are required to be made available prior to operation of the proposed project. These services and programs will present alternative transportation options to event attendees, serving to reduce VMT as part of the overall TMP and TDM program strategy. Consistent with the commenter's request, **Mitigation Measure TR-3** sets forth performance standards for the TMP and TDM program to achieve during operation of the proposed project. Additionally, **Mitigation Measures TR-5** and **TR-6** provide flexibility in implementation of the TMP and TDM program, requiring monitoring for effectiveness and encouraging adaptation to achieve the performance standards described in **Mitigation Measure TR-3** (please refer to pages 4.14-15 through 4.14-17 of the Final EIR and the MMRP).

Due to the number of proposed events and the associated travel for staff, attendees, and participants, even with the implementation of the TMP, the VMT impact would be reduced but not fully mitigated. Thus, having quantifiable performance standards for non-auto travel modes would not mitigate the VMT impact. No changes to the Draft EIR are necessary in response to this comment.

Comment G-3c The commenter requests the EIR evaluate whether the proposed project would contribute to the implementation of the FORTAG segments near CSUMB's campus. The commenter recommends that contributions to FORTAG could serve as a component of VMT mitigation if a clear nexus to project-generated travel and measured VMT reduction is demonstrated and found feasible.

Response G-3c Please refer to **Responses G-2c** through **Response G-3b**. CSUMB will continue to consider linkages with the proposed FORTAG CSUMB Loop trail alignments once they are designed and constructed as part of long-term campus planning efforts consistent with the build out of the Master Plan. CSUMB as an institution is committed to long-term collaboration with TAMC on matters regarding transportation planning. However, an analysis of linkages with the proposed FORTAG alignments and other off-site transportation improvements would be speculative at this time and is beyond the scope of the proposed project. No changes to the Draft EIR are necessary in response to this comment.

Comment G-4a The commenter suggests replacing weblinks under **Section 4.14.6, References**, for the CSUMB Master Plan Guidelines and California Office of Planning and Research 2018 Technical Advisory on Evaluating Impacts in CEQA as they are non-functional.

Response G-4a Comment acknowledged. The Board of Trustees and CSUMB have revised the weblinks for the references to the 2022 CSUMB Master Plan Guidelines and the California Office of Planning and Research 2018 Technical Advisory on Evaluating Transportation Impacts CEQA. For the full text of these revisions, please refer to **Section 4.14.6, References**, on page 4.14-24 of the Final EIR.

Comment G-4b The commenter recommends adding the 2018 Monterey County Active Transportation Plan to the references listed in **Section 4.14.6, References**.

Response G-4b Please refer to **Response G-3a**. Neither **Comment G-3a** nor this comment warrant changes to the EIR for inclusion of the 2018 Active Transportation Plan. No changes to the Draft EIR are necessary in response to this comment.

Comment G-5 The commenter states that they look forward to reviewing additional documentation for the proposed project following the Draft EIR. The commenter also provides their contact information for continued coordination.

Response G-5 This comment presents TAMC's closing remarks and provides contact information for continued coordination. This comment does not raise a specific issue regarding the adequacy or accuracy of the Draft EIR's environmental analysis. Therefore, no changes to the Draft EIR are necessary in response to this comment.

TRIBAL

Letter H - Amah Mutsun Tribal Band of Mission San Juan Bautista

Comment H-1 The commenter requests that the proposed project retain either an Ohlone Native American representative or an archeological consultant to provide cultural sensitivity and archaeological awareness training to construction workers. The purpose of the training would be to aid construction workers in identifying and protecting potential cultural and Tribal cultural resources.

Response H-1 The Board of Trustees and CSUMB have incorporated mitigation measures into the proposed project that address cultural and Tribal cultural resources, including sensitive and archeological awareness training for construction workers. Specifically, **Mitigation Measure CTR-1** requires CSUMB to ensure that the selected contractor retains a qualified archaeologist to conduct a cultural resource sensitivity training prior to the start of ground-disturbing activities. All CSUMB staff working in the vicinity of the proposed project site will also receive such training. Please refer to page 4.4-11 of the Final EIR and the MMRP for the full text of **Mitigation Measure CTR-1**. No changes to the Draft EIR are necessary in response to this comment.

Comment H-2 The commenter requests that the contractor and proposed project sponsor halt construction if workers discover a Tribal cultural resource. The commenter requests that work be stopped until such time as a cultural monitor or a qualified archaeologist can assess and determine appropriate measures for preservation of the discovered resource.

Response H-2 The Costanoan Rumsen Carmel Tribe specifically requested that the proposed project retain a Tribal Monitor for oversee ground-disturbing activities during AB 52 consultation (please refer to page 4.4-7 of the Final EIR). As such, the Board of Trustees and CSUMB have incorporated mitigation measures into the proposed project that address the inadvertent discovery of Tribal cultural resources and require retention of a Tribal Monitor. Specifically, **Mitigation Measure CTR-2** specifies the procedures that will occur if construction activities discover a potential Tribal cultural resource. As part of this mitigation measure, work shall stop within 100 feet of a potential discovery until a qualified archaeologist can evaluate the find and make a recommendation for how to proceed. Both the qualified archaeologist and Tribal Monitor shall determine the significance of the resource, prepare a research design and archaeological evaluation plan, prepare a data recovery plan, prepare a full written report including technical analyses for provision to the Northwest Information Center, and provide for the permanent curation of recovered materials. Furthermore, **Mitigation Measure CTR-3** requires that a Tribal Monitor oversee all ground-disturbing construction work and participate in the procedures outlined in **Mitigation Measure CTR-2**. Please refer to pages 4.4-11 and 4.4-12 of the Final EIR and the MMRP for the full text of **Mitigation Measures CTR-2** and **CTR-3**. No changes to the Draft EIR are necessary in response to this comment.

Comment H-3 The commenter requests that the proposed project sponsor coordinate with an archeological consultant and Ohlone Native American representative if construction activities unearth a Tribal cultural resource. The commenter also states that they would like the proposed project to incorporate provisions for the qualified archaeologist to prepare a Resource Preservation Plan in coordination with an Ohlone Native American representative if the qualified archaeologist determines that preservation-in-place of a discovered resource is feasible. The commenter also asks that the proposed project include a provision that that archaeological assessment and treatment of a discovered resource proceed in consultation an Ohlone Native American representative if preservation-in-place proves infeasible.

Response H-3 Please refer to **Response H-2** above. **Mitigation Measure CTR-2** requires that a qualified archaeologist and Tribal Monitor determine the significance of the resource, prepare a research design and archaeological evaluation plan, prepare a data recovery plan, prepare a full written report, including technical analyses for provision to the Northwest Information Center, and provide for the permanent curation of recovered materials. Additionally, **Mitigation Measure CTR-3** requires that a Tribal Monitor oversee all ground-disturbing construction work and participate in the procedures outlined in **Mitigation Measure CTR-2**. Therefore, both a qualified archaeologist and Tribal Monitor will be on-site during ground disturbing activities and will be responsible for overseeing identification, treatment, and preservation of potentially discovered Tribal cultural resources. Please refer to pages 4.4-11 and 4.4-12 of the Final EIR and the MMRP for the full text of **Mitigation Measures CTR-2** and **CTR-3**. No changes to the Draft EIR are necessary in response to this comment.

Comment H-4 The commenter requests that the proposed project incorporate provisions to sufficiently assess and treat a discovered Tribal cultural resource when the qualified archaeologist and Ohlone Native American representative determine that preservation-in-place is infeasible. Specifically, the commenter asks that a qualified archeologist and Ohlone Native American representative recommend appropriate archaeological treatment to preserve the data and values of the discovered resource, including implementation of an archaeological interpretive, monitoring, and testing program.

Response H-4 Please refer to **Responses H-2** and **H-3**. The Board of Trustees and CSUMB have incorporated mitigation measures into the proposed project that require retention of a qualified archaeologist, and a Tribal Monitor. The identified mitigation measures also require the qualified archaeologist and Tribal Monitor to oversee identification, treatment, and preservation of discovered resources. The qualified archaeologist and Tribal Monitor's recommendations would be determined on a case-by-case basis depending on the specific nature of the find. Please refer to pages 4.11 and 4.12 of the Final EIR and the MMRP for the full text of **Mitigation Measures CTR-1** through **CTR-4.** No changes to the Draft EIR are necessary in response to this comment.

Comment H-5 The commenter requests that the contractor and proposed project sponsor stop work if construction activities unearth human remains. The commenter requests that the contractor and project sponsor act in accordance with Health and Safety Code Section

7050.5 and Public Resources Code 5097.98 for treatment of discovered human remains.

Response H-5 The Board of Trustees and CSUMB have incorporated **Mitigation Measure CTR-4** to address the inadvertent discovery of previously unknown human remains in compliance with Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and CEQA Guidelines Section 15064.5(e). Specifically, **Mitigation Measure CTR-4** requires that work immediately stop upon discovery of human remains until a determination can be made in consultation with the County Coroner, the Native American Heritage Commission (NAHC), and the Most Likely Descendent (MLD). Additionally, this measure requires that the Ohlone/Costanoan-Esselen Nation be notified of a discovery regarding human remains even if not assigned as the Most Likely Descendant. Please refer to page 4.4-12 of the Final EIR and the MMRP for the full text of **Mitigation Measure CTR-4**. No changes to the Draft EIR are necessary in response to this comment.

Comment H-6 The commenter requests the proposed project incorporate a provision to prepare a Cultural Resources Public Interpretation Plan if preservation-in-place for a discovered Tribal cultural resource is infeasible. The commenter asks that a Cultural Resources Public Interpretation Plan be prepared and implemented prior to the occupancy stage of the proposed project to guide an interpretation program consisting of Native American art installations showing oral histories, cultural displays, educational panels, or other interpretive elements acknowledging that the proposed project is built on Ohlone land.

Response H-6 Please refer to **Responses H-2, H-3,** and **H-4**. **Mitigation Measures CTR-2 and CTR-3** require that the retained qualified archaeologist and Tribal Monitor evaluate discoveries of potential Tribal cultural resources and provide treatment and preservation recommendations. Recommendations would be determined on a case-by-case basis depending on the specific nature of the find. Please refer to pages 4.4-11 and 4.4-12 of the Final EIR and the MMRP for the full text of **Mitigation Measures CTR-2** and **CTR-3**. No changes to the Draft EIR are necessary in response to this comment.

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Chapter 1.0 INTRODUCTION

1.1 PROJECT OVERVIEW

The proposed project would include two (2) components at the existing California State University Monterey Bay (CSUMB) Stadium: 1) an expansion of existing programming at the CSUMB Stadium by CSUMB and the Monterey Bay Football Club (MBFC); and 2) the construction and operation of two (2) new locker rooms and shower facilities, two (2) new permanent restroom facilities, and a gated event storage and staging area just north of the stadium.

1.2 PURPOSE AND INTENDED USES OF THE EIR

The Board of Trustees of the California State University (Board of Trustees), as Lead Agency under the California Environmental Quality Act (CEQA), prepared this ~~Draft~~ Environmental Impact Report (~~Draft~~ EIR) for the CSUMB Stadium Expanded Use Project (proposed project) to provide the public and responsible and trustee agencies with information on the potential environmental effects of implementation of the proposed project on the environment. Per California Education Code Section 66606, the Board of Trustees is the governing body and owner of the CSUMB campus and has the authority to certify the EIR. CSUMB will act as point of contact for the CEQA process. The proposed project would involve two (2) components: 1) the expansion of existing CSUMB and the MBFC programming ; and 2) the construction and operation of two (2) new locker room facilities, two (2) new permanent restroom facilities, and a gated event storage and staging area just north of the stadium. **Section 1.5, Proposed Project Overview,** below provides an overview of the project's key components and **Chapter 3.0, Project Description,** presents a more detailed description.

This EIR has been prepared in accordance with the CEQA (Public Resource Code [PRC] Sections 21000 – 21189.3) and the State CEQA Guidelines, located in Title 14 of the California Code of Regulations (CCR), commencing with Section 15000. As stated in the State CEQA Guidelines Section 15002, the basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Pursuant to State CEQA Guidelines Section 15121, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be

presented to the agency. While the information in the EIR does not control the ultimate decision on the project, the public agency must consider the information in the EIR and respond to each significant effect identified in the EIR by making findings at the time of project approval, as further explained below in **Section 1.4, Project Approval and Permitting Process**. This EIR as well as any subsequent environmental analysis relying on this EIR are expected to be used to satisfy CEQA requirements of any responsible and trustee agencies.

The focus of the environmental review process is potentially significant environmental effects. As defined in the State CEQA Guidelines Section 15382, a "significant effect on the environment" is:

> ...a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether a physical change is significant.

State CEQA Guidelines Section 15064(e) further indicates that economic and social changes resulting from a project shall not be treated as significant effects on the environment, although they may be used to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project.

1.3 PREVIOUS ENVIRONMENTAL REVIEW

The Board of Trustees previously adopted a Mitigated Negative Declaration (MND) on September 8, 2021, (State Clearinghouse [SCH] # 2021070153) that evaluated proposed renovations to and additional operations at the CSUMB Stadium.[1] Several technical reports accompanied the previous MND to support the environmental analysis, including a Field Lighting Impacts Report, an Air Quality/Greenhouse Gas Emissions Assessment, Biological Resources Report, Cultural/Tribal Cultural Resources Report, and Vehicle Miles Traveled (VMT) Analysis.

The Board of Trustees concluded that the proposed renovations and operations would have a less than significant impact on the environment and required mitigation measures for Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, and Transportation. Due to the expanded use by both CSUMB and MBFC, which newly proposed the use of the stadium by a professional soccer team, impacts to VMT were identified to be potentially significant. Mitigation measures developed to address these impacts included a Transportation Management Plan (TMP) with a Transportation Demand Management Program (TDM). Both tools were intended to manage and monitor CSUMB and MBFC special event spectator attendance to assess achievement of the performance standard objectives. The performance standard objectives were identified as:

- A daily project-generated VMT per service population of 23.91 or less;
- The following annual travel-supporting performance standards:

[1] Freeman Stadium Renovations Project (SCH #2021070153) is available online at: https://ceqanet.lci.ca.gov/2021070153

- Fewer than 61,185 annual vehicle trips
- Fewer than 872,715 annual project-generated VMT

The project's transportation mitigation measures included a Remedial Action and Trigger for Subsequent Environmental Review, which included updating the TDM or identifying other TDM measures and implementing such measures to attempt to reduce transportation impacts. The measures stated that if by the second year of monitoring, the performance standard objectives were not met, CSUMB was required to evaluate whether additional/further environmental review was necessary. Operation of the project began in 2022 and within the first season it was determined that the transportation VMT threshold had been exceeded (Fehr and Peers, 2023). Therefore, future operations and expansion of current uses have triggered supplemental technical evaluation and CEQA evaluation, as the existing TDM would not sufficiently reduce trips under either scenario.

As presented in **Section 1.1, Project Overview** and **Chapter 3.0, Project Description**, the proposed project would expand existing programming at the CSUMB Stadium and construct and operate new ancillary facilities. The expanded programming and use of the facilities would exceed the transportation significance thresholds established in the previous MND and, therefore, the Board of Trustees is preparing an EIR.

This EIR is a standalone document and is not tiered off the previous MND for the CSUMB stadium. The EIR includes the results of new technical reports completed for the proposed project. However, where information from the studies and analysis presented in previous MND remains relevant to the existing conditions of the proposed project site, it is referenced throughout this document.

1.4 EIR PROCESS

1.4.1 Notice of Preparation and Scoping Meeting

In accordance with Section 15082 of the State CEQA Guidelines, the Board of Trustees, as Lead Agency, prepared a Notice of Preparation (NOP) for this EIR (please refer to **Appendix A**). The Board of Trustees circulated the NOP to local, state, and federal agencies and other interested parties from February 27 to March 31, 2025, for a 30-day review period.

The Board of Trustees and CSUMB held a public scoping meeting on Wednesday, March 12, 2025, from 5:30 PM to 7:00 PM both in-person and on Zoom at the Otter Student Union, located at 3118 Inter-Garrison Rd, Seaside, California 93955. The purpose of this meeting was to present the proposed project to the public and agencies and solicit input as to the scope and content of the EIR. The Board of Trustees and CSUMB placed public notices in a local newspaper, mailed notices to interested parties, and posted notices at the project site informing the general public of the scoping meetings. The comments received during this public scoping process are summarized in **Table 1-1** below. The table includes all comments pertinent to CEQA. Comments related to the merit of the proposed project are outside the purview of CEQA and are, therefore, excluded from this table. **Appendix A** contains the NOP, all written comments received in response to the NOP, and a summary of oral comments received at the public Scoping Meeting.

Table 1-1
Notice of Preparation Comments

Name	Date	Affiliation	Summary
Karen Sinclair	03/31/25	US Fish and Wildlife Service (USFWS)	Comment provides project summary, as well as background of special-status wildlife and plant species near the project site. The commenter recommends conducting species-specific surveys within the 1.25-acre undeveloped area and other areas of suitable habitat for federally listed species. The commenter requests conducting plant surveys in the spring and summer of the year prior to the start of construction.
Jacob Hernandez	03/19/25	California Department of Transportation (Caltrans)	Comment provides project summary and states that Caltrans supports local development consistent with State planning goals. Commenter requests the inclusion of several items in VMT traffic analysis (i.e., number of trips generated, cumulative impacts of special events on traffic volumes, assumed vehicle occupancy rate, land use type, and an estimated event schedule) and recommends evaluation of transit service frequency to accommodate expanded stadium use. Additionally, this comment requests that the EIR consider bike facilities as part of the project.
Julia A. Vance	05/09/25	California Department of Fish and Wildlife (CDFW)	Comment explains CDFW's role and provides a project summary. The commenter states that the project site is within the geographic range of several special-status wildlife and plant species (i.e., Crotch's and western bumble bee, Monterey gilia, and seaside bird's-beak). The commenter recommends four (4) mitigation measures to assess, survey, avoid, and mitigate for impacts to Crotch's and Western Bumble bee. They also recommend three (3) mitigation measures for special-status plants, including Monterey gilia and seaside bird's-beak. These recommendations include conducting special-status plant surveys, implementing avoidance measures, and requesting potential take authorization. The commentor also recommends conducting a cumulative impact analysis for biological resources where the EIR determines there to be a potentially significant or significant impact. They also provided a Mitigation Monitoring and Reporting Program (MMRP) table to reflect recommendations.
Brian Kim	03/13/25	City of Marina	Commenter requests to join a mailing list to remain informed about project updates.
Edward Ballaron	03/13/25	Monterey Bay Air Resources District (MBARD)	Comment recommends using MBARD CEQA Air Quality Guidelines as a resource when preparing the EIR. The commenter notes that construction activities should follow proper procedures when encountering buried asbestos-containing utility infrastructure associated with the former Fort Ord. Additionally, the commenter recommends reducing construction emissions through use of cleaner than required equipment following California Air Resources Board standards. Lastly, the commenter notes that engine permits may be required under certain circumstances and identifies standards applicable to portable construction equipment under the Portable Equipment Registration Program.

Name	Date	Affiliation	Summary
Emma Patel	03/25/25	Monterey-Salinas Transit (MST)	Comment describes MST's history of partnership with CSUMB and expresses a desire to continue coordinating with the campus. The commenter summarizes existing routes and services provided through the annual agreement with CSUMB and notes that a new multimodal mobility hub will be constructed west of campus as part of the SURF! Busway and Bus Rapid Transit Project. The commenter requests CSUMB and the Board of Trustees coordinate with MST to establish timed transit connections for events. This comment recommends the Board of Trustees develop a TDM Program to reduce VMT impacts and incorporate existing MST programs to encourage bus use. Lastly, the commenter recommends improving pathways, crosswalks, and bike lanes near the project site.
Lorelai Alli, Irenne Zwierlein	02/28/25	Amah Mutsun Tribal Band of Mission San Juan Bautista	Comment recommends the Board of Trustees reach out to the Native American Heritage Commission and conduct a Sacred Lands Files and California Historical Resources Information Systems records search. The commenter states that they are available to provide Native American Cultural Resource Monitoring, consulting, and/or sensitivity training for the project site. Commenter provides hourly rates as well as documentation of liability insurance. They also include formal Most Likely Descendant recommendations on behalf of the Amah Mutsun Tribal Band, including procedures for the treatment and removal of burial remains, requirements for contractual agreements with the Tribe, and expectations regarding future related lab analyses.
Mathew Lin	02/27/25	Native American Heritage Commission (NAHC)	Comment provides detailed background of CEQA requirements for Tribal consultation and cultural resources assessments, including the 2014 Amendments under AB 52 and SB 18. The commenter also includes NAHC recommendations including conducting an archaeological records search, preparing a professional report of records search and survey if necessary, and incorporating appropriate mitigation requirements into the MMRP.
Patti Dunton	03/19/25	Salinan Tribe	Commenter defers their comments to the local Esselen Tribe.
Joe Fletcher	03/12/25	Individual	Commenter proposes to discuss bringing concerts and festivals to CSUMB and the soccer stadium.
Leslie Asher	03/13/25	Individual	Commenter is a resident of the Dunes neighborhood, which is adjacent to the project site. The commenter questions whether the project would consider expanding 2nd Avenue to accommodate increased vehicle traffic associated with increased use of the stadium. The commenter notes that the road serves as the main entry and exit for the stadium and the expanding Dunes neighborhood.

1.4.2 Draft EIR

The Draft EIR focused on the potentially significant environmental effects of the proposed project. The Board of Trustees ~~has~~ identified significance criteria (indicating what constitutes a significant impact) for each environmental issue analyzed in ~~this~~ the Draft EIR, consistent with previous environmental impact

reports, updated agency guidance, and professional standards. ~~This~~ The document ~~defines~~ defined significance criteria at the beginning of each impact analysis section. The Draft EIR ~~categorizes~~ categorized impacts as follows:

1) Significant, unavoidable.

2) Significant, but can be mitigated to a less than significant level.

3) Less than significant (CEQA does not require mitigation, but the Draft EIR may recommend mitigation).

4) No impact.

The Board of Trustees ~~will~~ published and circulated ~~this~~ the Draft EIR for review and comment by public agencies, members of the public, and other interested parties and organizations for a 45-day review period. The public review period ~~will~~ begin on **May 15, 2026**, and ended on **June 29, 2026**, at 5:00 PM. Written comments on the Draft EIR ~~may be~~ were submitted to CSUMB:

ATTN: Matthew S. McCluney, AICP, Director of Campus Planning & Development
100 Campus Center
Seaside, California, 93955
or
Alternatively, public comments can be emailed to Matthew McCluney at mmccluney@csumb.edu, with the subject line: *CSUMB Stadium Expanded Use Project – Draft EIR*.

1.4.3 Final EIR

The Board of Trustees ~~will~~ addressed written comments received in response to the Draft EIR in Responses to Comments that, together with any necessary Corrections and Additions to the Draft EIR and the Draft EIR itself, ~~will~~ constitute ~~the~~ this Final EIR. ~~The~~ This Final EIR ~~will~~ includes written responses to any significant environmental issues raised in comments received during the public review period in accordance with the State CEQA Guidelines Section 15088. The Board of Trustees will distribute ~~the~~ this Final EIR in accordance with requirements of the State CEQA Guidelines Sections 15089, 15094, and 15095. Prior to approving the project, the Board of Trustees must certify that they have reviewed and considered the information in the EIR, that the EIR has been completed in conformity with the requirements of CEQA, and that the document reflects the Lead Agency's independent judgment pursuant to the State CEQA Guidelines Section 15090. Following EIR certification, the Board of Trustees may proceed with consideration of project approval actions.

1.4.4 Mitigation Monitoring and Reporting

CEQA requires lead agencies to adopt a Mitigation Monitoring and Reporting Program (MMRP) for mitigation measures the agency has adopted or made a condition of project approval to reduce or avoid significant effects on the environment. As part of approval of the proposed project or one (1) of the project alternatives, the Board of Trustees will adopt an MMRP pursuant to CEQA to monitor implementation of adopted mitigation measures and conditions of project approval.

1.5 PROJECT APPROVAL AND PERMITTING

Subsequent to certification of ~~the~~ this EIR, the Board of Trustees will act on the proposed project. It is anticipated that EIR certification and action on the project will be scheduled together. CEQA requires that a Lead Agency neither approve nor carry out a project as proposed unless the significant environmental effects have been reduced to an acceptable level (State CEQA Guidelines Sections 15091 and 15092), or the project objectives outweigh the unavoidable significant impacts (requiring the Lead Agency to make a Statement of Overriding Considerations as discussed in State CEQA Guidelines Section 15093). An acceptable level is defined as eliminating, avoiding, or substantially lessening the significant effects.

Pursuant to PRC Sections 21002, 21002.1, and 21081 and Sections 15091 and 15093 of the State CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one (1) or more significant effects unless one (1) or more findings are made:

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 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 alternatives identified in the Final EIR.

Following the above actions, the Board of Trustees would proceed with implementation of the project. Implementation would require the Board of Trustees to secure permits and approvals from several regional and, potentially, state agencies. **Chapter 3.0, Project Description**, presents these potential permits and approvals.

1.6 SCOPE AND CONTENT OF THE ~~DRAFT~~ FINAL EIR

This ~~Draft~~ Final EIR includes the following:

Preface to the Final EIR. Provides an overview of the Final EIR and its contents, a summary of the public review and decision process; and a summary of the changes made to the Draft EIR text in response to comments and community input received during the public comment period.

Response to Comments. Includes a list of all agencies, organizations, and individuals who submitted comments on the Draft EIR during the 45-day public review period, the comment letters reproduced in their original format, and responses to each environmental issue raised during the review period.

Chapter 1.0, Introduction. This section describes the EIR process and organization of this document.

Chapter 2.0, Executive Summary. This section summarizes the contents of the ~~Draft~~ EIR.

Chapter 3.0, Project Description. This section provides an overview of the proposed project, describes the need for and objectives of the proposed project, and provides detail on the characteristics of the proposed project.

Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures. This chapter presents a description of the physical and regulatory setting of the proposed project by environmental issue area (please refer to issue topics below), the significance criteria, including thresholds of significance, an analysis of the significance of impacts, and recommended mitigation measures to reduce any significant impacts. This document presents the following resource topics by their associated sections:

- **Section 4.1, Aesthetics**
- **Section 4.2, Air Quality**
- **Section 4.3, Biological Resources**
- **Section 4.4, Cultural and Tribal Cultural Resources**
- **Section 4.5, Energy**
- **Section 4.6, Geology, Soils, and Seismicity**
- **Section 4.7, Greenhouse Gas Emissions**
- **Section 4.8, Hazards and Hazardous Materials**
- **Section 4.9, Hydrology and Water Quality**
- **Section 4.10, Land Use and Planning**
- **Section 4.11, Noise**
- **Section 4.12, Population and Housing**
- **Section 4.13, Public Services and Recreation**
- **Section 4.14, Transportation**
- **Section 4.15, Utilities and Service Systems**

Each environmental resource section includes a discussion of the environmental setting, applicable regulations pertaining to the resource area, impact assessment, and mitigation measures where applicable. Each section of **Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures,** contains the following elements:

- Introduction
- Environmental Setting
- Regulatory Framework
- Impacts and Mitigation Measures
- References

Chapter 5.0, Alternatives. This chapter presents an overview of the alternatives to the proposed project, including alternatives screening and selection, and alternatives considered, but eliminated from further review. The section also provides a qualitative environmental impact analysis of the alternatives considered.

Chapter 6.0, Cumulative and Other CEQA Considerations. This chapter presents the potential growth inducement and cumulative impacts that may result from the proposed project.

Chapter 7.0, List of Preparers and Persons Consulted. This chapter identifies the preparers of the EIR and the persons consulted during the preparation of the EIR.

1.7 CALIFORNIA STATE UNIVERSITY AUTONOMY

CSUMB is a university within the California State University (CSU) system, which is a statutorily and legislatively created entity of the State of California. Education Code Section 66606 grants the CSU full power and responsibility in the construction and development of its capital program. Health & Safety Code 18934.5 requires the CSU to follow the provisions of the California Building Code (CBC), CCR Title 24). Section 1.2.1.2 of the CBC empowers the CSU to act as its own building official and enforce the provisions of the code for development on its state-owned lands. The CSU is required to coordinate its building official authority with various other state and federal agencies in certain aspects, including but not limited to the Office of the State Fire Marshall for certain activities not delegated to the CSU's Office of Fire Safety, and the Division of the State Architect for accessibility compliance. Other authorized agencies have specific approval authority that may apply depending upon the characteristics of an individual CSU project. For example, the local county health department has state-delegated approval authority for pools and food service operations.

As an entity of the state, CSUMB is not subject to local government planning and land use plans, policies, or regulations. Although there is no formal mechanism for joint planning or the exchange of ideas, CSUMB may consider, for coordination purposes, local plans and policies for the communities surrounding the campus when appropriate. The project is subject to state planning documents described herein but would not be bound by local or regional planning regulations or documents, such as a City or County General Plan or municipal code.

Nonetheless, the university regularly communicates with the cities of Seaside and Marina and keeps local organizations, associations, and elected representatives informed about ongoing planning efforts and considers community input.

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Chapter 2.0 Executive Summary

2.1 INTRODUCTION

CEQA Guidelines Section 15123(a) states that "an EIR shall contain a brief summary of the proposed action and its consequences." CEQA Guidelines Section 15123(b) further states that the summary shall identify: each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect (CEQA Guidelines Section 15123(b)(1)); areas of controversy known to the Lead Agency (CEQA Guidelines Section 15123(b)(2)); and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects (CEQA Guidelines Section 15123(b)(3)). This summary provides a brief description of the proposed project, alternatives, and the significant impacts identified as part of the environmental analysis. This section also provides an overview of areas of known controversy. This summary is intended as an overview. For a more comprehensive evaluation of the proposed project and its corresponding environmental effects, please refer to the topical CEQA sections included in this EIR. The information contained in the following chapters of this EIR serves as the basis for this summary.

2.2 PROPOSED PROJECT OVERVIEW

The proposed project would involve two (2) components at the existing CSUMB Stadium: 1) an expansion of existing programming at the CSUMB Stadium by CSUMB and MBFC; and 2) the construction and operation of two (2) new locker room facilities, two (2) new restroom buildings, and a gated event storage and staging area just north of the stadium.

The underlying purpose of the proposed project is the expansion of current stadium programming and facilities to accommodate college athletic championship events, additional CSUMB activities, and additional professional teams and games. The proposed facility improvements are necessary to ensure alignment with the requirements of the United Soccer League (USL) and the National Collegiate Athletic Association (NCAA). The project would support the educational mission of CSUMB by strengthening its role as a hub for athletics, academic growth, and community engagement.

The expanded programming of CSUMB Stadium would allow CSUMB to host the men's and women's California Collegiate Athletic Association (CCAA) Championship tournaments and the NCAA Division II National Championships. CSUMB would also host the following non-athletic events: Latinx Affinity Ceremonies for graduating students; Monte's 5k and post-race event; new student fall convocation; Otter Cross Cultural Center (OC3) affinity celebration; fall welcome concert; a spring concert; the Relay for Life; and up to 25 other university-related events.

Additionally, the proposed project would allow the CSUMB Stadium to host three (3) new teams under the oversight of the MBFC (the existing professional team in a Facilities Shared-Use Agreement with CSUMB): one (1) USL League Two (Men's Amateur), one (1) USL Super League (Women's Pro), and one (1) USL W League (Women's Amateur). The proposed project would accommodate games associated with these teams, totaling 18 events over 18 days for the USL Super League and 12 events over 10 days each for the USL League Two and USL W League. The CSUMB Stadium would also host other MBFC events, including a 28-day Winter Festival and up to 20 concerts annually, with a maximum attendance of 3,000 and 6,000 attendees, respectively.

2.3 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA Guidelines Section 15126.6 requires the consideration of a range of reasonable alternatives to the proposed project that could feasibly attain most of the basic project objectives and would avoid or substantially lessen the significant effects of the project. The discussion of alternatives should focus on alternatives capable of eliminating the significant adverse impacts of the project or reducing them to a less than significant level, even if the alternative would not fully attain most of the basic project objectives or would be more costly (CEQA Guidelines Section 15126.6(b)). An EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making. The range of potential alternatives is governed by the "rule of reason," which requires the evaluation of alternatives "necessary to permit a reasoned choice" (CEQA Guidelines Section 15126.6(f)). The alternatives evaluated in this EIR are summarized below. These alternatives are more fully described in **Chapter 5, Alternatives**.

- *No Project Alternative* – Under the No Project Alternative, the CSUMB Stadium would continue to operate under existing conditions, reflecting the improvements and programming implemented as part of the 2022 renovations.

- *Reduced Non-Athletic Event Frequency and Attendance Alternative* – Under the Reduced Non-Athletic Event Frequency and Attendance Alternative, CSUMB and MBFC would reduce both the number of event days and the number of tickets available for the proposed winter festival and weekend concerts to decrease transportation impacts.

2.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires an environmentally superior alternative to the proposed project be specified if one is identified. In general, the environmentally superior alternative is supposed to minimize adverse effects of the proposed project while achieving the basic project objectives. The No Project Alternative would be environmentally superior to the alternatives evaluated in this EIR since this alternative would avoid most adverse impacts associated with the proposed project, particularly those related to biological resources and cultural and Tribal cultural resources. This alternative would not, however, achieve the fundamental project objectives. However, CEQA Guidelines Section 15126.6(e)(2) states: "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Separate from the No Project Alternative would be the Reduced Non-Athletic Event Frequency and Attendance Alternative. This alternative reduces the scale or frequency of proposed events and would reduce project-generated VMT relative to the proposed project. While the Reduced Non-Athletic Event Frequency and Attendance Alternative would still result in significant and unavoidable VMT, GHG emission, and noise impacts, this alternative meets most of the project objectives. The discussion regarding the environmentally superior alternative is more fully described in **Chapter 5. Alternatives**.

2.5 SUMMARY OF IMPACTS AND MITIGATION MEASURES

For each impact considered to be significant or potentially significant, the table summarizes the recommended mitigations. **Table 2-1** is intended to provide a summary of the proposed project impacts and mitigation measures that are described in detail in **Chapter 4, Environmental Setting, Impacts, and Mitigation Measures**; please refer to that section for complete discussion.

Table 2-1
Summary of Potentially Significant Environmental Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
Aesthetics			
Impact AES-1: The proposed project would not have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	Less than Significant	Mitigation not Required.	Less than Significant
Impact AES-2: The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.	Less than Significant	Mitigation not Required.	Less than Significant
Impact AES-3: The proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	Less than Significant	Mitigation not Required.	Less than Significant
Cumulative Aesthetics Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on aesthetic resources.	Less than Significant	Mitigation not Required.	Less than Significant
Air Quality			
Impact AQ-1: The proposed project would not conflict with or obstruct implementation of applicable air quality plans**.**	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact AQ-2: The proposed project would not 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.	Less than Significant	Mitigation not Required.	Less than Significant
Impact AQ-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Less than Significant	Mitigation not Required.	Less than Significant
Impact AQ-4: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Less than Significant	Mitigation not Required.	Less than Significant
Cumulative Air Quality Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on air quality.	Less than Significant	Mitigation not Required.	Less than Significant
Biological Resources			
Impact BIO-1: The proposed project would have the potential for 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	Potentially Significant	**BIO-1 Restoration Plan:** The impacted area of Monterey spineflower shall be quantified during final design and Monterey spineflower will be replaced at a 1:1 ratio for the number of individual plants impacted, and a 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 impacted area, including the presence of Monterey spineflower, its locations, and densities;	Less Than Significant with Mitigation

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service**.**		▪ A detailed description of on-site and/or off-site restoration areas, salvage of seed and/or soil bank and/or plant salvage, seeding, and planting specifications, which may include but is not limited to, an increased planting ratio to ensure 1:1 ratio; ▪ Procedures to control and/or eliminate non-native invasive species within the restoration area; ▪ A monitoring program that describes annual monitoring efforts which incorporate success criteria and contingency plans if success criteria are not met. **BIO-2 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 species: ▪ A qualified biologist will conduct an Employee Education Program for the construction crew prior to the initiation of 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 the USFWS and CDFW; and 6) the proper procedures if a special-status species is encountered within the project site. ▪ Protective fencing shall be placed prior to and during construction to keep construction equipment and personnel from impacting vegetation outside of work limits. A biological monitor shall 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. ▪ Trees and vegetation not planned for removal or trimming shall be protected prior to and during construction to the maximum extent 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 shall be used, to avoid the introduction of non-native, invasive species. A biological monitor shall	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		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. ▪ 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 adjacent to the project site (pre-, during, and postconstruction). ▪ 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. ▪ To protect against spills and fluids leaking from equipment, the project proponent shall require that the construction contractor maintains an on-site spill plan and on-site spill containment measures that can be easily accessed.	
		BIO-3: Nesting Birds: Activities that may directly affect (e.g., tree removal) or indirectly affect (e.g., noise/ground disturbance) nesting raptors or other protected avian species shall be timed to avoid the breeding season. Specifically, any grading and excavation with heavy machinery and vegetation removal within 300 feet of suitable nesting habitat (i.e., trees within and adjacent to the project site) shall be scheduled during the non-breeding season (September 16 through January 31). If avoidance of the non-breeding season is not possible, a qualified biologist shall conduct a preconstruction survey for nesting raptors or other protected avian species within ~~300~~ 500 feet of the proposed construction activities. The survey shall be conducted no more than 14 days prior to the initiation of construction and submitted to CSUMB's Facilities Management Department. If raptor or other protected bird nests are identified within or immediately adjacent to the project site during the pre-construction surveys, the qualified biologist shall notify the project proponent and/or contractor and an appropriate no-disturbance buffer shall be imposed within which no construction activities or disturbance shall take place (generally ~~300~~ 500 feet in all directions for nesting raptors~~; other avian species may have species-specific requirements~~ and 250 feet in all directions for other nesting avian species) 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. The qualified biologist shall advise and support on any	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		variance to the established no-disturbance buffers and notify CDFW in advance of implementing any variance.	
Impact BIO-2: The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	No Impact	Mitigation not Required.	No Impact
Impact BIO-3: The proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	No Impact	Mitigation not Required.	No Impact
Impact BIO-4: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Less than Significant	Mitigation not Required.	Less than Significant
Impact BIO-5: The proposed project would not have the potential to conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact BIO-6: The proposed project would not 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	Mitigation not Required.	Less than Significant
Cumulative Biological Resources Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on biological resources.	Less than Significant	No additional mitigation required beyond those mitigation measures identified for **Impact BIO-1** (**Mitigation Measures BIO-1** through **BIO-3**).	Less than Significant
Cultural Resources			
Impact CTR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	No Impact	Mitigation not Required.	No Impact
Impact CTR-2: The proposed project would have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Potentially Significant	**CTR-1: Sensitivity Training:** CSUMB shall include a standard clause in every construction contract for the Project that requires cultural resource sensitivity training by a qualified archaeologist for workers prior to conducting ground-disturbance in the vicinity of a documented cultural resource-sensitive area, should one be identified in the future. Additionally, campus staff involved in ground-disturbing work in the vicinity of a documented resource sensitive area will also receive such training.	Less Than Significant with Mitigation
		CTR-2: Inadvertent Discovery Evaluation and Recordation: CSUMB shall include a standard inadvertent discovery clause in every construction contract for the Project, which requires that in the event that an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil-disturbing work within 100 feet of the find shall cease until a qualified archaeologist can evaluate the find and make a recommendation for how to proceed. For an archaeological resource that is encountered during construction, the campus shall: ▪ Retain a qualified archaeologist to determine, in coordination with the Tribal Monitor (please refer to **Mitigation Measure CTR-3**), whether the resource has potential to	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		qualify as a historical resource or a unique archaeological resource as outlined in the California Environmental Quality Act (CEQA) (Public Resources Code § 21083.2). ▪ If the resource has potential to be a historical resource or a unique archaeological resource, the qualified archaeologist, in consultation with the Tribal monitor and CSUMB, shall prepare a research design and archaeological evaluation plan to assess whether the resource should be considered significant under CEQA criteria. If the resource is determined significant, CSUMB shall provide for preservation in place, if feasible. If preservation in place is not feasible, in consultation with the Tribal monitor and CSUMB, a qualified archaeologist will prepare a data recovery plan for retrieving data that is specific to the site's geographic extent and the significance of any resources encountered. The data recovery plan shall be developed prior to site development and implemented prior to or during site development (with a 100-foot buffer around the resource). The archaeologist shall also perform appropriate technical analyses, prepare a full written report and file it with the Northwest Information Center, and provide for the permanent curation of recovered materials.	
Impact CTR-3: The proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries**.**	Potentially Significant	**CTR-3: Qualified Cultural Tribal Monitor:** To minimize potential impacts to previously unknown or subsurface cultural, Tribal, and archaeological resources, all ground-disturbing work shall be monitored by a qualified Tribal monitor. In the event a resource is identified, the proposed project would implement **Mitigation Measure CTR-2** above.	Less Than Significant with Mitigation
		CTR-4: Proper Handling of Human Remains: Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, PRC Section 5097398, and CEQA Guidelines Section 15064.5(e). According to the provisions of CEQA, should human remains be discovered at any time, work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Monterey County Coroner shall be notified immediately. The coroner shall then determine whether the remains are Native America. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the site secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner of the descendant may request mediation	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		by the NAHC. The Ohlone/Costanoan-Esselen Nation (OCEN) shall be notified of the discovery even if not assigned as Most Likely Descendant.	
Impact CTR-4: The proposed project would not cause a substantial adverse change in the significance of a Tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k). that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Potentially Significant	Please refer to **Mitigation Measure CTR-1** through **Mitigation Measure CTR-4**, above.	Less Than Significant with Mitigation
Cumulative Cultural and Tribal Cultural Resources Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on cultural and Tribal cultural resources.	Less than Significant	No additional mitigation required beyond those mitigation measures identified for **Impact CTR-2**, **Impact CTR-3**, and **Impact CTR-4** (**Mitigation Measures CTR-1** through **CTR-4**).	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
Energy			
Impact E-1: The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less than Significant	Mitigation not Required.	Less than Significant
Impact E-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency	Less than Significant	Mitigation not Required.	Less than Significant
Cumulative Energy Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to the use of energy.	Less than Significant	Mitigation not Required.	Less than Significant
Geology, Soils, and Seismicity			
Impact GEO-1: The proposed project would not 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,	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
including liquefaction; iv. landslides.			
Impact GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	Less than Significant	Mitigation not Required.	Less than Significant
Impact GEO-3: The proposed project would not 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	Mitigation not Required.	Less than Significant
Impact GEO-4: The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property	Less than Significant	Mitigation not Required.	Less than Significant
Impact GEO-5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No Impact	Mitigation not Required.	No Impact
Impact GEO-6: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
Cumulative Geology, Soils, and Seismicity Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to geology, soils, and seismicity.	Less than Significant	Mitigation not Required.	Less than Significant
Greenhouse Gas Emissions			
Impact GHG-1: The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Significant and Unavoidable	Please refer to **Mitigation Measures TR-1** through **TR-6,** below**.**	Significant and Unavoidable
Impact GHG-2: The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Significant and Unavoidable	Please refer to **Mitigation Measures TR-1** through **TR-6,** below**.**	Significant and Unavoidable
Cumulative Greenhouse Gas Emissions Impacts: The proposed project would result in a considerable contribution to a significant cumulative GHG impact and cumulative impacts would be significant and unavoidable.	Significant and Unavoidable	No additional mitigation is available beyond the mitigation measures identified for **Impact TR-1** and **Impact TR-2** (**Mitigation Measures TR-1** through **TR-6**)**.**	Significant and Unavoidable
Hazards and Hazardous Materials			
Impact HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; create a significant	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school**.**			
Impact HAZ-2: The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	Less than Significant	Mitigation not Required.	Less than Significant
Impact HAZ-3: The proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area as the project site is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport	No Impact	Mitigation not Required.	No Impact
Impact HAZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
plan or emergency evacuation plan.			
Impact HAZ-5: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Less than Significant	Mitigation not Required.	Less than Significant
Cumulative Hazards and Hazardous Materials Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to hazards and hazardous materials.	Less than Significant	Mitigation not Required.	Less than Significant
Hydrology and Water Quality			
Impact HYD-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; or substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in a substantial erosion or siltation on- or off-site. (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. (iii) create or contribute runoff water which	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (iv) impede or redirect flood flows.			
Impact HYD-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Less than Significant	Mitigation not Required.	Less than Significant
Impact HYD-3: The proposed project is not located in a flood hazard, tsunami, or seiche zone, and would not be at risk of the release of pollutants due to project inundation.	Less than Significant	Mitigation not Required.	Less than Significant
Impact HYD-4 The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than Significant	Mitigation not Required.	Less than Significant
Cumulative Hydrology and Water Quality Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to hydrology and water quality.	Less than Significant	Mitigation not Required.	Less than Significant
Land Use and Planning			
Impact LU-1:	No Impact	Mitigation not Required.	No Impact

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
The proposed project would not physically divide an established community.			
Impact LU-2: The proposed project would not cause a significant environmental impact due to a conflict with Land Use Plan, Policy, or Regulation adopted for the purpose of avoiding or mitigating an environmental effect.	No Impact	Mitigation not Required.	No Impact
Cumulative Land Use and Planning Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to land use and planning.	Less than Significant	Mitigation not Required.	Less than Significant
Noise and Vibration			
Impact NV-1: The proposed project would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Significant and Unavoidable	Please refer to **Mitigation Measures TR-1** through **TR-6,** below**.**	Significant and Unavoidable
Impact NV-2: The proposed project would not generate excessive groundborne vibration or groundborne noise levels.	Less than Significant	Mitigation not Required.	Less than Significant
Impact NV-3: The proposed project would not expose people residing or working in the project area to excessive	No Impact	Mitigation not Required.	No Impact

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
noise levels as the project site is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport.			
Cumulative Noise and Vibration Impacts: The proposed project would result in a considerable contribution to a significant cumulative noise impact (**Impact NV-1**, operational noise impacts), and cumulative impacts (**Impact NV-1**, operational noise impacts) would be significant and unavoidable.	Significant and Unavoidable	No additional mitigation is available for **Impact NV-1** beyond the mitigation measures identified for **Impact TR-1** and **Impact TR-2** (**Mitigation Measures TR-1** through **TR-6**).	Significant and Unavoidable
Cumulative Noise and Vibration Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to excessive groundborne vibration or groundborne noise levels.	Less than Significant	Mitigation not Required.	Less than Significant
Population and Housing			
Impact PH-1: The proposed project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)**.**	Less than Significant	Mitigation not Required.	Less than Significant
Impact PH-2: The proposed project would not displace substantial numbers of	No Impact	Mitigation not Required.	No Impact

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
existing people or housing, necessitating the construction of replacement housing elsewhere.			
Cumulative Population and Housing Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to population and housing.	Less than Significant	Mitigation not Required.	Less than Significant
Public Services and Recreation			
Impact PSR-1: The proposed project would not 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 of the public services: fire protection, police protection, schools, or other public facilities**.**	Less than Significant	Mitigation not Required.	Less than Significant
Impact PSR-2: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Include recreational facilities or require the construction or expansion of recreational facilities which might	Less than Significant	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
have an adverse physical effect on the environment.			
Cumulative Public Services and Recreation Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to public services and recreation.	Less than Significant	Mitigation not Required.	Less than Significant
Transportation			
Impact TR-1: The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	Potentially Significant	**TR-1: Transportation Management Plan:** CSUMB shall continue to develop and implement its TMP with a TDM Program component, prior to the commencement of and during events proposed as part of the project's expanded use. The TMP shall provide a management and operating plan for minimizing undesirable transportation-related effects at CSUMB Stadium and adjacent developments during events, while providing safe and convenient access for employees and spectators to the project. The TDM program shall provide a plan to reduce the amount of vehicle traffic generated by the MBFC and CSUMB special event activities by shifting employees, team personnel, match spectators, and CSUMB visitors from driving alone to using transit, carpooling, cycling, and walking modes.	Less than Significant with Mitigation
		TR-2: Transportation Management Plan Monitoring: CSUMB shall continue to monitor all CSUMB and MBFC athletic and non-athletic events to evaluate the effectiveness of the TDM program and the supporting performance measures of mode share, vehicle occupancy, and average vehicle distance traveled. These event-specific performance measures are necessary to determine the effectiveness of the TDM program and help identify additional VMT reduction measures. The TDM program shall continue to be implemented for the lifetime of the project; and CSUMB shall modify measures as needed during the life of the project to ensure the TDM achieves the overall vehicle miles traveled reduction objective.	
		TR-3: Transportation Management Plan Objectives: The TMP with the TDM program shall be updated to reflect the project's expanded use of the CSUMB Stadium. Specifically, the objectives should reflect the addition of CSUMB and MBFC athletic and non-athletic events as described in the EIR while reflecting: ▪ The reduction of overall automobile trips to and from the stadium to achieve fewer than 61,185 annual vehicle trips; ▪ Achieving a 75% vehicle mode share for MBFC event attendees;	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		▪ Achieving a 58% vehicle mode share for CSUMB Students attending the CSUMB events; ▪ Achieving a 77% vehicle mode share for community members attended CSUMB events; and, ▪ Achieving average vehicle occupancy of 3.91 persons per vehicle (or greater). The event-specific supporting performance standard shall continue to be monitoring and shall reflect less than 23.91 project generated VMT per service population, and achieve less than 872,715 annual project generated VMT.	
		TR-4: Transportation Demand Management Program: To the extent possible and effective, the TDM program shall continue to rely on the existing CSUMB TDM program to reduce CSUMB student, faculty, and staff vehicle travel. Prior to the operation of the expanded use of the CSUMB Stadium, the following measures shall be in place: ▪ Otter Cycle Center – on-campus bicycle repair shop that also offers bicycle rentals and other services to facilitate bicycle ridership. ▪ Bicycle Storage and Amenities – several hundred bicycle racks have been installed on campus outside of residence halls and popular academic, recreation and administrative buildings. Additionally, a secure bicycle bunker storage room has been installed, as well as three 'fix-it' stations that provide 24/7 access to bicycle repair tools and air pumps. Bicycle registration is also available through the University Police Department to simplify that process. Three skateboard storage racks also have been installed in the popular destinations on campus. ▪ Paid Parking – to discourage non-CSUMB related trips and parking on campus, as well as manage the vehicles allowed on campus, a fee structure is in place that is based upon user type. The fees have increased several times over the last two decades to more accurately match the true cost of providing managed parking. ▪ MST – the campus has entered into an annual agreement with MST that provides universal access on the MST bus network for all active CSUMB ID card holders, three supplemental campus-serving and subsidized bus routes, and funding for a shared transit marketing student intern.	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		▪ Main Campus Shuttle – the campus has secured funding and has begun the procurement process to initiate a shuttle program provider to run frequent circulating shuttle service around the Main Campus, connecting all major parking areas to academic, administrative, and co-curricular campus destinations. ▪ Emergency Ride Home Program – campus community members can sign up for a program run by the Transportation Agency for Monterey County (TAMC) that reimburses taxi or ridesharing trips home in emergency situations for commuters who use alternative means of transportation. ▪ Carsharing and Ridesharing – CSUMB hosts four cars for carsharing. These are cars stationed on the campus available to be used by carshare members in the campus. CSUMB students, faculty and staff can use Go831 a regional ride share program. ▪ Transportation Services Website – information for most of the TDM strategies are included on a campus website to facilitate information dissemination. ▪ Delivery Vehicle Limitations – to discourage delivery vehicle trips, frequent delivery services to campus, such as office supplies, have been instructed to reduce their deliveries to campus to no more than three days per week. ▪ Bicyclist/Pedestrian Malls – to encourage pedestrian and bicycle use, a section of Divarty Street and a section of Sixth Avenue are closed to regular vehicular traffic and encourage pedestrians and bicyclists to use the entire roadway. ▪ Traffic Calming – to discourage auto use (and improve safety), speed humps and flashing beacon crosswalk devices have been installed on several campus roadways to encourage lower vehicle speeds, particularly near high traffic pedestrian crosswalks. ▪ E-Scooter Share – The campus has entered into a multi-year agreement with an electric scooter share program provider. Students, faculty, staff, and campus visitors can use the app-based program to ride a scooter across campus instead of driving or walking.	
		TR-5: Transportation Demand Management Program Monitoring: During the first year of operations, each CSUMB and MBFC athletic and non-athletic event shall be monitored by CSUMB to identify how the activities meet the anticipated primary performance standard	

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		(project-generated VMT per service population), annual travel supporting performance standards (annual project generated VMT, and annual vehicle trips) and event specific supporting performance standards (mode share, average vehicle occupancy). An annual monitoring memorandum shall be submitted to CSUMB's Director of Campus Planning & Development. If the CSUMB and MBFC athletic and non-athletic events are found not to meet the anticipated performance standards, then additional travel reducing measures from the TMP and TDM program will be implemented to aim to achieve the performance standard. CSUMB may propose new strategies that develop over time to further reduce annual project generated VMT per service population if substantial evidence is provided to support the efficacy of the strategy.	
		TR-6 :Alternative Monitoring Approach: CSUMB may develop a regionwide VMT monitoring program to allow global monitoring of the stadium VMT, which may provide cost efficiencies and be a more effective way to track VMT generation foreach event. This monitoring program may make use of emerging technologies including location-based services on cell phones and in vehicles to track trip lengths, along with traditional technologies such as driveway traffic counts. If such a program is developed, CSUMB shall ensure the project is monitored and achieves the required performance with respect to the project's VMT target.	
Impact TR-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	Significant and Unavoidable	Please refer to **Mitigation Measures TR-1** through **TR-6,** above**.**	Significant and Unavoidable
Impact TR-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No Impact	Mitigation not Required.	No Impact
Impact TR-4: The proposed project would not result in inadequate emergency access.	Less than Significant Impact	Mitigation not Required.	Less than Significant Impact
Cumulative Transportation Impacts: The proposed project, when considered with other cumulative projects, would not	Less than Significant	No additional mitigation required beyond those mitigation measures identified for **Impact TR-1-2** (**Mitigation Measures TR-1** through **TR-6**).	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
result in a cumulatively considerable impact related to conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (**Impact TR-1**).			
Cumulative Transportation Impacts: The proposed project would result in a considerable contribution to a significant cumulative transportation impact (**Impact TR-2**, conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), VMT impacts), and cumulative impacts would be significant and unavoidable.	Significant and Unavoidable	No additional mitigation is available for **Impact TR-2** beyond the mitigation measures identified for **Impact TR-1** (**Mitigation Measures TR-1** through **TR-6**).	Significant and Unavoidable
Cumulative Transportation Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to inadequate emergency access (**Impact TR-4**).	Less than Significant Impact	Mitigation not Required.	Less than Significant Impact
Utilities and Service Systems			
Impact UTL-1: The proposed project would not 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	Mitigation not Required.	Less than Significant

Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact UTL-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	Less than Significant	Mitigation not Required.	Less than Significant
Impact UTL-3: The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Less than Significant	Mitigation not Required.	Less than Significant
Impact UTL-4: The proposed project would not 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. And comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than Significant	Mitigation not Required.	Less than Significant
Cumulative Utilities and Services Systems Impacts: The proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to utilities and service systems.	Less than Significant	Mitigation not Required.	Less than Significant

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Chapter 3.0 Project Description

3.1 PROJECT LOCATION

The proposed project encompasses physical improvements to the existing CSUMB Stadium located near the southwestern edge of the CSUMB campus at 4113 2nd Avenue, Seaside, California, 93955, in Monterey County (Assessor's Parcel Number 0311-0104-4000) (**Figure 3-1**). The 2022 CSUMB Master Plan designates the stadium site, as well as the areas surrounding it to the south and east, for a range of athletics and recreational uses (**Figure 3-2**). Directly south of the stadium are the CSUMB baseball and softball fields, with two (2) soccer fields to the southwest, the CSUMB Aquatic Center to the west, and a disc golf course to the northeast. Parking for the stadium is provided in the following existing parking lots:

Table 3-1
Stadium Parking

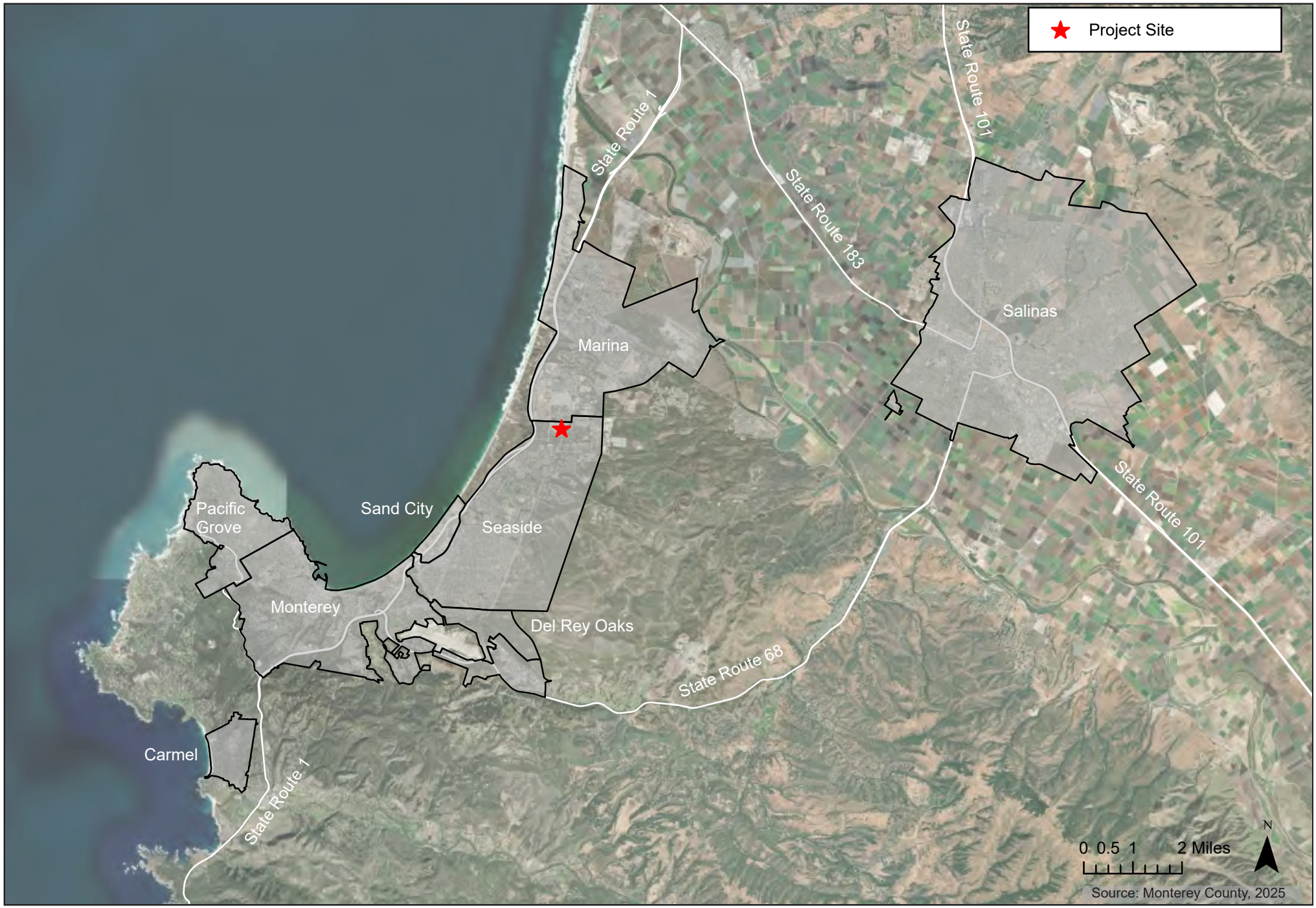
Lot Name	Usage	Vehicle Spaces
Lot 107	MBFC, CSUMB	191 general, 21 ADA stalls
Event Lot	MBFC, CSUMB	360 general stalls
Bank of America Lot	MBFC	891 general, 22 ADA stalls
Lot 903	MBFC	92 general stalls
Lot 106	CSUMB	102 general, 4 ADA stalls
Lot 100	CSUMB	44 general, 4 ADA stalls

The CSUMB Stadium is accessible via Divarty Street and 2nd Avenue. State Route (SR) 1 is one half (0.5) miles west of the project site. SR 1 and Lightfighter Drive provide regional and local access to the project site.

3.2 PROJECT BACKGROUND

The former Freeman Stadium (now the CSUMB Stadium) was constructed over 70 years ago. Historically, the stadium was the home of the Fort Ord Warriors, a semi-professional football team comprising service members stationed at the former Fort Ord army base. In 2020, the Monterey Bay Football Club (MBFC) approached CSUMB with a proposal to renovate, utilize, and maintain the existing stadium and Field House at CSUMB as a shared campus-United Soccer League (USL) facility with the intent to bring sports entertainment to the Monterey Bay area. CSUMB and MBFC entered into a 14-year facility use agreement on January 1, 2020, to share the use of the stadium. An MND was adopted by the Board of Trustees on September 8, 2021 (SCH #2021070153), which evaluated the potential environmental impacts associated with the proposed renovations and operation of the CSUMB Stadium.

The renovations to the CSUMB Stadium were completed in 2022 and consisted of upgrades to the existing 5,700-square-foot (sf) Field House and construction of a 90,000-sf synthetic soccer pitch, 3,000-sf portable restroom facility, four (4) sets of seating areas, four (4) 90-foot-tall poles for broadcast-quality light standards, a 200-sf illuminated scoreboard, and a beer garden with space for vendors. Seating includes seatbacks and bleacher seats that accommodate 6,000 spectators.



Title: Regional Map

Date 1-22-25
Scale
Project 2024-84

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure 3-1

Title: Project Location Map

Date 1-22-25
Scale
Project 2024-84

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
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Figure 3-2

Renovations to the stadium also involved improvements to three (3) roads that provide access from the parking lots to the stadium. The stadium renovations provided for:

- Hosting the USL team MBFC, consisting of:
    - Approximately 20 full-time MBFC staff using the Field House from 9:00 AM-5:00 PM, Monday-Friday as office and training preparation space,
    - Approximately 10 months of training (practice) in the Field House and on the adjacent existing soccer fields, four (4) to five (5) days per week for three (3) to four (4) hours each day, with an estimated 32 players, coaches, and staff at each practice,
    - Approximately 18 home matches per year, on Friday nights from 7:00 PM-11:00 PM and/or Saturdays during the day or in the early evening, with an estimated 210 part-time match-related personnel (i.e., staff, coaches, players) and 6,000 ticketed fan capacity, and
    - Approximately 32 staff, coaches, and players for both the home and visiting teams during MBFC match days.
- MBFC-related camps and off-season activities (an estimated six (6) activities per year),
- New use of renovated playing field for CSUMB academic courses and athletics programs when not in conflict with the MBFC schedule, and
- Campus-sponsored or invited community events, such as Spring Commencement, concerts, or other events.

Currently, the CSUMB women's soccer program consists of 28-32 student athletes and six (6) staff members. The women's program hosts 12 matches. The men's soccer program consists of 28-32 student athletes and six (6) staff members. Like the women's program, the men's program hosts 12 matches. CSUMB occasionally hosts tournaments depending on post-season opportunities each year. Both programs hold practices daily from 2:00 PM-4:00 PM from the middle of August through early December and again from early February to late April. Each team has four (4) staff members and 32 team members. Each match requires an additional 12 staff to operate the stadium and receives approximately 150 attendees/spectators.

In addition to athletic events, CSUMB hosts 10 campus-coordinated events (please refer to **Table 3-2)**.

Table 3-2
Existing CSUMB Campus-Coordinated Non-Athletic Events

Event	# of Events	Days per Event	Attendees (per day)	Staff
Fall Commencement	1	1	1,750	100
Spring Commencement	3	1	5,750	150
Fall Convocation	1	1	990	10
Spring Convocation	1	1	500	300
Homecoming	1	1	1,950	50
Spring Concert	1	1	650	350
Affinity Celebration	1	1	1900	50
Campus Community Event	1	1	8,500	500

Current MBFC operations consist of the men's USL Championship (Men's Professional) team hosting 18 matches over 18 days during the United Soccer League Championship (USLC) regular season, with an average attendance of 4,200 spectators. Each event requires an average of 216 staff members including players and coaches. MBFC also hosts one (1) post-season match, one (1) tournament, and one (1) international friendly match; each event requires one (1) day and attracts approximately 5,600 spectators.

3.3 PROJECT DESCRIPTION

3.3.1 Proposed Project Components

The proposed project would include two (2) components at the existing CSUMB Stadium: 1) an expansion of existing programming at the CSUMB Stadium by CSUMB and the MBFC; and 2) the construction and operation of two (2) new locker room and shower facilities, two (2) new permanent restroom facilities, and a gated event storage and staging area just north of the stadium.

3.3.1.1 Expansion of Use

CALIFORNIA STATE UNIVERSITY MONTEREY BAY

CSUMB's dedication to supporting its academic mission, fostering cultural enrichment, and enhancing community engagement is demonstrated through its plans to host a diverse range of campus events as part of the proposed project. The proposed project would expand CSUMB Stadium's use to host additional men's and women's California Collegiate Athletic Association (CCAA) Championship tournaments and the National Collegiate Athletic Association (NCAA) Division II National Championships (**Table 3-3**). The CCAA tournaments have the potential to be an annual or semi-annual event hosted by CSUMB. The Men's and Women's CCAA Championship tournaments would each last two (2) days, host four (4) teams totaling 120 players, and anticipate 300 spectators. Staff for CCAA tournaments would consist of 16 coaching and training staff members across each of the four (4) teams and 20 total event staff members. NCAA Division II National Championships have the potential to occur once every six (6) to eight (8) years depending on the national bid process. The Men's and Women's NCAA National Championships would each last five (5) days, host four (4) teams, and anticipate 400 spectators. Staff for NCAA tournaments would consist of 16 coaching and training staff members across each of the four (4) teams and 24 total event staff members. For both the CCAA and NCAA tournaments, staff may work eight (8)- to 14 hours per day depending on their specific role.

Table 3-3
New California State University, Monterey Bay Athletic Events

Team	Matches	Attendance	Players	Staff[1]
Men's CCAA Championships	3 events over 2 days	300 spectators	120	36.0
Women's CCAA Championships	3 events over 2 days	300 spectators	120	36.0
Men's NCAA Division II National Championships	3 events over 5 days	400 spectators	120	40.0
Women's NCAA Division II National Championships	3 events over 5 days	400 spectators	120	40.0

[1] The staff category includes coaching and training staff and event operation staff.

In addition to soccer events, CSUMB would host the Latinx Affinity Ceremonies for graduating students, Monte's 5k and post-race event, new student fall Convocation, Otter Cross Cultural Center (OC3) affinity celebration, fall welcome concert, a spring concert, and the Relay for Life. These events would occur once annually and last for one (1) day only. Except for the Relay for Life, which would host approximately 6,000 attendees, events would host between 600 and 2,500 attendees (**Table 3-4**). Lastly, CSUMB would host up to 25 other university-related events with an average of 2,000 attendees. All proposed events would be open to both the student body and members of the general public. Event staff is assumed to consist of part-time and full-time students and faculty from CSUMB and volunteers from the nearby communities. Staff hours will vary depending on specific roles and the event.

Table 3-4
New California State University, Monterey Bay Non-Athletic Events

Event	# of Events	Days per Event	Attendees (per day)	Staff
Latinx Affinity Ceremonies	1	1	2,000	60
Monte's 5k and post-race	1	1	1,200	150
New Student Fall Convocation	1	1	2,000	150
Fall and Spring Concerts	2	1	2,000	150
OC3 Affinity Celebration	1	1	2,500	50
Relay for Life	1	1	6,000	50
Additional Events	25	1	2,000	75

MONTEREY BAY FOOTBALL CLUB

MBFC is proposing to expand their use of the CSUMB Stadium to include three (3) new teams: one (1) USL League Two (Men's Amateur), one (1) USL Super League (Women's Pro), and one (1) USL W League (Women's Amateur) (**Table 3-5**). The addition of three (3) new teams would introduce 69 new players and 16 new coaching and training staff to the project site. All event staff would consist of people who currently work at existing MBFC soccer matches and the existing 20 front office staff members would serve the three (3) proposed teams. The proposed project would accommodate practices and matches associated with the addition of each team. The USL Super League team would include 23 new players and eight (8) coaching and training staff members, and the USL League Two and USL W League teams would each introduce 23 new players and four (4) new coaching and training staff members. The anticipated number of event staff members needed for each team's match events would be 110 event staff for the USL Super

League and 15 event staff for each of the USL League Two and USL W League teams. For MBFC match events, visiting teams are anticipated to travel with approximately 23 players and 23-25 staff members.

Table 3-5
New Monterey Bay Football Club Athletic Events

Team	Practices	Matches	Practice Attendance[1]	Match Attendance	Match Players[2]	Match Staff[3]
USL Super League	5 x per week	12 events over 10 days	31	4,000 spectators	46	143
USL League Two	5 x per week	7 events over 7 days	27	300 spectators	46	44
USL W League	5 x per week	7 events over 7 days	27	300 spectators	46	44

1 The practice attendance category includes all personnel anticipated to be present at each practice including players and staff members.
2 The players category includes the total number of players for both the home and visiting teams.
3 The staff category includes coaching and training staff for both the home and visiting teams and event operation staff for matches.

In addition to expanding athletic events, MBFC would host a 28-day Winter Festival and 20 concerts annually (**Table 3-6**). Both event types would require additional set-up days during the week. MBFC would rely on existing event staff members to run these events.

Table 3-6
Monterey Bay Football Club Non-Athletic Events

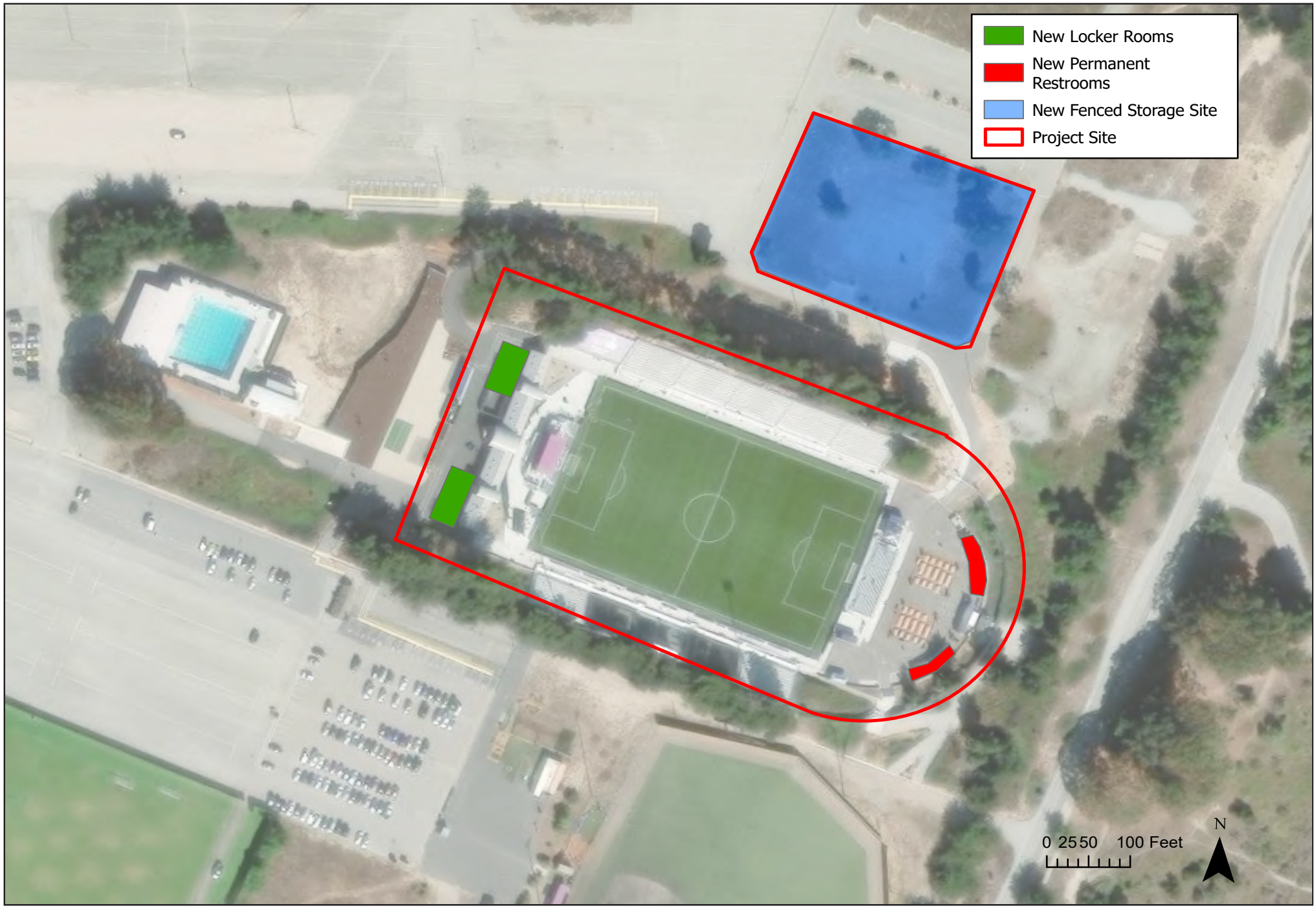
Event	# of events	Days (per event)	Attendees (per day)	Staff	Set-up Days (per event)
Winter Festival	1	28	3,000	150	10
Weekend Concerts	20	3	6,000	200	1-2

3.3.1.2 New Facilities

In addition to the expansion of use at the CSUMB Stadium, the proposed project would include the construction of the following:

1. **Men's & Women's Locker Room and Shower Facilities.** The project will construct two (2) 1,400-sf locker room and shower facilities. One (1) facility would replace the existing portable showers utilized by the men's team and the project would build this facility at the stadium entrance to the northwest of the Field House. The project would construct another facility to accommodate the women's teams southwest of the Field House (please refer to **Figure 3-3** and **Figure 3-4**).

2. **Permanent Restroom Facilities.** The proposed project would construct two (2) permanent restroom facilities, each approximately 1,000-sf, on the eastern side of the CSUMB Stadium in the existing beer garden area to replace the 36 portable restroom facilities (approximately 3,000-sf) currently in use (please refer to **Figure 3-3**).



Title:

Proposed Site Plan

Date 2-19-2025

Scale

Project 2024-84

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Environmental Consultants Resource Planners
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Monterey, CA 93940
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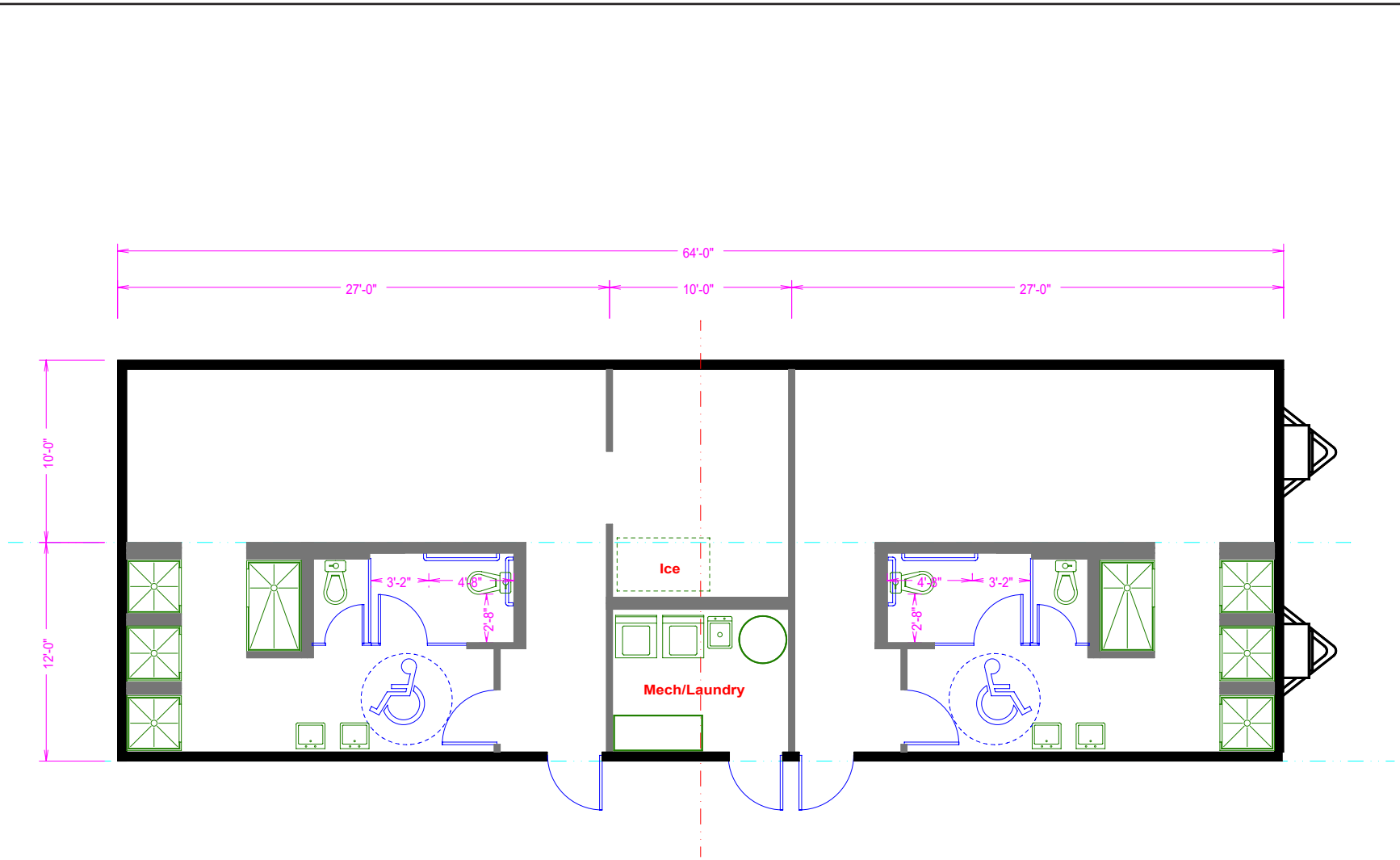
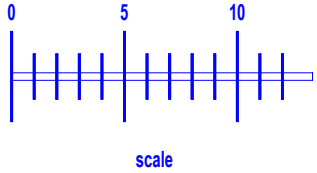
Figure 3-3



Schematic Floor Plan



Boxx Modular and Otto Construction, 2017

Title: Locker Room and Shower Facilities Conceptual Design Plan	Date 4/22/2026 Scale N/A Project 2024-84	Monterey | San Jose **Denise Duffy and Associates, Inc.** Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 3-4

1. **Gated Storage and Staging Area.** The project would establish a new 1.25-acre dedicated gated storage and staging area north of the stadium in the existing parking lot to support event operations, equipment storage, and logistical needs (please refer to **Figure 3-3**). The storage and staging area would not require permanent construction of structures besides fencing. The gated storage and staging area may accommodate shipping containers to protect equipment from the weather.

The following discussion provides a more detailed description of key proposed project elements, including lighting, access and parking, utilities, operation, and construction.

LIGHTING

The existing four (4) 90-foot-tall high-mast poles, one (1) at each corner of the stadium, each containing 46 LED flood lights aimed at the field surface would continue to illuminate the stadium during events (i.e., matches, concerts, etc.). The project does not propose new permanent stadium lighting, and temporary lighting would continue to be utilized in the parking lot for security and safety. New lighting would be associated with the new locker room and restroom facilities, and temporary lighting may be necessary for non-athletic events, such as concerts. Additional temporary lighting associated with events may include, but is not limited to, LED stage lighting and portable light towers.

ACCESS AND PARKING

There are two (2) existing parking lots at the stadium: one (1) is located to the north/northwest of the stadium and the other is located to the south/southwest. The proposed project would not involve the construction of any new parking facilities. A paved drive lane already exists leading up to the proposed storage and staging area, where an improved curb cut would allow vehicle access into the site. The proposed project would install perimeter fencing along the parking egress points to the stadium to improve access management.

UTILITIES

Potable Water

Currently, the CSUMB Stadium requires 0.48 acre feet per year (AFY) of potable water for MBFC office operations usage, and irrigation. The proposed project would require approximately 8.45 AFY for operation.

Existing water supply infrastructure located at the stadium Field House would supply potable water to the proposed facilities. Construction of the locker room and shower facilities will require approximately 350 linear feet of new water and sanitary sewer pipelines. The proposed new permanent restroom facilities would require the construction of approximately 800 linear feet of new water and sanitary sewer pipelines. Both systems would connect to the existing water supply infrastructure that serves the Field House.

Wastewater

Currently, the CSUMB Stadium operations produce 0.47 AFY of wastewater. The proposed project would generate approximately 8.45 AFY of wastewater. The proposed utilities would connect to existing wastewater pipelines.

Solid Waste

Currently, the CSUMB Stadium generates 0.25 tons per year of solid waste.[1] The proposed project would generate approximately 3,192,009 tons of solid waste per year (please refer to **Section 4.15, Utilities and Service Systems**).

Fire Suppression

The existing water supply infrastructure located at the Field House would also feed new fire suppression systems. The project would construct new restroom and locker room facilities with fire sprinklers as required by the California Building Code. The project does not propose to construct new hydrants.

OPERATION

California State University, Monterey Bay

CSUMB soccer programs would seek to host the NCAA and CCAA tournaments. Both the Men's and Women's Soccer CCAA Championships would be an annual or semi-annual event hosted at the CSUMB Stadium, and each event would host three (3) matches over two (2) days, host four (4) teams, 120 student athletes and 16 coaches and training staff members, 20 event staff members, and accommodate around 250-300 attendees per event. The NCAA Division II National Championships are awarded to host sites through a national bid process, and this opportunity would only occur once every six (6) to eight (8) years. Both the NCAA Division II Men's and Women's Soccer National Championship would host four (4) teams, 120 student athletes and 16 coaches and athletic staff members, 24 operation staff members, and accommodate 400 spectators. Each event would comprise three (3) matches over five (5) days. For both the CCAA and NCAA tournaments, staff may work eight (8) to 14 hours per day depending on their specific role.

CSUMB would hold up to 32 non-athletic events that would host on average 2,000 attendees and a maximum of 6,000 attendees. On-site staff for these events would vary with the Latinx Affinity Ceremonies requiring 60 staff members, OC3 Affinity Celebrations and Relay for Life requiring 50 staff members, and two (2) school concerts, Monte's 5k, and New Student Convocation requiring 150 staff members. Staff members for each of these events would consist of part-time and full-time CSUMB students and faculty and volunteers, all of whom live and work in the region. Staff hours would vary depending on each person's specific role and the event. During the athletic season (August – December and February – April), the facility would be in regular use throughout the week for practices.

[1] Solid waste generated by the existing stadium use is based on CalEEMod modeling prepared for the previous environmental analysis (SCH# 2021070153).

Monterey Bay Football Club

During the athletic season (January – November), the facility would be in regular use throughout the week by MBFC soccer programs. MBFC hosts matches on Wednesdays, Fridays, Saturdays, and Sundays from March through October. Anticipated attendance at each type of event would consist of 4,000 spectators for each USL Super League event and 300 spectators for each of the USL League Two and USL W League events. To meet staffing needs, 110 operation staff members would be needed for the new USL Super League team's matches, 15 operation staff members would be needed for the USL League Two and USL W League matches. However, the anticipated event staff members would consist of people who currently work at existing MBFC soccer events. Furthermore, the existing 20 front office staff members would serve the three (3) proposed teams.

Additionally, the USL Super League team would comprise 23 players and eight (8) coaches and training staff members, and the USL League Two team and USL W League team would both comprise 23 players and four (4) coaches and training staff. The addition of three (3) new teams would introduce 69 new players and 16 new coaching and training staff. For MBFC match events, visiting teams are anticipated to travel with approximately 23 players and 23-25 staff members.

MBFC would host a Winter Festival and 20 concerts annually. The Winter Festival would take place over 28 days and would host 3,000 attendees. 150 staff members would be needed for the operation of the Winter Festival. The concerts would take place over 20 weekends throughout the year and would attract approximately 6,000 spectators each day. Concerts would also require additional set up days during the week for each concert. 200 staff members would be needed for the operation of the concerts, and these staff members would consist of current MBFC employees.

3.3.2 Construction

The proposed project would require nine (9) months of construction beginning in 2026. The proposed project would construct two (2) 1,400-sf type 1 concrete locker room facilities, two (2) 1,000-sf type 1 concrete restroom facilities, and require grading of a total area of approximately 1.25 acres. The proposed project would replace approximately 4,800 sf of asphalt. Construction equipment would include, but would not be limited to, pickup trucks, cement trucks, vibratory hammers, generators, backhoe, excavator, graders, tractors/loaders, rollers, dozers, and crane. The extent of demolition activities would include the demolition of asphalt, concrete, and structures. Construction parking would be provided on-site in the existing paved campus parking lots and no separate construction access roads would be required. Access to the project site during construction would be provided via the 2nd Avenue entrance at the west end of the property. Construction waste and recycling would be separated and hauled offsite. Waste and recycling dumpster weight tags would be provided to CSUMB's construction project manager, and waste and recycling removal would be compliant with the LEED credit compliant Construction Waste Management Plan, and State waste and recycling requirements.

3.3.3 Project Objectives

CEQA provides that the statement of a project's objectives should be clearly written to define the underlying purpose of a project to permit development of a reasonable range of alternatives and aid the lead agency in making findings when considering a project for approval. The underlying purpose of the

proposed project is to modernize and enhance the existing stadium to function as a flexible, multipurpose venue that better supports CSUMB's academic and athletic programs while accommodating expanded use, including partnerships with external organizations such as professional athletic entities (e.g., USL). By improving the functionality, capacity, and quality of the facility, the proposed project would increase its utility for intercollegiate athletics, campus events, and community-serving activities, thereby strengthening community partnerships and elevating CSUMB's regional presence. The renovated stadium would also expand opportunities for student learning and research, particularly within the College of Health Sciences and Human Services, and enhance support for student-athlete development.

To achieve the underlying purpose outlined above, the proposed project would authorize the physical development of the CSUMB Stadium to accommodate new CSUMB athletics and non-athletic events, while simultaneously supporting new professional athletic and non-athletic events through an existing partnership with MBFC. The following project objectives support its underlying purpose:

1. Strengthen the stadium as a campus resource and shared community asset that can attract and support more intensive use and partnerships with external organizations, including professional athletic organizations, in a manner that aligns with CSUMB's academic mission.

2. Modernize and improve the usability, safety, and operational efficiency of the existing stadium through targeted physical improvements that extend its functional lifespan and better serve students, faculty, staff, and community.

3. Renovate and upgrade existing stadium facilities to address functional limitations of the current venue; including constraints related to space capacity, configuration, and athlete support infrastructure, and to better align with collegiate athletic program needs and applicable professional standards (e.g., USL facility requirements); while increasing visibility and awareness of athletics within the Monterey Bay region.

4. Renovate existing stadium facilities to support multiple programming needs including academic instruction, experiential learning, and applied research opportunities for students, including those related to health sciences, kinesiology, sports management, and community health, consistent with CSUMB's role as a comprehensive public university. Improvements would include the provision of permanent restroom facilities to replace existing temporary portable units, thereby improving visitor capacity, accessibility, and overall user experience.

5. Site new development in the already developed campus core, which is served by existing infrastructure, to avoid unnecessary expansion into undeveloped land, consistent with smart growth principles and long-term campus planning goals.

3.4 PROJECT APPROVALS

This EIR is an informational document for lead agencies, decision-makers, as well as for other agencies, organizations, and the public. The Board of Trustees is the Lead Agency under CEQA responsible for certification of the EIR, adoption of the MMRP, and approval of the proposed project. The following agencies may require permits or other types of approvals:

- Regional Water Quality Control Board (RWQCB) – National Pollution Discharge Elimination System (NPDES) General Storm Water Permit and Notification, including Construction Storm Water Pollution Prevention Plan (SWPPP).

- CSUMB – Minor Master Plan Amendment to the adopted 2022 California State University, Monterey Bay Master Plan.

- CSUMB – Facilities Use Agreement to be negotiated with the MBFC to reflect the expansion of use, construction, and operation of the facilities.

3.5 REFERENCES

[CSUMB] California State University Monterey Bay (2021). *Final Initial Study Initial Study/Mitigated Negative Declaration: Freeman Stadium Facilities Renovation at California State University Monterey Bay*. SCH# 2021070153.

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Chapter 4.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

4.0 INTRODUCTION

This section of the EIR provides an overview of the approach used to evaluate the proposed project, describes the contents of the technical sections presented in this chapter, and describes the "environmental baseline" that is used for the purposes of evaluating the proposed project's potential environmental effects. Each section in this chapter includes a description of the existing environmental setting relevant to that topical CEQA section, a description of existing regulatory requirements, and an evaluation of the proposed project's effects. If necessary, mitigation measures that would reduce potential effects to a less-than-significant level are described.

4.0.1 Approach

Each environmental resource section includes a discussion of the environmental setting, applicable regulations pertaining to the resource area, impact assessment, and mitigation measures where applicable. Each section of this chapter contains the following elements:

- **Environmental Setting.** This subsection presents a description of the existing physical environmental conditions in the vicinity of the proposed project with respect to each resource area at an appropriate level of detail to understand the impact analysis.

- **Regulatory Framework.** This subsection provides a brief discussion of federal, state, and local regulations and policies that are applicable to the resource topic and the proposed project. As a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances. However, where appropriate, local plans and policies are summarized to provide context for the analysis of potential impacts. Where the discussion concerns planning documents (e.g., master plans, general plans), this EIR narrowly focuses on policies and guidelines from the 2022 CSUMB Master Plan Guidelines and the City of Seaside's General Plan due to the location of the project. However, the EIR also considers polices and guidelines from the City of Marina's General Plan where appropriate since project site near land uses under their jurisdiction.

- **Impacts and Mitigation Measures.** This subsection evaluates the potential for the proposed project to affect the physical environment. The beginning of each impact analysis section defines significance criteria for evaluation of environmental impacts, including an explanation of how the significance criteria are used in the evaluation of impacts for the proposed project. Potential impacts are identified and characterized. Where feasible, mitigation measures are identified to avoid or reduce identified significant impacts to a less-than-significant level. The proposed project consists of two (2) components: 1) expanded use, and 2) stadium renovations.

- **References.** provides a list of all authors and agencies that assisted in the preparation of the report by name, title, and company or agency affiliation. This section itemizes supporting and reference data used in the preparation of the ~~Draft~~ EIR, and lists agencies, organizations, and other individuals consulted during the preparation of the ~~Draft~~ EIR.

4.0.1.1 Significance Determinations

In accordance with the CEQA, specifically, PRC Section 21068, a "significant effect on the environment" means a substantial, or potentially substantial, adverse change in the environment. As noted above, the significance criteria used for each environmental resource topic are presented in each section of **Chapter 4.0** following the setting and before the discussion of impacts. For the impact analyses, one (1) of the following significance determinations will be assigned:

- No impact: this determination is made if there is no potential that the proposed project could affect the resource at issue.
- Less than significant: this determination applies if there is a potential for some limited impact on a resource, but the impact is not significant in accordance with the significance criterion.
- Less than significant with mitigation: this determination applies if there is the potential for a significant adverse effect in accordance with the significance criterion, but mitigation is available to reduce the impact to a less than significant level.
- Significant and unavoidable: this determination applies to impacts that are significant, but for which there appears to be no feasible mitigation available to substantially reduce the impact.

Additionally, the EIR may identify beneficial impacts of the proposed project if evidence exists to substantiate the anticipated benefit(s). A separate Mitigation Monitoring and Reporting Program (MMRP) as required by PRC Section 21081.6 will accompany the Final EIR, which outlines the mitigation measures and the monitoring and reporting obligations and oversight that would be employed. The Board of Trustees will consider the MMRP for adoption at the time the Final EIR is certified.

4.0.1.2 Technical Resources Evaluated in Detail in this EIR

This EIR includes the following technical resource sections:

- **Section 4.1, Aesthetics**
- **Section 4.2, Air Quality**
- **Section 4.3, Biological Resources**
- **Section 4.4, Cultural and Tribal Cultural Resources**
- **Section 4.5, Energy**
- **Section 4.6, Geology, Soils, and Seismicity**
- **Section 4.7, Greenhouse Gas Emissions**
- **Section 4.8, Hazards and Hazardous Materials**
- **Section 4.9, Hydrology and Water Quality**
- **Section 4.10, Land Use and Planning**
- **Section 4.11, Noise**
- **Section 4.12, Population and Housing**
- **Section 4.13, Public Services and Recreation**
- **Section 4.14, Transportation**
- **Section 4.15, Utilities and Service Systems**

Alternatives to the proposed project are discussed in **Chapter 5.0, Alternatives**. This EIR also includes an evaluation of potential growth-inducing impacts, cumulative impacts, and effects found not to be significant in **Chapter 6.0, Cumulative and Other CEQA Considerations**.

4.0.1.3 Resources Not Analyzed in Detail

As part of the scoping and environmental analysis conducted for the proposed project, the following environmental resource topics are considered to have no potential for adverse impacts. This chapter provides a brief discussion as to why this EIR does not consider each of these environmental resource topics further.

- Agriculture and Forestry Resources
- Mineral Resources
- Wildfire

Agriculture and Forestry Resources. The California Department of Conservation (DOC) Division of Land Resource Protection and the Farmland Mapping and Monitoring Program maps California's agricultural resources. The DOC designates the proposed project site as "Urban and Built-Up Land" and the project site is surrounded by both "Urban and Built-Up Land" and "Other Land" (DOC, 2022). Therefore, the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, the project site is not under a Williamson Act contract (DOC, 2025). Similarly, the proposed project would not result in the loss or conversion of forest land for non-forest land use. For these reasons, the project would not impact agriculture and forestry resources.

Mineral Resources. Mineral resources are determined in accordance with the Surface Mining and Reclamation Act (SMARA) of 1975, and the California Geological Survey (CGS), which maps regional significance of mineral resources. The proposed project is located in a Mineral Resource Zone (MRZ) – 2, which are areas where geologic information indicates the presence of significant construction aggregate (CGS, 2021). However, the project site is developed with the existing stadium infrastructure and is located among the greater CSUMB campus, which has no history of and does not currently accommodate mineral resource extraction. Additionally, the 2022 CSUMB Master Plan designates the project site for a range of athletics and recreational uses, for which the proposed project would be consistent (CSU, 2022b). For these reasons, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. Therefore, the proposed project would not result in impacts to mineral resources.

Wildfire. The California Department of Forestry and Fire Protection (CalFire) maps fire hazards within State Responsibility Areas (SRAs) based on factors such as fuels, terrain, and weather (Public Resources Code Sec. 4201 – 4204). CalFire defines potential fire hazards based on their potential for causing ignitions to buildings and classifies these areas into separate "Fire Hazard Severity Zones" (FHSZ). CalFire designates these FHSZs as either "moderate," "high," or "very high" within SRAs. CalFire also provides recommendations on FHSZs in local jurisdictions for local responsibility areas (LRAs). The project site is located on CSUMB's campus and in the City of Seaside where the Seaside Fire Department responds to fire emergencies. Therefore, the project site is located in an LRA, and, according to CalFire, neither the project site nor adjacent properties are located in a moderate, high, or very high FHSZ (CalFire, 2025). The topic of wildfire and potential impacts to local evacuation routes are discussed again in **Section 4.8, Hazards and Hazardous Materials**. However, this report will not discuss potential wildfire impacts beyond the discussion here and in **Section 4.8, Hazards and Hazardous Materials** since the project would not be located in or adjacent to an SRA or a very high FHSZ. Therefore, the proposed project would have no impact regarding wildfire.

4.0.2 References

[CalFire] California Department of Forestry and Fire Protection. 2025. *Fire Hazard Severity Zone Viewer*. Available online at: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

[CGS] California Geological Survey. 2021. *Mineral Resource Zone map for Construction Aggregate in the Monterey Bay Production-Consumption Region*. Department of Conservation. Available online at: https://www.conservation.ca.gov/cgs/documents/publications/special-reports/SR_251-MLC-MontereyBayPCR-2021-Plate01-MRZs-a11y.pdf

[CSU] California State University. 2022b. *2022 Master Plan Guidelines*. Available online at: https://csumb.edu/media/csumb/section-editors/facilities/2022-master-plan/CSUMB-Master-Plan-Guidelines-2022.pdf

[DOC] California Department of Conservation. 2022. *California Important Farmland Finder*. Division of Land Use and Resource Protection. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/

[DOC] California Department of Conservation. 2025. *Williamson Act Enrollment Finder*. Division of Land Use and Resource Protection. Available online at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/

4.1 AESTHETICS

This section evaluates the potential aesthetic impacts associated with the development of the proposed project. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. The section is based in part on information contained in the project's Field Lighting Impacts Report prepared by EXP Engineering, dated August 7, 2025 (please refer to **Appendix B**). This report evaluates the expanded use of both field and temporary lighting during the proposed new events at the CSUMB Stadium, and discusses the potential impacts this lighting may have on surrounding land uses.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments concerning aesthetic resources were received during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.1.1 Environmental Setting

4.1.1.1 Concepts and Terminology

Visual or aesthetic resources consist of both the natural and built features of the landscape that contribute to the public's experience and appreciation of the environment. Depending on the extent to which a project's presence would alter the visual character and quality of the environment, a visual or aesthetic impact may occur. Visual quality, visual character, viewer sensitivity, and visual sensitivity are the terms used throughout the analysis.

VISUAL QUALITY

Visual quality is the overall visual impression or attractiveness of a site or locale as determined by its aesthetic qualities (such as color, variety, vividness, coherence, uniqueness, harmony, and pattern). Natural and built features combine to form perspectives with varying degrees of visual quality, which are rated in this analysis as low, moderate, and high, as follows:

- **Low.** The location is lacking in natural or cultural visual resource amenities typical of the region. A site with low visual quality will have aesthetic elements that are relatively unappealing and perceptibly uncharacteristic of the surrounding area.

- **Moderate.** The location is typical or characteristic of the region's natural or cultural visual amenities. A site with moderate visual quality maintains the visual character of the surrounding area, with aesthetic elements that do not stand out either contributing to, or detracting from, the visual character of an area.

- **High.** The location has visual resources that are unique or exemplary of the region's natural or cultural scenic amenities. A site with high visual quality is likely to stand out as particularly appealing and makes a notable positive contribution to the visual character of an area.

VISUAL CHARACTER

Visual character is a general description of the visual attributes of a particular land use setting and the unique set of landscape features. The purpose of defining the visual character of an area is to provide the context within which the viewing public is mostly likely to perceive visual quality of a particular site or locale. For natural and open space settings, visual character is most commonly described in terms of common landscape attributes such as landform, vegetation, or water features.

VIEWER SENSITIVITY

Viewer sensitivity conditions address the variables that affect viewers and their visual exposure to the proposed project component sites. The identification of viewer types and volumes describes the type and quantity of potentially affected viewers within the visual study area. Land uses that derive value from the quality of their settings are potentially sensitive to changes in visual conditions.

Viewer exposure considers some or all of the following factors: landscape visibility (the ability to see the landscape); viewing distance (the proximity of viewers to the component sites); viewing angle (whether the component sites would be viewed from a superior, inferior, or level line of sight); extent of visibility (whether the line of sight is open and panoramic to the facility sites or restricted by terrain, vegetation, and/or structures); and duration of view. Generally, viewer sensitivity relates to the level of interest or concern the public has for a particular aesthetic resource.

VISUAL SENSITIVITY

Visual sensitivity is the overall measure of a site's susceptibility to adverse visual changes. Visual sensitivity ratings range from high, moderate, or low and are determined based on the combined factors of visual quality, viewer types and volumes, and visual exposure to the proposed project as described above. A setting's overall visual sensitivity is the measure of its susceptibility to significant visual impacts because of project-caused visual change.

4.1.1.2 Regional Overview

The project site is located on CSUMB's campus on the former Fort Ord U.S. Army base. The Pacific Ocean is located to the west; the Salinas Valley and Gabilan Mountains are located to the east; and the Santa Lucia Mountains are located to the southeast. Prominent scenic resources in the area, therefore, include the Monterey Bay (Pacific Ocean), the coastal sand dunes to the west, and the Santa Lucia Mountains, Gabilan Mountains, and the Salinas Valley to the east and northeast (Monterey County, 2010).

Open spaces are also recognized as scenic resources as they embody the character and natural aesthetic value of Monterey County through conservation and maintenance of unique physical features and natural resources (Monterey County, 2010). The nearest open space areas to the proposed project site, offering access to regional scenic resources include Fort Ord Dunes State Park and Fort Ord National Monument. The Fort Ord Dunes State Park is located approximately 0.5 miles west of the project site and provides coastal access trails to visitors. This park encompasses four (4) miles of the coastline and offers scenic views of the Monterey Bay (California State Parks, 2025). Fort Ord National Monument is located approximately 2.1 miles east of the project site, and offers visitors views of maritime chapparal, oak forests, grasslands, and seasonal pools (Bureau of Land Management, 2025). The Bayonet & Blackhorse Golf Course offers views of the Monterey Bay, regional mountain ranges (i.e., Santa Lucia and Gabilan),

and of the City of Seaside (City of Seaside, 2024). The Bayonet & Blackhorse Golf Course is located approximately 1.1 miles south of the project site. The coastal sand dunes themselves represent important vantage points that offer many of the same views as previously discussed (e.g., the Pacific Ocean and Monterey Bay, and Santa Lucia and Gabilan Mountains). In addition to their location along the coastline, these sand dunes also run east/west across General Jim Moore Boulevard (City of Seaside, 2024).

The City of Seaside's General Plan defines CSUMB's campus as a scenic vantage point with views looking west towards the Pacific Ocean and Monterey Bay. The CSUMB Master Plan EIR notes that the vantage points identified by the City of Seaside are general and focused on the views of the ocean, which are intermittently in view to the west throughout campus (CSU, 2022a). Neither the CSUMB Master Plan EIR nor the 2022 CSUMB Master Plan Guidelines define a scenic resource on or near the project site (CSU, 2022a; CSU, 2022b).

Monterey County pioneered the scenic highway concept in the State of California. The proposed project is located 0.5 miles east of SR 1. The segment of SR 1 that is adjacent to the project site is not designated as a designated State Scenic Highway, but is eligible for designation. From this segment, SR 1 provides views of the Monterey Bay and coastline, including coastal sand dunes present in the Fort Ord Dunes State Park, to the west. To the east, coastal mountain ranges (i.e., the Santa Lucia and Gabilan Mountains) are visible from SR 1.

4.1.1.3 Project Site Setting

The proposed project would be located at the existing CSUMB Stadium site and adjacent parking area. The CSUMB Stadium is located on the southwestern portion of CSUMB's campus at 4113 2nd Avenue, in the City of Seaside; 2nd Avenue, Divarty Street, Lightfighter Drive, and General Jim Moore Boulevard bound the project site. CSUMB Stadium is located among the Otter Sports Complex, or Athletics and Recreation District as defined by the 2022 Master Plan Guidelines (CSU, 2022b). The areas adjacent to the project site are within the Athletics and Recreation District and consist of two (2) parking lots, a disc golf course, a baseball field, softball field, an aquatics center, and two (2) soccer fields. The existing CSUMB Stadium and adjacent baseball fields are equipped with stadium lighting. Several tree species, including Monterey cypress, Monterey pine, and coast live oak, surround both the CSUMB Stadium site and Athletics and Recreation District.

4.1.1.4 Proposed Project Viewshed

The viewshed, or area of potential visual effect,[1] for the proposed project is limited. The project site is primarily visible from other facilities present in the Athletics and Recreation District, namely the two (2) main parking lots and adjacent athletic facilities. The project site is intermittently visible on Divarty Street, to the north, and 2nd Avenue, to the west, as vegetation lining the road largely shield the project site from view. From Divarty Street and 2nd Avenue, the proposed storage area would be most visible to passersby since a large parking lot with little to no vegetation surrounds this project component. Along General Jim Moore Boulevard to the east, vegetation and topography largely shield the entire project site from view except for the lighting poles that stand above the tree line. The project site is not visible along Lightfighter Drive to the south, or SR 1 to the west, due to vegetation and topography.

[1] Viewsheds or areas of potential visual effect are areas within which the project could potentially be visible.

Surrounding land uses include campus residences, located approximately 1,800 feet northeast of the project site; and residential communities, located approximately 0.51 miles south and 0.7 miles north of the project site. The proposed project site is not visible from any of these on- or off-campus residential areas. Additionally, there are no notable local, state, or regional parks that are adjacent to or overlook the project site.

Views of the project site from public vantage points consist of the Athletics and Recreation District and surrounding vegetation. The two (2) large, concrete parking lots accommodate visitors to the site and comprise a large portion of the aesthetic landscape as viewed from the local roadways. The key scenic resources of the City of Seaside and the wider region, which consist of the Monterey Bay and Pacific Ocean, coastal sand dunes, Gabilan and Santa Lucia Mountain Ranges, and SR 1 are not visible from the project site. Additionally, key open space areas such as the Fort Ord Dunes State Park, Fort Ord National Monument, and Bayonet & Black Horse Golf Course are not visible from the project site; please refer to **Figure 4-1a** and **Figure 4-1b**.

Title: Site Photo Locations

Date	3/10/2026
Scale	N/A
Project	2024-84

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure
4.1-1a

Viewpoint #1: Southeast facing view of the project site from the corner of Divarty Street and 2nd Avenue.

Viewpoint #2: Southwest facing view of the project site from the corner of General Jim Moore Boulevard and Divarty Street.

Viewpoint #3: East facing view of the project site from 2nd Avenue and the entrance to the Athletics and Recreation District.

Viewpoint #4: Southeast facing view of the project site from Parking Lot 903.

Denise Duffy & Associates, Inc., 2026

Title: Site Photos

Date	3/2/2026
Scale	N/A
Project	2024-84

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure 4.1-1b

Viewpoint #5: Northwest facing view of the project site from the corner of General Jim Moore Boulevard and Lightfighter Avenue.

Viewpoint #6: East facing view of the project site from the Aquatics Center.

Viewpoint #7: Southeast facing view of the project site from the entrance of Cardinale Stadium.

Viewpoint #8: West facing view of the project site from Engineer Lane and the Veteran's Administration Building.

Denise Duffy & Associates, Inc., 2026

Title: Site Photos	Date 3/2/2026 Scale N/A Project 2024-84	Monterey | San Jose **Denise Duffy and Associates, Inc.** Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 4.1-1c

4.1.2 Regulatory Environment

4.1.2.1 State

CALIFORNIA STATE SCENIC HIGHWAY PROGRAM

The Legislature created the California State Scenic Highway Program in 1963. Its purpose is to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are either designated or eligible for designation as a Scenic Highway. The Streets and Highways Code, Sections 260 through 263 define state laws governing the Scenic Highway Program. A highway may be designated scenic depending upon how much travelers can see the natural landscape, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Portions of SR 1 along the California coastline are either designated as a State Scenic Highway or eligible for State Scenic Highway designation (Caltrans, 2025). The section of SR 1 west of the project site is eligible for listing as a State Scenic Highway under this program; SR 1 is 0.5 miles west of the proposed project site.

CALIFORNIA TITLE 24

The California Lighting Technology Center's (CLTC) 2022 Outdoor Lighting Guide for Title 24, Part 6, compliance helps builders, lighting industry professionals, and others to navigate the nonresidential outdoor lighting portion of the California's Building Energy Efficiency Standards (CLTC, 2016). The new standards, which took effect January 1, 2023, include updated requirements for retrofit standards, lighting controls, and up light and glare limits. The guide includes an overview of updates to the 2023 standards, information about current lighting technologies, and energy-efficient lighting strategies and principles. Explanations of critical code requirements for outdoor lighting and controls accompany best practice recommendations are also included.

CALIFORNIA GREEN BUILDING STANDARDS CODE

The California Green Buildings Standards (CalGreen), a subsection of California's Title 24 code (Part 11) includes regulations for backlight, up light, and glare. If the nearest property line is less than or equal to two (2) mounting heights from the front hemisphere of the luminaire distribution, the applicable reduced glare rating and reduced backlight rating regulations outlined within these standards shall be met. The California Energy Code and California Administrative Code include Lighting Zones that define glare and reduced backlight rating regulations.

CALIFORNIA STATE UNIVERSITY OUTDOOR LIGHTING DESIGN GUIDE (2018)

The Outdoor Lighting Design Guide provides CSU campuses with guidelines for outdoor lighting design to ensure a comfortable nighttime environment, maximize energy efficiency, reduce light pollution, reduce glare, and improve campus aesthetics. The guide dictates that lighting designs follow the current State codes (Title 24).

2022 CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The 2022 CSUMB Master Plan Guidelines do not contain policies pertaining the aesthetic or visual resources that are applicable to the proposed project. However, this document does encourage planting and retention of Monterey cypress, Monterey pine, and coast live oak along the undeveloped boundary of the Athletics and Recreation District to "create a distinct edge and signal that this is the campus boundary, while also allowing intermittent views into the campus Athletics and Recreation District" (CSU, 2022b).

4.1.2.2 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with aesthetic resources.

The current General Plan 2040 provides the direction for current and future development within the City of Seaside. A major theme throughout the plan involves the protection of the natural environment, including the night sky. The City of Seaside's General Plan includes the following directives specifically pertaining to lighting (City of Seaside, 2024):

Implementation Plan UD-2.2.1 Restrict Light and Noise Impacts

Continue to impose and enforce mitigation measures and operation requirements on new development to restrict construction and operation lighting and noise levels to regular work hours during the week and to acceptable times during the weekends.

Implementation Plan COS-8.1.2 Design Guidelines for Exterior Light Sources

The City shall develop design guidelines that require wherever possible that exterior light sources be controlled and/or shielded to a downward direction so as not to glare or be directly visible beyond the limits of the parcel. Additionally, the plan emphasizes the desire to protect the night sky environment for the continued success of the nearby Monterey Institute for Research in Astronomy (MIRA).

SEASIDE MUNICIPAL CODE

Chapter 17 of the City of Seaside's Municipal Code identifies lighting regulations for outdoor development. Specifically, Section 17.30.070 Outdoor Lighting states that lighting on the site of a multi-family or nonresidential structure or use shall comply with the following requirements:

Maximum Height. A freestanding outdoor light fixture shall be limited to a maximum height of 16 feet, measured from adjacent normal grade to the top of the fixture(s). The fixture shall be considered to be the highest portion of the light structure. When not located adjacent to a single-family residential zone, the Board of Architectural Review may grant exceptions to the maximum height of freestanding outdoor

light fixture(s) with the finding that the proposed height is consistent with surrounding land uses and is compatible with the existing or proposed surrounding structures.

Energy Efficiency. Outdoor lighting shall utilize energy-efficient (high pressure sodium, low pressure sodium, hard-wired compact fluorescent, LED, or other lighting technology that is of equal or greater energy efficiency) fixtures and lamps.

Position of Light Fixtures. All lighting fixtures shall be properly directed, recessed, and fully shielded (e.g., downward and away from adjoining properties) to reduce light bleed and glare onto adjacent properties or public rights-of-way, by:

1. Ensuring that the light source (e.g., bulb, etc.) is not visible from off the site; and

2. Confining glare and reflections within the boundaries of the subject site to the maximum extent feasible.

Maximum Illumination. No lighting on private property shall produce an illumination level greater than one (1) foot-candle on any property within a residential zone except on the site of the light source.

Backlighting, Uplighting, and Glare (BUG) Rating. All outdoor light fixtures are subject to the BUG rating limits established by the California Energy Code (CalGreen Section 5.106.8) prior to the issuance of an electrical permit.

No Blinking, Flashing, or High Intensity. No permanently installed lighting shall blink, flash, flutter, or be of unusually high intensity or brightness, or change light brightness, color, or intensity, as determined by the Zoning Administrator.

New Light Fixtures on Commercial Buildings. Installation of new light fixtures on commercial buildings shall be subject to review and approval by the Board of Architectural Review.

MARINA GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Marina. However, this document summarizes goals and policies from the City of Marina's General Plan for information purposes only, to provide context for the analysis of potential conflicts with aesthetic resources. The City of Marina's General Plan includes the following relevant policies (City of Marina, 2000):

Policy 4.26 The following design policies and programs shall apply to residential streets in the City. The standards designated for local residential and collector streets are consistent with the national standards jointly prescribed by the American Society of Civil Engineers, the Urban Land Institute, and the National Association of Homebuilders.

8. Both street lighting and lighting for parks and sports fields shall be shielded and should be consistent with the provisions of Chapter IV of the City Design Guidelines and Standards.

Policy 4.122 The City shall require that lighting of streets and other public areas in proximity to areas of natural open space be shielded and as unobtrusive as possible so as to direct light away from habitat reserve areas and other areas of natural open space. The same requirements shall follow for outdoor lighting on private development sites adjacent to such lands.

4.1.3 Methodology

EXP Engineering prepared the lighting analysis titled *California State University Monterey Bay Stadium Expanded Use Project Field Lighting Impacts*, dated August 2025 (**Appendix B**). This report evaluates the expanded use of both field and temporary lighting during the proposed new events at the CSUMB Stadium, and discusses the potential impacts this lighting may have on surrounding land uses. EXP Engineering identified the nearest sensitive receptors to the proposed project site and modeled the field lighting to produce a light spill and sky glow summary, which were used to determine potential impacts from proposed project lighting.

4.1.4 Impacts and Mitigation

4.1.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact on aesthetics if it would:

a. Have a substantial adverse effect on a scenic vista;

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway;

c. In a non-urbanized area, substantially degrade the existing visual character or quality of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or,

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

4.1.4.2 Impacts and Mitigation Measures

Impact AES-1: The proposed project would not have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway (criteria a and b).

Expanded Use

The proposed expanded use of the proposed project consists of an increase in the number and frequency of events at the existing CSUMB Stadium, including in the number of teams, including athletes and employees, vendors, and visitors. The existing viewshed within which the stadium lies is largely characterized by other athletic facilities within CSUMB's Athletics and Recreation District. The proposed project would not alter views of the scenic resources (e.g., Pacific Ocean, Santa Lucia Mountains) from

public vantage points because the only designated public vantage points in the vicinity are SR 1 and the coastal area (beach and dunes) to the west. The proposed project site is not visible from these designated public vantage points and, therefore, the proposed project site would not adversely affect views from these locations.

The existing use of the CSUMB Stadium would result in annual increase in the number of people visiting the site; however, the number of people for each event throughout the year would vary but never exceed the stadium's existing occupancy limit of 6,000 people. While the added events may increase the frequency of people gathering at or around the stadium; increase crowd activity, portable concession stands, staging, or other temporary features associated with events; these activities would occur within the existing stadium and Athletics and Recreation District. In this respect, these activities would not differ from typical stadium event operations. As discussed in **Impact AES-3**, some events would occur at night and require stadium and/or temporary lighting (e.g., lighting used for parking lot security and safety and theatrical lights for concerts and other non-athletic events). Scenic vistas are only visible during daylight hours, and, therefore, while nighttime lighting would generate illumination noticeable from adjacent public viewpoints (please refer to **Impact AES-3** for further discussion of proposed project lighting effects), the lighting would not have an adverse effect on a scenic vista.

Additionally, the expanded use component would not substantially damage scenic resources within a State Scenic Highway. The project site is not located in view of a State-designated Scenic Highway; rather the segment of SR 1 near the project site is eligible as a scenic highway. While not designated, this segment does provide views of various scenic resources; regardless, the expanded use component at the existing CSUMB Stadium would not impede views of scenic resources due to the developed nature of the project site and prevailing vegetation and topography.

For these reasons, the proposed expanded use of the stadium would have no impact with regard to a substantial adverse effect on a scenic vista or scenic resources within a State Scenic Highway.

Stadium Improvements

All proposed stadium improvements (i.e., locker room and shower facilities, permanent restroom facilities, and the gated event storage and staging area) would occur at or adjacent to the existing CSUMB Stadium. As identified in **Section 4.1.1.2**, above, key scenic resources defined by CSUMB and the City of Seaside consist of the Monterey Bay (Pacific Ocean), coastal sand dunes, and the Gabilan and Santa Lucia Mountain Ranges. The proposed project would not alter views of the scenic resources (e.g., Pacific Ocean, Santa Lucia Mountains) from public vantage points because the only designated public vantage points in the vicinity are SR 1 and the coastal area (beach and dunes) to the west, and the proposed project site does not adversely affect views from these locations. Similarly, the project site does not impede views of these resources from public viewing areas due to vegetation and topography. The proposed stadium improvements would be consistent with the visual character of the surrounding Athletics and Recreation District, which is largely developed with existing stadium and parking infrastructure for a range of athletics including soccer, baseball, softball, disc golf, and swimming. For these reasons, the proposed stadium improvements would have a less than significant impact on scenic vistas.

The proposed stadium improvements would not substantially damage scenic resources within a State Scenic Highway. All proposed stadium improvements would occur either within or directly adjacent to the existing CSUMB Stadium. The proposed stadium improvements would be visually consistent with the existing character of the Athletics and Recreation District and would not impact existing scenic resources

in the vicinity of the project site. As previously discussed, the project site is not in view of an existing designated State Scenic Highway, nor is it visible from SR 1, the nearest eligible scenic highway. Therefore, the proposed stadium improvements would have no impact.

Mitigation Measures

No mitigation is required for **Impact AES-1**.

Impact AES-2: The proposed project would not conflict with applicable zoning and other regulations governing scenic quality (criterion c).

Expanded Use

The expanded use component would occur at the existing CSUMB Stadium in the Athletics and Recreation District. The 2022 CSUMB Master Plan Guidelines allows for a range of athletics and recreational uses on and immediately adjacent to the project site (CSU, 2022b). Furthermore, the City of Seaside provides a land use designation for the entire CSUMB campus, including the proposed project site, of Public/Schools/Institutional (City of Seaside, 2024). These land use designations allow for the expanded use of the project site for hosting athletic and non-athletic events. Therefore, the proposed expanded use of the project site would have a less than significant impact with respect to a conflict with applicable zoning and other regulations for scenic quality.

Stadium Improvements

As discussed above, the project site carries land use designations from both CSUMB and the City of Seaside that allow for a range of athletics and recreational uses. The proposed stadium improvements consist of locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area that would support the operation of the existing CSUMB Stadium. These improvements would help facilitate ongoing athletic and recreational use of the project site and would be consistent both in terms of the existing visual character and use. Therefore, the proposed stadium improvements would have a less than significant impact with respect to substantially degrading the existing visual character or quality of the project site or its surroundings or a conflict with applicable zoning and other regulations for scenic quality.

Mitigation Measures

No mitigation is required for **Impact AES-2**.

Impact AES-3: The proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (criterion d).

Expanded Use

The proposed expanded use of the stadium would increase the usage of the existing stadium lighting, which involves four (4) 90-foot tall high-mast poles each containing 46 LED flood lights aimed downward at the field. These lighting poles are currently equipped with glare shields and Dark Sky-compliance LED fixtures. The existing lighting poles and other existing facility lighting currently operate in compliance with the CSU Outdoor Lighting Design Guide, which sets forth measures to provide a comfortable nighttime

environment, maximize energy efficiency, reduce light pollution and glare, and require a design that will improve campus aesthetics (EXP Engineering, 2025). While CSUMB is not subject to local ordinances and policies, the facility currently operates, and would continue to operate, in compliance with the City of Seaside's outdoor lighting policies and energy efficiency policies outlined in the City of Seaside's General Plan and Municipal Code. The proposed project would not add new stadium lighting, and any exterior lighting constructed on the new facilities proposed would be consistent with CSU's Outdoor Lighting ~~Desing~~ Design Guidelines. The proposed project would also continue to utilize temporary lighting. Temporary lighting is currently used in the parking lot areas for safety and security (CSUMB, 2021), expanded use of temporary lighting would be used for events such as concerts or other non-athletic uses.

The Athletics and Recreation District is frequently illuminated by lighting from the existing CSUMB Stadium and adjacent baseball and softball fields. To understand the potential impacts associated with expanded use, and more specifically the expanded use of lighting at the CSUMB Stadium, EXP Lighting conducted a lighting analysis (**Appendix B**). The lighting analysis identified that the closest campus residences are approximately 0.34 miles northeast of the site, and the closest existing private residences are located approximately 0.5 miles south of the project site. Additionally, the nearest planned new residences within the approved Campus Town Specific Plan Project would be located approximately 0.17 miles from the nearest existing light source at the project site. However, the existing lighting facilities at the project site produce little light spillover (EXP Engineering, 2025).

The Field Lighting Impacts Report also notes that fog, which is a common occurrence along the California's Central Coast, can amplify existing light sources through reflection and refraction causing extensive illumination fields. However, the report concludes that fog conditions would not create a considerable environmental concern since the same fog conditions surrounding the project site would also encompass nearby residential areas, obscuring both light from and visibility of the stadium (EXP Engineering, 2025). EXP Engineering concluded that the expanded use would not result in a new source of substantial light or glare that would adversely impact day or nighttime views in the areas.

As discussed above, some events would occur at night and require stadium or temporary lighting. While nighttime lighting would generate noticeable illumination as experienced from adjacent off campus land uses, the lighting would not have an adverse effect on a scenic vista, would not substantially increase lighting at the stadium, and would be temporary in nature. Moreover, temporary lighting used for events would be located at field level, and the stadium infrastructure and intervening topography would screen these additional light sources from view of nearby residential developments.

Therefore, due to the existing design of the lighting poles in compliance with the CSU Outdoor Lighting Design Guide, Dark Sky lighting design standards, and applicable local ordinances for outdoor lighting, the proposed expanded use of the stadium would have a less than significant impact regarding the creation of a new source of substantial light or glare that would adversely affect views in the area.

Stadium Improvements

The proposed stadium improvements would not create a new source of substantial light or glare that would adversely affect views in the area. The proposed stadium improvements do not involve substantial new sources of light (e.g., new stadium lighting poles or new parking lot lighting). However, the proposed locker room and shower facilities and permanent restroom facilities would require indoor and outdoor lighting fixtures. These improvements would be located within the existing CSUMB Stadium, operate

concurrently with athletic and non-athletic events, and would be out of view of existing residential land uses. Additionally, temporary lighting used for parking lot security and safety and concerts or other non-athletic uses would not substantially increase ambient light levels at the stadium and would not have an adverse effect on a scenic vista. Therefore, the proposed stadium improvements would have a less than significant impact regarding the creation of a new source of substantial light or glare that would adversely affect views in the area.

Mitigation Measures

No mitigation is required for **Impact AES-3**.

4.1.5 References

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4.2 AIR QUALITY

This section evaluates the potential air quality impacts associated with the development of the proposed project. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. This section is based on the Air Quality and Greenhouse Gas Emissions Analysis of the proposed project prepared by AMBIENT Air Quality and Noise Consulting (AMBIENT) (AMBIENT, 2026). Please refer to **Appendix C**. The Monterey Bay Air Resource District (MBARD) is the regional agency tasked with managing air quality. The California Air Resources Board (CARB) oversees regional air districts including MBARD.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies, according to CEQA. Comments were received related to air quality during the public scoping period, specifically from MBARD, which are summarized below:

- Recommendation to use the MBARD CEQA Air Quality Guidelines as a resource for preparing the EIR.
- Asbestos abatement may necessary as the land encompassing former Fort Ord contains buried asbestos utility infrastructure. During construction, the project must follow proper procedures when encountering active or abandoned asbestos containing infrastructure.
- Recommendation to use construction equipment that meets the California Air Resources Board's Tier 3 and Tier 4 emission standards, and to use alternative fuels (e.g., compressed natural gas, propane, electricity, or biodiesel) that reduce diesel exhaust emissions and odors.
- A permit may be necessary prior to the use of any stationary source of air pollutants. Please contact MBARD with questions regarding the permit process.
- For portable equipment registered with the California Air Resources Board's Portable Equipment Registration Program, the project must notify MBARD within two (2) working days if construction would require the use of portable equipment for more than five (5) days. Portable equipment not registered with the California Air Resources Board may require an MBARD permit.

For a copy of the MBARD letter and a complete list of public comments received during the public scoping period, please refer to **Appendix A, NOP and Public Comment Letters**.

4.2.1 Environmental Setting

4.2.1.1 Regional Overview

The proposed project is located within the North Central Coast Air Basin (NCCAB), one (1) of 14 statewide basins designated by CARB. The NCCAB covers an area of 5,159 square miles along the Central Coast. The NCCAB is comprised of Monterey, Santa Cruz, and San Benito counties. MBARD is responsible for local control and monitoring of criteria ~~for~~ air pollutants throughout the NCCAB. Air quality is affected by

topography, meteorology, and climate. These factors are discussed in more detail in the following sections.

The NCCAB covers an area of 5,159 square miles along the Central Coast and encompasses Santa Cruz, San Benito, and Monterey counties. The NCCAB is generally bounded by the Diablo Range to the northeast, which together with the southern portion of the Santa Cruz Mountains forms the Santa Clara Valley that extends into the northeastern tip of the NCCAB. Farther south, the Santa Clara Valley transitions into the San Benito Valley, which runs northwest-southeast and has the Gabilan Range as its western boundary. To the west of the Gabilan Range is the Salinas Valley that extends from Salinas at the northwest end to King City at the southeast end. The northwest portion of the NCCAB is dominated by the Santa Cruz Mountains.

4.2.1.2 Meteorology and Climate

Climate, or the average weather condition, affects air quality in several ways. Wind patterns can remove or add air pollutants emitted by stationary or mobile sources. Inversion, a condition where warm air traps cooler air underneath it, can hold pollutants near the ground by limiting upward mixing (dilution). Communities with cold climates may burn wood or other fuels for residential heating, whereas areas with hot climates may have higher emissions of some pollutants from automobiles. Topography also plays a part, as valleys often trap emissions by limiting lateral dispersal.

In the summer, the high-pressure cell is dominant and causes persistent west and northwest winds over the entire California Coast. As air descends in the Pacific high-pressure cell, a stable temperature inversion is formed. As temperatures increase, the warmer air aloft expands, forcing the coastal layer of air to move onshore producing a moderate sea breeze over the coastal plains and valleys. Temperature inversions inhibit vertical air movement and often result in increased transport of air pollutants to inland receptor areas. The onshore air currents pass over cool ocean waters to bring fog and relatively cool air into the coastal valleys. The warmer air acts as a lid to inhibit vertical air movement. The generally northwest-southeast orientation of mountainous ridges tends to restrict and channel the summer onshore air currents. Surface heating in the interior portion of the Salinas and San Benito Valleys creates a weak low pressure that intensifies the onshore air flow during the afternoon and evening. Summer temperatures generally remain between 40 and 70 degrees along the coastal areas. In the fall, the surface winds weaken, and the marine layer grows shallow, dissipating altogether on some days. The air flow is occasionally reversed in a weak offshore movement, and the relatively stationary air mass is held in place by the Pacific high-pressure cell, which allows pollutants to build up over a period of a few days. It is most often during this season that the north or east winds develop to transport pollutants from either the San Francisco Bay Area or the Central Valley into the NCCAB.

In the winter, when the high-pressure cell is weakest and farthest south, the inversion associated with the Pacific high-pressure cell is typically absent in the NCCAB. Air frequently flows in a southeasterly direction out of the Salinas and San Benito valleys in the NCCAB. The predominant offshore flow during this time of year tends to aid in pollutant dispersal producing relatively healthy to moderate air quality throughout the majority of the region. Conditions during this time are often characterized by afternoon and evening land breezes and occasional rainstorms. However, local inversions caused by the cooling of air close to the ground can form in some areas during the evening and early morning hours.

Winter daytime temperatures in the NCCAB typically average in the mid-50s during the day, with nighttime temperatures averaging in the low-40s. Summer daytime temperatures typically average in the

60s during the day, with nighttime temperatures averaging in the 50s. Precipitation varies within the region, but in general, annual rainfall is lowest in the coastal plain and inland valley, higher in the foothills, and highest in the mountains.

4.2.1.3 Criteria Air Pollutants & Ambient Air Quality Standards

The Federal Clean Air Act (FCAA) requires that the United States Environmental Protection Agency (EPA) establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as "criteria" pollutants because the EPA publishes criteria documents to justify the choice of standards. NAAQS define the maximum amount of an air pollutant that can be present in ambient air, and are generally specified as a concentration averaged over a specific time period, such as one (1)-hour, eight (8)-hours, 24-hours, or one (1)-year. The different averaging times and concentrations are meant to protect against different exposure effects. Ambient air quality standards (AAQS) established for the protection of human health are referred to as primary standards; whereas standards established for the prevention of environmental and property damage are called secondary standards. The FCAA allows states to adopt additional or more health-protective standards.

The following provides a summary discussion of the primary and secondary criteria air pollutants of primary concern. In general, primary pollutants are directly emitted into the atmosphere, and secondary pollutants are formed by chemical reactions in the atmosphere. **Table 4.2-1** identifies the applicable criteria air pollutants and their corresponding AAQS.

- Ozone (O_3) is a reactive gas consisting of three (3) atoms of oxygen. In the troposphere, it is a product of the photochemical process involving the sun's energy. It is a secondary pollutant that is formed when NO_X and volatile organic compounds (VOC), also referred to as reactive organic gases (ROG) react in the presence of sunlight. Ozone at the earth's surface causes numerous adverse health effects and is a criteria pollutant. It is a major component of smog. In the stratosphere, O_3 exists naturally and shields Earth from harmful incoming ultraviolet radiation.

- High concentrations of ground level O_3 can adversely affect the human respiratory system and aggravate cardiovascular disease and many respiratory ailments. Ozone also damages natural ecosystems such as forests and foothill communities, agricultural crops, and some man-made materials, such as rubber, paint, and plastics.

- ROG is a reactive chemical gas, composed of hydrocarbon compounds that may contribute to the formation of smog by their involvement in atmospheric chemical reactions. No separate health standards exist for ROG as a group. Because some compounds that make up ROG are also toxic, like the carcinogen benzene, they are often evaluated as part of a toxic risk assessment. Total Organic Gases (TOG) include all the ROGs, in addition to low reactivity organic compounds like methane and acetone. ROGs and VOC are subsets of TOG.

- VOCs are hydrocarbon compounds that exist in the ambient air. VOCs contribute to the formation of smog and may also be toxic. VOC emissions are a major precursor to the formation of O_3. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints.

- Oxides of Nitrogen (NO_X) are a family of gaseous nitrogen compounds and is a precursor to the formation of O_3 and particulate matter. The major component of NO_X, nitrogen dioxide (NO_2), is a reddish-brown gas that is toxic at high concentrations. NO_X results primarily from the

combustion of fossil fuels under high temperature and pressure. On-road and off-road motor vehicles and fuel combustion are the major sources of this air pollutant.

- Particulate Matter (PM), also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates [SO_4^{2-}]), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health problems. EPA is concerned about particles that are 10 micrometers in diameter or smaller because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. EPA groups particle pollution into three (3) categories based on their size and where they are deposited:

    - "Inhalable coarse particles ($PM_{2.5-10}$)," such as those found near roadways and dusty industries, are between 2.5 and 10 micrometers in diameter. $PM_{2.5-10}$ is deposited in the thoracic region of the lungs.

    - "Fine particles ($PM_{2.5}$)," such as those found in smoke and haze, are 2.5 micrometers in diameter and smaller. These particles can be directly emitted from sources such as forest fires, or they can form when gases emitted from power plants, industries and automobiles react in the air. They penetrate deeply into the thoracic and alveolar regions of the lungs.

- Carbon Monoxide (CO) is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels and is emitted directly into the air (unlike O_3). The main source of CO is on-road motor vehicles. Other CO sources include other mobile sources, miscellaneous processes, and fuel combustion from stationary sources. Because of the local nature of CO problems, CARB and EPA designate urban areas as CO nonattainment areas instead of the entire basin as with O_3 and PM_{10}. Motor vehicles are by far the largest source of CO emissions. Emissions from motor vehicles have been declining since 1985, despite increases in vehicle miles traveled, with the introduction of new automotive emission controls and fleet turnover.

- Sulfur Dioxide (SO_2) is a colorless, irritating gas with a "rotten egg" smell formed primarily by the combustion of sulfur-containing fossil fuels. However, like airborne NO_X, suspended sulfur oxides (SO_X) particles contribute to poor visibility. These SO_X particles can also combine with other pollutants to form $PM_{2.5}$. The prevalence of low-sulfur fuel use has minimized problems from this pollutant.

- Lead (Pb) is a metal that is a natural constituent of air, water, and the biosphere. Lead is neither created nor destroyed in the environment, so it essentially persists forever. The health effects of lead poisoning include loss of appetite, weakness, apathy, and miscarriage. Lead can also cause lesions of the neuromuscular system, circulatory system, brain, and gastrointestinal tract. Gasoline-powered automobile engines were a major source of airborne lead resulting from the use of leaded fuels. The use of leaded fuel has been mostly phased out, with the result that ambient concentrations of lead have dropped dramatically.

Table 4.2-1
Summary of Ambient Air Quality Standards (AAQS)

Pollutant	Averaging Time	California Standards*	National Standards* (Primary)
Ozone (O_3)	1-hour	0.09 ppm	–
O_3	8-hour	0.070 ppm	0.070 ppm
Inhalable Particulate Matter (PM_{10})	AAM	20 µg/m^3	–
PM_{10}	24-hour	50 µg/m^3	150 µg/m^3
Fine Particulate Matter ($PM_{2.5}$)	AAM	12 µg/m^3	~~12~~ 9 µg/m^3
$PM_{2.5}$	24-hour	No Standard	35 µg/m^3
Carbon Monoxide (CO)	1-hour	20 ppm	35 ppm
CO	8-hour	9 ppm	9 ppm
CO	8-hour (Lake Tahoe)	6 ppm	–
Nitrogen Dioxide (NO_2)	AAM	0.030 ppm	0.053 ppm
NO_2	1-hour	0.18 ppm	100 ppb
Sulfur Dioxide (SO_2)	AAM	–	0.03 ppm (for certain areas)
SO_2	24-hour	0.04 ppm	0.14 ppm (for certain areas)
SO_2	3-hour	–	0.5 ppm (1300 µg/m^3)**
SO_2	1-hour	0.25 ppm	75 ppb
Lead (Pb)	30-day Average	1.5 µg/m^3	–
Pb	Calendar Quarter	–	1.5 µg/m^3 (for certain areas)
Pb	Rolling 3-Month Average	–	0.15 µg/m^3
Sulfates (SO_4^{2-})	24-hour	25 µg/m^3	No Federal Standards
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	No Federal Standards
Vinyl Chloride (C_2H_3Cl or VCM)	24-hour	0.01 ppm (26 µg/m^3)	No Federal Standards
Visibility-Reducing Particle Matter	8-hour	Extinction coefficient: 0.23/kilometer-visibility of 10 miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when the relative humidity is less than 70 percent.	No Federal Standards

* For more information on standards, visit: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf

** Secondary Standard
[1] Key to Acronyms and Units:
[2] Acronym Key:
AAM – Annual Arithmetic Mean;
µg/m3 – micrograms per cubic meter;
ppb – parts per billion;
ppm – parts per million
Source: CARB, 2016

OTHER POLLUTANTS

The State of California has established the California ambient air quality standards (CAAQS) for some pollutants not addressed by NAAQS. CARB has established CAAQS for H_2S, SO_4^{2-}, VCM, and visibility reducing particles (i.e., PM_{10} and $PM_{2.5}$) (please refer to **Table 4.2-1** above). The following section summarizes these pollutants and provides a description of the pollutants' physical properties, health and other effects, sources, and the extent of the problems.

- Hydrogen Sulfide (H_2S) is associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. Hydrogen sulfide is extremely hazardous in high concentrations; especially in enclosed spaces (800 parts per million [ppm] can cause death). Occupational Safety and Health Administration (OSHA) regulates workplace exposure to H_2S.

  Sulfates (SO_4^{2-}) are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO_2 to SO_4^{2-} takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features.

- The SO_4^{2-} CAAQS is designed to prevent aggravation of respiratory symptoms. Effects of SO_4^{2-} exposure at levels above the standard include a decrease in ventilator function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and since they are usually acidic, can harm ecosystems and damage materials and property.

- Visibility Reducing Particles are a mixture of suspended particulate matter consisting of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. The standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

- Vinyl Chloride (C_2H_3Cl or VCM) is a colorless gas that does not occur naturally. It is formed when other substances such as trichloroethane, trichloroethylene, and tetrachloro-ethylene are broken down. VCM is used to make polyvinyl chloride which is used to make a variety of plastic products, including pipes, wire and cable coatings, and packaging materials.

4.2.1.4 Odors

Typically, odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from the psychological (i.e., irritation, anger, or anxiety) to the physiological, including circulatory and respiratory effects, nausea, vomiting, and headache.

The ability to detect odors varies considerably among the population is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor and an odor that is offensive to one (1) person may be perfectly acceptable to another (e.g., fast food restaurant). Unfamiliar odors are more easily detected and are more likely to cause complaints than a familiar one because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occur with an alteration in the intensity.

Quality and intensity are two (2) properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word strong to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. Over time, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

Neither the state nor the federal governments have adopted rules or regulations for the control of odor sources. MBARD does not have an individual rule or regulation that specifically addresses odors; however, odors would be subject to MBARD *Rule 402, Nuisance*. Any actions related to odors would be based on citizen complaints to local governments and the MBARD.

4.2.1.5 Toxic Air Contaminants

Toxic air contaminants (TACs) are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. Because there is no threshold level below which adverse health impacts are not expected to occur, TACs differ from criteria pollutants for which acceptable levels of exposure can be determined and for which State and Federal governments have set AAQS. TACs, therefore, are not considered "criteria pollutants" under either the FCAA or the California Clean Air Act (California CAA), and are thus not subject to NAAQS and CAAQS. Instead, the EPA and the CARB regulate Hazardous Air Pollutants (HAPs) and TACs through statutes and regulations that generally require the use of the maximum or best available control technology to limit emissions. In conjunction with MBARD rules, these Federal and State statutes and regulations establish the regulatory framework for TACs. At the national levels, the EPA has established National Emission Standards for HAPs (NESHAPs), in accordance with the requirements of the FCAA and subsequent amendments. These are technology-based source-specific regulations that limit allowable emissions of HAPs.

Within California, TACs are regulated primarily through the Tanner Air Toxics Act (AB 1807) ("Tanner Act") and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for CARB to designate substances as TACs. The following provides a summary of the primary TACs of concern within the State of California and related health effects.

- Diesel Exhaust Particulate Matter (Diesel Exhaust PM or DPM) was identified as a TAC by the CARB in August 1998. DPM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute approximately 40 percent of the statewide total, with an additional 57 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and transport refrigeration units. Stationary sources, contributing about 3 percent of emissions, include shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations. Emissions from these sources are from diesel-fueled internal combustion engines. Stationary sources that report DPM emissions also include heavy construction, manufacturers of asphalt paving materials and blocks, and diesel-fueled electrical generation facilities (CARB, 2026a).

  In October 2000, the CARB issued a report entitled: "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles," which is commonly referred to as the Diesel Risk Reduction Plan (DRRP) (CARB, 2000). The DRRP provides a mechanism for combating the DPM problem. The goal of the DRRP is to reduce concentrations of DPM by 85 percent by the year 2020, in comparison to year 2000 baseline emissions. The key elements of the DRRP are to clean up existing engines through engine retrofit emission control devices, to adopt stringent standards for new diesel engines, and to lower the sulfur content of diesel fuel to protect new, and very effective, advanced technology emission control devices on diesel engines. When fully implemented, the DRPP will significantly reduce emissions from both old and new diesel fueled motor vehicles and from stationary sources that burn diesel fuel. In addition to these strategies, the CARB continues to promote the use of alternative fuels and electrification. As a result of these actions, DPM concentrations and associated health risks in future years are projected to decline (CARB, 2026a).

  Exposure to DPM can have immediate health effects. DPM can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, exposure to DPM also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. The elderly and people with emphysema, asthma, and chronic heart and lung disease are especially sensitive to fine-particle pollution. Because children's lungs and respiratory systems are still developing, they are also more susceptible than healthy adults to fine particles. Exposure to fine particles is associated with increased frequency of childhood illnesses and can also reduce lung function in children. In California, DPM has been identified as a carcinogen.

- Acetaldehyde is a Federal HAP. The CARB identified acetaldehyde as a TAC in April 1993. Acetaldehyde is both directly emitted into the atmosphere and formed in the atmosphere as a result of photochemical oxidation. Sources of acetaldehyde include emissions from combustion processes such as exhaust from mobile sources and fuel combustion from stationary internal combustion engines, boilers, and process heaters. A majority of the statewide acetaldehyde emissions can be attributed to mobile sources, including on-road motor vehicles, construction and mining equipment, aircraft, recreational boats, and agricultural equipment. Area sources of emissions include the burning of wood in residential fireplaces and wood stoves. The primary

stationary sources of acetaldehyde are from fuel combustion from the petroleum industry (CARB, 2026a). Acute exposure to acetaldehyde results in effects including irritation of the eyes, skin, and respiratory tract. Symptoms of chronic intoxication of acetaldehyde resemble those of alcoholism.

- Benzene is highly carcinogenic and occurs throughout California. The CARB identified benzene as a TAC in January 1985. Most of the benzene emitted in California (roughly 88 percent) comes from motor vehicles, including evaporative leakage and unburned fuel exhaust. These sources include on-road motor vehicles, recreational boats, off-road recreational vehicles, and lawn and garden equipment. Benzene is also formed as a partial combustion product of larger aromatic fuel components. To a lesser extent, industry-related stationary sources are also sources of benzene emissions. The primary stationary sources of reported benzene emissions are crude petroleum and natural gas mining, petroleum refining, and electric generation that involves the use of petroleum products. The primary area sources include residential combustion of various types, such as cooking and water heating (CARB, 2026a).

  Acute inhalation exposure of humans to benzene may cause drowsiness, dizziness, headaches, as well as eye, skin, and respiratory tract irritation, and, at high levels, unconsciousness. Chronic inhalation exposure has caused various disorders in the blood, including reduced numbers of red blood cells and aplastic anemia, in occupational settings. Reproductive effects have been reported for women exposed by inhalation to high levels, and adverse effects on the developing fetus have been observed in animal tests. Increased incidences of leukemia (cancer of the tissues that form white blood cells) have been observed in humans occupationally exposed to benzene. The EPA has classified benzene as known human carcinogen for all routes of exposure (CARB, 2026a).

- 1,3-butadiene was identified by the CARB as a TAC in 1992. Most of the emissions of 1,3-butadiene are from incomplete combustion of gasoline and diesel fuels. Mobile sources account for a majority of the total statewide emissions. Additional sources include agricultural waste burning, open burning associated with forest management, petroleum refining, manufacturing of synthetics and man-made materials, and oil and gas extraction. The primary natural sources of 1,3-butadiene emissions are wildfires (CARB, 2026a).

  Acute exposure to 1,3-butadiene by inhalation in humans results in irritation of the eyes, nasal passages, throat, and lungs. Epidemiological studies have reported a possible association between 1,3-butadiene exposure and cardiovascular diseases. Epidemiological studies of workers in rubber plants have shown an association between 1,3-butadiene exposure and increased incidence of leukemia. Animal studies have reported tumors at various sites from 1,3-butadiene exposure. In California, 1,3-butadiene has been identified as a carcinogen.

- Carbon Tetrachloride was identified by the CARB as a TAC in 1987 under California's TAC program (CARB, 2026a). The primary stationary sources reporting emissions of carbon tetrachloride include chemical and allied product manufacturers and petroleum refineries. In the past, carbon tetrachloride was used for dry cleaning and as a grain-fumigant. Usage for these purposes is no longer allowed in the United States. Carbon tetrachloride has not been registered for pesticidal use in California since 1987. Also, the use of carbon tetrachloride in products to be used indoors has been discontinued in the United States. The statewide emissions of carbon tetrachloride are small (about 1.96 tons per year), and background concentrations account for most of the health risk (CARB, 2026a).

The primary effects of carbon tetrachloride in humans are on the liver, kidneys, and central nervous system. Human symptoms of acute inhalation and oral exposures to carbon tetrachloride include headache, weakness, lethargy, nausea, and vomiting. Acute exposures to higher levels and chronic (long-term) inhalation or oral exposure to carbon tetrachloride produces liver and kidney damage in humans. Human data on the carcinogenic effects of carbon tetrachloride are limited. Studies in animals have shown that ingestion of carbon tetrachloride increases the risk of liver cancer. In California, carbon tetrachloride has been identified as a carcinogen.

- Hexavalent chromium was identified as a TAC in 1986. Sources of Hexavalent chromium include industrial metal finishing processes, such as chrome plating and chromic acid anodizing, and firebrick lining of glass furnaces. Other sources include mobile sources, including gasoline motor vehicles, trains, and ships (CARB, 2026a).

  The respiratory tract is the major target organ for hexavalent chromium toxicity, for acute and chronic inhalation exposures. Shortness of breath, coughing, and wheezing were reported from a case of acute exposure to hexavalent chromium, while perforations and ulcerations of the septum, bronchitis, decreased pulmonary function, pneumonia, and other respiratory effects have been noted from chronic exposure. Human studies have clearly established that inhaled hexavalent chromium is a human carcinogen, resulting in an increased risk of lung cancer. In California, hexavalent chromium has been identified as a carcinogen.

- Formaldehyde was identified by the CARB as a TAC in 1992. Formaldehyde is both directly emitted into the atmosphere and formed in the atmosphere because of photochemical oxidation. Photochemical oxidation is the largest source of formaldehyde concentrations in California ambient air. Directly emitted formaldehyde is a product of incomplete combustion. One (1) of the primary sources of directly-emitted formaldehyde is vehicular exhaust. Formaldehyde is also used in resins, can be found in many consumer products as an antimicrobial agent, and is also used in fumigants and soil disinfectants. The primary area sources of formaldehyde emissions include wood burning in residential fireplaces and wood stoves (CARB, 2026a).

  Exposure to formaldehyde may occur by breathing contaminated indoor air, tobacco smoke, or ambient urban air. Acute and chronic inhalation exposure to formaldehyde in humans can result in respiratory symptoms, and eye, nose, and throat irritation. Limited human studies have reported an association between formaldehyde exposure and lung and nasopharyngeal cancer. Animal inhalation studies have reported an increased incidence of nasal squamous cell cancer. Formaldehyde is classified as a probable human carcinogen.

- Methylene Chloride was identified by the CARB as a TAC in 1987. Methylene chloride is used as a solvent, a blowing and cleaning agent in the manufacture of polyurethane foam and plastic fabrication, and as a solvent in paint stripping operations. Paint removers account for the largest use of methylene chloride in California, where methylene chloride is the main ingredient in many paint stripping formulations. Plastic product manufacturers, manufacturers of synthetics, and aircraft and parts manufacturers are stationary sources reporting emissions of methylene chloride (CARB, 2026a).

  The acute effects of methylene chloride inhalation in humans consist mainly of nervous system effects including decreased visual, auditory, and motor functions, but these effects are reversible once exposure ceases. The effects of chronic exposure to methylene chloride suggest that the

central nervous system is a potential target in humans and animals. Human data are inconclusive regarding methylene chloride and cancer. Animal studies have shown increases in liver and lung cancer and benign mammary gland tumors following the inhalation of methylene chloride. In California, methylene chloride has been identified as a carcinogen.

- Perchloroethylene was identified by the CARB as a TAC in 1991. Perchloroethylene is used as a solvent, primarily in dry cleaning operations. Perchloroethylene is also used in degreasing operations, paints and coatings, adhesives, aerosols, specialty chemical production, printing inks, silicones, rug shampoos, and laboratory solvents. In California, the stationary sources that have reported emissions of perchloroethylene are dry cleaning plants, aircraft part and equipment manufacturers, and fabricated metal product manufacturers. The primary area sources include consumer products such as automotive brake cleaners and tire sealants and inflators (CARB, 2026a).

  Acute inhalation exposure to perchloroethylene vapors can result in irritation of the upper respiratory tract and eyes, kidney dysfunction, and at lower concentrations, neurological effects, such as reversible mood and behavioral changes, impairment of coordination, dizziness, headaches, sleepiness, and unconsciousness. Chronic inhalation exposure can result in neurological effects, including sensory symptoms such as headaches, impairments in cognitive and motor neurobehavioral functioning, and color vision decrements. Cardiac arrhythmia, liver damage, and possible kidney damage may also occur. In California, perchloroethylene has been identified as a carcinogen.

4.2.1.6 Attainment Status

The attainment status of the NCCAB is summarized in **Table 4.2-2.** An attainment designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A nonattainment designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation(s) was caused by an exceptional event, as defined in the criteria. Unclassified designations indicate insufficient data is available to determine attainment status. The NCCAB is designated a nonattainment area for the PM_{10} CAAQS. Under the FCAA, the NCCAB is currently designated attainment for the recently established eight (8)-hour O_3 NAAQS. The NCCAB is designated either attainment or unclassified for the remaining CAAQS and NAAQS. MBARD is responsible for monitoring criteria pollutants to determine whether they are in attainment or not in attainment with the regional Air Quality Management Plan (AQMP).

Table 4.2-2
NCCAB Attainment Status Designations

Pollutants	State Designation	Federal Designation
Ozone (O_3)	Attainment	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
	San Benito Co. – Unclassified	Attainment
	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment

Source: MBARD, 2017; CARB, 2023.

4.2.1.7 Sensitive Receptors

One of the most important reasons for air quality standards is the protection of those members of the population who are most sensitive to the adverse health effects of air pollution, termed "sensitive receptors." The term sensitive receptors refer to specific population groups, as well as the land uses where individuals would reside for long periods. CARB defines sensitive receptors as children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Additionally, sensitive receptor locations include hospitals, schools, and day care centers (CARB, 2026b).

The nearest sensitive receptors consist predominantly of land uses associated with CSUMB's campus. Specifically, the nearest student housing is located approximately 1,500 feet northeast of the stadium along Divarty Street; the CSUMB Child Development Center is located approximately 706 feet (0.14 miles) north of the project site, the Otter Sports Center is located approximately 1,100 feet (0.21 miles) north of the project site, and the nearest classrooms are located approximately 1,370 feet (0.25 miles) north of the project site. Additionally, the Department of Veterans Affairs outpatient clinic that provides medical services to veterans is located approximately 534 feet (0.1 miles) east of the project site.

The nearest residential land uses (i.e., The Dunes) are located approximately 2,366 feet (0.45 miles) south of the project site along Gigling Road in Seaside and 2,900 feet (0.55 miles) north of the project site near 8th Street in Marina. Additionally, new planned residential areas (i.e., Campus Town Specific Plan) are planned and under construction south of the project site between Lightfighter Drive and Gigling Road. Once completed, new residential units would be located approximately 990 feet south of the proposed project site.

4.2.2 Regulatory Environment

Air quality within the NCCAB is regulated by several jurisdictions including the EPA, CARB, and MBARD. Each of these jurisdictions develop rules, regulations, and policies to attain the goals or directives imposed upon them through legislation. Although EPA regulations may not be superseded, both state and local regulations may be more stringent.

4.2.2.1 Federal

U.S. ENVIRONMENTAL PROTECTION AGENCY

At the federal level, the EPA has been charged with implementing national air quality programs. The EPA's air quality mandates are drawn primarily from the FCAA, which was signed into law in 1970. Congress substantially amended the FCAA in 1977 and again in 1990.

FEDERAL CLEAN AIR ACT

The FCAA required the EPA to establish NAAQS, and set deadlines for their attainment. Two (2) types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. The FCAA allows states to adopt additional or more health-protective standards.

The FCAA also requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The 1990 FCAA Amendments required states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The EPA has the responsibility to review all state SIPs to determine conformance with the mandates of the FCAA, and the amendments thereof, and determine if implementation will achieve air quality goals. If the EPA determines a SIP to be inadequate, a Federal Implementation Plan (FIP) may be prepared for the nonattainment area that imposes additional control measures.

Pursuant to California CAA and amendments, a region must participate in the SIP if it is designated as a maintenance region. The most recent FIP prepared by MBARD to maintain the 1-hour ozone NAAQS is the *2007 Federal Maintenance Plan* for Maintaining the National Ozone Standard in the Monterey Bay Region and adopted rules and regulations.[1]

CRITERIA AIR POLLUTANTS

The FCAA, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the FCAA, including setting NAAQS for major air pollutants; setting HAP standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric O3 protection measures, and enforcement provisions. Under the FCAA, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over one (1)- to three (3)-year periods, depending on the pollutant. The FCAA requires the EPA to reassess the NAAQS at least every five (5) years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames. The FCAA identifies two (2) types of national ambient air quality standards. Primary standards provide public health protection, including protecting the health of sensitive receptors. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

HAZARDOUS AIR POLLUTANTS

The 1977 FCAA amendments required the EPA to identify National Emission Standards for Hazardous Air Pollutants to protect public health and welfare. HAPs include certain VOCs, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 FCAA Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

[1] The emission standards established for motor vehicles differ depending on various factors including the model year, and the type of vehicle, fuel, and engine used.

4.2.2.2 State

CALIFORNIA AIR RESOURCES BOARD

CARB is the agency responsible for coordinating and overseeing state and local air pollution control programs in California and implementing the California CAA of 1988. Other CARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control districts and air quality management districts, establishing CAAQS, which in many cases are more stringent than the NAAQS, and setting emissions standards for new motor vehicles.

CALIFORNIA CLEAN AIR ACT

The California CAA requires that all air districts in the state endeavor to achieve and maintain CAAQS for Ozone, CO, SO_2, and NO_x by the earliest practical date. The California CAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. Each district plan is required to: either (1) achieve a five (5) percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors, or (2) provide for the implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both state and federal planning requirements.

ASSEMBLY BILLS 1807 & 2588 - TOXIC AIR CONTAMINANTS

Within California, TACs are regulated primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics Hot Spots Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Information and Assessment Act are required to: (1) prepare a toxic emissions inventory; (2) prepare a risk assessment if emissions are significant; (3) notify the public of significant risk levels; and (4) prepare and implement risk reduction measures.

CALIFORNIA BUILDING STANDARDS CODE

The California Building Standards Code (CBSC), commonly referred to as Title 24, contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBSC includes energy efficiency standards, which are commonly referred to as green building standards or CalGreen standards. The CBSC is adopted every three (3) years by the Building Standards Commission (BSC). In the interim, the BSC also adopts annual updates to make necessary mid-term corrections. The CBSC was most recently updated in 2025 and became effective as of January 1, 2026.

PORTABLE EQUIPMENT REGISTRATION PROGRAM

Owners or operators of portable engines and certain other types of equipment can register their units under the CARB's Statewide Portable Equipment Registration Program (PERP). PERP allows registered equipment to be operated throughout California without having to obtain individual permits from local air districts. To qualify, equipment must meet eligibility requirements, including applicable emissions standards.

4.2.2.3 Local

MONTEREY BAY AIR RESOURCE DISTRICT

MBARD is the agency primarily responsible for ensuring that NAAQS and CAAQS are not exceeded and that air quality conditions are maintained in the NCCAB. Responsibilities of the MBARD include, but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting, and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the FCAA and the California CAA. To achieve NAAQS and CAAQS and maintain air quality, the MBARD has most recently completed the *2012-2015 Air Quality Management Plan* for achieving the state ozone standards and the *2007 Federal Maintenance Plan* for maintaining federal ozone standards (MBARD, 2017). MBARD has been in attainment regarding ozone since 2023 (CARB, 2023).

To achieve and maintain ambient air quality standards, the MBARD has adopted various rules and regulations for the control of airborne pollutants. The MBARD rules and regulations that are applicable to the proposed project include, but are not limited to, the following:

- Rule 201: The purpose of this rule is to provide a list of source and equipment categories which are exempt from the requirements of District Rule 200 to obtain an Authority to Construct or Permit to Operate. Rule 201 also defines exceptions to the identified exempt equipment. Most applicable to the proposed project would be the requirement to obtain Permit to Operate prior to use of any stationary piston-type internal combustion engine of greater than 50 brake horsepower.

- Rule 402 (Nuisances). The purpose of this rule is to prohibit emissions that may create a public nuisance. Applies to any source operation that emits or may emit air contaminants or other materials.

- Rule 426 (Architectural Coatings). The purpose of this rule is to limit emissions of volatile organic compounds from architectural coatings.

- Rule 425 (Use of Cutback Asphalt). The purpose of this rule is to limit emissions of vapors of organic compounds from the use of cutback and emulsified asphalt. This rule applies to the manufacture and use of cutback, slow cure, and emulsified asphalt during paving and maintenance operations.

- Rule 424 (NESHAP-Asbestos). Rule 424 adopts the NESHAPs contained in the Code of Federal Regulations (40 CFR Part 61) pertaining to asbestos removal and building demolitions.

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with air quality policies. The City of Seaside's General Plan includes the following relevant policy (City of Seaside, 2024):

Goal HSC-4: Neighborhoods that enhance the safety and welfare of all residents, employers and tourists in the City of Seaside.

Protect Sensitive Receptor Uses. Discourage development of sensitive land uses – defined as schools, hospitals, residences, and elder and childcare facilities – near air pollution sources – including freeways and polluting industrial sites. In the case of communities, currently residing next to polluting sites such as hazardous and solid waste facilities, regularly ensure the cleaning of these sites to reduce exposure associated with increased health risks.

4.2.3 Methodology

AMBIENT prepared an Air Quality and Greenhouse Gas Emissions Analysis for the proposed project (please refer to **Appendix C**). The analysis quantified estimated emissions associated with construction and operation of the proposed project using the California Emissions Estimator Model (CalEEMod). Short-term construction outcomes consist of emissions generated from construction equipment, grading, and asphalt removal and paving associated with the proposed stadium improvements. Long-term operational emissions estimates considered operation of the stadium improvements and mobile-source emissions resulting from the expanded use of the stadium. AMBIENT quantified on-road mobile-sources of emissions using EmFac2021 off-model adjustment factors, which vary depending on factors such as vehicle classification and fuel type. The analysis applied the highest off-model adjustment factors for all vehicle classifications and fuel types.

The results of AMBIENT's analysis are measured against local air quality thresholds of significance. MBARD has set air quality thresholds of significance for the evaluation of projects (MBARD, 2016). **Table 4.2-3** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect during construction and operation. In addition to these thresholds, MBARD has also determined a significant short-term construction generated impact would occur if more than 2.2 acres of major grading or excavation, or 8.1 acres of minimal earthmoving per day was to occur.

Table 4.2-3
Thresholds of Significance Construction and Operation Emissions

Pollutant	Threshold of Significance (lb./day)
Nitrogen Oxides (NO_x)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550

Source: MBARD, 2016.

4.2.4 Impacts and Mitigation

4.2.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would have a significant air quality impact if it would:

a. conflict with or obstruct implementation of the applicable air quality plan;

b. 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;

c. expose sensitive receptors to substantial pollutant concentrations;

d. result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.2.4.2 Impacts and Mitigation Measures

Impact AQ-1: The proposed project would not conflict with or obstruct implementation of applicable air quality plans (criterion a).

Expanded Use

CEQA Guidelines Section 15125(b) requires that a project be evaluated for consistency with applicable regional plans, which includes MBARD's most recent AQMP released in 2017. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments (AMBAG). Consistency determinations are issued for commercial, industrial, residential, and infrastructure-related projects that have the potential to induce population growth. A project is inconsistent with the AQMP if it has not been accommodated in the forecast projections considered in the AQMP.

The proposed expanded use of the stadium would increase the number and frequency of annual events at CSUMB Stadium, from approximately 34 to 91 (not including MBFC daily practices). The attendees and staff attending these events are assumed to live and work within the AMBAG tri-County area (i.e., Monterey, Santa Cruz, and San Benito counties), consistent with the spectator distribution evaluation presented in the Transportation Study (please refer to **Appendix G** and **Section 4.14, Transportation**). New housing is not a component of the proposed project, and both CSUMB and MBFC are assumed to use existing athletic and event staff for most of their proposed events, except for the addition of three (3) new MBFC teams.

The addition of three (3) new MBFC professional soccer teams would introduce a total of 85 new persons to Monterey County, consisting primarily of new players, coaches, and training staff associated with the proposed USL soccer teams. As discussed in **Section 4.12, Population and Housing**, AMBAG's Subregional Employment Forecast projects an increase in employment opportunities of 1,876 jobs from 2015-2045. Although a total of 85 players, coaches, and training staff may relocate to the area, this number is well within AMBAG's projections and is not substantial compared to the overall projected increase in employment and population growth in the area. Therefore, the proposed expanded use would have a less than significant impact since the operation would not contribute to significant population growth that could exceed AMBAG's regional growth forecast or would produce emissions that would conflict with implementation of the 2017 AQMP for achievement of state ozone standards.

Furthermore, the most recent NCCAB AQMP primarily focused on achieving attainment for ozone emissions. In 2023, CARB indicated that the NCCAB is now in attainment for state ozone air quality

standards (CARB, 2023). For the above reasons, the proposed expanded use of the stadium would have a less than significant impact with respect to conflicting with or obstructing implementation of applicable air quality plans.

Stadium Improvements

The proposed stadium improvements consist of construction and operation of new locker room and shower facilities, new permanent restroom facilities, and a gated event storage and staging area within and directly adjacent to the existing footprint of CSUMB Stadium. As with the proposed expanded use, the minor proposed stadium improvements would not create new housing opportunities in Monterey County. The proposed stadium improvements would also not exceed AMBAG's growth projections, as discussed above under **Expanded Use**, since construction would be temporary and workers are assumed to already live in the tri-county area. Similarly, operation of these facilities would not require CSUMB and MBFC to hire new staff.

As discussed above, CARB has identified that the NCCAB is in attainment for state ozone standards, which was the primary focus of the most recent AQMP (CARB, 2023). Therefore, construction and operation of the proposed stadium improvements would have a less than significant impact since these actions would not contribute to significant population growth that could exceed AMBAG's regional growth forecast or would produce emissions that would conflict with implementation of the 2017 AQMP for achievement of state ozone standards.

Mitigation Measures

No mitigation is required for **Impact AQ-1**.

Impact AQ-2: The proposed project would not 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 (criterion b).

Expanded Use

AMBIENT's Air Quality and Greenhouse Gas Emissions analysis estimated long-term operational emissions associated with the expanded use of CSUMB Stadium, which includes the increased number of events and frequency of events. As described in **Chapter 3.0, Project Description**, the proposed expanded use would increase CSUMB athletic and non-athletic events, as well as MBFC athletic and non-athletic events. As discussed in **Impact AQ-1**, the expanded use would increase the number and frequency of events from 34 to 91 (excluding MBFC daily practices). The proposed expanded use of the stadium would not exceed MBARD thresholds as defined in **Section 4.2.3, Methodology**. **Table 4.3-4** summarizes daily operational emissions, which are based on the maximum expected daily emissions for each criteria air pollutant.

Table 4.2-4
Summary of Daily Operational Emissions (lbs./day)

Source	ROG	NOx	CO	SO2	$PM_{10}E$	$PM_{10}D$	$PM_{10}T$	$PM_{2.5}E$	$PM_{2.5}D$	$PM_{2.5}T$
Total[2,3]	**1.7**	**6.5**	**37.3**	**0.1**	**0.1**	**11.5**	**11.6**	**0.1**	**2.9**	**3.0**
MBARD Thresholds	137	137	550	150	--	--	82	--	--	55

Source	ROG	NOx	CO	SO2	$PM_{10}E$	$PM_{10}D$	$PM_{10}T$	$PM_{2.5}E$	$PM_{2.5}D$	$PM_{2.5}T$
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**--**	**--**	**No**	**--**	**--**	**No**

Source: AMBIENT, 2026; MBARD, 2016.

[1] Acronym Key:
ROG=Reactive Organic Compounds
Nox=Oxides of Nitrogen
CO=Carbon Monoxide
SO2=Sulfur Dioxide
PM10E/PM2.5E=Exhaust Particulate Matter/Fine Particulate Matter
PM10D/PM2.5D= Fugitive Dust Particulate Matter/Fine Particulate Matter
PM10T/PM2.5T= Total Particulate Matter/Fine Particulate Matter

[2] Totals may not sum due to rounding.

[3] Includes EmFac2001 off-model adjustment factors. To be conservative, the highest adjustment factors for all vehicle categories and fuel types were applied.

As discussed in **Section 4.2.1.6, Attainment Status**, the NCCAB is in attainment for all air pollutants except for PM_{10}. Based on the results above, the proposed expanded use would not exceed the daily PM_{10} threshold of 82 pounds. Therefore, the proposed expanded use of the stadium would have a less than significant impact with respect to the creation of a cumulatively considerable net increase in criteria air pollutants.

Stadium Improvements

Potential air quality impacts resulting from the proposed stadium improvements would primarily be associated with construction, which consists of disturbance of approximately 1.35 acres of the project site. Specifically, construction would require the removal of 4,800 sf (0.1 acre) of asphalt and installation of the new locker room and shower facilities and permanent restroom facilities. Additionally, construction would consist of site clearing and grading of the 1.25-acre gated event storage and staging area. The Air Quality and Greenhouse Gas Analysis analyzed construction impacts associated with removal of asphalt, construction of the locker room and shower facilities and permanent restroom facilities, emissions from construction equipment, and estimated worker and haul truck trips. The proposed expanded use of the stadium would not exceed MBARD thresholds as defined in **Section 4.2.3, Methodology**. **Table 4.2-5** summarizes daily construction emissions, which are based on the maximum expected daily emissions for each criteria air pollutant.

Table 4.2-5
Summary of Daily Construction Emissions (lbs./day)

Source	ROG	NOx	CO	SO2	$PM_{10}E$	$PM_{10}D$	$PM_{10}T$	$PM_{2.5}E$	$PM_{2.5}D$	$PM_{2.5}T$
Total	**1.6**	**5.6**	**43.4**	**<0.1**	**0.1**	**11.5**	**11.6**	**0.1**	**2.9**	**3.0**
MBARD Thresholds	137	137	550	150	--	--	82	--	--	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**--**	**--**	**No**	**--**	**--**	**No**

Source: AMBIENT, 2026; MBARD, 2016.

Furthermore, MBARD has determined a significant short-term construction generated impact would occur if more than 2.2 acres of major grading or excavation, or 8.1 acres of minimal earthmoving per day was to occur. The proposed stadium improvements would require grading for a total area of 1.25 acres over

the course of construction for the gated event storage and staging area, less than MBARD's daily screening threshold for significant impacts.

AMBIENT assessed operational air quality impacts associated with the use of the proposed stadium improvements alongside estimated emissions of the expanded use of the stadium. As presented above under **Expanded Use**, the proposed project would not exceed MBARD's air quality criteria pollutant thresholds. Based on the analysis, the proposed expanded use of the stadium would not exceed the criteria pollutant thresholds of significance during construction or operation, nor would the project exceed the grading criteria set forth by MBARD. Therefore, the proposed activities would not result in a cumulatively considerable net increase in MBARD's identified criteria air pollutants, especially PM_{10} for which the NCCAB is non-attainment. Additionally, the proposed project would incorporate and implement the following Best Management Practices as a design feature to further minimize PM_{10} emissions in compliance with MBARD Rule 402: 1) water all active construction areas at least twice daily; 2) prohibit grading activities during periods of high wind (over 15 mph); 3) cover all trucks hauling dirt, sand, or loose materials; 4) cover inactive storage piles; 5) maintain at least two (2) feet of freeboard in haul trucks; 6) apply chemical soil stabilizers on inactive construction areas. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to the creation of a cumulatively considerable net increase in criteria air pollutants.

Mitigation Measures

No mitigation is required for **Impact AQ-2**.

Impact AQ-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations (criterion c).

Expanded Use

The primary source of operational emissions associated with the proposed expanded use of the project would come from mobile source emissions from traffic. **Table 4.2-4** above summarizes the estimated daily maximum emissions attributable to long-term operations under the proposed project. Local and regional roadways would be expected to see an elevated level of criteria air pollution emissions associated with vehicle trips.

The nearest sensitive receptors to the project site are the CSUMB Child Development Center located approximately 706 feet (0.14 miles) north, the Otter Sports Center located approximately 1,100 feet (0.21 miles) north, classrooms located approximately 1,370 feet (0.25 miles) north, and the Veterans' Administration building that provides medical services to veterans located approximately 534 feet (0.1 miles) east. Additionally, the nearest residential land uses are located approximately 2,366 feet (0.45 miles) south of the project site along Gigling Road in Seaside and 2,900 feet (0.55 miles) north of the project site near 8th Street in Marina. However, as identified in **Impact AQ-2**, the proposed expanded use of the stadium would not generate daily emissions of criteria air pollutants in excess of MBARD's thresholds of significance. Therefore, the proposed expanded use of the stadium would have a less than significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

Stadium Improvements

Tables 4.2-4 and **4.2-5** above summarize expected construction and operational emissions associated with the proposed stadium improvements. Except for some mobile source emissions during construction (please refer to **Table 4.2-5**), most emissions associated with the proposed stadium improvements would be localized at the project site. As discussed in **Impact AQ-2**, neither construction nor operation of the proposed stadium improvements would generate criteria air pollution emissions exceeding MBARD's thresholds of significance. Therefore, the proposed stadium improvements would have a less than significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

Mitigation Measures

No mitigation is required for **Impact AQ-3**.

Impact AQ-4: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (criterion d).

Expanded Use

Odors represent emissions of one (1) or more pollutants that may be perceptible to the human senses and, in some cases, may be considered a nuisance. Common sources of objectionable odors include landfills, wastewater treatment plants, refineries, and certain industrial and agricultural operations, which typically generate continuous or large-scale emissions of odorous compounds. As described in **Chapter 3.0, Project Description**, the proposed Expanded Use would increase the number and frequency of events at the stadium, including concerts and other large gatherings. These activities could incrementally increase the use of short-term, event-related odor sources such as mobile food vendors, temporary diesel-powered generators, and solid waste handling. However, these sources differ substantially from typical stationary odor sources in that they are temporary, intermittent, and spatially dispersed within the stadium area, and do not involve continuous industrial-scale processing or storage of odorous materials.

In addition, odor emissions from these sources are generally short in duration, limited to event hours, and would dissipate rapidly due to atmospheric mixing and the open-air nature of the stadium environment. Vehicle-related emissions associated with event traffic are also transient and are not typically associated with persistent nuisance odors affecting sensitive receptors. While the proposed expanded use of the stadium would increase the frequency of these activities, it would not introduce new types of odor sources beyond those already associated with existing stadium operations, nor would it substantially intensify the scale or duration of odor-generating activities to levels comparable to recognized nuisance sources identified by air quality agencies. As a result, the potential for odors to affect a substantial number of people would remain limited and localized.

Therefore, although event frequency would increase, the characteristics of the associated odor sources specifically their intermittent nature, limited intensity, and rapid dispersion support the conclusion that the proposed expanded use of CSUMB Stadium would not result in a substantial increase in objectionable odors or expose a substantial number of people to other emissions. Impacts would be less than significant with respect to odors.

Stadium Improvements

Construction activities associated with the proposed stadium improvements may generate odors that could be perceptible and potentially objectionable to some individuals. Typical sources of construction-related odors include diesel exhaust from heavy equipment, architectural coatings (e.g., paints and solvents), asphalt paving, and other building materials. However, these odor sources are temporary, intermittent, and localized, occurring only during active construction periods and varying by construction phase. Odors generated during construction would be short-term in duration and would dissipate rapidly due to atmospheric dispersion and the open-air environment of the project site. Unlike major stationary sources of odor (e.g., landfills or wastewater treatment facilities), construction activities do not involve continuous processing or storage of odorous materials that would result in persistent or widespread odor conditions. As such, while nearby receptors may intermittently detect odors during specific construction activities, these occurrences would be limited in frequency and duration.

In addition, construction activities would be required to comply with applicable regulations, including the use of low-VOC architectural coatings and proper handling of materials, which would further limit the potential for objectionable odors. The proposed locker room, shower, and restroom facilities would be designed and constructed in accordance with the CBSC, including requirements for ventilation and wastewater management, which would minimize the potential for operational odors. The proposed staging and storage area would primarily accommodate equipment associated with construction and event operations and would not involve the handling or storage of materials that are substantial sources of odor. Any emissions associated with this area would be limited to intermittent mobile-source exhaust from equipment transport. Based on the temporary and intermittent nature of construction-related odor sources, their limited intensity, and their rapid dispersion, construction of the proposed stadium improvements would not result in the exposure of a substantial number of people to objectionable odors or other emissions. Therefore, impacts would be less than significant with respect to odors.

Mitigation Measures

No mitigation is required for **Impact AQ-4**.

4.2.5 References

[AMBIENT] AMBIENT Air Quality & Noise Consulting. 2026. *Emissions Modeling Report*. Prepared for Denise Duffy & Associates, Inc. ***[Appendix C]***

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4.3 BIOLOGICAL RESOURCES

This section evaluates the potential biological resource impacts associated with the proposed project. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. Denise Duffy and Associates, Inc. (DD&A) prepared a Biological Resources Report for the proposed project, which is contained in **Appendix D**. Biological resources include plant communities, wildlife habitats, potentially occurring special-status plant and wildlife species, and natural communities within and adjacent to the proposed project site.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. Comments were received related to biological resources during the public scoping period. These comments are summarized below:

- Federally listed species, including Monterey spineflower, sand gilia, California Tiger Salamander, Yadon's rein orchid, and Smith's blue butterfly, have the potential to occur in the vicinity of the project site. The project should evaluate the potential impact to these species.

- The project site is located in the geographic range of Crotch's bumble bee and Western bumble bee. The project should evaluate potential impacts to these species and consider implementation of the California Department of Fish and Wildlife (CDFW) recommended mitigation measures.

- The project site is located in the geographic range of special-status plant species including Monterey gilia and seaside bird's-beak. The project should evaluate potential impacts to these plant species and consider implementation of CDFW recommended mitigation measures.

- Please note that a lack of an occurrence record in the California Natural Diversity Data Base does not mean a species is absent from the project site.

- Recommendation that the project conduct a cumulative impact analysis for all biological resources present at the project site.

For a complete list of public comments received during the public scoping period, refer to **Appendix A, NOP and Public Comment Letters**.

4.3.1 Environmental Setting

4.3.1.1 Project Site Setting

The proposed project site is located on CSUMB's campus, formerly the Fort Ord Military Base. The proposed project site has been previously disturbed as the result of past military uses and on-going campus uses and consists primarily of existing infrastructure and campus facilities, with some vegetated areas. The site consists of one (1) vegetation type: ruderal/disturbed (approximately 1.25 acres). The remainder of the proposed project site, approximately 6,000 sf, is developed (i.e., consists of gravel,

pavement, or buildings), and, therefore, contains no vegetation or limited landscape/horticultural species that provide little to no habitat for wildlife species.

RUDERAL/DISTURBED HABITAT

Ruderal/disturbed habitat areas are those areas which have been developed or have been subject to historic and ongoing disturbance, including landscaping, by human activities, and are devoid of vegetation or dominated by non-native and/or invasive weed species. Much of the ruderal habitat is located within the proposed location for the new gated event storage and staging area and consists of compact fill dirt covered with non-native grasses, iceplant (*Carpobrotus edulis*), and scattered trees and shrubs. Trees with a four (4)-inch or greater diameter at breast height (dbh) within the ruderal habitat include four (4) bishop pines (Pinus muricata.), four (4) eucalyptus (*Eucalyptus sp.*), and eight (8) native coast live oaks (*Quercus agrifolia*). Several native coyote brush (*Baccharis pilularis*) and coffee berry (*Rhamnus californicus*) shrubs, as well as non-native Parney's cotoneaster (*Cotoneaster lacteus*) and magnolia (*Magnolia sp.*) are also present within the ruderal habitat. Eucalyptus and Parney's cotoneaster are invasive species in California. One (1) population of Monterey spineflower was identified on the western side of the area (**Figure 4.3-1**).

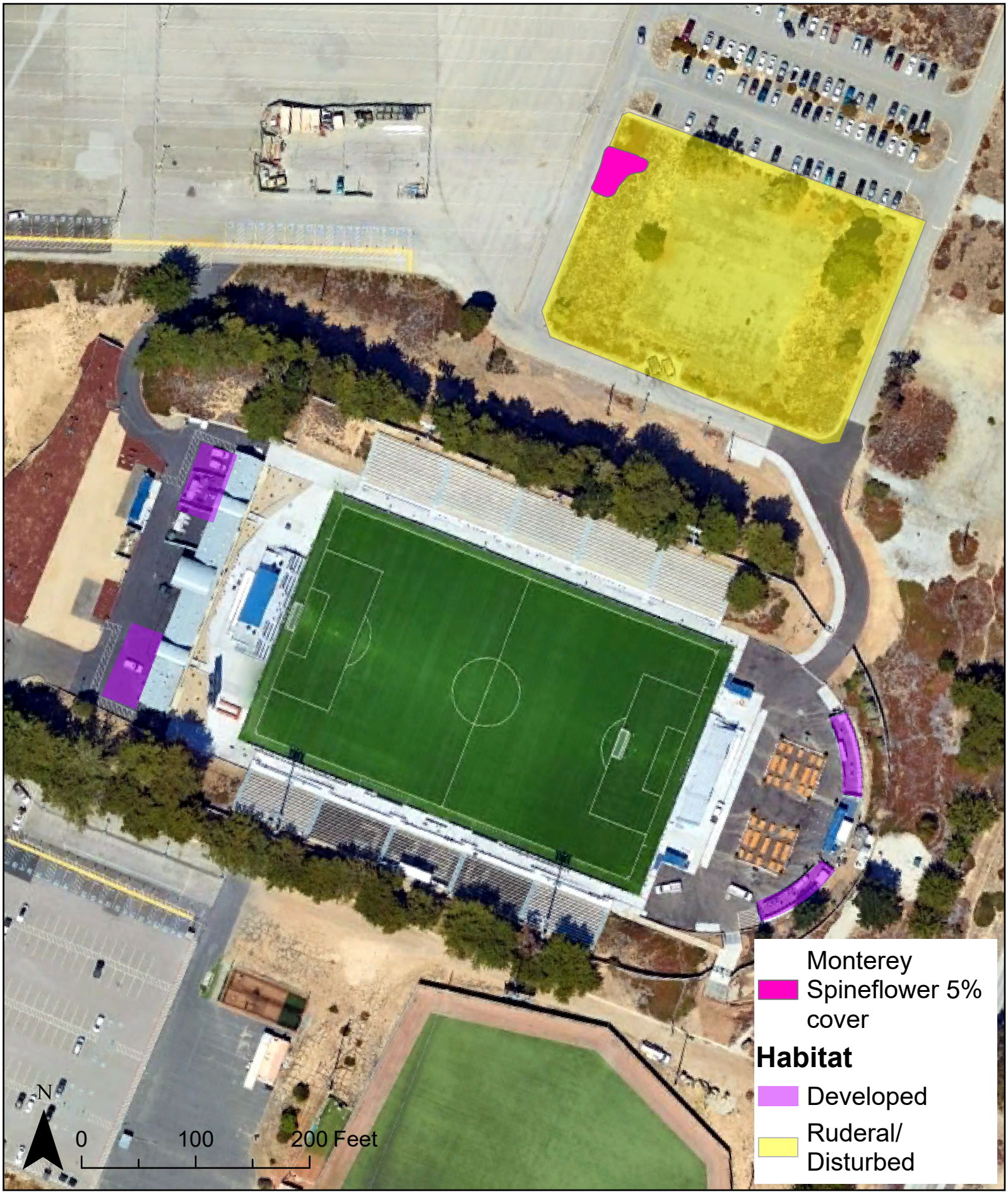
Ruderal/disturbed habitat has low biological value as it is generally dominated by non-native plant species and consists of relatively low-quality habitat from a wildlife perspective. However, common wildlife species that do well in urbanized and disturbed areas, such as the American crow (*Corvus brachyrhynchos*), California ground squirrel (*Otospermophilus beecheyi*), raccoon (*Procyon lotor*), western scrub jay (*Aphelocoma californica*), European starling (*Sturnus vulgaris*), western fence lizard (*Sceloporus occidentalis*), and rock pigeon (*Columba livia*), may forage in the ruderal/disturbed habitat within the proposed project site.

SENSITIVE HABITATS

DD&A did not identify sensitive habitats within the proposed project site. Additionally, surveys did not observe wetland or drainage features from the National Wetland Inventory or USGS Hydrography Dataset (please refer to **Appendix D**). No environmentally sensitive habitat areas (ESHA) are present on-site.

SPECIAL-STATUS SPECIES

Published occurrence data within the proposed project site and surrounding USGS quadrangles were evaluated to compile a table of special-status species known to occur in the vicinity of the proposed project site (**Appendix D**). Each of these species was evaluated for their likelihood to occur within or immediately adjacent to the proposed project site. Nesting raptors or other protected avian species may be present within the trees and shrubs around the stadium, and within the trees and shrubs proposed for



Title: Habitat Map	Date: 2/20/2026 Scale: 1 IN = 106 FT Project: 2024-84	Monterey | San Jose **Denise Duffy & Associates, Inc.** Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831)373-4341	Figure 4.3-1

removal within the proposed gated event storage and staging area. These species are discussed further below. One (1) special-status plant species, Monterey spineflower, was identified during the 2025 surveys within the proposed project site. A population of Monterey spineflower totaling approximately 1,198-sf with five (5) percent ground cover was identified within the grading limits of the new gated event storage and staging area (**Figure 4.3-1**). This species is discussed further below. All other special-status wildlife and plant species are assumed not present or unlikely to occur based on the species-specific reasons presented in **Appendix D** and, therefore, are unlikely to be impacted by the proposed project and not discussed further in this analysis.

Monterey Spineflower

DD&A identified one (1) special-status plant species, Monterey spineflower, during the 2025 surveys within the proposed project site. Monterey spineflower (*Chorizanthe pungens* var. *pungens*) is a federally threatened and a CNPS CRPR 1B species. This species is a small, prostrate annual herb in the Polygonaceae family that blooms from April to June. Monterey spineflower typically occurs on open sandy or gravelly soils on relic dunes in coastal dune, coastal scrub, and maritime chaparral habitats, though it can also be associated with cismontane woodlands and valley and foothill grasslands, within a range of three (3) – 450 meters (50 – 1500 ft) in elevation.

A population of Monterey spineflower totaling approximately 1,198 sf with five (5) percent ground cover was observed in the ruderal/disturbed habitat within the proposed project site during the focused botanical surveys on April 9 and May 13, 2025.

Nesting Birds and other Protected Avian Species

Raptors and their nests are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. While the life histories of these species vary, overlapping nesting and foraging similarities (approximately February through August) allow for their concurrent discussion. Most raptors are breeding residents throughout most of the wooded portions of the state. Stands of live oak, riparian deciduous, or other forest vegetation types, as well as open grasslands, are used most frequently for nesting. Breeding occurs February through August, with peak activity May through July. Prey for these species includes small birds, small mammals, and some reptiles and amphibians. Many raptor species hunt in open woodland and habitat edges. Various common raptor species (such as red-tailed hawk [*Buteo jamaicensis*], red-shouldered hawk, great horned owl [*Bubo virginianus*], western screech owl [*Megascops kennicottii*], and turkey vulture [*Cathartes aura*]), as well as other avian species have a potential to nest within any of the trees present within and adjacent to the project site.

Protected Trees

All trees, native and non-native, are under the jurisdiction of the CSUMB Tree Restoration Program (please refer to **Section 4.3.2, Regulatory Setting**, below, for further discussion of this program). A total of 16 trees with a four (4)-inches or greater dbh, including eight (8) coast live oaks, are located within the ruderal/disturbed lot within the proposed project site. This program requires that for every tree greater than four (4)-inch dbh that is removed, two (2) coast live oak trees would be replanted, and assumed to survive, in the identified restoration area on campus. In some cases, more than two (2) trees would need to be planted to achieve this survival rate.

4.3.2 Regulatory Setting

4.3.2.1 Federal

FEDERAL ENDANGERED SPECIES ACT

Provisions of the ESA of 1973 (16 USC 1532 et seq., as amended) protect federally listed threatened or endangered species and their habitats from unlawful take. Listed species include those for which proposed and final rules have been published in the Federal Register. The U.S. Fish and Wildlife Service (USFWS) or the National Oceanic and Atmospheric Administration (NOAA) and National Marine Fisheries Service (NMFS) administers the ESA. In general, NMFS is responsible for the protection of ESA-listed marine species and anadromous fish, whereas other listed species are under USFWS jurisdiction.

Section 9 of ESA prohibits the take of any fish or wildlife species listed under ESA as endangered or threatened. Take, as defined by ESA, is "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." Harm is defined as "any act that kills or injures the fish or wildlife…including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife." In addition, Section 9 prohibits removing, digging up, and maliciously damaging or destroying federally listed plants on sites under federal jurisdiction. Section 9 does not prohibit take of federally listed plants on sites not under federal jurisdiction. If there is the potential for incidental take of a federally listed fish or wildlife species, take of listed species can be authorized through either the Section 7 consultation process for federal actions or a Section 10 incidental take permit process for non-federal actions. Federal agency actions include activities that are on federal land, conducted by a federal agency, funded by a federal agency, or authorized by a federal agency (including issuance of federal permits).

MIGRATORY BIRD TREATY ACT

The MBTA of 1918 prohibits killing, possessing, or trading migratory birds except in accordance with regulation prescribed by the Secretary of the Interior. Most actions that result in permanent or temporary possession of a protected species constitute violations of the MBTA. The USFWS is responsible for overseeing compliance with the MBTA and implements Conventions (treaties) between the United States and four (4) countries—Canada, Mexico, Japan, and Russia—for the protection of migratory birds. The USFWS maintains a list of migratory bird species that are protected under the MBTA.

FORT ORD INSTALLATION-WIDE MULTISPECIES HABITAT MANAGEMENT PLAN

The U.S. Army's decision to close and dispose of the Fort Ord military base was considered a major federal action that could affect listed species under the ESA. In 1993, the USFWS issued a Biological Opinion (BO) on the disposal and reuse of former Fort Ord requiring that a Habitat Management Plan (HMP) be developed and implemented to reduce the incidental take of listed species and loss of habitat that supports these species (DD&A, 2026). The Fort Ord Installation-Wide Multispecies HMP (Fort Ord HMP) was prepared to assess impacts on vegetation and wildlife resources and provide mitigation for their loss associated with the disposal and reuse of former Fort Ord (DD&A, 2026).

The proposed project site is located within a designated "development" parcel under the HMP. Parcels designated as "development" do not have habitat management requirements relative to HMP species.

However, the 2017 Programmatic BO and Fort Ord HMP require the identification of sensitive botanical resources within the development parcels that may be salvaged for use in restoration activities in reserve areas (DD&A, 2026). In addition, the Fort Ord HMP requires that land recipients prepare and implement Resource Management Plans and Borderland Management Plans for specified parcels within their respective jurisdictions.

4.3.2.2 State

CALIFORNIA ENDANGERED SPECIES ACT

The CESA was enacted in 1984. The California Code of Regulations (Title 14, §670.5) lists animal species considered endangered or threatened by the state. Section 2090 of CESA requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species. Section 2080 of the Fish and Game Code prohibits "take" of any species that the commission determines to be an endangered species or a threatened species. “Take” is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." A Section 2081 Incidental Take Permit from the CDFW may be obtained to authorize “take” of any state listed species.

CALIFORNIA FISH AND GAME CODE

Section 3503 of the Fish and Game Code states that it is “unlawful to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Section 3503.5 prohibits the killing, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds-of-prey). Section 3511 prohibits take or possession of fully protected birds. Section 3513 prohibits the take or possession of any migratory nongame birds designated under the federal Migratory Bird Treaty Act. Section 3800 prohibits take of nongame birds.

The classification of “fully protected” was the state's initial effort in the 1960s to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish (Section 5515), mammals (Section 4700), amphibians and reptiles (Section 5050), and birds (Section 3511). Most Fully Protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

The CDFW also maintains a list of wildlife “species of special concern.” Although these species have no legal status, the CDFW recommends considering these species during analysis of project impacts to protect declining populations and avoid the need to list them as endangered in the future.

CDFW has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (Section 1802). As a trustee agency under CEQA Guidelines Section 15386, CDFW provides expertise in reviewing and commenting on environmental documents and provides protocols regarding potential negative impacts to those resources held in trust for the people of California.

CALIFORNIA NATIVE PLANT PROTECTION ACT

The CNPPA of 1977 directed CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and Endangered plants in the State." The CNPPA prohibits importing rare and Endangered plants into California, taking rare and Endangered plants, and selling rare and Endangered plants. The CESA and CNPPA authorized the Fish and Game Commission to designate endangered, threatened, and rare species and to regulate the taking of these species (Section 2050-2098, Fish and Game Code). Plants listed as rare under the CNPPA are not protected under CESA; however, these plants may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research.

Plants listed as rare under the California Native Plant Protection Act (CNPPA) or included in the California Native Plant Society's (CNPS) California Rare Plant Ranks (CRPR) 1A, 1B, 2A, and 2B are also treated as special-status species as they meet the definitions of Sections 2062 and 2067 of the CESA and in accordance with CEQA Guidelines Section 15380. In general, the CDFW requires that plant species on CRPR 1A (plants presumed extirpated in California and Either Rare or Extinct Elsewhere), CRPR 1B (plants rare, threatened, or endangered in California and elsewhere), CRPR 2A (plants presumed extirpated in California, but more common elsewhere), and CRPR 2B (plants rare, threatened, or endangered in California, but more common elsewhere) of the CNPS *Inventory of Rare and Endangered Vascular Plants of California* (please refer to **Appendix D**) be fully considered during the preparation of environmental documents relating to CEQA. CRPR 4 species (plants of limited distribution) may, but generally do not, meet the definitions of Sections 2062 and 2067 of CESA and are not typically considered in environmental documents relating to CEQA. While other species (i.e., CRPR 3 or 4 species) are sometimes found in database searches or within the literature, these do not meet the definitions of Section 2062 and 2067 of CESA and are not analyzed in this document.

CSUMB MASTER PLAN EIR

CSUMB prepared and adopted an EIR for the CSUMB Master Plan in 2022 (State Clearinghouse No. 2017051042). The CSUMB Master Plan EIR included a programmatic analysis of the potential impacts to sensitive resources that could result from projects at the campus, and mitigation measures were identified to reduce potentially significant impacts to a less than significant level. The mitigation measures were adopted in the MMRP for the CSUMB Master Plan EIR, and implementation of the adopted mitigation measures are required for any projects on the campus.

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES:

The 2022 CSUMB Master Plan Guidelines proved the following goals and policies relevant to the proposed project:

Goal OS 1 Protect, enhance, and connect the natural environment.

OS 1.1 Protect and preserve native habitats and trees. Development shall avoid or minimize impacts to native habitats and trees.

OS 1.2 Protect special-status plant and animal species from development impacts, and design development to avoid and integrate with nature.

OS 1.3 Document existing natural site conditions prior to the start of a project. Identify reference habitats to support movement, mitigation, or expansion of native habitats.

OS 1.5 Remove invasive species whenever possible, especially during new construction projects.

OS 1.6 Plant a minimum of two (2) trees for every one (1) tree that dies, is damaged, or is removed from the campus.

OS 1.13 Maintain and reintroduce open space that respects the natural ecology prevalent in the region, and foster habitat connectivity across ecological corridors. Maintain and reintroduce open space that respects the natural ecology prevalent in the region, and foster habitat connectivity across ecological corridors.

CSUMB TREE RESTORATION PROGRAM

CSUMB has established a Tree Restoration Program for impacts to coast live oak and other trees resulting from projects that take place on campus. This program requires that for every tree greater than four (4)-inch dbh that are removed, two (2) coast live oak trees would be replanted, and assumed to survive, in the identified restoration area on campus. In some cases, more than two (2) trees would need to be planted to achieve this survival rate. The implementation of this program is required for all projects that would result in impacts to trees 4” dbh or greater.

4.3.2.3 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside’s General Plan for information purposes only, to provide context for the analysis of potential conflicts with biological resources. The City of Seaside’s General Plan includes the following relevant policies (City of Seaside, 2024):

Goal C-2: New Development Supports the preservation or enhancement of the City’s natural resources. Relevant policies are as follows:

Clustered Development. Cluster new development on former Fort Ord lands to minimize impacts, preserve habitat management areas, and protect high-visibility ridgelines, steep slopes, wetlands, and waterways. Standards to cluster development should be developed as part of a future Seaside East Specific Plan.

Integrating Oak Woodland. Work with developers to promote an understanding of existing oak trees and previously-identified oak woodland linkages as they design new developments. Encourage compliance with State and County regulations as part of development review process.

Development Review. When projects are adjacent to or contain natural habitat or undeveloped area, require projects to submit analysis showing the existing habitat, on the proposed plan, potential impacts

to special-status species and sensitive natural communities or other biological resources (including nesting birds), and measures to avoid, minimize, and/or mitigate impacts, as necessary.

Development Near Habitat Management Areas. Require new development adjacent to habitat management areas to minimize new impervious surface, minimize light pollution, and emphasize native landscaping.

Native Species. Encourage new development to support a diversity of native species and manage invasive species.

Invasive Species. Prohibit the planting of plant species on the California Invasive Plant Inventory.

Habitat Preservation. Support the preservation of open space and sensitive habitat, minimizing the impacts of land uses on public lands, including:

- Oak woodlands and linkages.
- An open space buffer between future development and the National Monument.
- Open space corridors that support natural vegetation communities, scenic vistas, and sensitive habitats.

HABITAT CONSERVATION PLANS OR NATURAL COMMUNITY CONSERVATION PLANS

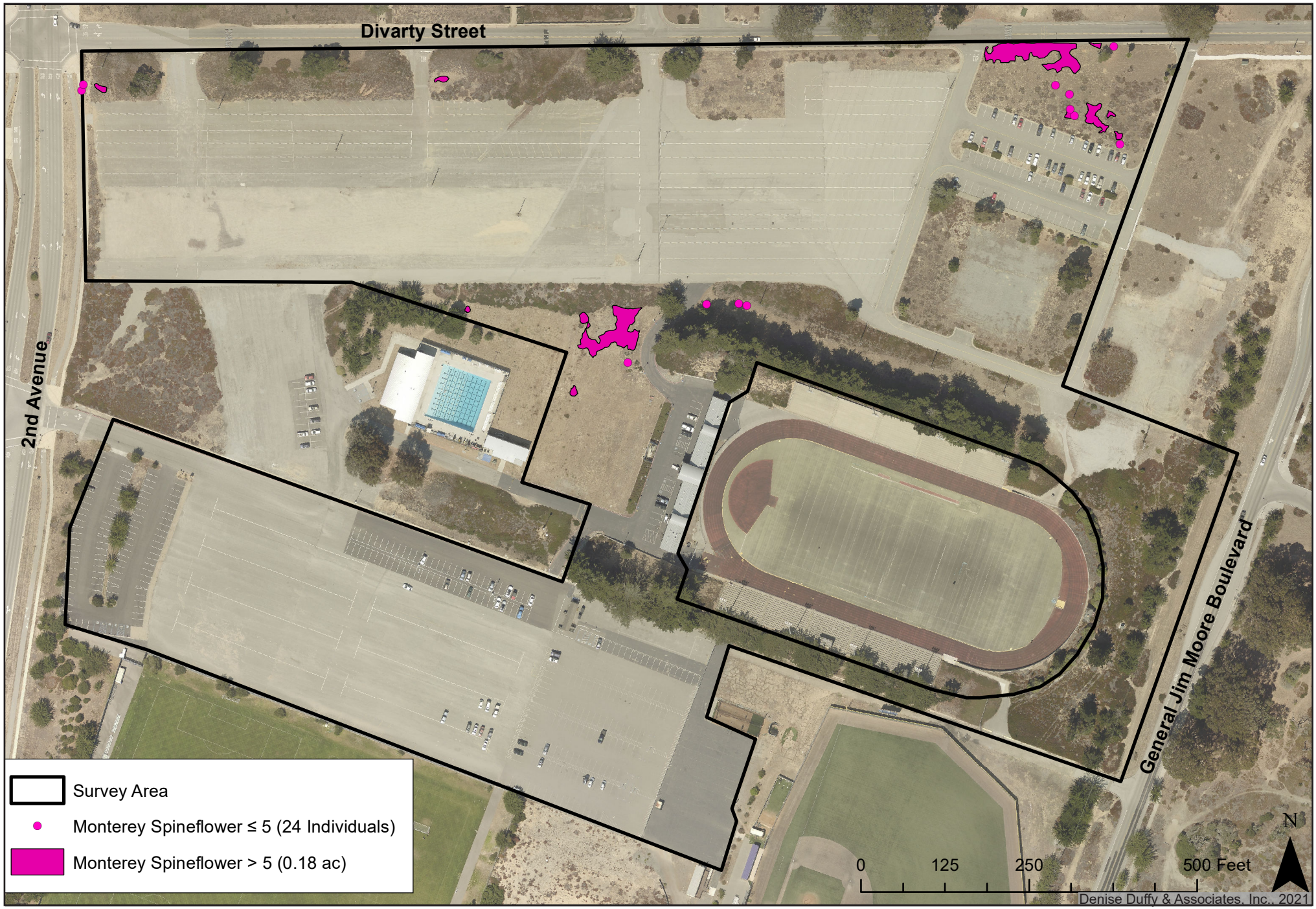
There are no approved Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP) associated with the proposed project site.

4.3.3 Methodology

DD&A Associate Environmental Scientists Liz Camilo and John Wandke conducted a reconnaissance-level biological and focused rare plant survey on June 2, 2021, in conjunction with the previous stadium renovations (CSUMB, 2021). DD&A defined the survey area as all areas where construction and operation activities would have the potential to cause a biological resource impact as illustrated in **Figure 4.3-2**. Developed areas within the project site include paved roads, sidewalks, buildings, and parking lots. DD&A identified little to no vegetation within developed areas and considered these areas to have little biological value. The 2021 biological surveys did not observe special-status species within developed areas, and none are expected to occur due to lack of suitable habitat. During the 2021 survey, DD&A identified approximately 0.18 acres containing Monterey spineflower, observed 24 individuals, and mapped them within the project site (**Figure 4.3-2**).

DD&A Senior Environmental Scientist Jami Davis and Assistant Environmental Scientist Jordan DePedro conducted focused botanical surveys of the proposed gated event storage and staging areas on April 9 and May 13, 2025, to identify presence of any special-status wildlife or plant species or suitable habitat for those species. The survey area was limited to the areas of new construction, totaling approximately 1.4 acres (**Figure 4.3-3**). Please refer to **Appendix D** for a detailed description of the report methodology, as summarized below.

The primary literature and data sources reviewed to determine the occurrence or potential for occurrence of special-status species at the proposed project site were as follows:

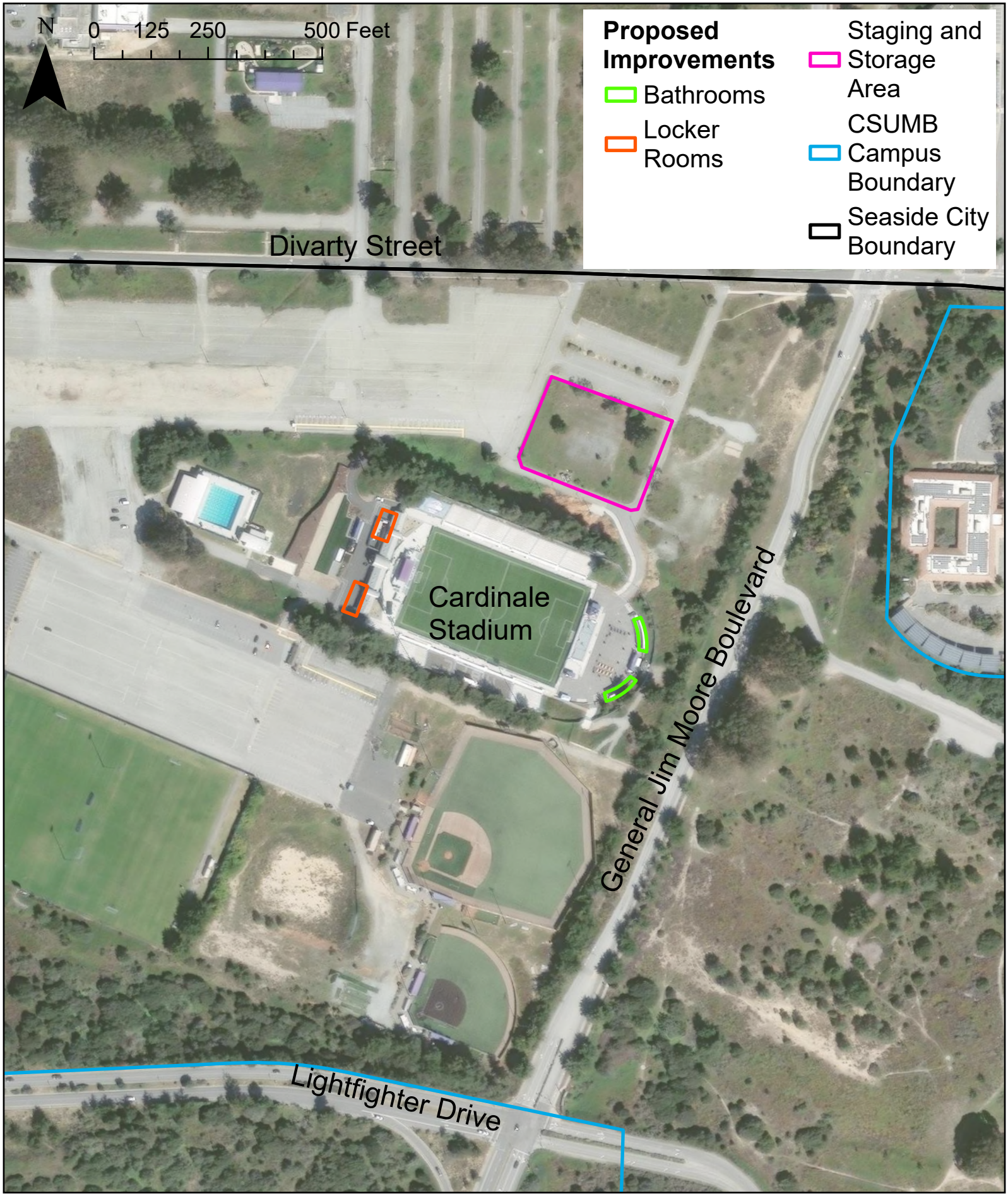


Title: Freedman Stadium IS/MND Biological Survey Area

Date	2/18/2026
Scale	N/A
Project	2024-84

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure 4.3-2



Title: Project Vicinity and Site Plan Map	Date: 2/20/2026 Scale: 1 IN = 266 FT Project: 2024-84	Monterey | San Jose **Denise Duffy & Associates, Inc.** Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831)373-4341	Figure 4.3-3

- Current agency status information from the USFWS and CDFW for species listed, proposed for listing, or candidates for listing as threatened or endangered under ESA or CESA, and those considered CDFW "species of special concern," including:
  - CNDDB occurrences reports from the U.S. Geologic Survey (USGS) Seaside quadrangle and the following surrounding quadrangles: Monterey, Marina, Salinas, Spreckels, Mt Carmel, and Carmel Valley; and
  - USFWS IPaC Resource List (**Appendix D**).
- The CNPS *Inventory of Rare and Endangered Vascular Plants of California*.
- The USFWS National Wetlands Inventory Wetlands Mapper; and
- The National Hydrography Dataset (**Appendix D**)

All plants observed within the proposed project site during the surveys were identified to the intraspecific taxon necessary to eliminate them as being special-status species using keys and descriptions in *The Jepson Manual: Vascular Plants of California, Edition 2* and *The Plants of Monterey County an Illustrated Field Key* (please refer to **Appendix D**). From these resources, DD&A created a list of special-status plant and wildlife species known or with the potential to occur in the vicinity of the proposed project site (**Appendix D**). This list presents these species along with their legal status, habitat requirements, and a brief statement of the likelihood to occur.

The Biological Resources Report also includes a review of the following literature and data sources: CDFW reports on special-status wildlife; California Wildlife Habitat Relationships Program species-habitat models; and general wildlife references (DD&A, 2026).

4.3.4 Impacts and Mitigation

4.3.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project impact would be considered significant if the project would:

a. have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

b. have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

c. have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

d. interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

e. conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

f. conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.3.4.2 Impacts and Mitigation Measures

Impact BIO-1: The proposed project would have the potential for a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (criterion a).

Expanded Use

The project would entail continued use the existing parking facilities and stadium infrastructure already in use for athletic and non-athletic events. The proposed expanded use would increase the number and frequency of events at the stadium but would not directly increase the area of impact outside of the developed areas of the existing stadium (please refer to **Stadium Improvements** below for analysis of related construction activities). The existing stadium and adjacent parking facilities are developed and paved sites. Therefore, the proposed expanded use of CSUMB Stadium would have no direct or indirect impact on special-status species.

Stadium Improvements

The proposed stadium improvements consist of construction and operation of new locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area. Construction and operation of the proposed locker room and shower facilities and permanent restroom facilities would occur within the existing and developed stadium footprint. Specifically, the proposed project would construct the locker room and shower facilities alongside the existing Field House at the west entrance of the stadium, and the proposed project would construct the permanent restroom facilities on the east side of the stadium replacing the current portable restroom facilities. Both sites are currently paved and developed.

Aside from the developed stadium and adjacent parking lots, the project site gated event storage and staging area includes the aforementioned approximately 1.25-acre area classified as ruderal/disturbed habitat. The proposed project plans currently include vegetation removal and grading, and installing gravel in the area where Monterey spineflower occurs. These activities could result in mortality or loss of the individual or seedbank stock as well as permanent habitat loss, which would be considered potentially significant impacts under CEQA. Implementation of **Mitigation Measure BIO-1** would reduce this impact to a less than significant level.

Furthermore, the proposed gated event storage and staging area currently contains a total of 16 trees with a four (4)-inches or greater dbh, including eight (8) coast live oaks (please refer to **Impact BIO-5**). Raptors and other protected avian species have the potential to occur within or immediately adjacent to the proposed project site. Tree removal and construction activities during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment within the proposed project site and immediately adjacent areas. Construction impacts to raptors and other protected avian species would, therefore, be significant, and would conflict with the MBTA and California Fish and Game Code. These impacts would be reduced to a less than significant level with the implementation of **Mitigation Measures BIO-2** and **BIO-3**.

The proposed stadium improvements would have a less than significant impact to special-status species with implementation of **Mitigation Measures BIO-1, BIO-2,** and **BIO-3**.

Mitigation Measures

Mitigation Measure BIO-1: Restoration Plan.

The impacted area of Monterey spineflower shall be quantified during final design and Monterey spineflower will be replaced at a 1:1 ratio for the number of individual plants impacted, and a 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 impacted area, including the presence of Monterey spineflower, its locations, and densities;
- A detailed description of on-site and/or off-site restoration areas, salvage of seed and/or soil bank and/or plant salvage, seeding and planting specifications, which may include but is not limited to, an increased planting ratio to ensure 1:1 ratio;
- Procedures to control and/or eliminate non-native invasive species within the restoration area;
- A monitoring program that describes annual monitoring efforts which incorporate success criteria and contingency plans if success criteria are not met.

Mitigation Measure BIO-2: 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 species:

- A qualified biologist will conduct an Employee Education Program for the construction crew prior to the initiation of 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 the USFWS and CDFW; and 6) the proper procedures if a special-status species is encountered within the project site.

- Protective fencing shall be placed prior to and during construction to keep construction equipment and personnel from impacting vegetation outside of work limits. A biological monitor shall 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.

- Trees and vegetation not planned for removal or trimming shall be protected prior to and during construction to the maximum extent 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 shall be used, to avoid the introduction of non-native, invasive species. A biological monitor shall 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.

- 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 adjacent to the project site (pre-, during, and post-construction).

- 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.

- To protect against spills and fluids leaking from equipment, the project proponent shall require that the construction contractor maintains an on-site spill plan and on-site spill containment measures that can be easily accessed.

Mitigation Measure BIO-3: Nesting Birds

Activities that may directly affect (e.g., tree removal) or indirectly affect (e.g., noise/ground disturbance) nesting raptors or other protected avian species shall be timed to avoid the breeding season. Specifically, any grading and excavation with heavy machinery and vegetation removal within ~~300~~ 500 feet of suitable nesting habitat (i.e., trees within and adjacent to the project site) shall be scheduled during the non-breeding season (September 16 through January 31).

If avoidance of the non-breeding season is not possible, a qualified biologist shall conduct a preconstruction survey for nesting raptors or other protected avian species within ~~300~~ 500 feet of the proposed construction activities. The survey shall be conducted no more than 14 days prior to the initiation of construction and submitted to CSUMB's Facilities Management Department. If raptor or other protected bird nests are identified within or immediately adjacent to the project site during the pre-construction surveys, the qualified biologist shall notify the project proponent and/or contractor and an appropriate no-disturbance buffer shall be imposed within which no construction activities or disturbance shall take place (generally ~~300~~ 500 feet in all directions for nesting raptors~~; other avian species may have species-specific requirements~~ and 250 feet in all directions for other nesting avian species) 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. The qualified biologist shall advise and support on any variance to the established no-disturbance buffers and notify CDFW in advance of implementing any variance.

Impact BIO-2: The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (criterion b).

Expanded Use

The proposed expanded use of the stadium would increase the number and frequency of annual athletic and non-athletic events at the existing stadium site. The CSUMB Stadium is a previously developed site that currently accommodates both athletic and non-athletic events. No riparian habitat or other sensitive natural communities exist within or in the vicinity of the project site. Therefore, no impact would occur on riparian habitat.

Stadium Improvements

Construction and operation of the new locker room, shower facilities and permanent restroom facilities would occur within the previously developed and existing footprint of the CSUMB Stadium. The storage and staging area would be located on an area currently consisting of ruderal/disturbed habitat. No riparian or other sensitive habitats currently exist within or in the vicinity of the project site. Therefore, no impact would occur on riparian habitat.

Mitigation Measures

No mitigation is required for **Impact BIO-2.**

Impact BIO-3: The proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (criterion c).

Expanded Use

The proposed expanded use of the stadium would increase the number and frequency of annual athletic and non-athletic events at the existing stadium site. The CSUMB Stadium is a previously developed site that currently accommodates both athletic and non-athletic events. No state or federally protected wetlands exist within or in the vicinity of the project site. Therefore, no impact would occur to protected wetlands.

Stadium Improvements

Construction and operation of the new locker room and shower facilities and permanent restroom facilities would occur within the previously developed and existing footprint of the CSUMB Stadium. The gated event storage and staging area would be located on an area currently consisting of ruderal/disturbed habitat. No state or federally protected wetlands exist within or in the vicinity of the project site. Therefore, no impact would occur to protected wetlands.

Mitigation Measures

No mitigation is required for **Impact BIO-3.**

Impact BIO-4: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (criterion d).

Expanded Use

The proposed expanded use of the CSUMB Stadium would occur within the existing stadium footprint and adjacent parking facilities currently in use by CSUMB and MBFC for athletic and non-athletic events. The project site contains minimal foraging resources and is not within an established wildlife corridor or nursery. Therefore, the proposed expanded use of the stadium would have no impact in regard to causing substantial interference with the movement of wildlife through the site or impeding the use of a native nursery site.

Stadium Improvements

As previously discussed, construction and operation of the new locker room, shower facilities and permanent restroom facilities would occur within the existing and developed footprint of CSUMB Stadium. These proposed facilities would not constitute an adverse impact on a special-status species or sensitive habitat area. The proposed storage and staging area would be located on a previously disturbed site classified as ruderal/disturbed habitat. The proposed project site contains minimal foraging resources for migratory wildlife and is not located within an established wildlife corridor or nursery. Therefore, construction and operation of the proposed stadium improvements would have a less than significant impact related to substantial interference with the movement of wildlife through the site or impeding the use of a native nursery site.

Mitigation Measures

No mitigation is required for **Impact BIO-4.**

Impact BIO-5: The proposed project would not have the potential to conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (criterion e).

Expanded Use

The proposed expanded use of the CSUMB Stadium consists of an increase in the number and frequency of annual events. No construction activities or tree removal activities are associated with the proposed expanded use of the stadium. Potential impacts related to construction of the proposed stadium improvements are analyzed separately under **Stadium Improvements** below. Therefore, the proposed expanded use of the stadium would have no impact regarding conflict with a policy or ordinance protecting biological resources.

Stadium Improvements

Implementation of the proposed stadium improvements, specifically the gated event storage and staging area, would result in impacts to trees on CSUMB's campus. The proposed gated event storage and staging

area currently contains a total of 16 trees with a dbh of four (4)-inches or greater, including eight (8) coast live oaks that would require removal during site clearing and grading activities. CSUMB has established a Tree Restoration Program for impacts to coast live oak and other trees resulting from projects that take place on campus. Projects that remove trees with a four (4)-inch dbh or greater must replant a minimum of two (2) coast live oak trees in an identified restoration area on campus (consistent with Goal OS 1.6) (CSU, 2022b). The implementation of this program is required for all projects that would result in impacts to trees on the CSUMB's campus. Therefore, as a feature of the project design, the project would replant two (2) coast live oak trees for every tree with a dbh of four (4)-inches or greater that is removed. The replanting specifications would be required in final project plans. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to conflicting with a policy or ordinance protecting biological resources.

Mitigation Measures

No mitigation is required for **Impact BIO-5.**

Impact BIO-6: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (criterion f).

Expanded Use

The project site is located on the former Fort Ord property and within the plan area of the Fort Ord HMP. The proposed expanded use activities are consistent with the approved HMP as the project site is located within parcels designated for "development" and the parcels do not have any restrictions for use under the Fort Ord HMP. Additionally, the proposed project will comply with the requirements of the HMP, as applicable. Therefore, implementation of the proposed expanded use of the stadium would not conflict with the approved Fort Ord HMP. This impact would be less than significant regarding conflict with the provisions of an adopted HCP or NCCP.

Stadium Improvements

As discussed above, the project site is located within Fort Ord HMP parcels designated for "development" and the parcels do not have any restrictions for use. Construction and operation of the proposed stadium improvements are consistent with the approved HMP since the parcels are designated for "development." The proposed project will comply with the requirements of the HMP, as applicable. As such, implementation of the proposed stadium improvements would not conflict with the approved Fort Ord HMP. The proposed stadium improvements would have a less than significant impact regarding conflict with the provisions of an adopted HCP or NCCP.

Mitigation Measures

No mitigation is required for **Impact BIO-6.**

4.3.5 Significance After Mitigation

Implementation of **Mitigation Measure BIO-1**, **Mitigation Measure BIO-2**, and **Mitigation Measure BIO-3** would avoid and minimize potentially significant impacts to Monterey spineflower and nesting birds,

which could be impacted during construction and operation of the proposed stadium improvements (please refer to **Impact BIO-1**). **Mitigation Measure BIO-1** would require preparation and implementation of a restoration plan to address the area of Monterey spineflower impacted by the construction of the gated event storage and staging area. The restoration plan would require the replacement of Monterey spineflower at a 1:1 ratio, and the development of a monitoring program to confirm success. Implementation of **Mitigation Measure BIO-2** would require implementation of best management practices, which include, but are not limited to, installation of protective fencing and restoring areas disturbed after construction. These best management measures would reduce impacts to special-status species. Furthermore, **Mitigation Measure BIO-3** would restrict activities that have the potential to directly or indirectly affect nesting raptors or other protected avian-species to avoid the breeding season or, alternatively, conduct pre-construction nesting bird surveys and if present, impose an appropriate no-disturbance buffer until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival.

4.3.6 References

City of Seaside. 2024. *City of Seaside General Plan*. Resolution GPA-24-01. Available online at: https://www.ci.seaside.ca.us/DocumentCenter/View/15999/Seaside2040-General-PlanPDF?bidId=

[CSUMB] California State University Monterey Bay. 2021. *Freeman Stadium Facilities Renovation Project Public Draft Initial Study Mitigated Negative Declaration*. State Clearinghouse Number 2021070153. Available online at: https://ceqanet.lci.ca.gov/2021070153

[CSU] California State University. 2022b. *2022 Master Plan Guidelines*. Available online at: https://csumb.edu/media/csumb/section-editors/facilities/2022-master-plan/CSUMB-Master-Plan-Guidelines-2022.pdf

[DD&A] Denise Duffy & Associates. 2026. *CSUMB Stadium Expanded Use Project – Biological Resources Report*. Prepared for California State University Monterey Bay.

4.4 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section evaluates the potential effects of the project on cultural resources, including historical (built environment) and archaeological resources, and Tribal cultural resources. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. The information contained in this section is based in part on the results of the Cultural Resource Inventory for the CSUMB Stadium Expanded Use Project prepared by Dudek in May 2025 (Cultural Resources Report). The Cultural Resources Report included an archival search of existing records, a field reconnaissance of the project site, and assessment of potential effects on cultural resources.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. Comments were received related to cultural and Tribal cultural resources during the public scoping period. These comments are summarized below:

- Analyze the potential impacts to historical and archaeological resources by conducting an archaeological inventory survey.
- Include mitigation measures for the inadvertent discovery of archaeological resources and human remains interred outside of cemeteries.

For a complete list of public comments received during the public scoping period, refer to **Appendix A, NOP and Public Comment Letters**.

4.4.1 Environmental Setting

4.4.1.1 Regional Overview

The proposed project is located in the territory of the Costanoan and Ohlone people. The Costanoan people comprise of eight (8) separate Penutian-stock language groups situated roughly between modern Richmond in the north to Big Sur in the south. Specifically, the Rumsen tribelet historically occupied the areas in and around project site (Dudek, 2025). Evidence of Indigenous occupation within the Central Coast region dates to the Paleo-Indian temporal period (pre-8000 B.C.) with the most recent pre-colonial occupation occurring between 1250-1769. This group inhabited the southern half of Monterey Bay, the Monterey Peninsula, Carmel Bay and some of Carmel Valley, and the coastal area south to Big Sur. The Rumsen belonged to a branch of the Costanoan (or Ohlone) language family. Their sociopolitical organization was based on the tribelet, each of which consisted of a primary village and several satellite settlements.

European contact began with the arrival of Spanish explorers in the 16th Century. However, it was not until 1770 that the Portola expedition arrived in Monterey Bay and established the first mission and Royal Presidio. The establishment of the Spanish missions drastically altered the lifeways of the Native Americans. The Spanish conscripted members of local Native American communities to move to the Mission San Carlos Borreméo de Carmelo. With the Mission, a period of intense Native American conversion to Catholicism was initiated. By 1778, most of the Rumsen and Esselen Indians in Carmel and

Monterey were baptized and settled around the Mission to farm church lands. This resettlement marked the beginning of the disintegration of Native American traditional lifeways in this area.

In 1820, Mexico gained independence from Spain, and a period of secularization ensued. The remaining Native American groups were employed as ranch hands and domestic servants, and by 1840, the Mission was in a state of ruin. In 1834, the Mexican government secularized the mission lands releasing the Native Americans from control of the mission-system. Many Indigenous peoples returned to pre-Spanish food collecting and hunting practices. Some hunted livestock instead of native elk or antelope and were punished severely as livestock thieves. Whole tribelets disappeared from this interaction. With the arrival of Anglo settlers, this process was accelerated as competition for land increased. The City of Monterey continued as the capital of Alta California and the Californios, the Mexicans who settled in the region, received land grants. The United States of America acquired Alta California after landing at Monterey in the 1848 during the Mexican–American War with California becoming a state in 1850.

The U.S. Army established the present iteration of the Presidio of Monterey in 1902, although the land had been used as a presidio at various times since 1792. In 1917, Fort Ord Military Base established a cavalry post in Seaside. Although the base was decommissioned in 1994, the area still possesses structures that are considered of historical significance. Specifically, several structures in the East Garrison area remain and are considered properties eligible for the National Register of Historic Places (NRHP). According to the Record of Decision for the Acquisition of the CSUMB campus, there are no historic sites on campus that are eligible or potentially eligible for listing in the NRHP. The historic former Fort Ord sites are located outside the property boundaries of the campus.

4.4.1.2 Project Site Setting

The proposed project would be located at the existing CSUMB Stadium and adjacent parking area. As discussed in **Section 3.0, Project Description**, the CSUMB Stadium is located on the southwestern portion of CSUMB's campus at 4113 2nd Avenue, in the City of Seaside. CSUMB Stadium is located among the Otter Sports Complex, or Athletics and Recreation District as defined by the 2022 Master Plan Guidelines. The areas adjacent to the project site are within the Athletics and Recreation District and consist of two (2) parking lots, a disc golf course, a baseball field, softball field, an aquatics center, and two (2) additional soccer fields. The CSUMB campus, including the project site, exist on land previously occupied by the Costanoan or Ohlone people prior to European arrival. Additionally, the CSUMB campus exists on land that was previously part of the Former Fort Ord Military Base.

4.4.2 Regulatory Environment

4.4.2.1 State

<u>CALIFORNIA REGISTER OF HISTORICAL RESOURCES</u>

In California, the term "historical resource" includes "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected,

to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR, enumerated in the following text, were developed to be in accordance with previously established criteria developed for listing in the NRHP. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one (1) of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (please refer to 14 CCR 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

As described further in the following text, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and Tribal cultural resources:

PRC Section 21083.2(g) defines "unique archaeological resource."

PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) define "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource." It also defines the circumstances when a project would materially impair the significance of a historical resource.

PRC Section 21074(a) defines "tribal cultural resources."

PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.

PRC Sections 21083.2(b)–(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-

place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). A site is a "historical resource" if it is either determined to be listed or is eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)). If a resource is determined to be a "historical resource," it is historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource, even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that conveys its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA [CEQA Guidelines Section 15064.5(b)(2)].

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

If evidence suggests that a project would cause damage to a unique archaeological resource, the lead agency may require the project make reasonable efforts to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that the project cannot avoid disturbance of archaeological resources, the lead agency shall require mitigation measures (Section 21083.2(a), (b), and (c)).

Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as Tribal cultural resource (PRC 21074(c); 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures for projects to implement when Native American remains are discovered. As described in the following text, PRC Section 5097.98 details these procedures.

CALIFORNIA PUBLIC RESOURCES CODE SECTION 5097.9

State law (PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures for projects to implement if Native American skeletal remains are discovered during construction of a project; and established the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. Additionally, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

Additionally, PRC Section 5097.9 mandates that public agencies or private parties may not interfere with free expression of Native American religion or cause severe or irreparable damage to a Native American place of worship, ceremonial site, or sanctified cemetery.

CALIFORNIA HEALTH AND SAFETY CODE SECTION 7050.5

If a project encounters Native American human remains or related cultural materials, Section 15064.5(e) of the CEQA Guidelines (as incorporated from PRC Section 5097.98) and California Health and Safety Code Section 7050.5 define the subsequent protocol. If a project encounters, excavates, or otherwise disturbs human remains, the project shall suspend all activities on the site, or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that an applicant or contractor present on-site contact a county-approved coroner to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate

dignity, the human remains, and any associated grave goods as provided in PRC Section 5097.98 (14 CCR 15064.5(e)).

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The 2022 CSUMB Master Plan Guidelines proved the following policies relevant to the proposed project (CSU, 2022b):

DT 1.4 Preserve the Native American and Fort Ord military history and regional Monterey Bay culture through new landmark art, architecture, and landscape design.

4.4.3 Methodology

For the Cultural Resources Report, Dudek reviewed the records search that was prepared for the CSUMB Master Plan EIR (CSU, 2022a). The records search evaluated the CSUMB campus and included a 0.5-mile buffer. The records search included data from the California Historical Resources Information System (CHRIS) and the Northwest Information Center located at Sonoma State University (NWIC). Dudek also considered resources from the State Historic Preservation Office's (SHPO) Historic Properties Directory and Archaeological Determinations of Eligibility, historical maps, local inventories, and the Bureau of Land Management General Land Office and historical rancho plat maps.

The records search indicated that 20 studies had previously occurred on CSUMB's campus, and another 22 studies occurred within the 0.5-mile buffer of the campus. However, none of these studies overlap with the proposed project site, or, more specifically, the gated event storage and staging area that was the focus of the pedestrian survey (please refer to **Survey Results** below). Eight (8) previously recorded cultural resources are present in the study area (i.e., CSUMB campus and 0.5-mile buffer). One (1) recorded resource exists on the former Fort Ord but lacks specific location data; the report states the site was destroyed in the 1940s and concludes that identification of the site would be unlikely.

4.4.3.1 Survey Results

Dudek conducted a pedestrian survey of the proposed gated event storage and staging area, which consists of a 1.25-acre area, on April 2, 2025. The proposed gated event storage and staging area is currently undeveloped. The focus of the survey was to characterize existing conditions and identify whether archaeological resources are located or had the potential to be located in the gated event storage and staging area. Dudek did not survey the existing stadium site as this area was previously evaluated during preparation of the Freeman Stadium Renovations Project MND, and has since been developed (CSUMB, 2021).

The gated event storage and staging area is previously disturbed and currently undeveloped, allowing for the survey to implement 33-foot (10-meter) transect intervals. Small vegetation including native grasses and non-native ice plant (*Carpobrotus edulis*) covered approximately 40 percent of the surface area. Imported gravels, with the heaviest concentration being located in the center of the gated event storage and staging area were determined to cover approximately 60 percent of this area. The report notes that evidence of previous disturbances included fire hydrants in the northwest, northeast, southwest, and southeast corners. A manhole is located at the center of the western boundary, and an underground

waterline is located at the center of the eastern boundary. Approximately 66 feet (20 meters) west from the manhole cover is an above ground utility.

No evidence for potential historical resources was encountered, and no evidence for use of the area during precontact times (e.g., charred faunal remains, marine shell, fire affected rock, or charcoal) was observed during the survey.

4.4.3.2 California Native American Consultation

Pursuant to AB 52, the Board of Trustees, as the Lead Agency, sent outreach letters detailing the proposed project to the list of California Native American Tribes provided by the NAHC. Additionally, the Board of Trustees also sent consultation letters to Native American Tribes in which the Board of Trustees has consulted with in the past for projects located on CSUMB's campus. The Board of Trustees sent these letters on April 15, 2025, through certified mail and by email to the Ohlone Costanoan Esselen Nation, the Costanoan Rumsen Carmel Tribe, the Esselen Tribe of Monterey County, and the Amah Mutsun Tribal Band of Mission San Juan Bautista. On April 17, 2025, the Costanoan Rumsen Carmel Tribe (CRCT) responded with a request for consultation. CSUMB met with representatives of the CRCT on May 29, 2025. Concerns regarding the potential for unknown resources were identified during consultation, and the CRCT requested a site visit in advance of ground-disturbing activities and that a Tribal monitor be on-site during ground-disturbing activities. CRCT also requested the opportunity to review the Cultural Resources Report prepared by Dudek, and the report was shared with CRCT on June 2, 2025. CSUMB emailed CRCT on July 28, 2025, to reshare the cultural resource report and invite CRCT to reach out if questions were to arise. A follow up email on September 26, 2025. No responses have been received to date.

4.4.4 Impacts and Mitigation

4.4.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would result in significant impacts related to cultural and Tribal cultural resources if it would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5;

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5; or

c. Disturb any human remains, including those interred outside of dedicated cemeteries.

d. Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in PRC § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

    i. listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k), or

ii. a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

4.4.4.2 Impacts and Mitigation Measures

Impact CTR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 (criterion a).

Expanded Use

Expanded use at the existing stadium would consist of new athletic and non-athletic events hosted by CSUMB and MBFC. The proposed expanded use of the stadium does not require construction or ground disturbing activities that would have the potential to cause a substantial adverse change in the significance of a historical resource. As discussed below, the CSUMB Stadium is not considered a historic facility, despite exceeding 50 years of age.[1]

The proposed expanded use of the stadium would also be unlikely to produce indirect impacts. Indirect impacts could feasibly include vibration-related effects to a historic structure because of heavy vehicle traffic, crowd movement or foot-traffic, or amplified sound. Alternation of a historic setting or feeling may also be considered an indirect impact. The expansion of use would be substantially the same as existing uses, and only increase the frequency of athletic and non-athletic events. Use of the proposed project site would be consistent with existing uses, and within facilities determined not to be historically significant. Therefore, indirect impacts would not result in a significant change in a historical resource. For these reasons, the proposed expanded use of the existing stadium would have no impact regarding the potential for causing a substantial adverse change in the significance of a historical resource.

Stadium Improvements

The proposed stadium improvements would include the construction and operation of two (2) locker room and shower facilities, two (2) permanent restroom facilities, and a gated event storage and staging area. The locker room, shower facilities, and permanent restroom facilities would be located entirely within the existing CSUMB Stadium (please refer to **Figure 3-3**), which is a previously disturbed and developed site. The stadium, while more than 50 years old, is not a historic resource. Dudek conducted a historic site analysis of the stadium in 2021 prior to the previous renovations evaluated in the Freeman Stadium Renovations Project MND (CSUMB, 2021). Dudek recorded the findings from their 2021 analysis with California Department of Parks and Recreation form 523A (Building, Structure, and Object Record). For context, a historical resource may be eligible for inclusion in the CRHR based on the following criteria:

1. Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1);

2. Associated with the lives of persons important in our past (Criterion 2);

[1] CSUMB Stadium was originally constructed in 1952.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (Criterion 3); or

4. Has yielded, or may be likely to yield, information important in prehistory or history (Criterion 4).

The 2021 historic resource analysis stated that the stadium and Field House are not eligible for listing on the NRHP or the CRHR per Criterion A/1 (Association with events that have made a significant contribution to the broad patterns of our history) because these facilities were constructed after the core construction period of the Fort Ord Military Base and were not included in the original base plans. Interest in sports and recreation at the time of their construction resulted in numerous improvements to recreation facilities on army bases across the country and, therefore, the stadium and Field House were not unique.

The 2021 analysis concluded that the stadium and the Field House are not eligible per Criterion B/2 (Association with the lives of persons significant in our past) because eligible properties must be directly tied to an important person and the place where that individual conducted or produced the work for which they are known. Archival research indicates that no single person was shown to be influential or directly associated with the stadium.

The 2021 analysis also concluded that the stadium and the Field House are not eligible per Criterion C/3 (Embodiment of the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction) because none of the research identified a significant architect for the stadium and, therefore, no master architect is associated with the design. Instead, architects and engineers employed by the Fort Ord Engineering Office prepared the original design for the stadium, bleachers, and Field House. The Department of Parks and Recreation Form 523A, provided in **Appendix E**, further notes that stadiums are a ubiquitous type of recreational facility and archival research did not identify this stadium as distinctive in type, period, and method of construction. No artistic value of the design of the stadium exists. Moreover, the field and track had been altered beyond recognition with numerous additions and replacement of original materials, including new surfacing on the track and the paving and surfacing of the field. Likewise, the Field House has undergone numerous extensive alterations, including substantial changes to the plan, exterior cladding, and fenestration. Therefore, the stadium and Field House are not eligible per Criterion D/4 (Yields, or may be likely to yield, information important in prehistory or history) as there is no evidence suggesting these facilities have this potential.

The analysis determined that the stadium and the Field House are not eligible for designation as a California Historic Landmark as these facilities were not the first, last, only, or most significant of their type in the state or within a large geographic region (Northern, Central, or Southern California); associated with an individual or group having a profound influence on the history of California; or a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder. Finally, for the same reasons these facilities do not rise to the level of significance required for federal or state designation per eligibility criteria discussed above, the property does not rise to the level of significance required for local designation on an individual level or as a component of a historic district.

Based on the 2021 analysis' significance evaluation and in consideration of national and state eligibility criteria, the stadium and Field House have been determined ineligible for listing in the NRHP or the CRHR. Since the 2021 analysis, the stadium has undergone significant renovations. These renovations were previously evaluated in the Freeman Stadium Renovations Project MND (CSUMB, 2021). The proposed project includes the construction and operation of a staging area immediately adjacent to the stadium. The proposed staging area is within a previously disturbed and developed area, and does not contain, nor is it located, near historic resources. As such, construction and operation of the proposed stadium improvements would have no impact on a historical resource.

Mitigation Measures

No mitigation is required for **Impact CTR-1**.

Impact CTR-2: The proposed project would have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 (criterion b).

Expanded Use

An increase in the number and frequency of events at the existing stadium would not require ground-disturbing activities that could have the potential to cause a substantial adverse change in an archeological resource. Moreover, the proposed project site has been previously disturbed and developed in connection with the existing stadium and parking facilities. As detailed above, the 2021 analysis did not find evidence of archaeological resources within the area proposed for the gated event storage and staging area, which was not previously evaluated for the Freeman Stadium Renovations Project MND (CSUMB, 2021).

While no direct impacts to known archaeological resources or Tribal cultural resources would occur, expanded operational use could result in indirect effects to any unknown cultural resources located in the surrounding area. Expanded use would increase the number of days per year during which concentrated crowds, amplified sound, nighttime lighting, and event-related vehicle traffic occur. These activities could indirectly affect nearby cultural resources through increased noise, vibration, light intrusion, and pedestrian activity**.** Over time, recurring vibration from heavy vehicle traffic and amplified sound could exacerbate existing structural vulnerabilities in cultural features. Increased pedestrian activity could also accelerate wear on character-defining elements of associated cultural landscapes. However, given the limited known cultural resources in the vicinity of the proposed project site and the consistency with existing uses at the site, indirect impacts would not likely result in a significant change to an archaeological resource. Additionally, existing event operation routing keeps vehicle and pedestrian traffic on designated and paved areas of the project site, further limiting the likelihood that the proposed expanded use of the stadium would indirectly impact archaeological resources. For these reasons, the proposed expanded use of the stadium would have no impact with regard to causing a substantial adverse change in the significance of an archeological resource.

Stadium Improvements

As reflected in the response above, the proposed stadium improvements would be entirely within the existing footprint of the stadium, and in areas that are previously disturbed and developed. The stadium was previously evaluated in the Freeman Stadium Renovations Project MND, and no known or unknown cultural resources were identified prior to or during construction (CSUMB, 2021).

The Cultural Resources Report prepared for this EIR evaluated the gated event storage and staging area, which is outside of the stadium footprint, but in an area that is disturbed and previously developed. The report found no evidence that cultural or archaeological resources are present in the area of potential impact associated with the gated event storage and staging area. Furthermore, the records search from the Cultural Resources Report prepared for this EIR did not identify any records in the vicinity of the project site or on the project site. Regardless, unknown resources may be uncovered during ground disturbance, which would result in a significant impact. **Mitigation Measure CTR-1**, includes sensitivity training prior to ground disturbance, and **Mitigation Measure CTR-2**, which sets forth "Inadvertent Discovery Evaluation and Recordation" protocols to be followed in the event of the discovery of unanticipated archaeological resources, is required to reduce impacts to a less than significant level. Operation of the proposed improvements as part of the project would be consistent with existing stadium operations, albeit increased in intensity, and would have no impact on the significance of an archaeological resource (please refer to the **Expanded Use** impact discussion above).

Mitigation Measures

Mitigation Measure CTR-1: Sensitivity Training

CSUMB shall include a standard clause in every construction contract for the project that requires cultural resource sensitivity training by a qualified archaeologist for workers prior to conducting ground disturbance in the vicinity of a documented cultural resource-sensitive area, should one be identified in the future. Additionally, campus staff involved in ground-disturbing work in the vicinity of a documented resource sensitive area will also receive such training.

Mitigation Measure CTR-2: Inadvertent Discovery Evaluation and Recordation.

CSUMB shall include a standard inadvertent discovery clause in every construction contract for the Project, which requires that in the event that an archaeological resource is discovered during construction (whether or not an archaeologist is present), all soil-disturbing work within 100 feet of the find shall cease until a qualified archaeologist can evaluate the find and make a recommendation for how to proceed. For an archaeological resource that is encountered during construction, the campus shall:

- Retain a qualified archaeologist to determine, in coordination with the Tribal Monitor (please refer to **Mitigation Measure CTR-3**), whether the resource has potential to qualify as a historical resource or a unique archaeological resource as outlined in the California Environmental Quality Act (CEQA) (Public Resources Code § 21083.2).

- If the resource has potential to be a historical resource or a unique archaeological resource, the qualified archaeologist, in consultation with the Tribal monitor and CSUMB, shall prepare a research design and archaeological evaluation plan to assess whether the resource should be considered significant under CEQA criteria.

- If the resource is determined significant, CSUMB shall provide for preservation in place, if feasible. If preservation in place is not feasible, in consultation with the Tribal monitor and CSUMB, a qualified archaeologist will prepare a data recovery plan for retrieving data that is specific to the site's geographic extent and the significance of any resources encountered. The data recovery plan shall be developed prior to site development and implemented prior to or during site

development (with a 100-foot buffer around the resource). The archaeologist shall also perform appropriate technical analyses, prepare a full written report and file it with the Northwest Information Center, and provide for the permanent curation of recovered materials.

Impact CTR-3: The proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries (criterion c).

Expanded Use

As stated in **Impact CTR-2**, above, an increase in the number and frequency of events at the existing stadium would not require ground disturbing activities that could have the potential to disturb human remains. The Cultural Resources Report did not identify any known resources on or adjacent to the proposed project site; furthermore, the expanded use would be consistent with existing uses and would not exceed the capacity of the stadium as determined by the prior Freeman Stadium Renovations Project MND (CSUMB, 2021). Additionally, the proposed project site and adjacent areas have been previously disturbed and developed. For these reasons, the proposed expanded use of the existing stadium would have no impact on human remains.

Stadium Improvements

The project site is not located on an existing or historical cemetery, and, moreover, the project site has been previously disturbed and developed. The stadium improvements would be entirely within the footprint of the existing stadium, which was previously evaluated under the Freeman Stadium Renovations Project MND (CSUMB, 2021) and the adjacent parking area. The prior analysis in 2021 made a similar finding but required mitigation measures that would lessen potential impacts in the unlikely event that human remains are discovered during construction; in such a circumstance, construction activity would halt and the Monterey County Coroner would be notified of the discovery. The coroner would determine whether the remains are Native American and notify the NAHC if appropriate, who, in turn, would determine and notify the Most Likely Descendant of the remains. Previously unknown human remains may exist at the project site. The stadium renovations component would require minimal earth moving (e.g., grading and trenching) that could result in the inadvertent discovery of remains. While unlikely, this impact would be potentially significant. Implementation of **Mitigation Measure CTR-3** and **Mitigation Measure CTR-4**, which would reduce this impact to a less than significant level.

Mitigation Measures

Mitigation Measure CTR-3: Qualified Cultural Tribal Monitor.

To minimize potential impacts to previously unknown or subsurface cultural, Tribal, and archaeological resources, all ground-disturbing work shall be monitored by a qualified Tribal monitor. In the event a resource is identified, the proposed project would implement **Mitigation Measure CTR-2** above.

Mitigation Measure CTR-4: Proper Handling of Human Remains.

Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, PRC Section 5097398, and CEQA Guidelines Section 15064.5(e). According to the provisions of CEQA, should human remains be discovered at any time, work in the immediate vicinity

of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Monterey County Coroner shall be notified immediately. The coroner shall then determine whether the remains are Native America. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the site secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner of the descendant may request mediation by the NAHC. The Ohlone/Costanoan-Esselen Nation (OCEN) shall be notified of the discovery even if not assigned as Most Likely Descendant.

Impact CTR-4: The proposed project would not cause a substantial adverse change in the significance of a Tribal cultural resource, defined in PRC § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k). that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe (criterion d).

Please refer to **Section 4.4.3, Methodology**, above. CSUMB conducted AB 52 consultation in April 2025. Letters of notification were distributed on to Tribes including the Ohlone Costanoan Esselen Nation, the Esselen Tribe of Monterey County, and the Amah Mutsun Tribal Band of Mission San Juan Bautista. The CRCT requested formal consultation on April 17, 2025. CSUMB met with Tribal representatives on May 29, 2025. Concerns regarding the potential for unknown resources were identified during consultation, and the CRCT requested a site visit in advance of ground-disturbing activities and that a Tribal monitor be on-site during ground-disturbing activities (please refer to **Mitigation Measures CTR-2** and **CTR-3**).

Expanded Use

The proposed project site is not listed in the CRHR nor is the site included in a local register of historical resources as defined by PRC Section 5020.1(k). Similarly, the proposed project site is not listed as eligible, nor has the site previously been identified as eligible for listing on the CRHR. While the stadium is more than 50 years old, it does not meet the criteria for a historic resource as discussed in **Impact CTR-1** above, nor does the proposed project site contain Native American or historic period archeological resources identified in the records search. As discussed previously, the expanded use of the project site would not result in direct impacts on resources. Indirect impacts would also be unlikely to occur from implementation of the expanded use. Indirect impacts could feasibly include vibration-related effects to a Tribal cultural resource because of heavy vehicle traffic, crowd movement or foot-traffic, or amplified sound. Alteration of a historic setting or feeling may also be considered an indirect impact. However, the expansion of use would be substantially the same as existing uses, and only increase the frequency of athletic and non-athletic events. The Cultural Resources Report did not identify the presence of Tribal

cultural resources in the vicinity of the project site, and the expanded use would not require ground disturbing activities that could potentially degrade or alter a previously unknown resource. Use of the proposed project site would be consistent with existing uses, and within facilities determined to not contain known resources. Therefore, the proposed expanded use of the stadium would have a less than significant impact on a Tribal cultural resource.

Stadium Improvements

As reflected in the responses above, the proposed stadium improvements would be located entirely within the existing footprint of the stadium, and in areas that have been previously disturbed and developed. The stadium was previously evaluated in the Freeman Stadium Renovations Project MND, and no known or unknown Tribal cultural resources were identified prior to or during construction (CSUMB, 2021). The Cultural Resources Report evaluated the proposed gated event storage and staging area, which is outside of the stadium footprint, but in an area that has been previously disturbed. The Cultural Resources Report found no evidence that resources are present in the proposed gated event storage and staging area. Furthermore, the records search in the Cultural Resources Report did not identify any resources in the vicinity of the project site or on the project site.

During AB 52 consultation, CRCT identified that unknown or previously unrecorded resources may exist, and emphasized the project area has cultural significance and requested monitoring during ground disturbance. Although the proposed project is not expected to directly affect known Tribal cultural resources, construction activities have the potential to unearth buried or previously unknown resources. Potential discovery of unknown Tribal cultural resources would constitute a potentially significant impact. Impacts would be mitigated to a less than significant level through the implementation of the **Mitigation Measures CTR-1** through **Mitigation Measure CTR-4** identified above.

Mitigation Measures

Please refer to **Impact CTR-2** and **Impact CTR-3** for the full text of **Mitigation Measures CTR-1** through **Mitigation Measure CTR-4.**

4.4.5 Significance After Mitigation

Implementation of **Mitigation Measure CRT-1**, **Mitigation Measure CRT-2**, **Mitigation Measure CRT-3**, and **Mitigation Measure CRT-4** would reduce potentially significant impacts on archeological, cultural, and Tribal cultural resources to a less than significant level (please refer to **Impact CTR-2** through **Impact CTR-4**). Mitigation would require sensitivity training prior to construction of the proposed project, and would require work to halt in the event construction activities unearth previously unknown resources until the County, archaeologist, and Tribal monitor can: 1) determine the significance of the resource, and 2) determine the appropriate avoidance measure or other appropriate mitigation, if deemed necessary. Together, these measures would reduce impacts on cultural and Tribal cultural resources to a less than significant level.

4.4.6 References

[CSU] California State University. 2022a. *California State University Master Plan Environmental Impact Report*. State Clearinghouse Number 2017051042. Available online at: https://ceqanet.lci.ca.gov/2017051042/3

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[CSUMB] California State University Monterey Bay. 2021. *Freeman Stadium Facilities Renovation Project Public Draft Initial Study Mitigated Negative Declaration*. State Clearinghouse Number 2021070153. Available online at: https://ceqanet.lci.ca.gov/2021070153

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4.5 ENERGY

This section describes the energy setting for the proposed project and evaluates the potential energy impacts during the construction and operation. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments were received concerning energy use during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.5.1 Environmental Setting

Electricity supply in California involves a complex grid of power plants and transmission lines. In 2024, California was the fourth largest total electricity producer in the nation, and the state imported the second largest share of electricity of any other state. While California is the second largest total energy consumer in the nation, the state consumes the third lowest in the nation in terms of per capita energy consumption (US Energy Information Administration [EIA], 2025). Total energy consumption in California was approximately 7,194.4 trillion British thermal units (Btu) in 2023 (the most recent year for which this specific data was available). Energy use by sector in 2023 was approximately 17.1% for residential uses, 17.0% for commercial uses, 21.4% for industrial uses, and 44.5% for transportation (EIA, 2025). According to the EIA, existing energy use in California primarily consists of natural gas (2,154.5 trillion Btu in 2023), petroleum (3,378.8 trillion Btu in 2023), and renewables (1,250.4 trillion Btu in 2023) (EIA, 2025).

4.5.1.1 Regional Overview

ELECTRICITY

Electric energy used in Monterey County is procured from carbon-free and renewable energy sources (i.e., solar, wind, and hydroelectric). Pacific Gas & Electric (PG&E) operates a grid distribution system that transmits electricity with a network of transmission and distribution lines throughout the service area to approximately 140,000 residential and nonresidential user accounts. Beginning in 2018, all PG&E customers within Monterey, San Benito, and Santa Cruz Counties were automatically enrolled in Central Coast Community Energy (3CE). 3CE is a locally controlled public agency providing carbon-free electricity to residents and businesses. 3CE is a joint power authority and based on a local energy model called community choice energy. With a goal to provide customers with 100 percent clean and renewable energy by 2030, 3CE's standard electricity offering is carbon free and currently offers 30 percent renewable energy (3CE, 2025). In 2022, (the most recent year for which this specific data was available) Monterey County consumed approximately 2,463 gigawatt hours (California Energy Commission [CEC], 2026).

NATURAL GAS

PG&E delivers natural gas through high-pressure pipelines to its load centers with compressors used to maintain transmission pressure. Smaller distribution pipelines distribute gas to facilities (commercial,

residential) or other underground storage facilities. In 2020, Monterey County consumed approximately 11 million therms of natural gas (CEC, 2025a).

4.5.1.2 Project Site Setting

CSUMB receives electricity and natural gas from PG&E and distributes these energy resources campus-wide using two (2) separate distribution systems, one (1) for electricity and one (1) for natural gas. Natural gas is metered to the campus at a single location. The natural gas distribution system consists of a gas-fired central plant that supplies hot water for heating to the campus core through underground piping. Approximately two-thirds of CSUMB's thermal demand is satisfied from this system; the balance is supplied by standalone gas-fired boilers and furnaces. Additionally, the east campus housing area is individually metered with natural gas delivered by PG&E (CSU, 2022a). CSUMB also contracts with SunEdison, who supplies energy via a 1.0 megawatt solar tracking photovoltaic generation facility (CSUMB, 2022).

4.5.2 Regulatory Environment

4.5.2.1 Federal

At the federal level, energy standards set by the EPA apply to numerous consumer and commercial products (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

FEDERAL ENERGY POLICY AND CONSERVATION ACT AND CAFE STANDARDS

Congress passed the Energy Policy and Conservation Act of 1975 in response to the oil crisis of 1973, which increased oil prices due to a shortage of reserves and sought to ensure all vehicles sold in the United States would meet certain fuel economy standards. This act established the first fuel economy standards for on-road motor vehicles in the United States. The National Highway Traffic Safety Administration (NHTSA) establishes additional vehicle standards. In 2024, the NHTSA established new fuel economy standards for passenger cars and light trucks. These standards apply to model years 2027 through 2031. The NHTSA also established new fuel economy standards for heavy-duty pick-up trucks and vans for model years 2030-2035 (89 FR 60832). On April 1, 2022, former Transportation Secretary Pete Buttigieg unveiled new CAFE standards for 2024–2026 model year passenger cars and light-duty trucks, requiring new vehicles sold in the US to average at least 40 miles per gallon.

ENERGY POLICY ACT OF 1992 AND 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. EPAct requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan

guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the Energy Policy Act of 2005 in setting out a comprehensive national energy strategy for the 21st century.

4.5.2.2 State

SENATE BILL 350 -- CLEAN ENERGY AND POLLUTION REDUCTION ACT OF 2015 AND CALIFORNIA RENEWABLE ENERGY STANDARDS

In 2002, California established its Renewables Portfolio Standard (RPS) Program through Senate Bill (SB) 1078, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2017. In 2006, SB 107 accelerated the RPS established in SB 1078. Under the provisions of SB 107, investor-owned utilities were required to generate 20 percent of their retail electricity using qualified renewable energy technologies by the end of 2010. In 2008, EO S-14-08 established that retail sellers of electricity serve 33 percent of their load with renewable energy by 2020.

In October 2015, the Legislature passed SB 350, which codified California's climate and clean energy goals. A key provision of SB 350 for retail sellers and publicly owned utilities requires them to procure 50 percent of the state's electricity from renewable sources by 2030. In 2018, SB 100 accelerated the provisions of SB 350, requiring retail seller and publicly owned utilities to procure 60 percent of their electricity from renewable energy resources by 2030.

CALIFORNIA ENERGY COMMISSION

The Warren-Alquist Act of 1975 established CEC and directed the CEC to formulate and adopt the nation's first energy conservation standards for buildings and appliances. The act also granted the CEC the authority to forecast electricity demand and directed the CEC to research and develop non-conventional energy sources. The CEC currently leads state energy policy and planning as they oversee renewable energy growth, including the RPS Program; oversee the state's energy system; and invest in research and development for electricity and natural gas production projects and clean transportation technologies (CEC, 2025b).

CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS (TITLE 24, PART 6)

The state established the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the CCR (Title 24) in 1978 to respond to California's energy consumption. Title 24 is updated every three (3) years and requires compliance at the time new building permits are issued by city and county governments. The 2022 California Energy Code went into effect on January 1, 2023. The 2022 California Energy Code advances the onsite energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar photovoltaic (PV) system and battery storage standards, and strengthening ventilation standards to improve indoor air quality.

CALIFORNIA GREEN BUILDING STANDARDS (TITLE 24, PART 11)

To support energy conservation, the California Green Building Standards, also known as CALGreen, , Title 24, Part 11, establishes mandatory and voluntary (Tiers I and II) green building standards for residential and nonresidential construction in California. The current version is the 2025 CALGreen Code, which took effect on January 1, 2026. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and used as guidelines by state agencies for meeting the requirements of Executive Order B-18-12. CalGreen covers five (5) categories; planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality.

CLIMATE CHANGE SCOPING PLAN

Reducing GHG emissions in California has been the focus of the state government for approximately two decades. GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (AB 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (SB 32 of 2016). Executive Order S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. This target was superseded by AB 1279, which codifies a goal for carbon neutrality and reduce emissions by 85 percent below 1990 levels by 2045. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius.

CARB adopted the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 16, 2022, which traces the state's pathway to achieve carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top-down, bottom-up approach under various scenarios. It identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals.

EXECUTIVE ORDER B-18-12: GREEN BUILDING ACTION PLAN

Executive Order B-18-12 was issued in April 2012 and requires state agencies to implement green building practices to improve energy, water, and materials efficiency; improve air quality and working conditions for state employees; reduce costs to the state; and reduce environmental impacts from state operations. Among other actions, Executive Order B-18-12 requires state agencies to reduce agency-wide water use by 10 percent by 2015 and 20 percent by 2020, as measured against a 2010 baseline.

The Executive Order directs new state buildings designed after 2025 to be constructed as zero net energy (ZNE) facilities, with an interim target of 50 percent of new facilities beginning design after 2020 to be ZNE. it also calls for state agencies to identify and pursue opportunities to provide electric vehicle charging stations at employee parking facilities for new buildings.

The State has passed legislation that aims to reduce GHG emissions. The legislation often has an added benefit of reducing energy consumption. SB 32 requires a Statewide GHG emission reduction of at least

40 percent below 1990 levels by no later than December 31, 2030. Executive Order S-3-05 sets a long-term target of reducing Statewide GHG emissions by 80 percent below 1990 levels by 2050.

SB 375 aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. The Advanced Clean Cars program, approved by CARB, combines the control of GHG emissions and criteria air pollutants and the increase in the number of zero-emission vehicles into a single package of standards. The program's zero-emission vehicle regulation requires battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. In August 2022, CARB adopted the ACC II program, which sets sales requirements to reach the goal of 100 percent ZEV sales in the State by 2035. Additionally, in April 2023, CARB adopted the Advanced Clean Fleets regulation, which sets a goal of achieving a fully zero-emission truck and bus fleet within the State by 2045. Implementation of the State's legislation associated with GHG reduction will have the co-benefit of reducing California's dependency on fossil fuel and making land use development and transportation systems more energy efficient.

More details about legislation associated with GHG reduction are provided in the regulatory setting of **Section 4.7, Greenhouse Gas Emissions**.

CALIFORNIA CODE OF REGULATIONS TITLE 20

CCR Title 20 requires manufacturers of appliances to meet state and federal standards for energy and water efficiency, and the CEC regulates and certifies all manufactured appliances in the state. Title 20 sets forth three (3) appliance standards comprised of federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances. Appliance regulated under Title 20 includes refrigerators, refrigerator-freezers and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 is currently amended through 2024 to reflect changes in federal law, revise data submittal requirements, and update product compliance review and administrative procedures (CEC, 2024).

CALIFORNIA STATE UNIVERSITY SUSTAINABILITY POLICY

In Spring 2024, the CSU Board of Trustees adopted an update to the CSU Systemwide Sustainability Policy, which was first adopted in 2014 with subsequent updates in 2019,2020, and 2022. The current update became effective October 18, 2024. The policy aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. The CSU Sustainability Policy established the following goals (CSU, 2024):

University Sustainability

- The CSU will seek to further integrate sustainability and climate literacy into the academic curriculum working within the normal campus consultative process. Activities can include but will not be limited to supporting multi-disciplinary course development, utilizing the campus as a living laboratory model, connecting sustainability with social justice, strengthening community partnerships, and creating appropriate learning outcomes. Progress shall be measured using the

Association for the Advancement of Sustainability in Higher Education Sustainability Tracking, Assessment & Rating System (AASHE STARS) platform.

- The CSU shall promote environmental and social justice through new and existing Diversity, Equity, & Inclusion programs such as the CSU Basic Needs Initiative.

- The CSU will develop employee and student workforce skills in the green jobs industry, climate-related industry, promote the development of sustainable products and services, and foster economic development.

- The CSU will pursue sustainable practices, using AASHE STARS for guidance and reporting, in all areas of the university, including:

    - business operations such as procurement; information technology; student and employee services; food services; events, habitat and land-use management, facilities operations; design and construction; and

    - self-funded entities such as student housing, student unions, parking and transportation, children's centers, and auxiliary operations.

- Each CSU will designate a sustainability officer/staff member responsible for planning and/or coordinating campus sustainability program efforts.

Climate Action Plan

- The CSU will strive to reduce systemwide facility carbon emissions to 40 percent below 1990 levels consistent with SB 32, California's Global Warming Solutions Act of 2006 (Health and Safety Code Section 38566, effective January 1, 2017). Emissions will include both state and auxiliary organization purchases of electricity and natural gas; fleet, marine vessel usage; and other emissions the university or self-support entity has direct control over. The Chancellor's Office staff will provide the baseline 1990 facility emission levels (for purchased electricity and natural gas) for the campuses that existed at that time and assist campuses added to the CSU after 1990 to determine their appropriate baseline.

- The CSU will strive to reduce facility carbon emissions to 80 percent below 1990 levels by 2040 to achieve carbon neutrality by 2045 in accordance with statewide mandates. Metrics will include GHG emissions per FTE.

Energy Resilience and Procurement

- The CSU will pursue energy procurement and production to reduce energy capacity requirements from fossil fuels, enhance electrical demand flexibility, and promote energy resilience using available economically feasible technology for on-site renewable generation, microgrids, and other fossil fuel-free energy storage solutions. The CSU shall endeavor to increase its self-generated renewable energy and battery capacity from 32 to 80 megawatts by 2030.

- The CSU will consider cost effective opportunities to exceed the State of California and California Public Utilities Commission Renewable Portfolio Standard sooner than the established goal of

procuring 60 percent of its electricity needs from renewable sources by 2030 consistent with SB 100 (Public Utilities Code Section 399.11).

- To minimize use of natural gas, campuses will transition from fossil-fuel sourced equipment to electric equipment as replacements or renovations are needed. Any in-kind fossil-fuel sourced equipment will be justified through an analysis which demonstrates why that solution represents the most cost-effective option and what alternatives were analyzed for comparative purposes. The intention of this item shall be limited to no new investment in, or renewal of, natural gas assets or infrastructure as part of campus projects starting July 1, 2035, with the exception of critical academic program needs.

Energy Conservation, Carbon Reduction and Utility Management

- All CSU buildings and facilities, regardless of the source of funding for their operation, will be operated in the most energy efficient manner and transition to a low carbon strategy without endangering public health and safety and without diminishing the quality of education and the academic program.

- All CSU campuses shall continue to identify energy efficiency and carbon reduction improvement measures to the greatest extent possible, undertake steps to seek funding for their implementation and, upon securing available funds, expeditiously implement the measures.

- The CSU will cooperate with federal, state, and local governments and other appropriate organizations in accomplishing energy conservation, and carbon reduction, and utilities management objectives throughout the state; and inform students, faculty, staff and the general public of the need for and methods of energy conservation, and carbon reduction, and utilities management.

- Each CSU campus shall designate an energy/utilities staff with the responsibility and the authority for carrying out energy conservation and utilities management programs. The Chancellor's Office will have the responsibility to coordinate the individual campus programs into a systemwide program.

- The CSU will monitor monthly energy and utility usage on all campuses and the Chancellor's Office and will prepare a systemwide annual report on energy utilization and greenhouse gas emissions. The Chancellor's Office will maintain a systemwide energy database in which monthly campus data will be compiled to produce systemwide energy reporting. Campuses will provide the Chancellor's Office the necessary energy and utility data, such as electricity and natural gas consumption; water and sewer usage; fuel consumed by fleet vehicles, boats, and ships; waste disposal for the systemwide database in a timely manner.

- Each CSU campus shall develop and maintain a campuswide utility master plan which includes an integrated strategic energy resource plan, with tactical recommendations in the areas of new construction, decarbonization, deferred maintenance, climate resilience, facility renewal, energy projects, water conservation, solid waste management, and an energy management plan. This

plan will be updated every 10 years and guide the overall energy and climate action program at each campus.

Water Conservation

- All CSU campuses shall pursue cost effective water resource conservation to reduce consumption by 10 percent by 2030, as compared to a 2019 baseline, consistent with AB 1668 (California Water Code Section 10609) including steps to develop sustainable, drought tolerant or native landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms, showers, fountains and decorative water features, and promote the use of reclaimed/recycled water. In the event of a declaration of drought, the CSU will cooperate with the state, city, and county governments to the greatest extent possible to reduce water use.

Sustainable Procurement

- Campuses shall promote use of suppliers and/or vendors who reduce waste, re-purpose recycled material, or support other environmentally friendly practices in the provision of goods or services to the CSU under contract. This may include additional evaluation points in solicitation evaluations for suppliers integrating sustainable and socially responsible practices.

- To move to zero waste, campus practices should: (1) encourage use of products that minimize the volume of trash sent to landfill or incinerators; (2) participate in the CalRecycle Buy-Recycled program or equivalent; and (3) increase recycled content purchases in all Buy-Recycled program product categories.

- Campuses shall continue to report on all recycled content product categories, consistent with Public Contract Code Section 12153-12217 and shall implement improved tracking and reporting procedures for their recycled content purchases.

- Campuses shall align procedures with state initiatives to report environmental product declarations for select construction materials, consistent with Public Contract Code Section 3500-3505 and state mandates.

- Campuses shall promote circular economies 2by seeking to reduce waste when considering materials purchases, including but not limited to, office supplies, equipment, classroom supplies, and promotional and giveaway items by minimizing purchase of items that have a short useful life, are unable to be recycled, and/or are made of unsustainable or carbon intensive materials.

Waste Management

- Campuses shall seek to reduce landfill bound waste to 50 percent of total campus waste by 2030, divert at least 80 percent from landfill by 2040, and move toward zero waste.

- Campuses shall identify and implement cost effective opportunities for organics diversion, collection, and disposal and shall designate zero waste responsibilities for coordinating campus waste prevention, reduction and diversion efforts. Campuses will continue to report on all disposal activities using the CalRecycle State Agency Reporting Center (SARC) and are encouraged

to coordinate and maintain a solid waste management plan as it is a requirement in the utility master plan.

- The CSU will continue to reduce hazardous waste disposal while supporting the academic program.

Sustainable Food Service

- All campus food service organizations should track and increase/improve their sustainable food purchases.

- Campuses and food service organizations shall collaborate to provide information and/or training to staff and patrons on the benefits of, and how to successfully participate in sustainable food service operations.

Sustainable Building and Lands Practices

- All future CSU new construction, remodeling, renovation, and repair projects, regardless of funding source, will be designed with consideration of optimum energy utilization, decarbonization, and low life-cycle operating costs and shall exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Title 24 CCR Section 6) by 10 percent. In the areas of specialized construction that are not regulated through the current energy standards, such as historical buildings, museums, and auditoriums, the CSU will ensure that these facilities are designed to maximize energy efficiency. Energy efficient and sustainable design features in the project plans and specifications will be considered in balance with the academic program needs of the project within the available project budget.

- Capital planning for state, non-state facilities and infrastructure shall consider features of a sustainable and durable design to achieve a low life cycle cost. Campuses shall design, construct, operate, and maintain green building certified high performing buildings, regardless of funding source, that improve occupant productivity and wellness, optimize life-cycle costs, and minimize carbon impact. Principles and best practices established by leading industry standards or professional organizations shall be implemented to the greatest extent possible.

- Existing building energy performance will be optimized through improved operation, maintenance and repair, and capital improvement, enabling campuses to meet carbon reduction goals. Sustainable design for capital projects is a process of balancing long-term institutional needs for academic and related programs with environmental concerns. In the context of designing to provide for university and academic needs, the following attributes will be considered "sustainable:"

    - Siting and design considerations that optimize local geographic features to improve sustainability of the project, such as proximity to public transportation and maximizing use of vistas, microclimate, and prevailing winds;

    - Durable systems and finishes with long life cycles that minimize maintenance and replacement.

- Optimization of layouts and designing spaces that can be reconfigured with the expectation that the facility will be renovated and re-used (versus demolished);
- Systems designed for optimization of energy, water, and other natural resources;
- Optimization of indoor environmental quality for occupants;
- Utilization of environmentally preferable products and processes, such as long life-cycle materials and components, recycled-content and recyclable materials;
- Procedures that monitor, trend, and report operational performance as compared to the optimal design and operating parameters.
- Cost-effective design features which align with the CSU Basic Needs Initiative and support campus diversity, equity and inclusion efforts.

- To implement the sustainable building goal in a cost-effective manner, the process will: identify economic and environmental performance measures; determine cost savings; use extended life cycle costing; and adopt an integrated systems approach. Such an approach treats the entire building as one system and recognizes that individual building features, such as lighting, windows, heating and cooling systems, or control systems are not stand-alone systems.

- Capital Planning, Design and Construction in the Chancellor's Office shall monitor building sustainability/energy performance and maintain information on design best practices to support the energy efficiency goals and guidelines of this policy.

Physical Plant Management

- Each campus shall operate and maintain a comprehensive energy management system that will provide centralized reporting and control of the campus energy and carbon reduction related activities.

- Campus energy/utilities managers will make the necessary arrangements to achieve optimum efficiency in the use of natural gas, electricity, or any other purchased energy resources to meet the heating, cooling, and lighting needs of the buildings and/or facilities. Campuses shall strive to adhere to Statewide energy efficiency guidance regarding appropriate indoor temperature setpoints during heating and cooling periods (State Administrative Manual, Section: 1805.3). Except for areas requiring special operating conditions, such as electronic data processing facilities, or other scientifically critical areas, where rigid temperature controls are required, building and/or facility temperatures will be allowed to fluctuate between the limits stated above. Simultaneous heating and cooling operations to maintain a specific temperature in work areas will not be allowed unless special operating conditions dictate such a scheme to be implemented.

- To the extent possible, academic and non-academic programs will be consolidated in a manner to achieve the highest building utilization.

- All CSU campuses shall implement a utilities chargeback system to recover direct and indirect costs of utilities provided to self-supporting and external organizations pursuant to procedures in the CSU Policy Library.

Transportation

- The CSU will encourage and promote the use of alternative transportation and/or alternative fuels to reduce GHG emissions related to university associated transportation, including commuter and business travel. The Chancellor's Office will establish a baseline for carbon emissions from student, faculty and staff commuting and establish a systemwide reduction target.

- All CSU campuses shall develop and maintain a TDM plan to reduce VMT and carbon emissions. This plan will be updated every 5 years and guide the overall transportation and parking program at each campus.

- Campuses shall strive to increase EV, electric bicycle, and other electric mobility and transportation device charging infrastructure and incentive programs to further support campus carbon reduction strategies.

- Campuses shall strive to develop and maintain a long-range plan for transitioning fleet, and grounds equipment to zero emissions, excluding public safety patrol vehicles if necessary. 50 percent of all light duty vehicle purchases will be ZEV by 2035, with no addition of gas-powered light duty vehicles to the fleet after 2035. All small off-road engine equipment used for campus grounds will be all-electric by 2035. All buses and heavy-duty vehicles will be ZEV by 2045 in alignment with state regulations.

CALIFORNIA STATE UNIVERSITY, MONTEREY BAY MASTER PLAN GUIDELINES

CSUMB incorporated elements of the CSUMB Climate Action Plan into their 2022 Master Plan Guidelines. CSUMB completed their Climate Action Plan in 2013, which provides strategies to achieve carbon neutrality by 2030 for a campus enrollment of 8,500 full time equivalent students. Both the CSUMB Climate Action Plan and the 2022 CSUMB Master Plan Guidelines incorporate CSU Sstemwide Sustainability Policies, listed below (CSU, 2022b):

- Reduce GHG emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2040.

- Promote alternative transportation on campus.

- Increase on-site self-generation capacity to 80 megawatts.

- Procure more than 1/3 of electricity purchased from renewable sources.

- Identify and implement energy efficiency measures to reach GHG reduction goals.

- Design to LEED Silver equivalent, and strive for Gold.

- Consider energy use and life cycle cost in construction or renovation of any building.

The 2022 CSUMB Master Plan Guidelines proved the following energy goals and policies relevant to the proposed project (CSU, 2022b):

Goal ES 1 Achieve carbon neutrality and pursue net positive energy.

Goal ES 2 Meet future demand for energy in a safe, reliable, and cost effective manner.

ES 2.1 Identify purchasing strategies for greenhouse gas emission offsets to close any remaining gaps at the end of the time-line to reach the 2030 carbon neutrality goal. Consider the following strategies:

- Participate in a CSU/UC system or local Community Choice Aggregation (CCA) program.
- Purchase renewable energy offsets from a certified green-e source.

ES 2.2 Target a minimum 15 percent energy performance improvement over current Title 24 code in new construction.

ES 2.3 Target a minimum 5 percent energy performance improvement over current usage in existing facilities.

ES 2.4 Invest in non-capital-intensive alternative energy sources that best meet the campus's needs.

Goal ES 3 Design and retrofit infrastructure and buildings to minimize energy use.

ES 3.4 Implement lighting and other energy retrofits and other incentive programs as indicated by energy audits. To do this, consider the assistance of the UC CSU Energy Efficiency Partnership and programs like Savings by Design.

Goal ES 3 Design and retrofit infrastructure and buildings to minimize energy use.

Additionally, the 2022 CSUMB Master Plan Guidelines encourage the building design standards separate from specific policies to address energy. These standards include:

- Utilize efficient technologies to minimize the amount of energy needed to meet heating or cooling loads not met through passive strategies.
- Utilize occupancy sensors to automatically turn off equipment and lighting in order to lower demand and reduce peak equipment sizing.
- Design buildings to meet lower-temperature heat distribution.

4.5.2.3 Local

SEASIDE GENERAL PLAN

As a campus within the CSU, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with energy resources. The City of Seaside's General Plan includes the following relevant policies (City of Seaside, 2024):

Goal LUD-20: Resilient neighborhoods on Former Fort Ord Lands.

Resource Efficiency. Provide incentives to encourage new development to be more water and energy efficient and use fewer natural resource to increase long-term neighborhood resilience.

Goal PO-7: Environmental sustainability and awareness at new and existing park and recreational facilities.

Conservation and Efficiency. Increase energy and water conservation and efficiency at new and existing park and recreation facilities.

Goal HSC-9: Energy efficient buildings that use energy from renewable sources.

Net Zero Buildings. Explore a requirement for all new residential buildings to use net zero energy by 2030 and all new commercial buildings by 2040, consistent with state goals.

4.5.3 Methodology

Energy impacts were evaluated based on a review of project characteristics, anticipated energy demand, and applicable regulatory and planning frameworks. Project-related energy use, including electricity, natural gas, and transportation fuels, was estimated using CalEEMod and, where applicable, information from the project traffic analysis. The analysis considers whether the project would result in inefficient, wasteful, or unnecessary consumption of energy during construction or operation, or conflict with applicable energy conservation plans and regulations. This evaluation is based on a qualitative and quantitative assessment of project energy demand in comparison to typical consumption patterns and applicable standards, including relevant building energy efficiency requirements.

4.5.4 Impacts and Mitigation

4.5.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would have a significant energy impact if it would:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.5.4.2 Impacts and Mitigation Measures

Impact E-1: The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (criterion a).

Expanded Use

Expanded use of the CSUMB Stadium would consist of an increase in the number and frequency of events at the stadium. Energy use would be required for stadium and facility lighting, heating, as well as for transport of materials and people. Energy consumption would occur in connection with the procurement and transportation of materials and people to the site. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these activities. An analysis of transportation impacts is found in **Section 4.14, Transportation**. Although the proposed project would result in a significant and unavoidable impact related to VMT, the proposed project would be required to implement a TMP and TDM. Additionally, California energy policies, ongoing improvements in vehicle fuel efficiency, and the transition to lower-emission and zero-emission vehicles would reduce per-vehicle energy consumption over time, thereby limiting the proposed projects contribution to long-term energy demand.

Energy for the operation of the proposed project was modeled by AMBIENT. Electrical energy consumption related to operation would result in 48,413 kWh/year, and 202,533 kBTU/yr of natural gas would be consumed. While the proposed expanded use of the stadium would require the use of energy, this use would not be wasteful, inefficient, or unnecessary. All electricity and natural gas utilities would come from the campus' existing service lines. Moreover, the expanded use of the CSUMB Stadium must comply with several CSU and CSUMB policies for increasing energy efficiency. These policies include CSU Sustainability Policy requiring all CSU facilities be operated in the most energy efficient manner; CSUMB Climate Action Plan and 2022 CSUMB Master Plan Guidelines sustainability policy for identifying and implementing energy efficiency measures to reach GHG reduction goals; and 2022 CSUMB Master Plan Guidelines Policy ES 2.2 and Policy ES 2.3 requiring energy performance improvements over current CBC Title 24 code in new construction and a minimum five (5) percent energy performance improvement over current usage in existing facilities (CSU, 2024; CSU, 2022b). Furthermore, energy use at the proposed project site would only be needed during use of the facilities, and high energy consumptive utilities (e.g., lighting) would only be necessary for evening practice, games, or events. For these reasons, implementation of the proposed expanded use of the stadium would have a less than significant impact on energy consumption.

Stadium Improvements

Construction of the proposed stadium improvements would require energy for the manufacture and transportation of construction materials, preparation of the site (e.g., grading), and vertical construction. The amount of energy required for construction has not been determined at the time of writing; however, the construction process is designed to be efficient to avoid excessive costs, and energy use for construction would be temporary.

Operation of the proposed stadium improvements would also use energy efficiently since new facilities must incorporate the CBC Title 24 energy efficiency building requirements and the stricter CSU and

CSUMB energy efficiency policies. As discussed above, the CSU and CSUMB energy efficiency policies consist of the CSU Sustainability Policy requiring all CSU facilities use energy efficiently in addition to CSUMB Climate Action Plan and 2022 CSUMB Master Plan Guidelines policies. Specifically, these policies require implementation of energy efficiency measures to reach GHG reduction goals and require energy performance improvements over current CBC Title 24 requirements in new construction (CSU, 2024; CSU, 2022b). For these reasons, the proposed stadium improvements would have a less than significant impact with respect to wasteful, inefficient, or unnecessary consumption of energy resources.

Mitigation Measures

No mitigation is required for **Impact E-1**.

Impact E-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (criterion b).

Expanded Use

The proposed expanded use of the stadium would rely on the existing energy distribution infrastructure, which serves the CSUMB Stadium and campus. The proposed expanded use of the stadium would be subject to state policies and regulations for increasing both energy efficiency and the use of renewable energy, and as stated in **Impact E-1**, specific CSU and CSUMB policies for increasing energy efficiency would be required and implemented.

As for renewable energy, CSUMB incorporated energy policies in the 2022 CSUMB Master Plan Guidelines that govern the overall energy distribution and acquisition of the entire campus, which would include the project site. Policy ES 2.1 outlines institutional strategies for acquiring renewable energy sources and achieving carbon neutrality by 2030. Additionally, both the 2022 CSUMB Master Plan Guidelines and CSUMB Climate Action Plan incorporate CSU Systemwide Sustainability Policies. Those policies related to renewable energy and reduction of GHGs require a reduction in GHG emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2040; procurement of more than one-third of electricity purchased from renewable sources, and identification and implementation of energy efficiency measures to reach GHG reduction goals (CSU, 2024; CSU, 2022b). For discussion regarding GHG emissions, please refer to **Section 4.7, Greenhouse Gas Emissions**.

CSUMB is incorporating measures to address each of these policies campus-wide, which includes the project site. Therefore, the proposed expanded use of the stadium would be consistent with state, CSU, and CSUMB policies and plans for renewable energy and energy efficiency and result in a less than significant impact with respect to the use of energy in a manner that would conflict with or obstruct a state or local plan for renewable energy and energy efficiency.

Stadium Improvements

As discussed above, the proposed stadium improvements would rely on energy resources supplied by the campus' existing service lines for electricity and natural gas. Therefore, the CSU and CSUMB policies for operating in the most energy-efficient manner possible, increasing energy efficiency beyond CBC Title 24 efficiency requirements, achieving carbon neutrality by 2030, and procuring more renewable energy resources, would all be incorporated into the operation of the proposed stadium improvements.

In addition to these operational policies, CSU and CSUMB implement design measures for new facilities. The CSU Systemwide Sustainability Policies require that the design of new facilities meet a LEED Silver equivalent standard and that construction considers the energy use and life cycle cost of the new facility. The 2022 CSUMB Master Plan Guidelines also encourages the design standards in new facilities to meet energy efficiency goals. These design standards encourage the use of efficient technologies to minimize the amount of energy needed to meet heating or cooling loads not met through passive strategies, the use of occupancy sensors to automatically turn off equipment and lighting to lower demand and reduce peak equipment sizing, and design buildings to meet lower-temperature heat distribution (CSU, 2022b). Furthermore, construction activities for each of the proposed stadium improvements would be temporary in nature and designed to minimize energy consumption, in part, as a cost saving strategy. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to the use of energy in a manner that would conflict with or obstruct a state or local plan for renewable energy and energy efficiency.

Mitigation Measures

No mitigation is required for **Impact E-2**.

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4.6 GEOLOGY, SOILS, AND SEISMICITY

This section describes the geologic and seismic setting for the proposed project and evaluates its potential to cause geologic impacts, such as erosion during construction, or to be subjected to geologic hazards, such as earthquakes. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments were received concerning geology, soils, and seismicity during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.6.1 Environmental Setting

4.6.1.1 Regional Overview

The project site is located approximately one (1) mile east of Monterey Bay (Pacific Ocean), within the Coast Ranges Geomorphic Province of Central California. The Coast Ranges generally consists of two (2) core complexes: the Franciscan Formation and the Salinian Block. The Salinian Block, which underlies the proposed project region, consists of an elongated north-northwest-trending crustal block of granitic and metamorphic rock. The collision of the North American and Pacific tectonic plates formed the Salinian Block.

The proposed project region is characterized by bar and swale landforms of perennial vegetation-stabilized dunes, which represent older coastal dune sand. According to the 2022 CSUMB Master Plan EIR, most of the original hummocky dune topography has been graded, resulting in relatively flat to gently sloping topography (CSU, 2022a).

4.6.1.2 Faulting and Seismicity

The San Andreas Fault system is the predominant seismic hazard in the greater San Francisco/Monterey Bay Area. The San Andreas Fault system is the tectonic boundary between the northward moving Pacific Plate (west of the fault) and the southward moving North American Plate (east of the fault). The movement of these two (2) plates against each other forms a complex system of strike-slip, right-lateral, and subparallel faults.

The California Geologic Survey (CGS), a division of the DOC, administers the Earthquake Zones of Required Investigation mapping tool, also referred to as the Earthquake Hazards Zone Application (EQ ZAPP). This application illustrates the location of Alquist-Priolo Fault Zones, which are regulatory zones that surround the surface traces of active fault lines in the state. Active faults are those that have ruptured in the last 11,000 years, and the state requires a 50-foot set back from these fault lines and prohibits projects from constructing structures for human occupancy over a fault line (CGS, 2025). The project site is not located within an Alquist-Priolo Earthquake Fault Zone, as the nearest Alquist Priolo Fault Zones are the Zayante-Vergeles Fault Zone located approximately 16 miles northeast near the communities of Prunedale and

Aromas and the San Andres Fault located approximately 20 miles northeast in the City of San Juan Batista (CGS, 2024).

Evaluation of fault rupture hazards is based on the historic activity and recurrence of faulting along existing fault lines. Faults of known historic activity during the last 200 years, as a class, have a greater probability for future activity than faults classified as Holocene age (last 11,000 years), and a much greater probability of future activity than faults classified as Quaternary age (last 1.6 million years). However, certain faults have recurrent activity measured in tens or hundreds of years whereas other faults may be inactive for thousands of years before reactivating. The magnitude, sense, and nature of fault rupture also vary for different faults or along different strands of the same fault. **Table 4.6-1** identifies the faults in proximity to the proposed project site and details the rupture length and maximum moment magnitude.

Table 4.6-1
Summary of Regional Fault Zones

Fault Name	Distance (miles)	Distance (km.)	Direction	Rupture Length (km)
Reliz-King City	1.5	2.4	North	77
Monterey Bay – Tularcitos*	4.9	8	Northeast	84
Chupines**	2.4	3.9	Southwest	50
San Gregorio – Palo Colorado	14.2	23	West-Southwest	241
Zyante-Vergeles	16	25.7	Northeast	87
San Andres – 1906 Segment	19.26	31	Northeast	>450

Sources: USGS, 2025; CGS, 2015.
* Tularcitos Fault contains three (3) segments: Navy segment, Tularcitos segment, Monterey Bay segments.
** Chupines Fault contains three (3) segments: Chupines, Ord Terrace, and Seaside segments.

GROUND SHAKING

Strong ground shaking may occur due to earthquake events along active faults in the region. Disregarding local variations in ground conditions, the intensity of shaking at different locations within the area generally decreases with distance away from an earthquake source. Small to moderate earthquakes (magnitude less than 5.0 on the Richter Scale) are common in Monterey County. The most significant quakes affecting the County during the last century have included the 1906 San Francisco earthquake and the 1989 Loma Prieta earthquake. Due to the project site's proximity to a number of active faults, the project would experience seismically-induced ground shaking.

4.6.1.3 Project Site Setting

SOILS

Surface and subsurface soils within the broader CSUMB campus are composed of fine to medium grained sand (CSU, 2022). The density of sand is expected to vary significantly with the upper 20-26 feet of the sand being medium to very dense. Soils at the project site vary based upon the topography of the site. These soils consist of mostly disturbed soils due to the existing development (i.e., the stadium infrastructure and parking lots). Oceano (OaD) soils primarily underlay the project site (University of California Davis [UCD] and Natural Resources Conservation Service [NRCS], 2025). Oceano series consist

of very deep, excessively drained soils that formed in material from old eolian deposits associated with coastal environments and processes (e.g., sand dunes). In addition to being excessively drained soils, Oceano soils are subject to damage by erosion (UCD and NRCS, 2025). As discussed in the 2022 CSUMB Master Plan EIR, soil deposits on the CSUMB campus, including the project site, have moderate to high potential for wind erosion and moderate limitations to most uses that can be overcome or minimized by special planning, design, and engineering (CSU, 2022a).

SOIL LIQUEFACTION AND LATERAL SPREADING

Liquefaction is the transformation of soil from a solid to a liquid state because of increased pore-water pressures, usually in response to strong ground shaking, such as those generated during a seismic event. Loose, granular soils are most susceptible to these effects while more stable, silty clay and clay materials are generally somewhat less affected. The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving, and cracking of structure slabs due to sand boiling, and buckling of deep foundations due to liquefaction-induced ground settlement. Dynamic settlement may also occur in loose, dry sands above the water table. In general, a relatively high potential for liquefaction exists in loose, sandy soils that are within 50 feet of the ground surface and are saturated (below the groundwater table).

Lateral spreading is horizontal movement of soil toward a free face, such as a creek bank, typically associated with liquefaction. Lateral spreading is a failure within weaker soil material that causes the soil mass to move towards a free face or down a gentle slope. Lateral spreading generally occurs in shallow groundwater areas with unsupported embankments including natural creek banks, fill slopes, or levees.

Materials that underlie the CSUMB campus have a low susceptibility to liquefaction, except where groundwater is within 10 feet of the ground surface. At locations where groundwater is within 10 feet of the ground surface the susceptibility to liquefaction is moderate. In general, groundwater is not present in appreciable quantities in the sand dune deposits. Localized concentrations of perched water may be present at random locations and depths.

Monterey County maps potential geologic hazards using its Parcel Report Web Application to inform planning initiatives in the County. This application identifies the project site as having a low susceptibility for liquefaction (Monterey County, 2025). Furthermore, the CSUMB Master Plan EIR evaluated the likelihood of liquefaction and lateral spreading across CSUMB's campus and concluded that the potential for liquefaction in the vicinity of the project site is low based on the density of the dune sand deposits and lack of static groundwater table within 50 feet of the existing ground surface (CSU, 2022a).

LANDSLIDES

Slope angle, soil moisture content, vegetative cover, and the physical nature of the underlying strata influence the likelihood of landslides in a given area. Landslides can be triggered by one (1) or more specific events, including development-related construction, seismic activity, soil saturation, and fires. The primary factor in determining landslide potential is an unstable slope condition. According to Monterey County's Parcel Report Web Application, the project site is located in an area with low landslide potential (Monterey County, 2025).

EXPANSIVE SOILS

Expansive soils shrink and swell because of moisture changes. Expansive soils can cause heaving and cracking of slabs on grade, pavements, and structures founded on shallow foundations. Structures or improvements built atop expansive soils may be subject to damage from soil shrinkage and swelling, associated with wetting and drying. A soil with a higher plasticity index is generally more prone to shrinkage or swelling in response to seasonal rainfall.

As discussed above, the soils at the project site are primarily comprised of Oceano (OaD) soil deposits. Oceano soils are present in old sand dune deposits located near the coast, and are somewhat excessively drained (UCD and NRCS, 2025). Therefore, the near-surface soils at the proposed project site are generally low plasticity silts and sand that have low expansion potential. Additionally, the CSUMB Master Plan EIR evaluated the CSUMB campus for expansive soils and determined that there is a low potential for expansive soils (CSU, 2022a).

PALEONTOLOGICAL RESOURCES

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, and diagnostically or stratigraphically important, as well as those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. These resources include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy and assemblages of fossils that might aid stratigraphic correlations – particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Most of the fossils found in Monterey County are of marine life forms and form a record of the region's geologic history of advancing and retreating sea levels.

Soils on CSUMB's campus are characterized by older coastal dune sand and either Baywood sand (in the northern portion of the campus) or Oceano loamy sand (in the southern portion of the campus). No paleontological resources have been previously identified on CSUMB's campus, and most of the older coastal dune sand has been graded with previous development of Fort Ord and CSUMB (CSU,2022a). Furthermore, the project site is currently developed with the existing stadium infrastructure. The Freeman Stadium Renovations Project previously evaluated the presence of paleontological resources and yielded negative results, and subsequent development of the Freeman Stadium Renovations Project did not encounter paleontological resources (CSUMB, 2021).

4.6.2 Regulatory Environment

4.6.2.1 State

CALIFORNIA ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT AND SEISMIC HAZARD MAPPING ACT

The state passed the Alquist-Priolo Earthquake Fault Zoning Act in 1972 (Alquist-Priolo Act) to mitigate the hazard of surface faulting to structures for human occupancy. The State Geologist established regulatory zones, called "earthquake fault zones," around the surface traces of active faults and published maps showing these zones. Within these zones, buildings for human occupancy cannot be constructed across the surface traces of active faults. Because many active faults are complex and consist of more than

one (1) branch, each earthquake fault zone extends between 200 to 500 feet on either side of the mapped fault trace.

Title 14 of the CCR, Section 3601(e), defines buildings intended for human occupancy as those that would be inhabited for more than 2,000 hours per year. The proposed project does not cross an Alquist-Priolo Earthquake Fault Zone.

SEISMIC HAZARDS MAPPING ACT

Like the Alquist-Priolo Act, the Seismic Hazards Mapping Act of 1990 (PRC Sections 2690 to 2699.6 intends to reduce damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act. The state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards. This act requires cities and counties to regulate development within mapped Seismic Hazard Zones.

Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, this act prohibits cities and counties from issuing development permits for sites within Seismic Hazard Zones until appropriate site-specific geologic and/or geotechnical investigations have been conducted and measures to reduce potential damage have been incorporated into the development plans. There are no jurisdictions within Monterey County subject to the State Seismic Hazards Mapping Act.

BUILDING CODES

The CBC, codified in CCR Title 24, Part 2, was promulgated to safeguard public health, safety, and general welfare by establishing minimum standards related to structural strength, egress facilities, and general building stability. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures. The BSC administers Title 24 and the BSC by law is responsible for coordinating all building standards. The BSC published the 2022 CBSC on July 1, 2022, and took effect on January 1, 2023. The CBSC is a compilation of three (3) types of building criteria with three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, which constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

The CBSC identifies acceptable design criteria for construction that addresses seismic design and load-bearing capacity, including specific requirements for seismic safety; excavation, foundation and retaining wall design, site demolition, excavation, and construction, and; drainage and erosion control.

The earthquake design requirements consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, all of which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC.

STORM WATER POLLUTION PREVENTION PLAN

The RWQCBs have authority to issue waivers to Reports of Waste Discharge (RWD) requirements and Waste Discharge Requirements for broad categories of "low threat" discharge activities that have minimal potential for adverse water quality effects, when implemented according to prescribed terms and conditions. CSUMB has a waiver from the WDRs for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s). Therefore, only the NPDES Construction General Permit and the WDRs General Permit for Discharges with Low Threat to Water Quality apply to the campus.

The NPDES Construction General Permit requires construction activity that disturbs one (1) or more acres of soil, or less than one (1) acre but is part of a larger common plan of development that in total disturbs one (1) or more acres, to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of a facility. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP includes construction mitigation measures such as desilting basins, silt fences, hydroseeding of slopes, and monitoring and clean-up requirements.

Development on smaller sites would be subject to proposed PDF-OS-3 and PDF-OS-5, which call for the use of construction BMPs to minimize erosion and sedimentation and the use of native plants and seed mixes to eliminate erosion after construction (CSU, 2022a).

CALIFORNIA STATE UNIVERSITY SEISMIC REQUIREMENTS

The CSU Seismic Requirements, prepared by the CSU Office of the Chancellor, include specific requirements for the construction of new buildings and the rehabilitation of existing buildings to ensure that all CSU structures provide an acceptable level of earthquake safety, per the CBC. The policy, as adopted in 1993 and revised in 2024, reads as follows (CSU, 2024):

> It is the policy of the Trustees of the California State University that to the maximum extent feasible by present earthquake engineering practice to acquire, build, maintain, and rehabilitate buildings and other facilities that provide an acceptable level of earthquake safety for students, employees, and the public who occupy these buildings and other facilities at all locations where University operations and activities occur. The standard for new construction is that it meets the life safety and damageability objectives of Title 24 provisions; the standard for existing construction is that it provides reasonable life safety protection, consistent with that for typical new buildings. The California State University shall cause to be performed independent technical peer reviews of the seismic aspects of all construction projects from their design initiation, including both new construction and remodeling, for conformance to good seismic resistant practices consistent with this policy. The feasibility of all construction projects shall include

seismic safety implications and shall be determined by weighing the practicality and cost of protective measures against the severity and probability of injury resulting from seismic occurrences.

The CSU Seismic Requirements describe the CSU framework used to implement the CSU's Seismic Policy. As noted in the policy above, the CSU enforces the Title 24 CBC in its entirety. The CSU also adopted, as policy, selected additional section of the CBC concerning code administration, code enforcement, and code interpretation. The CSU Seismic Requirements supplement CBC requirements, and where requirements differ from each other, the more restrictive policy shall apply (CSU, 2024).

4.6.2.2 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with geology, soils, and seismicity. The City of Seaside's General Plan includes the following relevant policy (City of Seaside, 2024):

Goal S-3: Protection from the effects of earthquakes, landslides, tsunamis, and other natural disasters.

Updated Building Codes and Development Reviews. Reduce the risk of impacts from seismic and geologic hazards through land use planning, updated building codes, and the development review process. Ensure new development meets building code requirements.

4.6.3 Methodology

Existing conditions were characterized through review of available geologic, seismic, and soil data for the proposed project site and surrounding region. This includes mapping and hazard data from CGS, soil data from UCD and NRCS, and regional seismic information from the United States Geological Survey (USGS), as well as available geotechnical information prepared for prior campus development. This information was used to identify the presence or absence of known hazards, including active faulting, strong seismic shaking, liquefaction susceptibility, slope instability, and soil characteristics such as expansion potential. Particular consideration was given to the proposed project site's location within the former Fort Ord area, where undocumented fill or previously disturbed soils may be present.

4.6.4 Impacts and Mitigation

4.6.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would result in significant impacts related to geology, soils, and seismicity if it would:

a. 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;

b. Result in substantial soil erosion or the loss of topsoil;

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.6.4.2 Impacts and Mitigation Measures

Impact GEO-1: The proposed project would not 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 (criterion a).

Expanded Use

Surface rupture generally occurs along lines of previous faulting. The project site is not located within an Alquist Priolo Fault Zone, and the nearest known active or potentially active fault is the Reliz-King City fault, located approximately 1.5 miles (approximately 2.4 km) north of the site. As is true for the entire region, moderate to severe ground shaking and associated seismic hazards due to large earthquakes on vicinity faults may be experienced during the design lifetime of the project, please refer to **Table 4.6-1** above (Monterey County, 2025; CGS, 2015). No active fault zones traverse the project site; therefore, the proposed expanded use of the project site would have a less than significant impact regarding a substantial adverse effect from fault rupture.

While exposure to ground shaking can be reasonably expected, the expanded use would occur within facilities that comply with the engineering and construction techniques required by the CBC. The soil unit

at the project site is considered to have a low susceptibility to ground failure and liquefaction based on the density of the dune sand deposits and lack of static groundwater table within 50 feet of the existing ground surface (CSU, 2022a). Additionally, the project site is located on a generally flat and previously graded area within the campus. The existing stadium facilities are not located on or in the vicinity of geological formations likely to experience landslides. For these reasons, the proposed expanded use at the stadium would have a less than significant impact with respect to loss, injury, or death from potential seismic hazards including fault rupture, ground shaking, ground failure and liquefaction, and landslides.

Stadium Improvements

Surface rupture occurs along lines of previous faulting. According to the CGS, the site is not located within an Alquist-Priolo Earthquake Fault Zone. The nearest known active or potentially active fault is the Reliz-King City fault, located approximately 1.5 miles (approximately 2.4 km) north from the site. As is true for the entire region, moderate to severe ground shaking and associated seismic hazards due to large earthquakes on vicinity faults may be experienced during the design lifetime of the proposed project. However, there are no known faults that traverse the CSUMB campus. The project is located in a seismically active region and may be subject to strong seismic ground shaking during the design life. Seismic impacts would be minimized by using standard engineering and construction techniques in compliance with the requirements of the CBC.

While the project site would be subject to seismic activity, the soil materials that underlie the project site are considered to have a low susceptibility to ground failure and liquefaction based on the density of the dune sand deposits and lack of static groundwater table within 50 feet of the existing ground surface (CSU, 2022a). The proposed stadium improvements, which are largely interior, would not cause potentially substantial adverse effects with respect to loss, injury, or death from landslides. The proposed stadium improvements would not be located on or in the vicinity of geological formations likely to experience landslides.

The CSU Seismic Requirements would require geotechnical investigations. The geotechnical investigation conducted for the proposed project would include consideration of all seismically induced site failure hazards, including liquefaction, differential settlement, lateral spreading, landsliding, and surface faulting. The proposed project, and specifically the stadium improvements, would be subject to review and plan approval by CSU building officials, prior to and during construction, to design improvements for an acceptable level of earthquake safety, per the CBC (CSU, 2024). For these reasons, the proposed stadium improvements would have a less than significant impact with respect to loss, injury, or death from potential seismic hazards including fault rupture, ground shaking, ground failure and liquefaction, and landslides.

Mitigation Measures

No mitigation is required for **Impact GEO-1**.

Impact GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil (criterion b).

Expanded Use

The proposed project site is disturbed and developed. Moreover, the use of the site would be consistent with existing uses, albeit more frequent. The proposed expanded use of the stadium would not directly require the construction or ground disturbing activities that would contribute to erosion and loss of topsoil. Additionally, the existing footprint of the stadium is paved and improved with stadium facilities. For these reasons, the proposed expanded use of the stadium would have no impact with respect to substantial soil erosion or the loss of topsoil.

Stadium Improvements

Construction of the proposed locker room and shower facilities and the permanent restroom facilities would occur within the existing and previously developed CSUMB Stadium. Construction of these facilities would have limited opportunity to disturb uncovered soils; however, construction would be required to comply with CBC policies, CSU policies, and recommendations of a geotechnical report to minimize construction-generated erosion. The proposed location of the gated event storage and staging area is 1.25 acres and largely undeveloped, but previously disturbed. The area consists of ruderal vegetation with compact fill dirt covered with non-native grasses and ice plant (please refer to **Section 4.3, Biological Resources**). Construction activities associated with the gated event storage and staging area would require clearing of the site, and, thus, clearing and grading of the proposed gated event storage and staging area during construction could result in soil erosion. Construction activity of more than one (1) acre of land, including land clearing activities, requires acquisition of a Construction General Permit and the development and implementation of a SWPPP pursuant to NPDES requirements (please also refer to **Section 4.9, Hydrology and Water Quality**). Implementation of a SWPPP and the accompanying erosion control measures would lessen potential impacts for soil erosion. Therefore, the proposed stadium improvements would have a less than significant impact with respect to soil erosion.

Mitigation Measures

No mitigation is required for **Impact GEO-2**.

Impact GEO-3: The proposed project would not 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 (criterion c).

Expanded Use

The proposed expanded use of the existing stadium consists of an increase in the number and frequency of events at CSUMB Stadium and would not have a potentially significant impact regarding landslides, lateral spreading, subsidence, liquefaction, or collapse. Soils at the project site are excessively (i.e., well) drained and are not subject to these geologic events. Furthermore, the proposed increase in activity of the stadium does not itself directly require construction, and future activities at the site would be consistent with existing uses, albeit more frequent. For these reasons, the proposed expanded use of the stadium would have no impact with respect to soil instability.

Stadium Improvements

As previously discussed, the project site has a low susceptibility for landslides due to the regional topography, and a low susceptibility to liquefaction and lateral spreading based on the density of the dune sand deposits and lack of static groundwater table within 50 feet of the existing ground surface (CSU, 2022a). However, dune soils may become unstable during construction, and all proposed improvements would be designed and constructed in accordance with the CBC requirements, CSU policies, and recommendations of a geotechnical report for construction structures proposed in areas with unstable soils. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to soil instability.

Mitigation Measures

No mitigation is required for **Impact GEO-3**.

Impact GEO-4: The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (criterion d).

Expanded Use

The proposed expanded use of the existing stadium consists of an increase in the number and frequency of the events at the existing stadium, and would not have a potentially significant impact regarding expansive soils. Soils at the project site are excessively drained and are not subject to expansion. Furthermore, the proposed expanded use of the stadium does not directly require construction, and the use of the site would be consistent with existing uses, albeit more frequent. For these reasons, the proposed expanded use of the stadium would have no impact with respect to expansive soils.

Stadium Improvements

The proposed stadium improvements would construct and operate new shower and locker room facilities, permanent restroom facilities, and a gated event storage and staging area. As discussed above, the soils at the project site are comprised of old sand dune deposits that have low plasticity silts and sand, which has a low expansion potential (UCD and NRCS, 2025). Furthermore, the proposed locker room and shower facilities and permanent restroom facilities, would be constructed in accordance with all applicable geological requirements pursuant to the CBC, CSU policies, and a geotechnical report. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to expansive soils.

Mitigation Measures

No mitigation is required for **Impact GEO-4**.

Impact GEO-5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (criterion e).

Expanded Use

The proposed expanded use of the existing stadium does not include physical changes or construction of facilities. Moreover, the expanded use would not require septic or alternative wastewater disposal systems. Please refer to the discussion below regarding **Stadium Improvements**. For these reasons, the proposed expanded use of the stadium would have no impact regarding soils incapable of supporting the use of septic tanks or alternative wastewater systems.

Stadium Improvements

Stadium improvements would include new locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area. The new locker rooms, shower facilities, and permanent restroom facilities would connect to existing sewer infrastructure on campus and would not require installation of a septic system or alternative wastewater system. The gated event storage and staging area would not require wastewater services. For more details regarding water and wastewater, please refer to **Section 4.15, Utilities and Service Systems**. The proposed stadium improvements would have no impact regarding soils incapable of supporting the use of septic tanks or alternative wastewater systems.

Mitigation Measures

No mitigation is required for **Impact GEO-5**.

Impact GEO-6: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (criterion f).

Expanded Use

As identified above, no known fossil localities are on or near the proposed project site, and the site is previously disturbed and developed. Furthermore, the expanded use of the site would result in an increase in the number and frequency of events at the site but would not substantially change the type or intensity of use during those events. While the project site and adjacent areas are composed of older dune sands having a high paleontological sensitivity, disturbance to any unknown and buried resources would be unlikely as the proposed expanded use would occur substantially within the existing footprint of the stadium and within disturbed areas (e.g., parking lots, roadways, sidewalks). For these reasons, the proposed expanded use of the stadium would have a less than significant impact on paleontological resources. No unique geological features are present on or near the project site.

Stadium Improvements

As discussed above, no known paleontological resources existing on or near the project site. While the proposed project site is located on soils associated with ancient sand dunes, the site is developed and extensively disturbed. Furthermore, the stadium was previously evaluated in the Freeman Stadium Renovations Project MND, which concluded no paleontological resources or geologic features were located on the site (CSUMB, 2021). The proposed stadium improvements would be entirely within the

existing footprint of the stadium, or in areas previously disturbed and developed. Therefore, the proposed stadium improvements would have a less than significant impact with respect to the potential to destroy a unique paleontological resource or site or unique geological feature.

Mitigation Measures

No mitigation is required for **Impact GEO-6**.

4.5.4 References

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4.7 GREENHOUSE GAS EMISSIONS

This section evaluates the potential greenhouse gas (GHG) impacts associated with the development of the proposed project. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. This section is informed by the GHG analysis of the proposed project prepared by AMBIENT Air Quality and Noise Consulting (AMBIENT, 2026) and contained in **Appendix C**.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments were received concerning GHG emissions during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.7.1 Environmental Setting

Various gases in the Earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the Earth's surface temperature. Solar radiation enters the Earth's atmosphere from space and the Earth's surface absorbs a portion of this radiation. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, these GHGs in the Earth's atmosphere retain infrared radiation that otherwise would have escaped back into space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). This report further discusses the primary GHGs attributed to global climate change below:

- Carbon Dioxide. CO_2 is a colorless, odorless gas. CO_2 emissions occur in a number of ways, both naturally and through human activities. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO_2 emissions. The atmospheric lifetime of CO_2 is variable due to the natural and ongoing exchange between the surface of the Earth and the atmosphere through the carbon cycle (EPA, 2025a).

- Methane. CH_4 is a colorless, odorless gas that is not flammable under most circumstances. CH_4 is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (enteric fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of methane to the atmosphere. Natural sources of methane include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. Methane's atmospheric lifetime is about 12 years (EPA, 2025b).

- Nitrous Oxide. N_2O is a clear, colorless gas with a slightly sweet odor. Both natural and human-related sources produce N_2O. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. A wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests also contribute to the production of N_2O. The atmospheric lifetime of N_2O is approximately 114 years (EPA, 2025c).

- Chlorofluorocarbons. CFCs originate from cleaning solvents, aerosol propellants, and refrigerants. These manufactured gases contributed to the depletion of stratospheric ozone, and as such, began to decrease in use starting in 1987 with passage of the Montreal Protocol (EPA, 2025d).

- Hydrofluorocarbons. HFCs are man-made chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The only significant emissions of HFCs before 1990 were of the chemical HFC-23, which is a byproduct of the production of HCFC-22 (or Freon 22, used in air conditioning applications). The atmospheric lifetime for HFCs varies by compound, but can last up to 270 years (EPA, 2025e).

- Perfluorocarbons. PFCs are colorless, highly dense, chemically inert, and nontoxic. These gases commonly originate as a byproduct of aluminum production and in the manufacturing of semiconductors. PFCs have a varying atmospheric lifespan ranging from 2,600 to 50,000 years depending on the chemical compound (EPA, 2025e).

- Nitrogen Trifluoride. Nitrogen trifluoride (NF_3) is an inorganic, colorless, odorless, toxic, nonflammable gas used as an etchant in microelectronics. Nitrogen trifluoride is predominantly employed in the cleaning of the plasma-enhanced chemical vapor deposition chambers in the production of liquid crystal displays and silicon-based thin film solar cells. This gas has a global warming potential (GWP) of 17,200 carbon dioxide equivalents (CO_2e). While NF_3 may have a lower GWP than other chemical etchants, it is still a potent GHG. In 2009, NF_3 was listed by California as a high GWP GHG to be listed and regulated under AB 32 (Section 38505 Health and Safety Code).

- Sulfur Hexafluoride. SF_6 is an inorganic compound that is colorless, odorless, nontoxic, and generally nonflammable. SF_6 is used as an electrical insulator in high voltage equipment. The electric power industry uses roughly 80 percent of all SF_6 produced worldwide. Leaks of SF_6 occur from aging equipment and during equipment maintenance and servicing. SF_6 has an atmospheric life of 3,200 years (EPA, 2025e).

- Black Carbon. Black carbon is a strong light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass. Black carbon contributes to climate change both directly by absorbing sunlight and indirectly by depositing on snow and by interacting with clouds and affecting cloud formation. Black carbon is a short-lived gas, which can vary spatially and, consequently, it is very difficult to quantify associated global-warming potentials. The main sources of black carbon in California are wildfires, off-road vehicles (locomotives, marine vessels, tractors, excavators, dozers, etc.), on-road vehicles (cars, trucks, and buses), fireplaces, agricultural waste burning, and prescribed burning (planned burns of forest or wildlands). California has been an international leader in reducing emissions of black carbon, with close to 95

percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB, 2025).

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Often, estimates of GHG emissions are presented in CO_2e, which weight each gas by its GWP. Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect of emitting only CO_2. **Table 4.7-1**, **Global Warming Potential Greenhouse Gases** shows the GWP for the GHG emissions that will likely result from the proposed project, based on a 100-year time horizon. As indicated, CH_4 traps over 25 times more heat per molecule than CO_2, and N_2O absorbs roughly 264 times more heat per molecule than CO_2. Additional GHGs with high GWP include NF_3, SF_6, PFCs, and black carbon.

Table 4.7-1
Global Warming Potential for Greenhouse Gases

Greenhouse Gas	Global Warming Potential (100-year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	264

**Based on Intergovernmental Panel on Climate Change (IPCC) GWP values for 100-year time horizon.*
Source: EPA, 2025a; EPA, 2025b; EPA, 2025c.

4.7.1.1 Sources of Greenhouse Gas Emissions

On a global scale, GHG emissions are predominantly associated with activities related to energy production; changes in land use, such as deforestation and land clearing; industrial sources; agricultural activities; transportation; waste and wastewater generation; and commercial and residential land uses. World-wide, energy production including the burning of coal, natural gas, and oil for electricity and heat is the largest single source of global GHG emissions.

As of 2022, GHG emissions within California totaled 371.1 million metric tons (MMT) of CO_2e. GHG emissions, by sector are as follows: 39 percent from transportation, 23 percent from industrial, 11 percent from in state electrical generation, eight (8) percent from residential, eight (8) percent agricultural, six (6) percent commercial, and five (5) percent from electricity imports. Within California, the transportation sector is the largest contributor, accounting for approximately 39 percent of the total statewide GHG emissions. Emissions associated with industrial uses are the second largest contributor, totaling roughly 23 percent. Overall, state emissions have shown a decline since 2004 (CARB, 2024).

4.7.1.2 Effects of Global Climate Change

Global climate change is driving an increase in more volatile and unpredictable disaster events. While there are some uncertainties associated with the magnitude and timing of these disaster events, climate change is leading to sea level rise, spread of certain diseases out of their usual geographic range, shifting timing and geographic ranges for agricultural production, constraining water supply, changes to the sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, increasing ocean acidification, and the consequence of these effects on the economy.

Within California, climate change alters the ecological characteristics of many ecosystems throughout the state. Such alterations would likely include increases in surface temperatures and changes in the form, timing, and intensity of precipitation. For instance, historical records depict an increasing trend toward earlier melting of the Sierra Nevada snowpack. This snowpack is a principal supply of water for the state, providing roughly 50 percent of state's annual runoff. Earlier melting of the Sierra Nevada snowpack would mean that the state may experience an increased danger of floods during the winter months and possible exhaustion of the snowpack during spring and summer months. An earlier snowmelt would also impact the state's energy resources. Currently, approximately 14.8 percent of California's electricity comes from hydropower (CEC, 2023). An early exhaustion of the Sierra Nevada snowpack may force electricity producers to switch to more costly or non-renewable forms of electricity generation during spring and summer months. A changing climate may also impact agricultural crop yields, coastal structures, and biodiversity. Resultant changes in climate will likely have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry (California Climate Adaption Strategy, 2025).

4.7.2 Regulatory Environment

Several jurisdictions including the EPA, CARB, and MBARD regulate air quality, including GHGs, in the NCCAB. Each of these jurisdictions develop rules, regulations, and policies to attain the goals or directives imposed upon them through legislation. Although state and local regulations may not supersede EPA regulations, both state and local regulations may be more stringent than federal regulations.

4.7.2.1 Federal

MASSACHUSETTS V. EPA

In Massachusetts v. EPA (April 2007), the U.S. Supreme Court directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In December 2009, the administrator signed a final rule with the following two distinct findings regarding GHGs under section 202(a) of the FCAA:

- The administrator found that elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is the "endangerment finding."

- The administrator further found that the combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is the "cause or contribute finding."

These two (2) findings were necessary to establish the foundation for federal regulation of GHGs from new motor vehicles as air pollutants under the FCAA (42 USC § 7401).

ENERGY INDEPENDENCE AND SECURITY ACT OF 2007

To aid in the reduction of national GHG emissions, the Energy Independence and Security Act of 2007 (Public Law 110-140), among other key measures, provides for the following:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy-efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

FEDERAL VEHICLE STANDARDS

In 2007, in response to the Massachusetts v. EPA U.S. Supreme Court ruling, the Bush Administration issued Executive Order 13432 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012 through 2016 (75 Fed. Reg. 25324–25728).

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 through 2025 light-duty vehicles. The proposed standards projected to achieve 163 grams/mile of CO2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 through 2021 (77 Fed. Reg. 62624–63200), and NHTSA intends to set standards for model years 2022 through 2025 in a future rulemaking.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines (76 Fed. Reg. 57106–57513).

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two (2) program applies to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

In August 2018 (during the administration of President Trump), the EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post2020 standards then in place, the 2018 proposal increased U.S. fuel consumption by about half a million barrels per day (2–3 percent of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of one degree Celsius by 2100 (EPA and NHTSA 2018).

In September 2019, the EPA and NHTSA published the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 FR 51310), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. The EPA and NHTSA subsequently issued the Part Two Rule in March 2020, which set less aggressive CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026.

On January 20, 2021, President Joe Biden issued an Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, which called for review of the Part One Rule by April 2021 and review of the Part Two Rule by July 2021 (The White House 2021). After reviewing the public comments submitted on the NHTSA's April 2021 Notice of Proposed Rulemaking, the NHTSA concluded that the SAFE Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. The final rule adopted by the NHTSA ensures that the SAFE Rule will no longer form an improper barrier to States exploring creative solutions to address their local communities' environmental and public health challenges (NHTSA 2021).

Relatedly, in December 2021, the EPA finalized its revisions to the federal GHG emissions standards for passenger cars and light-duty trucks, as applied to model years 2023 through 2026. These standards have been described as the "strongest vehicle emissions standards ever established for the light-duty vehicle sector" and are expected to result in the avoidance of more than 3 billion tons of GHG emissions through 2050. At the same time, the EPA also announced its intent to initiate a separate rulemaking to establish multi-pollutant emissions standards for model years 2027 and later, which are anticipated to transition the passenger vehicle fleet to a zero-emissions fleet consistent with federal executive policy.

4.7.2.2 State

<u>ASSEMBLY BILL 1493</u>

AB 1493 (Pavley) of 2002 (Health and Safety Code Sections 42823 and 43018.5) requires the CARB to develop and adopt the nation's first GHG emission standards for automobiles. These standards are also known as Pavley I. The California Legislature declared in AB 1493 that global warming is a matter of increasing concern for public health and the environment. AB 1493 cites several risks that California faces from climate change. These risks include a reduction in the state's water supply, an increase in air pollution caused by higher temperatures, harm to agriculture, an increase in wildfires, damage to the coastline, and economic losses caused by higher food, water, energy, and insurance prices. The bill also states that technological solutions to reduce GHG emissions would stimulate California's economy and provide jobs. In 2004, the State of California submitted a request for a waiver from federal clean air regulations, as the state is authorized to do under the FCAA. This waiver request would allow the state to require reduced tailpipe emissions of CO_2. In late 2007, the U.S. EPA denied California's waiver request and declined to

promulgate adequate federal regulations limiting GHG emissions. In early 2008, the state brought suit against the U.S. EPA related to this denial.

In January 2009, President Obama instructed the U.S. EPA to reconsider the Bush Administration's denial of California's and 13 other states' requests to implement global warming pollution standards for cars and trucks. In June 2009, the U.S. EPA granted California's waiver request, enabling the state to enforce its GHG emissions standards for new motor vehicles beginning with the current model year.

In 2009, President Obama announced a national policy to increase fuel economy and reduce GHG pollution for all new cars and trucks sold in the U.S. The new standards would cover model years 2012 to 2016 and would raise passenger vehicle fuel economy to a fleet average of 35.5 miles per gallon by 2016. When the national program takes effect, California has committed to allowing automakers who show compliance with the national program to also be deemed in compliance with state requirements. California is committed to further strengthening these standards beginning in 2017 to obtain a 45 percent GHG reduction from the 2020 model year vehicles.

EXECUTIVE ORDER NO. S-3-05

Executive Order S-3-05 (State of California) proclaims that California is vulnerable to the impacts of climate change. The order declares that increased temperatures could reduce the Sierra Nevada's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, the order instructs the state to reduce emissions to the 2000 level by 2010, to the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

The Executive Order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary will also submit biannual reports to the Governor and state legislature describing: (1) progress made toward reaching the emission targets, (2) impacts of global warming on California's resources, and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the secretary of CalEPA created a Climate Action Team made up of members from various state agencies and commissions. The Climate Action Team released its first report in March 2006 and continues to release periodic progress reports. The report proposed achieving the targets by building on voluntary actions of California businesses, local government, and community actions, and through state incentive and regulatory programs.

ASSEMBLY BILL 32 - CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006

AB 32 (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, 38592–38599) requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. AB 32 regulates CO_2, CH_4, N_2O, HFCs, PFCs, NF3, and SF6. An enforceable, phased statewide cap on GHG emissions would accomplish the reduction in emissions to 1990 levels starting in 2012. AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources to effectively implement the cap. AB 32 specifies that regulations adopted in response to AB 1493 should address GHG emissions from vehicles. However, AB 32 also includes language stating that if CARB cannot implement the AB 1493 regulations, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap, institute a schedule to meet the emissions cap, and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

CLIMATE CHANGE SCOPING PLAN

In October 2008, CARB published its Climate Change Proposed Scoping Plan, which is the state's plan to achieve GHG reductions in California required by AB 32. This initial Scoping Plan contained the main strategies to be implemented to achieve the target emission levels identified in AB 32. The Scoping Plan included CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reduction recommendations were associated with improving emissions standards for light-duty vehicles, implementing the Low Carbon Fuel Standard program, implementation of energy efficiency measures in buildings and appliances, the widespread development of combined heat and power systems, and developing a renewable portfolio standard for electricity production.

The Scoping Plan states that land use planning and urban growth decisions will play important roles in the state's GHG reductions because local governments have primary authority to plan, zone, approve and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. CARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors. With regard to land use planning, the Scoping Plan expects approximately 5.0 MMT CO_2e will be achieved with the implementation of Senate Bill 375, discussed further below.

CARB first approved the initial Scoping Plan on December 11, 2008, and updates the plan every five (5) years. CARB approved the first update of the Scoping Plan on May 22, 2014, which looked past 2020 to set mid-term goals (2030-2035) on the road to reaching the 2050 goals. The most recent update released by CARB is the 2017 Climate Change Scoping Plan, which CARB released in November 2017. The 2017 Climate Change Scoping Plan incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and Executive Order B-30-15.

SENATE BILL 1078 AND GOVERNOR'S ORDER S-14-08 (CALIFORNIA RENEWABLES PORTFOLIO STANDARDS)

SB 1078 (Public Utilities Code Sections 387, 390.1, 399.25, and Article 16) addresses electricity supply and requires that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide a minimum of 20 percent of their supply from renewable sources by 2017. This Senate Bill will affect statewide GHG emissions associated with electricity generation. In 2008, Governor Schwarzenegger signed Executive Order S-14-08, which set the Renewables Portfolio Standard target to 33 percent by 2020. It directed state government agencies and retail sellers of electricity to take all appropriate actions to implement this target. Executive Order S-14-08 was later superseded by Executive Order S-21-09 on September 15, 2009. Executive Order S-21-09 directed the CARB to adopt regulations requiring 33 percent of electricity sold in the state come from renewable energy by 2020. Statute SB X1-2 superseded this Executive Order in 2011, which obligated all California electricity providers, including investor-owned utilities and publicly owned utilities, to obtain at least 33 percent of their energy from renewable electrical generation facilities by 2020.

CARB is required by current law, AB 32 of 2006, to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, and SB 32 of 2016 to further reduce GHG emission to 40 percent below the 1990 level by 2030. The CEC and California Public Utilities Commission (CPUC) serve in advisory roles to help CARB develop the regulations to administer the 40 percent by 2030 requirement. CARB is also authorized to increase the target and accelerate and expand the time frame.

MANDATORY REPORTING OF GHG EMISSIONS

The California Global Warming Solutions Act (AB 32, 2006) requires the reporting of GHGs by major sources to CARB. Major sources required to report GHG emissions include industrial facilities, suppliers of transportation fuels, natural gas, natural gas liquids, liquefied petroleum gas, and carbon dioxide, operators of petroleum and natural gas systems, and electricity retail providers and marketers.

CAP-AND-TRADE REGULATION

The cap-and-trade regulation is a key element in California's climate plan. It sets a statewide limit on sources responsible for 85 percent of California's GHG emissions and establishes a price signal needed to drive long-term investment in cleaner fuels and more efficient use of energy. The cap-and-trade rules came into effect on January 1, 2013, and were applied to large electric power plants and industrial plants. In 2015, fuel distributors, including heating and transportation fuels distributors, also became subject to the cap-and-trade rules. At that stage, the program will encompass around 360 businesses throughout California and nearly 85 percent of the state's total GHG emissions.

Under the cap-and-trade regulation, companies must hold enough emission allowances to cover their emissions and are free to buy and sell allowances on the open market. California held its first auction of GHG allowances on November 14, 2012. California's GHG cap-and-trade system is projected to reduce GHG emissions to 1990 levels by the year 2020 and would achieve an approximate 80 percent reduction from 1990 levels by 2050.

SENATE BILL 32

SB 32 was signed by Governor Brown on September 8, 2016. SB 32 effectively extends California's GHG emission-reduction goals from year 2020 to year 2030. This new emission-reduction target of 40 percent below 1990 levels by 2030 is intended to promote further GHG reductions in support of the state's ultimate goal of reducing GHG emissions by 80 percent below 1990 levels by 2050. SB 32 also directs CARB to update the Climate Change Scoping Plan to address this interim 2030 emission-reduction target.

SENATE BILL 375

SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities strategy or alternative planning strategy that will address land use allocation in that MPOs regional transportation plan. In consultation with MPOs, CARB establishes regional reduction targets for GHGs emitted by passenger cars and light trucks for the years 2020 and 2035. These reduction targets will be updated every eight (8) years but can be updated every four (4) years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, funding for transportation projects may be withheld.

CALIFORNIA BUILDING CODE

The CBC contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC is adopted every three (3) years by the BSC. In the interim, the BSC also adopts annual updates to make necessary mid-term corrections. The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

GREEN BUILDING STANDARDS

In essence, green buildings standards are indistinguishable from any other building standards. Both standards are contained in the CBC and regulate the construction of new buildings and improvements. The only practical distinction between the two (2) is that whereas the focus of traditional building standards has been protecting public health and safety, the focus of green building standards is to improve environmental performance.

AB 32, which mandates the reduction of GHG emissions in California to 1990 levels by 2020, increased the urgency around the adoption of green building standards. In its scoping plan for the implementation of AB 32, CARB identified energy use as the second largest contributor to California's GHG emissions, constituting roughly 25 percent of all such emissions. In recommending a green building strategy as one (1) element of the scoping plan, CARB estimated that green building standards would reduce GHG emissions by approximately 26 MMT of CO_2e by 2020. Most recently, the CEC adopted new building energy efficiency standards that amend the building code and emphasize building decarbonization particular with regard to space and water heating, photovoltaic and battery storage systems, and other demand flexible technology that will help buildings be responsive to climate change (CEC, 2026).

SENATE BILL 97

SB 97 was enacted in 2007. SB 97 required Office of Planning and Research, now the Office of Land Use and Climate Innovation, to develop and the Natural Resources Agency to adopt amendments to the CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those CEQA Guidelines amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions.
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions.
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change.
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria.

- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply and ways to reduce energy demand, including through the use of efficient transportation alternatives.

As part of the administrative rulemaking process, the California Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

SHORT-LIVED CLIMATE POLLUTANT REDUCTION STRATEGY

In March 2017, CARB adopted the "Short-Lived Climate Pollutant Reduction Strategy" (SLCP Strategy), establishing a path to decrease GHG emissions and displace fossil-based natural gas use. Strategies include avoiding landfill methane emissions by reducing the disposal of organics through edible food recovery, composting, in-vessel digestion, and other processes; and recovering methane from wastewater treatment facilities, and manure methane at dairies, and using the methane as a renewable source of natural gas to fuel vehicles or generate electricity. The SLCP Strategy also identifies steps to reduce natural gas leaks from oil and gas wells, pipelines, valves, and pumps to improve safety, avoid energy losses, and reduce methane emissions associated with natural gas use. Lastly, the SLCP Strategy also identifies measures that can reduce HFC emissions at national and international levels, in addition to state-level action that includes an incentive program to encourage the use of low-GWP refrigerants and limitations on the use of high-GWP refrigerants in new refrigeration and air-conditioning equipment (CARB, 2017).

EXECUTIVE ORDER B-55-18

In September 2018, Executive Order B-55-18 was enacted and establishes a statewide policy for achieving carbon neutrality as soon as possible, and no later than 2045, and achieving and maintaining net negative emissions thereafter. CARB will be responsible for working with relevant state agencies to ensure that future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

SENATE BILL 100

In 2018, SB 100 increased the standards set forth by SB 350 establishing that 44 percent of the total electricity sold to retail customers in California per year by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, be secured from qualifying renewable energy sources. Additionally, this bill states that it is the policy of California that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California, and that to achieve that goal, carbon emissions are not to increase elsewhere in the western grid or through resource shuffling.

CALIFORNIA STATE UNIVERSITY SUSTAINABILITY POLICY

The Board of Trustees adopted their first systemwide Sustainability Policy in May 2014 and most recently revised the Sustainability Policy in May 2024. The Board of Trustees developed their Sustainability Policy to integrate sustainability into all facets of the CSU, including academics, facilities operations, built environment, and student life. The Sustainability Policy primarily focuses on energy and GHG emissions and largely aligns with the State of California's energy and GHG emissions reduction goals (CSU, 2024). The policy aims to reduce the environmental impact of construction and operation of buildings and to

integrate sustainability across the curriculum through 11 broad policies, including university sustainability; climate action plan; energy resilience and procurement; energy conservation, carbon reduction, and utility management; water conservation; sustainable procurement; waste management; sustainable food service; sustainable building and lands practices; physical plant management; and transportation (CSU, 2024).

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The 2020 CSUMB Campus Sustainability Plan builds upon and replaces the 2013 CSUMB Climate Action Plan. CSUMB completed their Climate Action Plan in 2013, which provides strategies to achieve carbon neutrality by 2030 for a campus enrollment 8,500 full time equivalent students. Both the CSUMB Climate Action Plan and the 2022 CSUMB Master Plan Guidelines incorporate CSU Sustainability Policies, listed below (CSU, 2022b):

- Reduce GHG emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2040.
- Promote alternative transportation on campus.
- Increase on-site self-generation capacity to 80 megawatts.
- Procure more than 1/3 of electricity purchased from renewable sources.
- Identify and implement energy efficiency measures to reach GHG reduction goals.
- Design to LEED Silver equivalent, and strive for Gold.
- Consider energy use and life cycle cost in construction or renovation of any building.

The following goals and policies described in the 2022 CSUMB Master Plan Guidelines may be applicable to the proposed project (CSU, 2022b):

Goal MO 4 Reduce greenhouse gas emissions.

MO 4.1 Prioritize campus development strategies to promote transit, bicycling, and walking.

MO 4.2 Use data from regularly updated campus travel surveys to determine the transportation mode access and amenities necessary and appropriate for new development.

MO 4.5 Develop a new Campus shuttle route.

MO 5.13 Create incentives to encourage students, faculty and staff commuters to take alternative modes of travel to Campus.

ES 2.1 Identify purchasing strategies for greenhouse gas emission offsets to close any remaining gaps at the end of the timeline to reach the 2030 carbon neutrality goal. Consider the following strategies:

- Participate in a CSU/UC system or local Community Choice Aggregation (CCA) program.
- Purchase renewable energy offsets from a certified green e-source.

ES 2.4 Invest in non-capital-intensive alternative energy sources that best meet the Campus's needs.

Goal ES 3 Design and retrofit infrastructure and buildings to minimize energy use.

4.7.2.3 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with energy resources. The City of Seaside's General Plan includes the following relevant policies (City of Seaside, 2024):

Goal HSC-7: Citywide greenhouse gas emissions that meet State reduction targets.

Reduction Targets. Establish greenhouse gas emission reduction targets in line with those of the State that call for reducing greenhouse gas emissions as follows:

- 40 percent below 1990 levels by 2030.
- Carbon neutrality by 2045.

Sustainable Communities Strategy. Collaborate with regional and State partners to implement the Sustainable Communities Strategy to reduce greenhouse gas emissions, balance jobs and housing, and develop transportation systems that support all modes of circulation.

Goal HSC-9: Energy efficient buildings that use energy from renewable sources.
Net Zero Buildings. Explore a requirement for all new residential buildings to use net zero energy by 2030 and all new commercial buildings by 2040, consistent with State goals.

Renewable Energy. Encourage the installation of renewable energy generation sources in the design and development of new development to reduce energy costs and support resource conservation.

4.7.3 Methodology

AMBIENT prepared an Air Quality and Greenhouse Gas Emissions analysis (please refer to **Appendix C**). The analysis quantified estimated emissions associated with construction and operation of the proposed project using CalEEMod. Short-term construction emissions would be generated from construction equipment, grading, and asphalt removal and paving associated with the proposed stadium

improvements. Long-term operational emissions estimates considered operation of the stadium improvements and mobile-source emissions resulting from the expanded use of the stadium. AMBIENT quantified on-road mobile-sources of emissions using EmFac2021 off-model adjustment factors, which vary depending on factors such as vehicle classification and fuel type. The analysis applied the highest off-model adjustment factors for all vehicle classifications and fuel types.

Climate change has a cumulative impact; a project contributes to this impact through its incremental contribution of GHG emissions combined with the cumulative increase of all other sources of GHGs. MBARD defines their GHG threshold in terms of CO_2e, a metric that accounts for emissions from various GHGs based on their GWP. If annual emissions of GHGs exceed these threshold levels, the proposed project would result in a cumulatively considerable contribution of GHG emissions and must implement mitigation measures (MBARD, 2016). MBARD has not yet adopted a threshold for construction-related GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District [SMAQMD]). SMAQMD adopted an updated threshold based on the 2030 target year in April 2020. SMAQMD adopted the current GHG thresholds of significance, which include a construction threshold (1,100 metric tons of CO_2e/year) and a land use operational threshold (1,100 metric tons of CO_2e/year). Projects whose emissions are expected to meet or exceed the significance criteria will have a potentially significant adverse impact on global climate change (SMAQMD, 2020).

4.7.4 Impacts and Mitigation

4.7.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would have a significant GHG emissions impact if it would:

a. generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.7.4.2 Impacts and Mitigation Measures

Impact GHG-1: The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (criterion a).

Expanded Use

The Air Quality and Greenhouse Gas Analysis prepared for the proposed project estimated that the long-term operation of the stadium under the proposed project would increase GHG emissions by approximately 2,204.7 $MTCO_2e$/year largely from mobile emissions sources in the form of people traveling to and from the stadium for events. **Table 4.7-2** summarizes the operational GHG emissions for the proposed project.

Table 4.7-2
Operational GHG Emissions (Tons/Year)

Source	CO_2	CH_4	N_20	Refrigerants	$MTCO_2e$/Year[3]
Mobile Source – Adjusted[2]	2,114.6	<0.1	<0.1	3.3	2,143.8
Energy	15.2	<0.1	<0.1	--	15.3
Water	2.3	<0.1	<0.1	--	5.1
Waste	11.6	1.20	0	--	40.5
Refrigerants	--	--	--	<0.1	<0.1
Total[1,2]	**2,143.6**	**1.3**	**0.1**	**3.3**	**2,204.7**

Source: AMBIENT, 2026.

1 Totals may not sum due to rounding.

2 Includes EmFac2001 off-model adjustment factors. To be conservative, the highest adjustment factors for all vehicle categories and fuel types were applied.

3 Calculated based on global warming potential of individual GHG pollutants (e.g., CO2=1; CH4=25; N2O=298).

4 Acronym Key:
GHG=Greenhouse Gas
MT=Metric Tons
CO_2=Carbon Dioxide
CH_4=Methane
N_2O=Nitrous Oxide
CO_2e=Carbon Dioxide Equivalent

As discussed above in **Section 4.7.3, Methodology**, MBARD has not yet adopted a threshold for construction-related GHG emissions but recommends utilizing thresholds set by neighboring districts. SMAQMD adopted an updated threshold based on the 2030 target year in April 2020. SMAQMD adopted the current GHG thresholds of significance, which include a construction threshold (1,100 metric tons of CO_2e/year) and a land use operational threshold (1,100 metric tons of CO_2e/year). Projects whose emissions are expected to meet or exceed the significance criteria will have a potentially significant adverse impact on global climate change (SMAQMD, 2020).

The primary emissions generated by the proposed expanded use of the stadium would be the mobile source emissions for the increased number and frequency of annual events, which collectively would total 2,143.8 $MTCO_2e$/year. Therefore, the proposed expanded use of the stadium would exceed SMAQMD's operational threshold of 1,100 $MTCO_2e$/year. However, please refer to the discussion regarding transportation impacts in **Section 4.14, Transportation**. Although the proposed project would result in a significant and unavoidable effect related to VMT, the proposed project would be required to implement a TMP and TDM for operations of CSUMB Stadium (please refer to **Mitigation Measure TR-1** through **Mitigation Measure TR-6**), which would provide adaptive management strategies for addressing VMT impacts and, therefore, reduce these effects.

Furthermore, California energy policies and associated ongoing improvements in vehicle fuel efficiency and the transition to lower-emission and zero-emission vehicles would reduce per-vehicle GHG emissions over time, thereby limiting the proposed project's contribution to long-term GHG emissions. However, the proposed expanded use of the stadium would have a significant and unavoidable impact with respect to GHG emissions since total emissions would exceed the established threshold of 1,100 $MTCO_2e$/year during operation.

Stadium Improvements

The Air Quality and Greenhouse Gas Analysis prepared for the proposed project estimated that construction of the proposed stadium improvements would result in emission of 204.2 $MTCO_2e$/year. **Table 4.7-3** summarizes construction GHG emissions for the proposed project.

Construction emissions are temporary in nature and can also be quantified by averaging them over the lifetime of the project (e.g., 30 years), which is known as amortized GHGs. 204.2 $MTCO_2e$/year amortized over 30 years equals 6.80 $MTCO_2e$/year. Amortized construction emissions of 6.8 $MTCO_2e$/year are below the screening threshold of 1,100 $MTCO_2e$/year.

Table 4.7-3
Construction-Generated GHG Emissions

Source	CO_2	CH_4	N_20	$MTCO_2e$/Year
Total	202.5	<0.1	--<0.1	**204.2**
SMAQMD 1,100 metric tons of CO_2e/year				1,100
Exceeds Threshold				**No**

Source: AMBIENT 2026
GHG=Greenhouse Gas; MT=Metric Tons; CO_2e=Carbon Dioxide Equivalent

Additionally, the analysis considered operation of the proposed stadium improvements by modeling operation of the 4,800-square-foot building area encompassing the new locker room, shower facilities and permanent restroom facilities (please refer to **Table 4.7-2**) (AMBIENT, 2026). The proposed stadium improvements would have a potentially significant impact with respect to GHG emissions if either construction or operation exceed 1,100 $MTCO_2e$/year. The Air Quality and Greenhouse Gas Analysis did not independently evaluate the proposed project components (i.e., proposed expanded use and stadium improvements), and, therefore, this impact evaluation looks at the proposed project GHG emission as a whole. Combined with the operation emissions generated by expanded use, the total project emissions would exceed SMAQMD's operational threshold of 1,100 $MTCO_2e$/year.

Operation of the proposed stadium improvements must adhere to CSU and CSUMB policies for increasing energy efficiency and reducing GHG emissions. The CSU and CSUMB energy efficiency policies consist of the CSU Sustainability Policy requiring all CSU facilities to operate in the most energy efficient manner possible and transition to a low carbon strategy in addition to CSUMB Climate Action Plan and 2022 CSUMB Master Plan Guidelines policies. Specifically, these policies require implementation of energy efficiency measures to reach GHG reduction goals and require energy performance improvements over current CBC Title 24 requirements in new construction (CSU, 2024; CSU, 2022b). Moreover, as discussed in **Expanded Use,** above, **Mitigation Measure TR-1** through **Mitigation Measure TR-6** would be required and implemented to reduce VMT impacts, which correlate to the mobile source GHG emissions (please refer to **Table 4.7-2).** With implementation of CSU and CSUMB GHG polices and implementation of these measures, the proposed stadium improvements by themselves would have a less than significant impact with respect to the generation of GHG emissions. However, since the Air Quality and Greenhouse Gas Analysis did not independently evaluate the proposed project components, operational emissions from the proposed stadium improvements are combined with the operation emissions generated by expanded use, exceeding SMAQMD's operational threshold of 1,100 $MTCO_2e$/year and resulting in a significant and unavoidable impact.

Mitigation Measures

Please refer to **Section 4.14, Transportation** for the full text of **Mitigation Measures TR-1** through **TR-6**.

Impact GHG-2: The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (criterion b).

Expanded Use

As discussed in **Impact GHG-1**, the proposed expanded use of the stadium would generate approximately 2,204.7 $MTCO_2e$/year of GHG emissions largely from traffic associated with the increase in the number and frequency of annual events exceeding the established threshold of 1,100 $MTCO_2e$/year. Exceeding the GHG threshold would conflict with CSU and CSUMB policies for the reduction of GHG emissions. Specifically, the proposed expanded use would conflict with the CSUMB Climate Action Plan and CSUMB Master Plan Guidelines objective Reduce GHG emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2040 as well as conflict with the overall CSU Sustainability Policy (CSU, 2022b; CSU, 2024).

Although the proposed project would result in a significant and unavoidable effect related to VMT, the proposed project would be required to implement TMP and TDM programs for operation of the CSUMB Stadium (please refer to **Mitigation Measure TR-1** through **Mitigation Measure TR-6** in **Section 4.14, Transportation**). The TMP is intended to provide adaptive management strategies for address VMT impacts and, therefore, reduce these effects and the TDM is meant to plan for and reduce potential transportation impacts associated with use of the CSUMB Stadium. Over the lifetime of the proposed project, any reductions in transportation and traffic impacts would in turn reduce overall GHG emissions produced annually from mobile source emissions. Furthermore, California energy policies and associated ongoing improvements in vehicle fuel efficiency and the transition to lower-emission and zero-emission vehicles would reduce per-vehicle GHG emissions over time, thereby limiting the proposed project's contribution to long-term GHG emissions. As discussed in **Section 4.7.2**, both the CSU and CSUMB have policies for reducing GHG emissions with a goal of reaching net zero emissions. As part of this effort, CSUMB aims to increase alternative modes of transportation (please refer to the CSUMB Sustainability Policies and 2022 CSUM Master Plan Guidelines policies MO 4.1, MO 4.2, MO 4.5, and MO 5.13), which would lessen traffic impacts associated with the proposed expanded use of the stadium over time as the campus develops (CSU, 2022b). However, the analysis provided in this EIR must consider reasonably foreseeable increases in traffic based on existing transportation modes and infrastructure. Therefore, the proposed expanded use of the stadium would result in a significant and unavoidable impact regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Stadium Improvements

As discussed in **Impact GHG-2**, construction of the proposed stadium improvements would result in 204.2 $MTCO_2e$/year. Amortized construction emissions over the lifetime of the project (e.g., 30 years) would result in annual emissions of approximately 6.80 $MTCO_2e$/year. Each of these totals are below the established construction and operational GHG thresholds of 1,100 $MTCO_2e$/year.

Furthermore, new locker room and shower facilities and permanent restroom facilities would have to adhere to CSU and CSUMB policies for energy efficiency and GHG emission reduction strategies. The CSU and CSUMB energy efficiency policies consist of the CSU Sustainability Policy requiring all CSU facilities to operate in the most energy efficient manner possible and transition to a low carbon strategy in addition

to CSUMB Climate Action Plan and 2022 CSUMB Master Plan Guidelines policies. Specifically, these policies require implementation of energy efficiency measures to reach GHG reduction goals and require energy performance improvements over current CBC Title 24 requirements in new construction (CSU, 2024; CSU, 2022b). The proposed gated event storage and staging area would not include connections for energy or water use. For these reasons, the proposed stadium improvements would have a less than significant impact regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measures

Please refer to **Section 4.14, Transportation** for the full text of **Mitigation Measure TR-1** through **TR-6**.

4.7.5 Significance After Mitigation

Implementation of **Mitigation Measure TR-1** through **Mitigation Measure TR-6** (please refer to **Section 4.14, Transportation**) would require the implementation of the TDM. The purpose of the TDM is to shift travel mode share away from single-occupancy vehicle use and towards safe and convenient non-automotive modes of transportation. Implementation of the TDM would reduce vehicle use and minimize vehicle-generated GHG emissions, which represents the greatest source of GHG emissions for the proposed project. However, as discussed above, implementation of these measures would not reduce traffic related impacts to a less than significant level. Specifically, VMT generated by the proposed project would continue to exceed thresholds and the impact would remain significant and unavoidable. As a result, traffic-generated GHG emissions would also remain significant and unavoidable, and the proposed project would conflict with plans or policies pertaining to GHG emissions.

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4.8 HAZARDS AND HAZARDOUS MATERIALS

This section analyzes the potential existence of hazardous materials at the proposed project site and possible impacts involving the use, transport, or storage of hazardous materials. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. Potential impacts related to flooding, groundwater quality, seismic/geologic, and public service hazards, such as fire and emergency response, are discussed in **Section 4.6, Geology, Soils, and Seismicity**; **Section 4.9, Hydrology and Water Quality**; and **Section 4.12, Public Services**, respectively.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. A comment was received related to hazards and hazardous materials during the public scoping period. This comment is summarized below:

- Asbestos abatement may be necessary as the land encompassing former Fort Ord contains buried asbestos utility infrastructure. During construction, the project must follow proper procedures when encountering active or abandoned asbestos-containing infrastructure.

For a complete list of public comments received during the public scoping period, refer to **Appendix A, NOP and Public Comment Letters**.

4.8.1 Environmental Setting

4.8.1.1 Concepts and Terminology

For the purposes of this analysis, the term "hazardous materials" refers to both hazardous substances and hazardous wastes.[1] Under federal and state law, materials and wastes may be considered hazardous if they are specifically listed by statute or if they are toxic, ignitable, corrosive, or reactive. If improperly handled, hazardous materials and waste can cause public health hazards when released to the soil, groundwater, or air. The four (4) basic exposure pathways through which an individual can be exposed to a chemical agent include: inhalation, ingestion, bodily contact, and injection. Exposure can come because of an accidental release during transportation, storage, or handling of hazardous materials. Disturbance of subsurface soil during construction can also lead to exposure of workers or the public from stockpiling, handling, or transportation of soils contaminated by hazardous materials from previous spills or leaks.

[1] The California Health and Safety Code define a hazardous material as "a material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety, or to the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, radioactive materials and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment" (Health and Safety Code, Section 25501).

4.8.1.2 Regional Overview

NATIONAL PRIORITIES LIST AND SUPERFUND SITES

The U.S. Army historically used Fort Ord as a training and staging facility for infantry units between 1917 and 1994. The EPA added the former Fort Ord Military Base to the National Priorities List (NPL) of Hazardous Waste Sites (Superfund) compiled pursuant to Government Code §65962.5 (Cortese List) in 1990, and a federal facilities agreement required the U.S. Army to perform the Superfund cleanup process prior to the conveyance of any land. The EPA listed Fort Ord as a Superfund site due to the presence of industrial solvents, heavy metals, pesticides, polyfluorinated alkylated substances (PFAs) polycyclic aromatic hydrocarbons (PAHs), explosives residues, and munitions and explosives of concern (Department of Toxic Substances Control [DTSC], 2025a). Subject to a federal facility agreement signed in 1990, the EPA, Central Coast RWQCB, and DTSC oversee the U.S. Army's remediation efforts at the former Fort Ord (DTSC, 2025a).

Prior to conveying land to any entity, the NPL listing and federal facilities agreement required the U.S. Army to remediate the former Fort Ord properties. The Army prepared Findings of Suitability to Transfer (FOST) to document that the CSUMB Stadium site is environmentally suitable for transfer under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Department of Defense (DOD) FOST Guidance. In accordance with CERCLA, the FOSTs demonstrate that either the property is uncontaminated or that the U.S. Army has completed all necessary remediation or that all necessary remediation actions are in place and operating properly and successfully. The U.S. Army classifies the CSUMB Stadium site as part of parcel L33.1. The U.S. Army released a FOST and transferred the property to CSUMB in May 2003 (U.S. Army, 2003). Furthermore, the U.S. Army and EPA deleted this site from the NPL, meaning that the property is no longer part of the Fort Ord Superfund site (U.S. Army, 2025).

SCHOOLS

Schools represent sensitive receptors for hazardous materials because children are more susceptible than adults to the effects of hazardous materials. The proposed project is located on CSUMB's campus, and other schools near the project site include Monterey College of Law, located approximately 0.3 miles southeast; George C. Marshall Elementary, located approximately 0.86 miles south; and Chartwell School, located approximately 0.9 miles south. However, none of these schools are within 1/4-mile of the proposed project site except for CSUMB.

AIRPORTS

The Marina Municipal Airport, located approximately 2.5 miles northeast, and Monterey Regional Airport, located approximately 4.6 miles south, are the closest airports to the proposed project site. Neither airport is located within two (2) miles of the project site.

4.8.1.3 Project Site Setting

The project site contains the existing stadium and disturbed lot and is immediately adjacent to other facilities associated within the Athletic and Recreation District. The proposed project is located at the existing CSUMB campus, and this land was formerly part of the Fort Ord U.S. Military Base.

OTHER HAZARDOUS WASTE SITES

The State Water Resources Control Board (SWRCB) and the DTSC oversee the GeoTracker database and EnviroStor database, respectively. The GeoTracker database tracks authorized and unauthorized discharges of waste. The database provides data on leaking underground storage tanks (LUST), cleanup program sites, military sites, land disposal sites, permitted underground storage tanks, composition operations, waste discharge requirement sites, confined animal/concentrated animal feed lot facilities, irrigated lands regulatory program sites, and oil and gas monitoring sites (SWRCB, 2025a). The EnviroStor database provides data on cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known or suspected hazardous waste contamination (DTSC, 2025b). The project site is not located on a hazardous waste site as catalogued by both GeoTracker and EnviroStor (SWRCB, 2025b; DTSC, 2025c).

ASBESTOS

Development of the former Fort Ord military base occurred between the 1940s and the 1960s. Building materials used during this time routinely contained some type of asbestos (CSU, 2022a). The U.S. Army Corps of Engineers (USACE) managed an Asbestos Management Program for the former Fort Ord. The program aimed to identify asbestos-containing materials (AMCs) in Army-controlled buildings, evaluate the friability, conditions, and potential damage of the ACMs, and implement a response action. Under this program, the U.S. Army Corps of Engineers surveyed buildings between 1989 and 2019 for AMCs and abated, if necessary, prior to any demolition or renovation (CSU, 2022a).

The Marina Coast Water District (MCWD) serves the campus through a system of four (4) interconnected pressure zones known as zones A-D. The proposed project site is connected to Zone B water Line. The existing water system was constructed between the 1940s and the 1980s and are primarily composed of asbestos cement water lines, as are the sanitary sewer lines on campus. Removal or improvements to the water and wastewater utility infrastructure by CSUMB would require special handling and disposal of hazardous materials (CSU, 2022b).

EMERGENCY ACCESS

While CSUMB is not subject to local planning requirements, the campus lies within the city limits of the City of Seaside, City of Marina, and within unincorporated Monterey County land. Therefore, emergency response and evacuation efforts by these jurisdictions may rely on roadways in the vicinity of CSUMB and the project site. The General Plans for the City of Marina and County of Monterey do not identify roads adjacent to the project site as emergency routes or evacuation routes. However, the City of Seaside's General Plan identifies General Jim Moore Boulevard, located immediately east of the project site, as a road "likely to function as a key evacuation route" (City of Seaside, 2024). While the CSUMB Emergency Operations Plan identifies strategies and materials for emergency preparations, the plan does not identify explicit routes as the type of emergency would inform the appropriate location of emergency response and evacuation routes (CSUMB, 2023). Furthermore, the County of Monterey Multi-Jurisdictional Hazard Mitigation Plan does not identify specific designated evacuation routes because evacuation routes are considered dynamic and would change based on the nature and location of an emergency (Monterey County, 2022). As a result, all local roadways within the vicinity of the proposed project could potentially be utilized as evacuation routes during an emergency.

WILDFIRE

CalFire maps fire hazards within SRAs based on factors such as fuels, terrain, and weather (PRC Section 4201 – 4204). CalFire defines potential fire hazards based on their potential for causing ignitions to buildings, and CalFire refers to these areas as FHSZs. CalFire designates FHSZs as "moderate," "high," or "very high" for areas within SRAs and makes recommendations to local jurisdictions for FHSZs in LRAs.

The proposed project is located in an LRA under the jurisdiction of the City of Seaside's Fire Department. Additionally, neither the project site nor adjacent properties is in a moderate, high, or very high FHSZ (CalFire, 2025).

4.8.2 Regulatory Environment

Various federal, state, and local laws and regulations aimed at the protection of public health and the environment regulate the generation, storage, and handling of hazardous materials. A summary of regulations is as follows.

4.8.2.1 Federal

RESOURCES CONSERVATION AND RECOVERY ACT

The Resource Conservation and Recovery Act (RCRA) enables the EPA to administer a regulatory program that extends from the manufacture of hazardous materials to their disposal, thus regulating the generation, transport, treatment, storage, and disposal of hazardous waste at all facilities and sites in the nation.

TOXIC SUBSTANCES CONTROL ACT

Congress enacted the Toxic Substances Control Act (TSCA) in 1976, to become effective January 1, 1977. The act authorizes the EPA to secure information on all new and existing chemical substances and to control any of these substances determined to cause an unreasonable risk to public health or the environment. The TSCA also includes requirements for the storage, use, and disposal of Polychlorinated biphenyls (PCB)-containing materials.

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT

CERCLA, more commonly known as Superfund, established the NPL for identifying and obtaining funding for remediation of severely contaminated sites. The Code of Federal Regulations (40 CFR) contains federal regulations pertaining to hazardous materials and waste. The regulations contain specific guidelines for determining whether a waste is hazardous based on either the source of generation or the characteristics of the waste.

U.S. DEPARTMENT OF TRANSPORTATION HAZARDOUS MATERIALS TRANSPORT ACT (49 USC 5101)

The U.S. Department of Transportation, in conjunction with the EPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 directs the U.S. Department of Transportation to

establish criteria and regulations regarding the safe storage and transportation of hazardous materials. CFR 49, 171–180, regulates the transportation of hazardous materials, types of material defined as hazardous, and the marking of vehicles transporting hazardous materials.

OCCUPATIONAL SAFETY AND HEALTH ACT (29 USC 15)

The Occupational Safety and Health Act of 1970 passed to address employee safety in the workplace. The Act created the OSHA, whose mission is to ensure the safety and health of America's workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. The OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs.

4.8.2.2 State

The EPA has delegated much of its regulatory authority to individual states whenever adequate state regulatory programs exist. DTSC, a division of the CalEPA, is the agency empowered to enforce federal hazardous materials and waste regulations in California, in conjunction with the EPA.

HAZARDOUS WASTE CONTROL ACT

The Hazardous Waste Control Act of 1972 created the state hazardous waste management program similar to, but more stringent than, the federal RCRA. CCR Titles 22 and 26 contain the provisions of the Hazardous Waste Control Act. Regulations implementing the California Hazardous Waste Control Act list hazardous chemicals; establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management of hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of them. Under Title 26 and the California Hazardous Waste Control Act, hazardous waste manifests must be retained by the hazardous waste generator for a minimum of three (3) years. A hazardous waste manifest lists a description of the waste, its intended destination, and regulatory information about the waste. A copy of each manifest must be filed with DTSC. The generator must match copies of hazardous waste manifests with receipts from the treatment/disposal/recycling facility to confirm proper handling of said wastes.

HAZARDOUS MATERIALS RELEASE RESPONSE PLANS AND INVENTORY ACT

The Hazardous Materials Release Response Plans and Inventory Act of 1985, also known as the Business Plan Act, requires the preparation of hazardous materials business plans and disclosure of hazardous materials inventories. The hazardous materials business plan includes a description of facilities, inventories, emergency response plans, and employee safety and emergency response training programs (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). Hazardous materials are not considered hazardous waste and are defined as raw or unused materials that are part of a process or manufacturing step. However, health concerns pertaining to the release of hazardous materials are similar to those relating to hazardous waste.

CALIFORNIA WATER CODE

California Water Code Section 231 requires the California Department of Water Resources (DWR) to develop well standards to protect California's groundwater quality. Standards for wells in California are found in DWR Bulletins No. 74-81 and 74-90, entitled Water Well Standards, State of California. The standards apply to all water well drillers in California and the local agencies that enforce them.

CALIFORNIA EMERGENCY SERVICES ACT

Under the California Emergency Services Act, the state developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local agencies. Responding to hazardous materials incidents is one (1) part of this plan. The California Office of Emergency Services (CalEMS) administers the Emergency Response Plan, and CalEMS coordinates the responses of other agencies. The County of Monterey Environmental Health Department's Emergency Response Team provides the capabilities for hazardous materials emergencies within the project area. Emergency Response Team members respond and work with local fire and police agencies, California Highway Patrol, CDFW, Caltrans, U.S. Coast Guard, and National Marine Sanctuary personnel.

GOVERNMENT CODE SECTION 51175-51189

Sections 51175 through 51189 of the California Government Code directs CalFire to recommend FHSZs within LRAs. Local agencies must designate very high FHSZs in their jurisdiction within 120 days of receiving recommendations from CalFire and may include additional areas not identified by CalFire as very high FHSZs.

CALIFORNIA FIRE CODE

The 2022 California Fire Code Chapter 49 establishes the requirements for development within wildland-urban interface areas, including regulations for wildfire protection building construction, hazardous vegetation and fuel management, and defensible space maintained around buildings and structures.

In 2021, the California Board of Forestry re-adopted the State Minimum Fire Safe Regulations. These regulations established the minimum wildfire protection standards in conjunction with construction of buildings in the SRA's and in the very high FHSZ. Building construction within these zones are required to provide the minimum wildfire protection standards specified in the articles of 14 CCR Section 1270.

UNIFORM FIRE CODE

The Uniform Fire Code, Article 80 (Section 80.103 of the Uniform Fire Code as adopted by the State Fire Marshal pursuant to Health and Safety Code Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for the release of hazardous materials and for mixing incompatible chemicals, and specify the following design features to reduce the potential for the release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and

- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill.

CALIFORNIA STATE UNIVERSITY MASTER PLAN GUIDELINES

The 2022 CSUMB Master Plan Guidelines contain the following policy for hazards and hazardous materials applicable to the proposed project (CSU, 2022b):

WS 1.18 Ensure special handling, removal, and disposal of hazardous materials to an approved location during any improvements to water supply and distribution systems when undertaken by the University, or by others on University property.

EMERGENCY OPERATIONS PLAN

CSUMB prepared an Emergency Operations Plan to implement and maintain an integrated emergency management program in response to potential natural, man-made, and technical disasters. CSUMB prepared this plan in accordance with the CSU Chancellor's Office Executive Order 1056, Coded Memo RM-2018-1, and the California Emergency Services Act. The Emergency Operations Plan provides management tools for timely, effective, and coordinated emergency response and recovery actions. As part of emergency management planning, the Emergency Operations Plan identifies management tools for identifying and coordinating emergency response and evacuation routes depending on the incident. However, no designated emergency or evacuation routes are expressly identified. The Emergency Operations Plan incorporates an existing Memorandum of Understanding (MOU) between the campus, City of Marina, City of Seaside, and City of Sand City that creates the Monterey Peninsula Regional Emergency Coordination Center (MPRECC) that coordinates support during regional incidents across jurisdictions (CSUMB, 2023).

4.8.2.3 Local

MONTEREY BAY AIR RESOURCES DISTRICT

MBARD is the agency primarily responsible for ensuring that NAAQS and CAAQS are not exceeded and that air quality conditions are maintained in the NCCAB. Responsibilities of the MBARD include, but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting, and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the FCAA and the CCAA. In an attempt to achieve NAAQS and CAAQS and maintain air quality, the MBARD has most recently completed the 2012-2015 AQMP for achieving the state ozone standards and the *2007 Federal Maintenance Plan* for maintaining federal ozone standards (MBARD, 2017).

To achieve and maintain ambient air quality standards, the MBARD has adopted various rules and regulations for the control of airborne pollutants. One (1) such regulated pollutant incudes asbestos. MBARD implements the following rule for asbestos removal during renovation and demolition:

- Rule 424 (NESHAP-Asbestos). Rule 424 adopts the National Emissions Standards for Hazardous Air Pollutants contained in 40 CFR Part 61 pertaining to asbestos removal and building demolitions.

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with hazards and hazardous materials. The City of Seaside's General Plan contains the following relevant policies (City of Seaside, 2024):

Hazardous Materials Management. Assess the use of hazardous materials as part of its environmental review and/or include the development of a hazardous management and disposal plan, as a condition of a project, subject to review by the County Environmental Health Department.

Superfund. Ensure that activities comply with the land use restrictions specific to each parcel.

Evacuation Route Maintenance. Maintain roadways that are likely to function as key evacuation routes including but not limited to the following major routes: General Jim Moore Boulevard, Canyon Del Rey Boulevard (SR 218), Fremont Boulevard/Fremont Street, Broadway Avenue, Hilby Avenue, and Del Monte Boulevard.

4.8.3 Methodology

Existing hazardous materials conditions at the proposed project site and surrounding area were characterized through a review of available regulatory databases, environmental records, and prior site investigations. Key sources include DTSC's EnviroStor database, the SWRCB's GeoTracker database, and records from the EPA, as well as applicable local agency resources.

These sources were reviewed to identify the presence or absence of known hazardous materials sites, including LUSTs, hazardous waste generators, and sites with documented soil or groundwater contamination. In addition, historical land use information for the broader CSUMB campus located within the former Fort Ord area was reviewed to identify the potential for residual contamination associated with prior military uses, including fuels, solvents, or other hazardous substances.

4.8.4 Impacts and Mitigation

4.8.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would have a significant impact relating to hazards and hazardous materials if it would:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment;

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

4.8.4.2 Impacts and Mitigation Measures

Impact HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; 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; or emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (criteria a, b, and c).

Expanded Use

The proposed expanded use of the stadium would increase the frequency and number of athletic and non-athletic events hosted by both CSUMB and MBFC. Routine stadium maintenance between events would require an increase in the frequency of transport, use, and disposal of cleaning supplies (e.g., ammonia and bleach). Additionally, non-athletic events may require temporary facilities such as stages, extra seating, temporary lighting, and tents. The set up and maintenance of such temporary facilities may require the transport, use, and disposal of potentially hazardous materials including petroleum lubricants.

The use and handling of hazardous materials would be consistent with existing use, albeit more frequent because of the increase in events. The transport, use, and disposal of potentially hazardous materials would be completed in accordance with the manufacturer's labels for each product and would, therefore, not pose a significant impact on the environment. Furthermore, the project site is not located on hazardous materials site, nor would the proposed expanded use of the stadium require construction or ground disturbing activities that would have the potential to upset, release, or emit hazardous materials. As such, the proposed expanded use would have a less than significant impact with respect to the routine transport, use, or disposal of hazardous materials; the upset or release of hazardous materials; or emission

of hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school.

Stadium Improvements

Construction activities would require the temporary use of hazardous substances, such as fuel for construction equipment, oil, solvents, paints. The types and amounts of hazardous materials used during construction activities would vary according to the type of activity. An appropriately licensed contractor would coordinate and conduct the removal and disposal of hazardous materials from the project site. Any handling, transporting, use, or disposal would comply with applicable laws, regulations, policies, and programs set forth by various federal, state, and local agencies. Additionally, construction activities that disturb one (1) acre or more would be subject to NPDES Construction General Permit requirements and will require preparation and implementation of a SWPPP and appropriate best management practices to control erosion and sediment runoff. Implementation of the SWPPP and associated Best Management Practices would reduce potential construction-related contaminated runoff (please refer to **Section 4.9, Hydrology and Water Quality** for further discussion). Compliance with existing federal, state, and local laws and regulations governing the use, storage, transportation, and disposal of hazardous materials during construction activities would minimize the potential for the proposed project to cause a significant hazard to the environment through the release of hazardous materials. Construction impacts would be temporary in nature**.**

Additionally, construction of the proposed stadium improvements would require ground disturbing activities and connecting new improvements to existing utility infrastructure. As identified above in **Section 4.8.1, Environmental Setting**, the proposed project would connect to existing MCWD water and wastewater systems. These systems were constructed as early as 1940 and could contain asbestos casings. Construction of the stadium improvements would connect to existing pipelines that may contain asbestos and, therefore, could result in temporary exposure. To minimize potential adverse effects associated with the demolition or modification of existing structures, MBARD Rule 424 requires an asbestos survey of existing structures prior to demolition or renovation. If asbestos-containing material is identified, Rule 424 requires that the asbestos hazard is abated and notification to MBARD may be necessary prior to demolition or renovation activities. Compliance with MBARD Rule 424 would reduce potential asbestos related hazards to a less than significant level.

Operational maintenance of the locker room and shower facilities and permanent restroom facilities would require use of cleaning products (e.g., ammonia and bleach), which may be considered hazardous materials. As stated above, the transport, use, and disposal of potentially hazardous materials in accordance with the manufacturer's labels for each product would not pose a significant impact on the environment. Compliance with existing federal and state regulations governing the use, storage, transportation, and disposal of hazardous materials would lessen potential impacts. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to the routine transport, use, or disposal of hazardous materials; the upset or release of hazardous materials; or emission of hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school.

Mitigation Measures

No mitigation is required for **Impact HAZ-1**.

Impact HAZ-2: The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment (criterion d).

Expanded Use

The proposed expanded use of the existing stadium would not occur on an existing hazardous materials site as listed by Government Code § 65962.5. While the project site was formerly part of the Fort Ord Military Base and Fort Ord Superfund site, the U.S. Army in conjunction with the EPA, Central Coast RWQCB, and DTSC remediated the site and transferred the property to CSUMB as documented in the FOST from 2003 (U.S. Army, 2003). As discussed above, FOSTs demonstrate that either the property is uncontaminated or that the U.S. Army has completed all necessary remediation or that all necessary remediation actions are in place and operating properly and successfully. The U.S. Army and EPA have since deleted the project site from the Fort Ord Superfund site and NPL. Furthermore, neither GeoTracker nor EnviroStor identify the project site as being a hazardous materials site. For these reasons, the proposed expanded use of the existing stadium would have a less than significant impact with respect to creating a significant hazard to the public or environment due to being located on a hazardous materials site.

Stadium Improvements

The proposed stadium improvements would not be located on an existing hazardous materials site as listed by Government Code § 65962.5. Please refer to the discussion under **Impact HAZ-2**, **Expanded Use**.

Mitigation Measures

No mitigation is required for **Impact HAZ-2**.

Impact HAZ-3: The proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area as the project site is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport (criterion e).

Expanded Use

The proposed expanded use of the existing stadium would not interfere with an existing airport land use plan, and events would not be located within two (2) miles of an airport. The nearest airport is the Marina Municipal Airport located approximately 2.5 miles northeast of the stadium. Therefore, the proposed expanded use of the existing stadium would not be subject to any airport-related hazards.

Stadium Improvements

The proposed stadium improvements would not interfere with an existing airport land use plan or be located within two (2) miles of an airport. Please refer to the response with respect to **Expanded Use**.

Mitigation Measures

No mitigation is required for **Impact HAZ-3**.

Impact HAZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (criterion f).

Expanded Use

The proposed expanded use of the stadium would increase the number of and frequency of events at CSUMB Stadium. However, the proposed expanded use of the stadium would not increase the existing event-specific occupancy of the stadium, which provides 6,000 ticketed seats for attendees in addition to event staff. Since the existing stadium and adjacent parking facilities are designed to accommodate approximately 6,000 attendees in addition to staff members for each event, and the proposed expanded use would not increase the occupancy of the stadium, the potential impact on emergency services, response routes, and evacuation routes would not be substantially greater than existing conditions; please also refer to **Section 4.13, Public Services and Recreation** and **Section 4.14, Transportation**. Therefore, the proposed expanded use of the stadium would have a less than significant impact with respect to the impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan.

Stadium Improvements

The proposed stadium improvements would be located in the existing Athletics and Recreation District of the campus and away from the existing roadways and vehicle entrances. The shower and locker room facilities and permanent restroom facilities would be constructed and operated within the existing footprint of CSUMB Stadium, and the storage and staging area would be constructed and operated immediately adjacent to the stadium and in an existing parking lot. All proposed stadium improvements would be located away from local roadways, and would not interfere with emergency response or evacuation routes and vehicles. Moreover, the proposed stadium renovations would not change emergency access (ingress or egress). Therefore, the proposed stadium improvements would have a less than significant impact with respect to the impairment of or interference with an adopted emergency response plan or emergency evacuation plan.

Mitigation Measures

No mitigation is required for **Impact HAZ-4**.

Impact HAZ-5: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (criterion g).

Expanded Use

The proposed expanded use of the existing stadium would result in an increase in use both in terms of the number of events and people at the stadium. However, the project site would be located on a previously developed and urban site located outside of a CalFire designated FHSZ. More specifically, the project site would be located in an LRA under the jurisdiction of the City of Seaside's Fire Department and outside of the wildland urban interface. For these reasons, the proposed expanded use of the existing stadium would have a less than significant impact with respect to the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires.

Stadium Improvements

The proposed stadium improvements would be located at the existing stadium site, which is a previously developed site located in an LRA and outside of a wildland urban interface area. Additionally, the proposed improvements would not be located in a CalFire recommended FHSZ. Furthermore, the design and construction of the proposed stadium improvements, especially the locker room and shower facilities and permanent restroom facilities, would incorporate requirements from the CBC and California Fire Code, and Uniform Fire Code. The proposed project must also align with the 2022 CSUMB Master Plan Guidelines and provide adequate fire storage capacity for the project site. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires.

Mitigation Measures

No mitigation is required for **Impact HAZ-5**.

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4.9 HYDROLOGY AND WATER QUALITY

This section evaluates the potential hydrology and water quality impacts associated with the development of the proposed project. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments concerning hydrology and water quality were received during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.9.1 Environmental Setting

4.9.1.1 Regional Overview

SURFACE WATERS

Surface waters within former Fort Ord are not used for domestic supply, and, therefore, surface water quality data is limited. Surface water quality varies seasonally; the first heavy rains of the season tend to flush the highest concentration of pollutants into the storm water system. This runoff from urbanized areas typically contains elevated levels of suspended solids, coliform bacteria, oil and grease, fertilizers and pesticides, and heavy metals; many of these pollutants are associated with the operation of motor vehicles. Furthermore, there are no ponds, lakes, or other water bodies located on or in the vicinity of the proposed project site.

GROUNDWATER

The Salinas Valley Groundwater Basin (SVGB) extends from Monterey Bay southeast through the Salinas Valley. The SVGB is comprised of nine (9) sub-basins, six (6) of which are either partially or entirely within the jurisdiction of Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA). Those sub-basins under SVBGSA's jurisdiction include the 180/400-Foot Aquifer Subbasin, Eastside Aquifer Sub-basin, Forebay Aquifer Sub-basin, Langley Area Sub-basin, Monterey Sub-basin, and Upper Valley Aquifer Sub-basin (SVBGSA, 2025a). The SVBGSA is the public agency charged with development and implementation of the Groundwater Sustainability Plan (GSP) for the SVGB based on requirements of the Sustainable Groundwater Management Act (SGMA) passed into law in 2014.

MCWD primarily draws from the Monterey Sub-basin, which consists of two (2) management areas: the Marina-Ord Area and Corral de Tierra Area. The Monterey Sub-basin comprises 48 square miles and includes the cities of Marina and Seaside (MCWD and SVBGSA, 2022). The DWR classifies the Monterey Sub-basin as medium priority, requiring a GSP to achieve sustainability by 2042. MCWD and SVBGSA jointly hold jurisdiction over the Monterey Sub-basin and developed the Monterey Sub-basin GSP in January 2022. In January 2020, SVGWSA finalized their GSP, a requirement per the 2014 California SGMA. The GSP outlines how each basin will achieve groundwater sustainability in 20 years, and how they will maintain sustainability for an additional 30 years. In addition to the GSP, the SVGWSA must also submit

annual Water Year (WY) reports to discuss the condition of the basin and show that the GSP is being implemented in a manner that will meet the sustainability goals defined by the GSP.

FLOODING

CEQA requires lead agencies to consider flood hazard zones and evaluate the likelihood that a project would release hazardous materials in the event of a flood. As confirmed by the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the project site is located outside the 100-year floodplain, but within the 500-year floodplain (FEMA, 2025).

Tsunamis or "tidal waves" are seismic waves created when displacement of a large volume of seawater occurs because of movement on seafloor faults. The proposed project site is about 200 feet above mean sea level and is located outside the tsunami hazard zone defined by CGS (CGS, 2025).

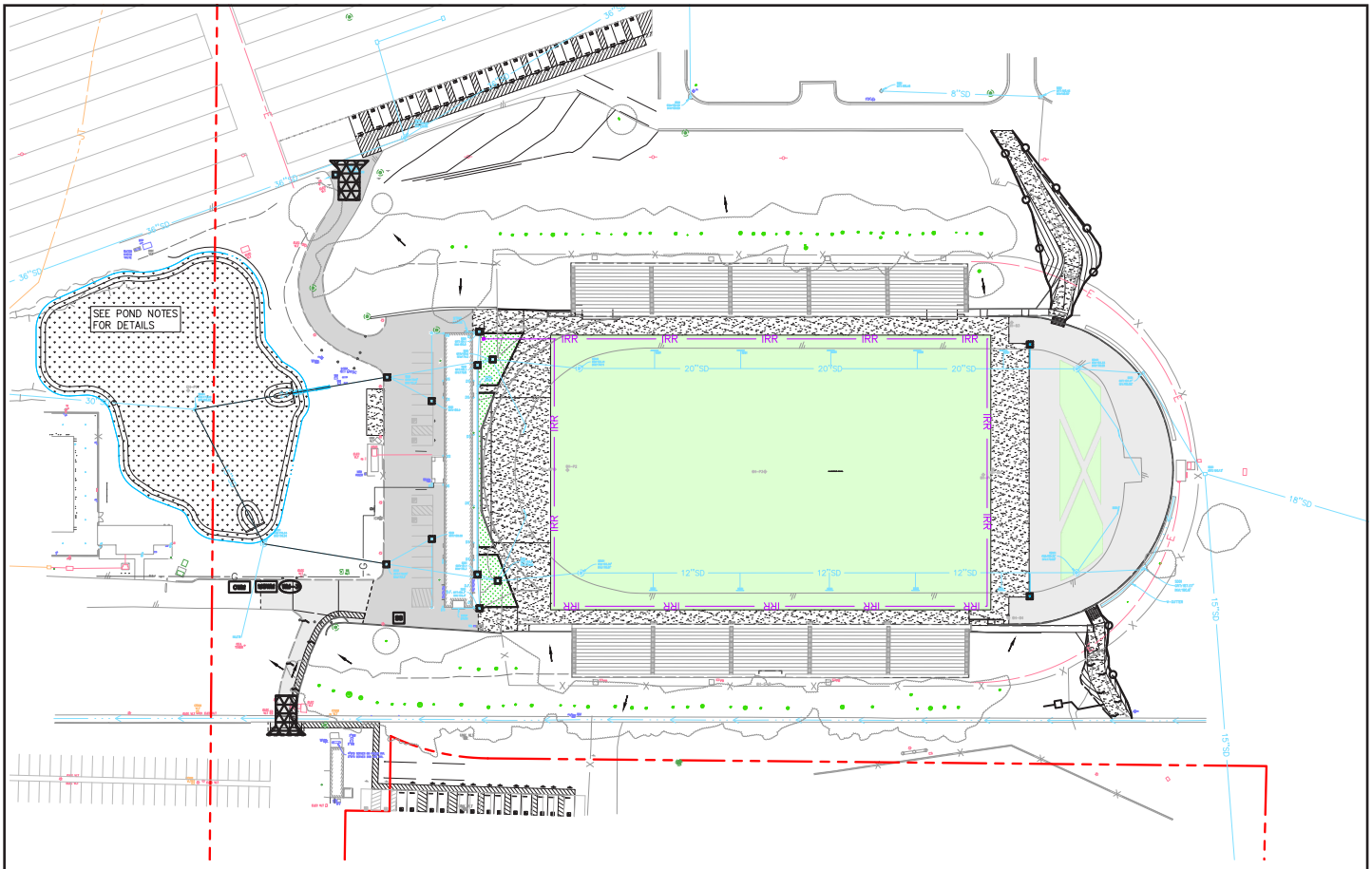
4.9.1.2 Project Site Setting

STORMWATER DRAINAGE

Natural drainage channels are absent in the vicinity of the project site because sandy soils on CSUMB's campus are highly permeable and absorb much of the rainfall and runoff. The campus contains 11 watershed sub-areas, which include the following:

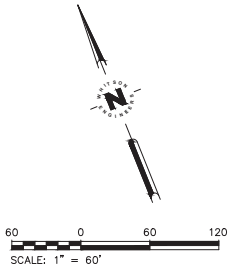
- Sub-area A
- Sub-area B
- Sub-area C3
- Sub-area DA3
- Sub-area DA4
- Sub-area DA5
- Sub-area DC1
- Sub-area DC2
- Sub-area DD1
- Sub-area DD2
- The areas east of DA5 and DC2

CSUMB contains gravity stormwater infrastructure that conveys stormwater to two (2) regional outfall systems, System C and System D. The System C regional drain culminates in a 54-foot outfall and System D regional drain culminates in a 48-foot outfall (CSU, 2022b). The proposed project site is located within Watershed Sub-area DC1 as identified within the 2022 CSUMB Master Plan Guidelines. Stormwater in the DC1 watershed drains in a westward direction, ultimately leading to the System D regional drain (CSU, 2022b). Stormwater drainage improvements were made in 2022 during the previous stadium renovation project (please refer to the Freeman Stadium Renovations Project MND (SCH # 2021070153). These improvements were consistent with CSUMB's Stormwater Master Plan prepared by Schaaf & Wheeler Consulting Engineers in February 2006. Specifically, stormwater drainage improvements included modifying an existing infiltration pond immediately west of the stadium (please refer to **Figure 4.9-1**).



LEGEND

SYMBOL	CALTRANS BMP #	CALTRANS STD. PLAN	DESCRIPTION
	SS-9	–	EARTH DIKES, DRAINAGE SWALES AND LINED DITCHES
	SC-1, SC-5, SC-6	T51, T56, T60, T66	LINEAR SEDIMENT BARRIER: FIBER ROLLS, SILT FENCE, OR COMPOST SOCK (CONTRACTOR'S OPTION)
	SC-1	T51, T60	SILT FENCE
~~SC-7~~	SC-7	–	STREET SWEEPING
	SC-10	–	INLET PROTECTION
CWM	WM-8	T61, T62, T63, T64	CONCRETE WASTE MANAGEMENT (WASHOUT) AREA
	SS-3, SS-4, SS-5, SS-6, SS-7, SS-8	T59 –	SOIL STABILIZATION (PROVIDE ON ALL DISTURBED SOILS) TEMPORARY STABILIZATION PER CIVIL PLANS PERMANENT STABILIZATION PER LANDSCAPE DWGS
	TC-1, TC-3	T58	STABILIZED CONSTRUCTION ENTRANCE/EXIT OR TIRE WASH
MSWM	WM-1	–	MATERIAL STORAGE AND WASTE MANAGEMENT AREA
WM-3	WM-3	T53	TEMPORARY STOCKPILES
SS	WM-9	–	SANITARY FACILITIES
	–	–	DIRECTION OF DRAINAGE
	SC-6	T57	GRAVEL BAG CHECK DAM



Hellmuth, Obata & Kassabum, Inc., 2021

Title: Erosion and Sediment Control Plan	Date 1/12/2026 Scale N/A Project 2024-84	Monterey | San Jose **Denise Duffy and Associates, Inc.** Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 4.9-1

GROUNDWATER

MCWD provides all CSUMB's water supply, which originates in the SVGB. The Monterey County Water Resources Agency (MCWRA) regulates water withdrawal from the SVGB. Through agreements with the MCWRA, MCWD allocates 6,600 AFY of groundwater to the service area that includes CSUMB. To reduce risk of saltwater intrusion, MCWRA requires that MCWD not pump more than 5,200 AFY of the 6,600 AFY of water available in the service area. Of the 6,600 AFY groundwater allocation in the MCWD service area, MCWD specifically allocated CSUMB 1,035 AFY of potable water. At full buildout of the current 2022 CSUMB Master Plan Guidelines, CSUMB expects to have 404 AFY of this allocation remaining for additional uses (CSU, 2022b). As discussed, the existing stadium was previously renovated and evaluated in the Freeman Stadium Renovations Project MND (SCH # 2021070153); which evaluated the use and facilities renovations that currently exist (please refer to **Chapter 3.0, Project Description**). During the prior environmental evaluation, water demand was expected to be approximately 1.03 AFY. The Freeman Stadium Facilities Renovation Project was constructed in 2022, and operation of the stadium for CSUMB and MFBC events began thereafter. CSUMB reviewed the water demand based on one (1) year of operation between July 2024 and June 2025 and determined that the existing stadium required approximately 0.48 AFY of potable water (per communications between DD&A and CSUMB dated September 11, 2025).

4.9.2 Regulatory Environment

4.9.2.1 Federal

FEDERAL EMERGENCY MANAGEMENT AGENCY AND THE NATIONAL FLOOD INSURANCE PROGRAM

FEMA responds to, plans for, aids in recovery from, and mitigates against disasters. FEMA also determines flood elevations and floodplain boundaries based on U.S. Army Corps of Engineers and approved agencies' studies; for coordinating the federal response to floods, earthquakes, hurricanes, and other natural or man-made disasters; and for providing disaster assistance to states, communities, and individuals. FEMA prepares and distributes the Flood Insurance Rate Maps (FIRMs), which are used in the National Flood Insurance Program (NFIP). These maps identify the locations of special flood hazard areas, including the 100-year flood zone.

The Flood Insurance and Mitigation Administration (FIMA), a component of FEMA, manages the NFIP. The NFIP consists of three (3) components: flood insurance; floodplain management; and flood hazard mapping. Nearly 20,000 communities across the United States and territories participate in the NFIP by adopting and enforcing floodplain management ordinances to reduce future flood damage. In exchange, the NFIP makes federally-backed flood insurance available to homeowners, renters, and business owners in these communities. Community participation in the NFIP is voluntary. In addition to providing flood insurance and reducing flood damages through floodplain management regulations, the NFIP also identifies and maps the nation's floodplains.

CLEAN WATER ACT

The CWA establishes the basic structure for regulating discharges of pollutants into the Waters of the U.S. and regulating quality standards for surface waters. CWA's goals are to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Under CWA, the EPA has implemented pollution

control programs and established water quality standards. The NPDES permit program under section 402 of the CWA and enabling regulations controls water pollution by regulating point sources that discharge pollutants into Waters of the EPA has delegated authority of issuing NPDES permits in California to the SWRCB, which has nine (9) RWQCBs. The Central Coast RWQCB regulates water quality in the project area. The NPDES permit program is further described below.

National Pollution Discharge Elimination System Construction General Permit

Construction activities on one (1) acre or more or that disturb less than one (1) acre but are part of a larger common plan of development that in total disturbs one (1) or more acres, must obtain coverage under the General Construction Permit (SWRCB Order No. 2009-09-DWQ; Modified 2010-0014-DWQ). The SWRCB established the General Construction Permit program to reduce surface water impacts from construction activities. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation.

The Construction General Permit requires the development and implementation of a SWPPP. The General Construction Permit requires the preparation and implementation of a SWPPP for construction activities. The SWPPP must be prepared before the construction begins. The SWPPP must include specifications for Best Management Practices that would need to be implemented during construction. BMPs are measures that are undertaken to control degradation of surface water by preventing soil erosion or the discharge of pollutants from the construction area. Additionally, the SWPPP must describe measures to prevent or control runoff after construction is complete and identify the procedures for inspecting and maintaining facilities and other project elements. The required elements of a SWPPP include:

- Site description addressing the elements and characteristics specific to the site;
- Descriptions of BMPs for erosion and sediment controls;
- BMPs for construction waste handling and disposal;
- Implementation of approved local plans;
- Proposed post-construction controls; and
- Non-stormwater management.

Examples of typical construction Best Management Practices include scheduling or limiting activities to certain times of year, installing sediment barriers such as silt fence and fiber rolls, and maintaining equipment and vehicles used for construction. Non-stormwater management measures include installing specific discharge controls during certain activities, such as paving operations, vehicle and equipment washing, and fueling.

ENERGY STAR PROGRAM

Energy Star is a government-backed symbol for energy efficiency, administered by the EPA. The Energy Star program provides energy and water use requirements for a range of appliances including washing machines and ice machines. Energy Star washing machines use, on average 14 gallons of water per load compared to standard machines (Energy Star, 2025a). The Energy Star program identifies a range of

requirements for air cooled ice machines based on the design and type of ice each machine produces. For a smaller athletic training facility, this analysis assumes that CSUMB will install a self-contained unit air cooled continuous-type ice maker producing around 200 pounds of ice per day (Energy Star, 2025b). Continuous-type ice makers produce flaked ice, as opposed to cubed, which offers better malleability for treatment of sports injuries. Additionally, an athletic facility of this size is unlikely to require ice machines capable of producing 800 to 4,000 pounds of ice per day as these quantities better serve large restaurants or medical facilities.

4.9.2.2 State

PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Act (Division 7 of the California Water Code, Section 13000) is the principal law governing water quality regulation in California. The act establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, groundwater, and to point and nonpoint pollution sources. Pursuant to the Porter-Cologne Act, the State of California maintains the policy that:

- The quality of all the Waters of the State shall be protected.
- All activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason.
- The state must be prepared to exercise its full power and jurisdiction to protect the quality of water in the state from degradation.

The Porter-Cologne Act defines water quality objectives as the limits or levels of water constituents that are established for reasonable protection of beneficial uses. The Porter-Cologne Act allows the SWRCB to adopt statewide water quality control plans or basin plans, which serve as the legal, technical, and programmatic basis of water quality regulation for a region. The act also authorizes the NPDES program under the CWA, which establishes effluent limitations and water quality requirements for discharges to Waters of the State.

Under the Porter-Cologne Act, any person or entity discharging or proposing to discharge waste within the region (except discharges into a community sewer system) that could affect the quality of the Waters of the State must file a Report of Waste Discharge. The SWRCB or RWQCB reviews the nature of the proposed discharge and adopts Waste Discharge Requirements to protect the beneficial uses of Waters of the State. Waste discharge requirements could be adopted for an individual discharge, or a specific type of discharges in the form of a general permit. California Water Code Section 13269 authorizes the SWRCB or RWQCB to waive waste discharge requirements for specific discharges or specific types of discharges where such a waiver is consistent with any applicable state or regional water quality control plan and is in the public interest.

STORM WATER POLLUTION PREVENTION PLAN

The RWQCBs have authority to issue waivers to RWD requirements and Waste Discharge Requirements for broad categories of “low threat” discharge activities that have minimal potential for adverse water

quality effects, when implemented according to prescribed terms and conditions. CSUMB has a waiver from the WDRs for Stormwater Discharges from MS4s. Therefore, only the NPDES Construction General Permit and the WDRs General Permit for Discharges with Low Threat to Water Quality apply to the campus.

The NPDES Construction General Permit requires construction activity that disturbs one (1) or more acres of soil, or less than one (1) acre but is part of a larger common plan of development that in total disturbs one (1) or more acres, to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of a facility. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP includes construction mitigation measures such as desilting basins, silt fences, hydroseeding of slopes, and monitoring and clean-up requirements.

Development on smaller sites would be subject to proposed PDF-OS-3 and PDF-OS-5, which call for the use of construction BMPs to minimize erosion and sedimentation and the use of native plants and seed mixes to eliminate erosion after construction (CSU, 2022a).

SUSTAINABLE GROUNDWATER MANAGEMENT ACT

SGMA, signed in 2014, requires a public agency to develop and implement a GSP for priority groundwater basins. GSPs are guiding documents for the management of groundwater basins and sub-basins to achieve groundwater sustainability. The regional agency for Monterey County is the SVBGSA, formed in 2017 to oversee the priority SVGB. The Monterey Sub-basin, one (1) of six (6) sub-basins managed by the SVBGSA, is the primary source of potable water for MCWD. MCWD and SVBGSA oversee the management of the Monterey Sub-basin through implementation of the Monterey Sub-basin GSP, created in 2022 (MCWD and SVBGSA, 2022; SVBGSA, 2025b).

CALIFORNIA GREEN BUILDING STANDARDS CODE

CalGreen, Part 11 of the California Building Standards Code (Title 24), improves public health, safety, and general welfare by utilizing design and construction methods that reduce the negative environmental impact of development and encourage sustainable construction practices (CCR Title 24, part 11).

In 2025, California adopted the most recent version of CalGreen, which establishes mandatory green building standards for new and remodeled structures in California. These standards include a mandatory set of guidelines and more stringent voluntary measures for new construction projects, to achieve specific green building performance levels, such as recycle and salvage 65 percent of nonhazardous construction and demolition debris.

Additionally, Section 5.303 of the 2025 CalGreen requirements sets the following maximum water use rates for toilets, sinks, and showers:

- Toilets: 1.28 gallons/flush
- Sink: 0.5 gallons/minute

- Shower: 1.8 gallons/minute

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The 2022 CSUMB Master Plan Guidelines incorporate guiding elements of other campus planning documents. The Master Plan Guidelines incorporate policies to further the objectives from CSUMB's Stormwater Master Plan, which requires all redevelopment on campus to infiltrate 100 percent of stormwater runoff from a hundred-year storm event. This requirement would reduce reliance on offsite regional stormwater facilities. The 2022 CSUMB Master Plan Guidelines encourage all new development on campus to use of low impact development (LID) strategies and to develop and use conventional drainage basins to retain stormwater.

The following goals and policies described in the 2022 CSUMB Master Plan Guidelines may be applicable to the proposed project (CSU, 2022b):

WS 2.4 Collect stormwater runoff throughout the site and transport, preferably through surface conveyance, to LID water-quality treatment areas.

Goal WS 3 Percolate all stormwater within the campus footprint.

WS 3.1 Design both the site-based and campus-based systems to retain stormwater for infiltration or reuse.

WS 3.3 Integrate landscape and hardscape in order to funnel stormwater runoff into landscaped areas and minimize reliance on existing and future storm drain systems.

WS 3.8 Locate stormwater storage and reuse facilities near locations with high-irrigation water demand, such as athletic facilities.

OS 3.6 Consider using recreation and athletic fields for stormwater percolation.

4.9.2.3 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis of potential conflicts with hydrology and water quality. The City of Seaside's General Plan includes the following relevant policies (City of Seaside, 2024):

Flood Control. Require new development and redevelopment projects to provide adequate stormwater infrastructure for flood control.

Groundwater Recharge in New Development. Continue to optimize groundwater recharge from new and redevelopment projects by infiltrating stormwater in accordance with state, regional, and local requirements.

4.9.3 Methodology

Existing hydrologic conditions at the proposed project site and surrounding area were characterized through review of available mapping, regulatory data, and prior studies. Key sources include mapping and flood hazard data from FEMA, water quality and stormwater regulatory information from the SWRCB and the Central Coast RWQCB, and watershed and hydrologic data from USGS.

Additional information was obtained from campus planning documents, drainage studies, and infrastructure records to identify existing stormwater conveyance systems, drainage patterns, impervious surfaces, and areas subject to flooding or ponding. These sources were reviewed to characterize baseline conditions related to surface water flow, stormwater runoff, groundwater recharge, water quality, and flood risk.

4.9.4 Impacts and Mitigation

4.9.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact on hydrology and water quality if it would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    i. result in a substantial erosion or siltation on- or off-site;

    ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

    iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

    iv. impede or redirect flood flows;

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.4.2 Impacts and Mitigation Measures

Impact HYD-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; or substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in a substantial erosion or siltation on- or off-site. (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (iv) impede or redirect flood flows (criteria a and c).

Expanded Use

The existing stadium and adjacent parking lot consist of land that has previously been disturbed and developed, and the proposed expanded use of the stadium would not directly require construction of new facilities that would increase the impervious surface coverage or result in erosion or siltation. The project site is generally flat, and no surface waters exist in the vicinity of the existing stadium. The proposed expanded use would increase the number and frequency of events annually and would rely on existing campus stormwater drainage infrastructure, including the existing stadium infrastructure developed in compliance with the existing CSUMB Stormwater Master Plan for the previous renovation in 2021 (CSUMB, 2021). Additionally, operation of the stadium for events would comply with existing stormwater regulations and best management practices. Therefore, the proposed expanded use of the existing stadium would have no impact with respect to violating water quality standards; degrading surface or groundwater quality; or altering the drainage system in a manner causing substantial erosion or siltation, increasing the amount of surface runoff, exceeding the existing drainage capacity, or impeding or redirecting flows.

Stadium Improvements

Construction of the proposed stadium improvements would disturb approximately 1.35 acres. Construction activities that disturb one (1) acre or more would be subject to NPDES Construction General Permit requirements, require preparation and implementation of a SWPPP, and implement SWPPP required best management practices to control erosion and sediment runoff. Implementation of the SWPPP and associated best management practices would reduce potential construction-related water quality impacts to a less than significant level. Furthermore, the existing stadium was previously renovated, and site improvements included drainage on-site and a retention pond to the west of the project site (please refer to **Figure 4.9-1**) (CSUMB, 2021). These existing improvements retain runoff and eliminate discharge of runoff to surface water bodies within or near the campus.

The design and operation of the proposed stadium improvements would be consistent with the 2022 CSUMB Master Plan Guidelines, including on-site stormwater retention, LID water-quality treatment areas, and campus policies for reduced potable water use and expanded greywater reuse. New building plumbing must meet or exceed CalGreen potable-water reduction requirements and incorporate greywater systems where feasible (e.g., toilet flushing). Implementation and adherence to these policies would reduce potential impacts regarding waste discharge, increased rate of runoff, drainage capacity, and impeding or redirecting flows. Moreover, the locker rooms and restrooms would replace existing infrastructure (e.g., existing portable shower facilities) within the stadium's existing footprint and would not increase the total impervious area of the site. The gated event storage and staging area would be limited to temporary containers and fencing with no permanent paved surfaces proposed. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to violating water quality standards; degrading surface or groundwater quality; or altering the drainage system in a manner causing substantial erosion or siltation, increasing the amount of surface runoff, exceeding the existing drainage capacity, or impeding or redirecting flows.

Mitigation Measures

No mitigation is required for **Impact HYD-1**.

Impact HYD-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (criterion b).

Expanded Use

As discussed in **Section 4.9.1.2, Project Site Setting**, above, MCWD provides all CSUMB's water supply, which originates in the SVGB. MCWRA regulates water withdrawal from the SVGB. Through agreements with the MCWRA, MCWD allocates 6,600 AFY of groundwater to the service area that includes CSUMB. CSUMB does not draw down groundwater for potable or non-potable water demand but utilizes water provided by MCWD.

The existing stadium and adjacent parking lot have previously been developed and disturbed as the result of the periodic construction and ongoing operation of the Athletics and Recreation District on campus, as well as by historical uses associated with the former Fort Ord Military Base. The expanded use of the existing stadium would not directly require construction of new facilities. Therefore, the proposed expanded use would not increase the coverage of impermeable surfaces that could decrease groundwater recharge. For these reasons, the proposed expanded use of the stadium would have a less than significant impact with respect to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the SVGB.

Stadium Improvements

As discussed above, MCWD allocates water to CSUMB and the project site from the SVGB. The proposed stadium improvements consist of new locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area. The proposed stadium improvements would not expand the field house, and the footprint of the gated event storage and staging area would be minor (i.e., 1.25-acre).

Furthermore, the areas for improvements are previously developed and disturbed. Construction of the proposed stadium improvements would be temporary and would not require substantial use of water.

With respect to groundwater recharge, the proposed stadium improvements would not increase the amount of impervious surfaces at the project site. The locker room and shower facilities and permanent restroom facilities would be installed within the existing stadium's footprint, which is currently paved. Additionally, the gated event storage and staging area would require installation of perimeter fencing but would remain unpaved. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the SVGB.

Mitigation Measures

No mitigation is required for **Impact HYD-2**.

Impact HYD-3: The proposed project is not located in a flood hazard, tsunami, or seiche zone, and would not be at risk of the release of pollutants due to project inundation (criterion d).

Expanded Use

The project site is not located in a tsunami, or seiche zone as defined by FEMA and the CGS (FEMA, 2025; CGS, 2025). The project site is located in 500-year floodplain (i.e., 0.2% annual change flood hazard area), however, given the developed nature of the site, risk of inundation is low. Therefore, the proposed expanded use of the existing stadium would have a less than significant impact regarding release of pollutants as the result of flood, tsunami, or seiche inundation.

Stadium Improvements

Please refer to the response regarding **Expanded Use** above. Construction and operation of the proposed stadium improvements would have a less than significant impact regarding release of pollutants because of flood, tsunami, or seiche inundation.

Mitigation Measures

No mitigation is required for **Impact HYD-3**.

Impact HYD-4 The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (criterion e).

Expanded Use

Please refer to **Impact HYD-2**, above. CSUMB does not draw down groundwater for potable or non-potable water demand but utilizes water provided by MCWD. MCWD's water supply originates from the SVGB, which is regulated by the MCWRA. Therefore, the proposed expanded use would have a less than significant impact regarding a water quality control plan or sustainable groundwater management plan.

Stadium Improvements

As discussed in **Impact HYD-2**, CSUMB does not draw down groundwater for potable or non-potable water demand but utilizes water provided by MCWD. MCWD's water supply originates from the SVGB, which is regulated by the MCWRA. Additionally, the proposed stadium improvements would incorporate water conservation polices required by the 2022 CSUMB Master Plan Guidelines. Adherence to these policies would minimize the outcome of exceeding the remaining MCWD water allocation of 404 AFY. Additionally, the proposed stadium improvements would incorporate NPDES Construction General Permit requirements and 2022 CSUMB Master Plan Guidelines policies for stormwater management. Therefore, the proposed stadium improvements would have a less than significant impact regarding a water quality control plan or sustainable groundwater management plan.

Mitigation Measures

No mitigation is required for **Impact HYD-4**.

4.9.5 References

[CGS] California Geological Survey. 2025. *Tsunami Hazard Area Map*. California Department of Conservation. Available online at: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/#data_s=id%3AdataSource_3-1918f9f263a-layer-15%3A5

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[MCWD] Marina Coast Water District and [SVBGSA] Salinas Valley Basin Groundwater Sustainability Agency. 2022. *Groundwater Sustainability Plan – Monterey Subbasin*. Available online at: https://svbgsa.org/wp-content/uploads/2022/04/Completed_Monterey-Subbasin-GSP_Chap-ES-10_wo_Appendices.pdf

[SVBGSA] Salinas Valley Basin Groundwater Sustainability Agency. 2025a. *Subbasins*. Available online at: https://svbgsa.org/subbasins/

[SVBGSA] Salinas Valley Basin Groundwater Sustainability Agency. 2025b. *About Salinas Valley Basin Groundwater Sustainability Agency*. Available online at: https://svbgsa.org/about-us/

4.10 LAND USE AND PLANNING

This section analyzes potential impacts to land use that would occur with implementation of the proposed project. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments were received concerning land use and planning during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.10.1 Environmental Setting

4.10.1.1 Regional Overview

The proposed project site is in Monterey County and located on CSUMB's campus. The proposed project site is located on a portion of the CSUMB campus within the City of Seaside's city limits.

4.10.1.2 Project Site Setting

The project site is located at 4113 2nd Avenue, Seaside, California, 93955, in Monterey County (APN 0311-0104-4000) in the Athletics and Recreation District. The Athletics and Recreation District comprise the existing CSUMB Stadium, baseball and softball fields, two (2) existing soccer fields, CSUMB aquatic center, and a disc golf course along with two (2) parking lots. While the 2022 CSUMB Master Plan Guidelines does not specifically plan for this project, this document accommodates improvements to the Athletics and Recreation District.

The 2022 CSUMB Master Plan Guidelines accommodates development in the Athletics and Recreation District by proposing to expand athletic and recreation facilities to facilitate expansion of new athletic and recreational programs and opportunities, shared commuter and athletics parking, regional transit amenities, event spaces, and encourages CSUMB to host various athletic and non-athletic campus and community events (CSUMB, 2022b). SR 1 is the major north-south transportation route along the Central Coast, providing access to both CSUMB and the City of Seaside, linking these jurisdictions to other cities on the Monterey Peninsula to the south and Santa Cruz County in the north. Divarty Street and 2nd Avenue, via SR 1, Lightfighter Drive, and General Jim Moore Boulevard provide local access to the project site.

4.10.2 Regulatory Environment

4.10.2.1 State

<u>CALIFORNIA STATE UNIVERSITY MASTER PLAN GUIDELINES</u>

The 2022 CSUMB Master Plan Guidelines is the current guiding document for long-range land use planning for CSUMB. This document guides the physical development of the campus and presents long-range

strategies for growth, while factoring in development, mobility infrastructure, open space, site ecology, and energy and stormwater management. The 2022 CSUMB Master Plan Guidelines contains planning recommendations, strategies, goals, and policies for achieving carbon neutrality, reducing traffic impacts, managing constrained water resources, and accommodations for a projected campus population of 12,700 full time equivalent student enrollment and 1,776 full time faculty and staff members. For a detailed analysis of the proposed project's consistency with applicable land use policies contained in the 2022 CSUMB Master Plan Guidelines for minimizing environmental impacts related to land use please refer to **Table 4.10-1** for the proposed expanded use of the stadium and **Table 4.10-2** for the proposed stadium improvements.

4.10.2.2 Local

CSUMB is not subject to local government permitting or regulations, policies, or ordinances. However, a discussion of local plans are summarized to address standards of significance. Consistent with the 2022 CSUMB Master Plan EIR, plans or polices are described for land use context and for informational purposes only, not as the basis for the determination of significant environmental impacts (CSU, 2022a). The 2022 CSUMB Master Plan Guidelines designates the proposed project site, as well as the areas surrounding it to the south and east, for a range of athletics and recreational uses (CSU, 2022b). Additionally, as a member of the CSU, CSUMB is subject to its overarching policies and plans implemented by the CSU.

CITY OF SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis. Please refer to **Table 4.10-1** and **Table 4.10-2** for a detailed summary of the City of Seaside General Plan policies related to land use for the proposed expanded use and proposed stadium improvements, respectively.

Table 4.10-1
Review of CSUMB and Seaside Land Use Policies for the Proposed Expanded Use

Planning Document	Policy #	Policy Summary	Plan Consistency
2022 CSUMB Master Plan Guidelines	LU 1.4	Develop the Athletics and Recreation District to meet future campus needs and host regional conference tournaments; and consider shared-use agreements with the surrounding community.	No Conflict. The proposed expanded use would support this policy by hosting additional CSUMB events, including men's and women's CCAA Championship tournaments and the NCAA Division II National Championships. MBFC would host three (3) new teams and associated athletic events. Non-athletic events would also be hosted at the proposed project site (please refer to **Chapter 3, Project Description**). Additionally, the proposed expanded use would be consistent with the shared-use agreement with MBFC.
2022 CSUMB Master Plan Guidelines	LU 4.4	Consider establishing a facilities use agreement within the Athletics and Recreation District between Campus programs and the broader Monterey Bay community.	No Conflict. The proposed expanded use would support the 14-year existing facilities use agreement between the Athletics and Recreation District and MBFC that began in January 2020 (please refer to **Chapter 1, Introduction**).
Seaside General Plan	An integrated and well-planned expansion of CSUMB.	Intent: to work with CSUMB to ensure the planned expansion provides numerous benefits to Seaside and its residents. The expansion of CSUMB can play an important role as a community anchor, providing services in convenient locations, improving opportunities for physical activity, and leveraging opportunities for capital investments.	No Conflict. The proposed expanded use and stadium improvements would support this policy by providing expanded use of that stadium to the CSUMB community, MBCF, and the residents of Seaside. This would promote community involvement, increase opportunities for soccer games, and provide new structures for an integrated and well-planned expansion of CSUMB.
Seaside General Plan	CSUMB Expansion	Continue to work with CSUMB to plan for the expansion of the campus in a way that supports the vision for a Campus Town, as described in the Land Use and Community Design Element.	No Conflict. The proposed expanded use would expand the number of non-athletic community events and athletic events available to the residents of the City of Seaside. The expanded use of the stadium would not impede cooperation between CSUMB and the City of Seaside, and this use would be consistent with existing land use designations.
2022 CSUMB Master Plan Guidelines	LU 2.6	Convert East Campus Housing to exclusive use by faculty, staff, students with families, and if space permits, Community Housing Partners.	No Conflict. The proposed expanded use of the stadium would not substantially increase regional population such that new housing would need to be built (please refer to **Section 4.12, Population and Housing**). Additionally, the proposed expanded use of the stadium would occur at the existing stadium site in the southern portion of campus, and not conflict with proposed housing in the east campus housing area.

Planning Document	Policy #	Policy Summary	Plan Consistency
Seaside General Plan	Balanced Land Use.	Maintain a land use pattern to support a broad range of housing choices, retail businesses, employment opportunities, educational and cultural institutions, entertainment spaces, and other supportive uses on former Fort Ord lands and within long-established Seaside neighborhoods.	No Conflict. The proposed expanded use of the stadium would be consistent with current land use designation for the site, and would not conflict with surrounding land use designations in the City of Seaside.
Seaside General Plan	Coordination with CSUMB.	Strengthen the relationship between the City and Cal State University Monterey Bay, Marina, and other regional partners. Hold regular meetings with CSUMB to discuss plans for the "campus town" area.	No Conflict. The proposed expanded use would increase the number and frequency of non-athletic community events and athletic events available to the residents of the City of Seaside. The expanded use of the stadium would not impede cooperation between CSUMB and the City of Seaside, and this use would be consistent with existing land use designations.

Table 4.10-2
Review of CSUMB and Seaside Land Use Policies for the Proposed Stadium Improvements

Planning Document	Policy #	Policy Summary	Plan Consistency
2022 CSUMB Master Plan Guidelines	LU 1.1	Infill development on previously disturbed sites, before building on greenfield sites.	No Conflict. The proposed stadium improvements would develop structures on an existing, previously disturbed site within the CSUMB Stadium. No greenfield sites would be altered. No development is proposed on new, undeveloped sites.
2022 CSUMB Master Plan Guidelines	LU 1.4	Develop the Athletics and Recreation District to meet future campus needs and host regional conference tournaments; and consider shared-use agreements with the surrounding community.	No Conflict. The proposed stadium improvements would develop new locker room and shower facilities, new permanent restroom facilities, and storage and staging area. These improvements would meet future campus needs and promote site use during athletic and non-athletic events. Operation of the proposed stadium improvements would be consistent with the existing shared-use agreement with MBFC.
2022 CSUMB Master Plan Guidelines	LU 4.4	Consider establishing a facilities use agreement within the Athletics and Recreation District between Campus programs and the broader Monterey Bay community.	No Conflict. The proposed stadium improvements would provide new structures for the communities that are utilizing the CSUMB Stadium, which includes those in Seaside, CSUMB, and the greater Monterey area.

Planning Document	Policy #	Policy Summary	Plan Consistency
Seaside General Plan	An integrated and well-planned expansion of CSUMB.	Intent: to work with CSUMB to ensure the planned expansion provides numerous benefits to Seaside and its residents. The expansion of CSUMB can play an important role as a community anchor, providing services in convenient locations, improving opportunities for physical activity, and leveraging opportunities for capital investments.	No Conflict. The proposed stadium improvements would support this policy by supporting the use of the stadium by the CSUMB community, MBCF, and the residents of Seaside. This would promote community involvement, increase opportunities for soccer games, and provide new structures for an integrated and well-planned expansion of CSUMB.
Seaside General Plan	CSUMB Expansion	Continue to work with CSUMB to plan for the expansion of the campus in a way that supports the vision for a Campus Town, as described in the Land Use and Community Design Element.	No Conflict. The proposed stadium improvements consist of new locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area. These improvements would support future use of the stadium by local community members and organizations.
2022 CSUMB Master Plan Guidelines	LU 2.6	Convert East Campus Housing to exclusive use by faculty, staff, students with families, and if space permits, Community Housing Partners.	No Conflict. The proposed stadium improvements would be constructed within and adjacent to the footprint of the existing stadium. These improvements would consist of locker room and shower facilities, permanent restroom facilities, and a storage and staging area none of which would provide housing or replace housing space in the East Campus Housing area of CSUMB.
Seaside General Plan	Balanced Land Use.	Maintain a land use pattern to support a broad range of housing choices, retail businesses, employment opportunities, educational and cultural institutions, entertainment spaces, and other supportive uses on former Fort Ord lands and within long-established Seaside neighborhoods.	No Conflict. The proposed stadium improvements would not consist of habitable structures or replace potential housing options. The proposed stadium improvements would be constructed within and adjacent to the footprint of the existing stadium to support stadium operations.

4.10.3 Methodology

The evaluation of land use and planning is based on a review of relevant adopted plans and policy documents, including the 2022 CSUMB Master Plan and the City of Seaside's General Plan, applicable zoning regulations, and any adopted regional or resource management plans. Characteristics of the proposed project were compared against applicable land use designations, goals, policies, and implementation measures to determine consistency and to identify any environmental consequences of land use conflicts.

4.10.4 Impacts and Mitigation

4.10.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact on land use and planning if it would:

a. Physically divide an established community; or

b. 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.

4.10.4.2 Impacts and Mitigation Measures

Impact LU-1: The proposed project would not physically divide an established community (criterion a).

Expanded Use

The proposed expanded use of the existing stadium would involve an increase in number and frequency of events at the project site, which already hosts sports events and other special events. The physical division of an established community typically refers to the construction of a physical feature (e.g., a road, railroad tracks, or other type of structure that prohibits access) or removal of a means of access (e.g., a local road or bridge) that would impair internal access within an existing community, or between a community and adjacent areas. The expanded use aspect of the project would not result in the construction of such physical features or removal of a means of access. Rather, the project's expanded use is anticipated to enhance community interaction and access to shared facilities. The project's expanded use would build upon the existing campus land use framework and development that was improved through the 2020 Master Plan to accommodate increases in enrollment and improve on-campus amenities. Therefore, the proposed expanded use of the existing stadium would have no impact with respect to the physical division of an established community.

Stadium Improvements

The proposed physical stadium improvements consist of proposed locker room and shower facilities, permanent restroom facilities, and development of a gated event storage and staging area. The stadium improvements would not result in the construction of physical features or removal of a means of access that would physically divide an established community. Project development would occur entirely within

the existing campus boundaries; furthermore, the proposed stadium improvements would be within the footprint of the existing stadium and adjacent parking lot. The proposed project would not add, remove, or alter roadways or otherwise prevent access. The proposed project would build upon the existing campus land use framework and development to accommodate increases in enrollment and improve on-campus amenities. The proposed stadium improvements would also expand on 2022 CSUMB Master Plan Guidelines policy LU-1.4, which aims to "Develop the Athletics and Recreation District to meet future campus needs...", and, therefore, would promote more active use of stadium facilities and enhanced community interaction and connection (CSU, 2022b). For these reasons, the proposed stadium improvements would have no impact with respect to the physical division of an established community.

Mitigation Measures

No mitigation is required for **Impact LU-1**.

Impact LU-2: The proposed project would not cause a significant environmental impact due to a conflict with Land Use Plan, Policy, or Regulation adopted for the purpose of avoiding or mitigating an environmental effect (criterion b).

Expanded Use

The proposed expanded use of the existing stadium would involve an increase in athletic and non-athletic events at the project site. The proposed expanded use would occur within the jurisdiction of CSUMB and within the City of Seaside's city limits and would not conflict with a land use policy as defined in the 2022 CSUMB Master Plan Guidelines. While the 2022 CSUMB Master Plan Guidelines do not specifically plan for the proposed expanded use, they provide for improvements and increased activity within the Athletics and Recreation District, within which the stadium is located.

This analysis also includes selected policies from the adopted Seaside General Plan to provide context for potential land use and planning considerations in areas where CSUMB and the City of Seaside have overlapping boundaries. Both the 2022 CSUMB Master Plan Guidelines and the City of Seaside's General Plan include policies encouraging coordination and cooperation between jurisdictions, and the proposed expanded use would be consistent with this policy direction. Accordingly, the proposed expanded use of the stadium would not conflict with applicable campus Master Plan policies, CSU policies, or local jurisdictional land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Stadium Improvements

The proposed stadium improvements consist of locker room and shower facilities, permanent restroom facilities, and a storage and staging area. These improvements would be located within and adjacent to the existing stadium footprint, which has been previously developed and disturbed in association with athletic facilities, and in an adjacent parking lot. As noted above, the 2022 CSUMB Master Plan Guidelines do not specifically plan for this project but accommodate improvements within the Athletics and Recreation District. The Seaside General Plan contains a limited number of policies applicable to CSUMB, and the proposed stadium improvements would not conflict with those policies. No impact would occur.

Mitigation Measures

No mitigation is required for **Impact LU-2**.

4.10.5 References

[CSU] California State University. 2022a. *California State University Master Plan Environmental Impact Report*. State Clearinghouse Number 2017051042. Available online at: https://ceqanet.lci.ca.gov/2017051042/3

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City of Seaside. 2024. *City of Seaside General Plan*. Resolution GPA-24-01. Available online at: https://www.ci.seaside.ca.us/DocumentCenter/View/15999/Seaside2040-General-PlanPDF?bidId=

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4.11 NOISE AND VIBRATION

This section evaluates the potential noise and vibration impacts that could result from implementation of the proposed project due to temporary construction impacts and long-term operational impacts. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less –than significant level, where feasible. This section is based on the Noise & Groundborne Vibration Impact Analysis prepared by AMBIENT; please refer to **Appendix F**.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments regarding noise and vibration were received during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.11.1 Environmental Setting

4.11.1.1 Concepts and Terminology

Noise is generally defined as sound that is loud, disagreeable, or unexpected. Sound, as this report describes in more detail below, is mechanical energy transmitted in the form of a wave because of a disturbance or vibration. Sound levels are described in terms of both amplitude and frequency.

AMPLITUDE

Amplitude is the difference between ambient air pressure and the peak pressure of the sound wave. Amplitude is measured in decibels (dB) on a logarithmic scale. For example, a 65 dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by three (3) dB). Amplitude is interpreted by the ear as corresponding to different degrees of loudness. Laboratory measurements correlate a 10 dB increase in amplitude with a perceived doubling of loudness and establish a three (3) dB change in amplitude as the minimum audible difference perceptible to the average person.

FREQUENCY

The frequency of a sound is the number of fluctuations of the pressure wave per second. The unit of frequency is the hertz (Hz). One (1) Hz equals one (1) cycle per second. The human ear is not equally sensitive to sound of different frequencies. Sound waves below 16 Hz or above 20,000 Hz cannot be heard at all, and the ear is more sensitive to sound in the higher portion of this range than in the lower. To approximate the sensitivity of the human ear to changes in frequency, measurements of environmental sound usually use “A-weighted decibels” (dBA). On this scale, the normal range of human hearing extends from about 10 dBA to about 140 dBA (AMBIENT, 2026). **Table 4.11-1** depicts common community noise sources and noise levels.

Table 4.11-1
Typical Noise Levels in the Environment

Common Outdoor Noise Source	Noise Level (dBA)*	Common Indoor Noise Source
	110 dBA	Rock concert
Jet fly-over at 300m(1,000 ft)		
	110 dBA	
	100 dBA	
Gas lawn mower at 1m (3 ft)		Night club with live music
	90 dBA	
Diesel truck at 15m (50 ft), at 50 mph		Food blender at 1m (3 ft)
	80 dBA	Garbage disposal at 1m (3 ft)
Noisy urban area, daytime		
Gas lawn mower at 30m	**70 dBA**	Vacuum cleaner at 3m (10 ft)
Commercial/Urban area daytime		Normal speech at 1m (3 ft)
Suburban expressway at 90m (300 ft)	**60 dBA**	
		Active office environment
Quiet urban daytime	**50 dBA**	Dishwasher next room
Quite urban nighttime	**40 dBA**	Theater, large conference room
Quiet Suburban nighttime		
Quiet rural areas	**30 dBA**	Library
		Quiet bedroom at night
	20 dBA	
	10 dBA	
Lowest Threshold of human hearing	**0 dBA**	Lowest Threshold of human hearing

Source: AMBIENT, 2026

[1] Typical A-weighted sound levels. The A-weighted decibel scale approximates the frequency response of the human ear.

ADDITION OF DECIBELS

Because decibels are logarithmic units, sound levels cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a three (3) dB increase. In other words, when two (2) identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be three (3) dB higher than one (1) source under the same conditions. For example, if one (1) automobile produces a sound level of 70 dB when passing an observer, two (2) cars passing simultaneously would not produce 140 dB; rather, they would combine to produce 73 dB. Under the decibel scale, three (3) sources of equal loudness together would produce an increase of five (5) dB.

SOUND PROPAGATION & ATTENUATION

Geometric Spreading

Sound from a localized source (i.e., a point source) propagates uniformly outward in a spherical pattern. The sound level decreases (attenuates) at a rate of approximately six (6) dB for each doubling of distance from a point source. Highways consist of several localized noise sources along a defined path, and hence

can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately three (3) dB for each doubling of distance from a line source, depending on ground surface characteristics. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between a line source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation for soft surfaces results in an overall attenuation rate of 4.5 dB per doubling of distance from a line source.

Atmospheric Effects

Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) from the highway due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects.

Shielding by Natural or Human-Made Features

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in an approximate five (5) dB of noise reduction. Taller barriers provide increased noise reduction.

Noise reductions afforded by building construction can vary depending on construction materials and techniques. Standard construction practices typically provide approximately 15 dBA exterior-to-interior noise reductions for building facades, with windows open, and approximately 20-30 dBA with windows closed. The absorptive characteristics of interior rooms, such as carpeted floors, draperies and furniture, can result in further reductions in interior noise.

NOISE DESCRIPTORS

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is purely physical quantity, the loudness or human response is determined by the characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the sound-pressure level in that range. In general, people are most sensitive to the frequency range of 1,000–8,000 Hz, and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies, which is referred to as the “A-weighted” sound level (expressed in units of dBA). The A-weighting network approximates the frequency

response of the average young ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-weighted noise scale. Other weighting networks have been devised to address high noise levels or other special problems (e.g., B-, C-, and D-scales), but these scales are rarely used in conjunction with environmental noise.

The intensity of environmental noise fluctuates over time, and several descriptors of time-averaged noise levels are typically used. For the evaluation of environmental noise, the most commonly used descriptors are L_{eq}, L_{dn}, CNEL, and SEL. The energy-equivalent noise level, L_{eq}, is a measure of the average energy content (intensity) of noise over any given period. Many communities use 24-hour descriptors of noise levels to regulate noise. The day-night average noise level, L_{dn}, is the 24-hour average of the noise intensity, with a 10 dBA "penalty" added for nighttime noise (10:00p.m. to 7:00a.m.) to account for the greater sensitivity to noise during this period. CNEL, the community equivalent noise level, is similar to L_{dn} but adds an additional five (5) dBA penalty for evening noise (7:00p.m. to 10:00p.m.). SEL, sound exposure level, describes a receiver's cumulative noise exposure from a single noise event, which is defined as an acoustical event of short duration (0.5 seconds), such as a backup beeper, the sound of an airplane traveling overhead, or a train whistle. **Table 4.11-2** summarizes common noise descriptors.

Table 4.11-2
Common Acoustical Terms and Descriptors

Descriptor	Definition
Decibels (dB)	A unit-less measure of sound on a logarithmic scale, which indicates the squared ratio of sound pressure amplitude to referenced sound pressure amplitude. The reference pressure is 20 micro-pascals.
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level in dB that approximates the frequency response of the human ear.
Energy Equivalent Noise Level (L_{eq})	The energy mean (average) noise level. The instantaneous noise levels during a specific period of time in dBA are converted to relative energy values. From the sum of the relative energy values, an average energy value (in dBA) is calculated.
Minimum Noise Level (L_{min})	The minimum instantaneous noise level during a specific period of time.
Maximum Noise Level (L_{max})	The maximum instantaneous noise level during a specific period of time.
Day-Night Average Noise Level (DNL or L_{dn})	The 24-hour L_{eq} with a 10 dBA "penalty" for noise events that occur during the noise-sensitive hours between 10:00p.m. and 7:00a.m. In other words, 10 dBA is "added" to noise events that occur in the nighttime hours to account for increases sensitivity to noise during these hours.
Community Noise Equivalent Level (CNEL)	The CNEL is similar to the L_{dn} described above, but with an additional five (5) dBA "penalty" added to noise events that occur between the hours of 7:00p.m. to 10:00p.m. The calculated CNEL is typically approximately 0.5 dBA higher than the calculated L_{dn}.
Sound Exposure Level (SEL)	The level of sound accumulated over a given time interval or event. Technically, the sound exposure level is the level of the time-integrated mean square A-weighted sound for a stated time interval or event, with a reference time of one (1) second.

HUMAN RESPONSE TO NOISE

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels. When community noise interferes with human activities or contributes to stress, public annoyance with the noise source increases. The acceptability of noise and the threat to public well-being are the basis for land use planning policies preventing exposure to excessive community noise levels.

Unfortunately, there is no completely satisfactory way to measure the subjective effects of noise or of the corresponding reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and habituation to noise over differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted: the so-called "ambient" environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged. Regarding increases in A-weighted noise levels, knowledge of the following relationships will be helpful in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of one (1) dB cannot be perceived by humans;
- Outside of the laboratory, a three (3) dB change is considered a just-perceivable difference;
- A change in level of at least five (5) dB is required before any noticeable change in community response would be expected. An increase of five (5) dB is typically considered substantial; and
- A 10 dB change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

EFFECTS OF NOISE ON HUMAN ACTIVITIES

The extent to which environmental noise is deemed to result in increased levels of annoyance, activity interference, and sleep disruption varies from individual to individual depending on various factors, including the loudness or suddenness of the noise, the information value of the noise (e.g., aircraft overflights, child crying, fire alarm), and an individual's sleep state and sleep habits. Over time, adaptation to noise events and increased levels of noise may also occur. In terms of land use compatibility, environmental noise is evaluated in terms of the potential for noise events to cause increased levels of annoyance, sleep disruption, or interference with speech communication, activities, and learning. This EIR provides further discussion of noise-related effects on human activities in more detail below.

Speech Communication

For most noise-sensitive land uses, an interior noise level of 45 dB L_{eq} is identified for the protection of speech communication to provide for 100-percent intelligibility of speech sounds. Assuming a minimum 20-dB reduction in sound level between outdoors and indoors, with windows closed, this interior noise level of 45 dB L_{eq} would equate to an exterior noise level of 65 dBA L_{eq}. For outdoor voice communication, exterior noise levels of 60 dBA Leq allows normal conversation at distances up to 2 meters with 95 percent

sentence intelligibility (AMBIENT, 2026) Based on this information, speech interference begins to become a problem when steady noise levels reach approximately 60 to 65 dBA.

Annoyance and Sleep Disruption

Regarding potential increases in annoyance, activity interference, and sleep disruption, land use compatibility determinations are typically based on the use of the cumulative noise exposure metrics (i.e., CNEL or L_{dn}). The Schultz curve, expressing a correlation between cumulative noise exposure and an individual's annoyance level, is a basis for noise standards. The Schultz curve indicates that approximately 13 percent of the population is highly annoyed at a noise level of 65 dBA L_{dn}. The curve also indicates that the percentage of people describing themselves as being highly annoyed accelerates smoothly between 55 and 70 dBA L_{dn}. A noise level of 65 dBA L_{dn} is a commonly referenced dividing point between lower and higher rates of people describing themselves as being highly annoyed (AMBIENT, 2026).

The Schultz curve and associated research became the basis for many of the noise criteria subsequently established for federal, state, and local entities. Most federal and state of California regulations and policies related to transportation noise sources establish a noise level of 65 dBA CNEL/L_{dn} as the basic limit of acceptable noise exposure for residential and other noise-sensitive land uses. For instance, with respect to aircraft noise, both the Federal Aviation Administration and the State of California have identified a noise level of 65 dBA L_{dn} as the dividing point between normally compatible and normally incompatible residential land use generally applied for determination of land use compatibility. For noise-sensitive land uses exposed to aircraft noise, noise levels exceeding 65 dBA CNEL/L_{dn} are considered to cause a potentially significant increase in levels of annoyance.

Allowing for an average exterior-to-interior noise reduction of 20 dB, an exterior noise level of 65 dBA CNEL/L_{dn} would equate to an interior noise level of 45 dBA CNEL/L_{dn}. An interior noise level of 45 dB CNEL/L_{dn} is considered sufficient to protect against activity interference at most noise-sensitive land uses, including residential dwellings, and would also be sufficient to protect against sleep interference (AMBIENT, 2026)

The cumulative noise exposure metric is currently the only noise metric for which there is a substantial body of research data and regulatory guidance defining the relationship between noise exposure, people's reactions, and land use compatibility. However, when evaluating environmental noise impacts involving intermittent noise events, such as aircraft overflights and train pass byes, the use of cumulative noise metrics may not provide a thorough understanding of the resultant impact. The general public often finds it difficult to understand the relationship between intermittent noise events and cumulative noise exposure metrics. In such instances, supplemental use of other noise metrics, such as the L_{eq} or L_{max} descriptor, may be helpful as a means of increasing public understanding regarding the relationship between these metrics and the extent of the resultant noise impact.

4.11.1.2 Project Site Setting

NOISE-SENSITIVE RECEPTORS

Noise-sensitive land uses include those where noise exposure could result in health-related risks to individuals. Noise-sensitive land uses also include places where a quiet atmosphere is an essential element of their intended purpose. Residential dwellings are generally of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Land uses

such as parks, historic sites, cemeteries, and recreational areas are also sensitive to increases in exterior noise levels. Furthermore, schools, churches, hotels, libraries, and other places where low interior noise levels are essential are noise-sensitive land uses.

The nearest noise-sensitive land uses to the project site consist predominantly of on-campus student housing. The nearest student housing is located approximately 1,500 feet northeast of the stadium along Divarty Street. In addition, a child day-care facility is located approximately 900 feet north of the stadium, along 3rd Avenue. The nearest residential land uses are located approximately 2,366 feet (0.45 miles) south of the project site along Gigling Road in Seaside and 2,900 feet (0.55 miles) north of the project site near 8th Street in Marina (i.e., The Dunes). Additionally, new planned residential areas (i.e., Campus Town Specific Plan) are planned and under construction south of the project site between Lightfighter Drive and Gigling Road. Once completed, new residential units would be located approximately 990 feet south of the proposed project site (AMBIENT, 2026).

AMBIENT NOISE ENVIRONMENT

To document existing ambient noise levels in the project area, short-term ambient noise measurements were conducted on January 14, 2026, using a Larson Davis Laboratories Type I, LxT integrating sound-level meter. The meter was calibrated before use and is certified to comply with Acoustical National Standards Institute specifications. **Table 4.11-3** summarizes measured ambient daytime noise levels.

Table 4.11-3
Summary of Measured Ambient Noise Levels

Location	Monitoring Period	Measured Daytime Noise Levels	
		L_{eq}	L_{max}
1. West of the proposed project site. Near 2nd Avenue. Approximately 70 feet from roadway edge.	14:10-14:20	57.3	77.8
2. Northwest of the proposed project site. Near Divarty Street on Division Hill. Approximately 55 feet from Divarty Street.	14:35-14:45	52.2	71.5
3. Northeast of the proposed project site. Approximately 15 feet from Divarty Street. Approximately 225 feet east of General Jim Moore Boulevard.	15:05-15:15	53.5	74.9
4. Approximately 352 feet east of General Jim Moore Boulevard.	15:35-15:45	54.1	69.4

Source: AMBIENT, 2026.

[1] AMBIENT noise measurements were conducted on January 14, 2026, using a Larson Davis Laboratories, Type 1, Model LxT integrating sound level meter placed at a height of five (5) feet.

Based on the measurements conducted, daytime average-hourly noise levels in the project vicinity ranged from the low to upper-50s (in dBA L_{eq}). Ambient noise levels within the project area are predominantly influenced by vehicle traffic on area roadways. The predominant noise source on the CSUMB campus, and, more specifically, at the proposed project site, is motor vehicle traffic along Highway 1, as well as on local roads including 2nd Avenue, Inter-Garrison Road, Lightfighter Drive, and Imjin Parkway. Aircraft activities at the Marina Municipal Airport and Monterey Peninsula Regional Airport do not significantly

affect the site since the approach and takeoff areas are over rural areas to the north and south of the CSUMB campus.

Ambient noise levels during the evening and nighttime hours are generally 5-10 dB lower than daytime noise levels.

4.11.1.3 Vibration Characteristics

Similar to noise, vibration involves a source, a transmission path, and a receiver. While vibration is related to noise, it differs in that noise is considered to be pressure waves transmitted through air, whereas vibration consists of the excitation of a structure or surface. As with noise, vibration consists of amplitude and frequency. A person's perception of the vibration will depend on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating. Vibration may be measured in terms of acceleration, velocity, or displacement. Measurements in terms of velocity are expressed as peak particle velocity (PPV) with units of inches per second (in/sec).

No major existing sources of groundborne vibration are in the project area. Vehicle traffic on area roadways, particularly heavy-duty trucks, can result in increased groundborne vibration. However, groundborne vibration levels associated with vehicle traffic are typically minor.

4.11.2 Regulatory Environment

4.11.2.1 Federal

FEDERAL TRANSIT ADMINISTRATION

Guidance from the Federal Transit Administration (FTA) recommends the following daytime standards when evaluating potential construction noise impacts: at residential land uses, no more than 80 dBA Leq energy-averaged over an eight (8)-hour period; and for a commercial land use, or similar space where occupancy is limited to daytime hours (e.g., classroom), the acceptable exterior threshold is 85 dBA Leq. These standards are especially applicable when other specific quantitative standards are lacking (FTA, 2006).

4.11.2.2 State

CALIFORNIA DEPARTMENT OF TRANSPORTATION – TRANSPORTATION AND CONSTRUCTION GUIDANCE MANUAL

There are no federal, state, or local regulatory standards for groundborne vibration. However, Caltrans provides practical guidance to engineers, planners, and consultants who address vibration associated with Caltrans projects in the *Transportation and Construction Vibration Guidance Manual* (Caltrans, 2020). In this manual, Caltrans recommends 0.5 inches per second PPV as a threshold for avoiding structural damage to newer residential buildings exposed to groundborne vibration. For transient vibration events, such as blasting, the damage risk threshold is 1.0 inches per second PPV at the same type of newer residential structures. These guidelines provide stricter thresholds for old structures. For example, Caltrans recommends a vibration threshold of 0.3 inches per second PPV for continuous and intermittent vibration sources and 0.5 inches per second PPV for transient vibration events (Caltrans, 2020). Additionally, Caltrans guidance indicates that building occupants exposed to continuous groundborne

vibration would experience annoyance at 0.2 inches per second PPV and feel unpleasant at 0.4 inches per second PPV. **Table 4.11-4** depicts Caltrans's full vibration damage potential threshold criteria, and **Table 4.11-5** summarizes human reaction to a range of vibration levels.

Table 4.11-4
Guideline Vibration Damage Potential Threshold Criteria

Structure and Conditions	Transient Sources (Maximum PPV [in/sec])	Continuous/Frequent and Intermittent Sources (Maximum PPV [in/sec])
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans, 2020.

Table 4.11-5
Summary of Groundborne Vibration Levels and Potential Effects

Vibration Level (in/sec ppv)[1]	Human Reaction
0.006-0.019	Threshold of perception; possibility of intrusion.
0.08	Vibrations readily perceptible.
0.10	Level at which continuous vibrations begin to annoy people.
0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relatively short periods of vibrations).
0.30-0.60	Vibrations become distinctly perceptible at 0.04 in/sec ppv and considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges.

Source: Caltrans 2020

[1] The vibration levels are based on peak particle velocity in the vertical direction for continuous vibration sources, which includes most construction activities.

While the Caltrans guidance thresholds are not explicit regulations, these thresholds provide verifiable, quantitative standards in the absence of local jurisdiction limits.

CALIFORNIA BUILDING CODE

The California Building Code regulates environmental noise intrusion into new single- and multi-family housing. Interior noise levels attributable to exterior sources shall not exceed 45 L_{dn}. Residential buildings proposed where exterior noise levels exceed 60 L_{dn} require an acoustical analysis demonstrating that the proposed design will maintain interior noise levels at or below 45 L_{dn}.

CONTRACT GENERAL CONDITIONS FOR COLLABORATIVE DESIGN-BUILD MAJOR PROJECTS

The CSU Office of the Chancellor provides the Contract General Conditions for Collaborative Design-Build Major Projects, which include sound control measures for construction projects. These measures require the design-builder to 1) comply with all sound control and noise level rules, regulations, and ordinances that apply to the project; 2) minimize disruption to others due to sound and noise in the absence of specific rules, regulations, and ordinances; 3) prevent construction noise from exceeding 65 dB on the project site between 7:00pm and 7:00am; 4) prevent construction noise from exceeding 85 dB at the project site between 7:00am and 7:00pm without consent of the university; 5) use noise dampening technology on all construction equipment (e.g., equip vehicles with mufflers); and 6) schedule loading and unloading of construction materials to minimize disruptions to university activities (CSU, 2025).

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The *2022 CSUMB Master Plan Guidelines* include the following policy relevant to the proposed project for addressing noise and vibration (CSU, 2022b):

DT 2.25 Incorporate noise dampening measures to reduce the impact of noise-generating equipment at grade.

4.11.2.3 Local

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside or City of Marina. However, this document summarizes General Plan guidelines and goals and municipal code policies relevant to development-related noise from both cities for information purposes only, to provide context for the analysis of potential impacts from noise and vibration.

CITY OF SEASIDE'S GENERAL PLAN

The City of Seaside's General Plan – Land Use Element defines noise compatibility guidelines for determining whether a proposed land use is compatible with existing noise environment or whether additional noise reduction measures are necessary. These noise standards represent the maximum acceptable average-daily noise level, which are used to determine noise impacts for new land uses. **Table 4.11-6** summarizes the City of Seaside's interior and exterior noise standards, and **Table 4.11-7** summarizes the City of Seaside's land use compatibility matrix.

Table 4.11-6
City of Seaside's Interior and Exterior Noise Standards

Land Use	Exterior (CNEL)	Interior (CNEL)
Residential	65 dBA	45 dBA
Mixed Use Residential	70 dBA	45 dBA
Commercial	70 dBA	--
Office	70 dBA	50 dBA
Industrial	75 dBA	50 dBA
Public Facilities	70 dBA	50 dBA
Schools	50 dBA	50 dBA

Source: City of Seaside, 2024

Table 4.11-7
City of Seaside's Noise/Land Use Compatibility Matrix – Noise Contours and Noise Impact Areas

Land Use Type	CNEL 55	CNEL 60	CNEL 65	CNEL 70	CNEL 75	CNEL 80
Residential – Single Family, Multifamily, Duplex	A	B	B	C	--	--
Residential – Mobile Homes	A	B	C	C	--	--
Transient Lodging – Motels, Hotels	A	B	B	C	C	--
Schools, Libraries, Churches, Hospitals, Nursing Homes	A	B	C	C	--	--
Auditoriums, Concert Halls, Amphitheaters, Meeting Halls	B	C	C	--	--	--
Sports Arenas, Outdoor Spectator Sports, Amusement Parks	A	A	B	B	--	--
Playgrounds, Neighborhood Parks	A	A	B	C	--	--
Golf Courses, Riding Stables, Cemeteries	A	A	A	B	C	C
Office and Professional Buildings	A	A	B	B	C	--
Commercial Retail, Banks, Restaurants, Theaters	A	A	A	B	B	C
Industrial, Manufacturing, Utilities, Wholesale, Service Stations	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A

Source: City of Seaside, 2024

A Normally Acceptable- Specified land use is satisfactory based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

B Conditionally Acceptable- New construction or development should be undertaken only after a detailed analysis of the noise requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

C- Normally Unacceptable- New construction or development should generally be discouraged. If it does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

-- Clearly Unacceptable – New construction or development should generally not be undertaken.

Furthermore, the City of Seaside's General Plan include the following relevant policies (City of Seaside, 2024).

Goal N-1: Appropriate noise environments that are compatible with existing and proposed land uses based on guidelines provided in the Noise Element.

Noise standards. Adopt, maintain, and enforce planning guidelines that establish the acceptable noise standards identified in Table 17 (please refer to **Table 4.11-6** above).

Compatible development. Assess the compliance of individual developments, including new development and reuse/revitalization projects, with noise land use compatibility standards in Table 18 (**Table 4.11-7** above). Where proposed projects are not located in an area that is "clearly compatible," the City may require that an acoustical study be prepared as a condition of building permit approval demonstrating compliance with the noise standards shown in Table 17 (please refer to **Table 4.11-6** above).

Noise sensitive land uses. Protect noise-sensitive land uses or sensitive receptors, including residences, schools, hospitals, libraries, established religious gatherings, convalescent homes, community open spaces and recreation areas, and sensitive wildlife habitat on former Fort Ord lands, from high noise levels emitted by both existing and future noise sources.

SEASIDE MUNICIPAL CODE

The City of Seaside Municipal Code, Chapter 9.12, includes standards, prohibitions and exemptions for noise generated by non-transportation noise sources. Accordingly, construction noise is prohibited before 7:00 a.m. or after 7:00 p.m. daily except Saturday, Sunday, and holidays when the prohibited time is before 9:00 a.m. and after 7:00 p.m. The use of amplified sound systems is typically limited to between the hours of 7:00 a.m. and 10:00 p.m.

MARINA GENERAL PLAN

The City of Marina's General Plan defines maximum allowable noise standards by land use. **Table 4.11-8** summarizes these standards.

Table 4.11-8
City of Marina Allowable Noise Standards Measured in L_{dn} (dBA)

Land Use Category	Maximum Exterior	Maximum Exterior	Maximum Interior
	Acceptable	Conditionally Acceptable	
Residential	60	70	45
Live/Work	65	75	50
Hotel/Motel	65	75	50
Office	67	77	55
Other Commercial	70	80	60
Industrial/Agriculture	70	80	60
Schools, Libraries, Theaters, Churches, Nursing Homes	60	70	45
Parks and Playfields	65	70	N/A
Golf Courses, Riding Stables, Cemeteries	70	75	N/A

Source: City of Marina, 2000

Additionally, the City of Marina establishes maximum allowable noise levels for stationary noise sources at the property lines of residences and other noise-sensitive receptors as follows (City of Marina, 2000):

- Daytime (7 a.m. – 10 p.m.) – 50 dB hourly L_{eq}, 70 dBA Lmax; and,
- Nighttime (10 p.m. – 7 a.m.) – 45 dB hourly L_{eq}, 65 dBA Lmax

4.11.3 Methodology

AMBIENT conducted a noise and groundborne vibration impact analysis for the proposed project (please refer to **Appendix F**). AMBIENT evaluated short-term construction noise impacts using representative noise levels for typical off-road equipment derived from the Federal Highway Administration (FHWA) Road Construction Noise Model, with assumptions based on average equipment usage rates and the simultaneous operation of the two (2) loudest pieces of equipment identified through CalEEMod emissions modeling. Predicted noise levels were assessed at the nearest noise-sensitive land uses based on distance attenuation. Long-term operational noise associated with on-site events was modeled using the SoundPlan computer model, assuming conservative peak hourly noise levels (approximately 87 dBA Leq at 100 feet) associated with amplified sound during concert-type events, and event durations occurring between 7:00 a.m. and 10:00 p.m. consistent with CSUMB or adjacent cities (e.g., City of Seaside and City of Marina) noise standards. The analysis considered both existing and planned noise sensitive receptors. Traffic-related noise increases were evaluated qualitatively based on the project Transportation Study (**Appendix G**). Groundborne vibration from construction was quantitatively assessed using equipment-based vibration source levels from Caltrans guidance, while operational vibration was evaluated qualitatively.

4.11.4 Impacts and Mitigation

4.11.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would result in significant impacts related to noise and vibration if it would:

a. generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b. generation of excessive groundborne vibration or groundborne noise levels; or

c. for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

4.11.4.2 Impacts and Mitigation Measures

Impact NV-1: The proposed project would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established

in the local general plan or noise ordinance, or applicable standards of other agencies (criterion a).

Expanded Use

The proposed expanded use would increase the number and frequency of athletic and non-athletic events at the existing CSUMB Stadium. Specifically, the expanded use would increase the athletic and non-athletic events from 34 to 91 annually. The events associated with the proposed expanded use are illustrated in **Table 4.11-9** below.

Table 4.11-9
Summary of New CSUMB and MBFC Athletic and Non-Athletic Events

Event	# of Events	# of Attendees
CSUMB		
Men's CCAA Championships	3 events over 2 days	300 spectators
Women's CCAA Championships	3 events over 2 days	300 spectators
Men's NCAA Division II National Championships	3 events over 5 days	400 spectators
Women's NCAA Division II National Championships	3 events over 5 days	400 spectators
Latinx Affinity Ceremonies	1	2,000
Monte's 5k and post-race	1	1,200
New Student Fall Convocation	1	2,000
Fall and Spring Concerts	2	2,000 (per event)
OC3 Affinity Celebration	1	2,500
Relay for Life	1	6,000
Additional Events	25	2,000 (per event)
MBFC		
USL Super League	12 events over 10 days	4,000 spectators
USL League Two	7 events over 7 days	300 spectators
USL W League	7 events over 7 days	300 spectators
Winter Festival	1	3,000 (per event)
Weekend Concerts	20	6,000 (per event)

Noise sources associated with these events would include spectator noise, the use of amplified public address and amplified sound systems, and an increase in vehicle traffic on adjacent roadways. Each is discussed below.

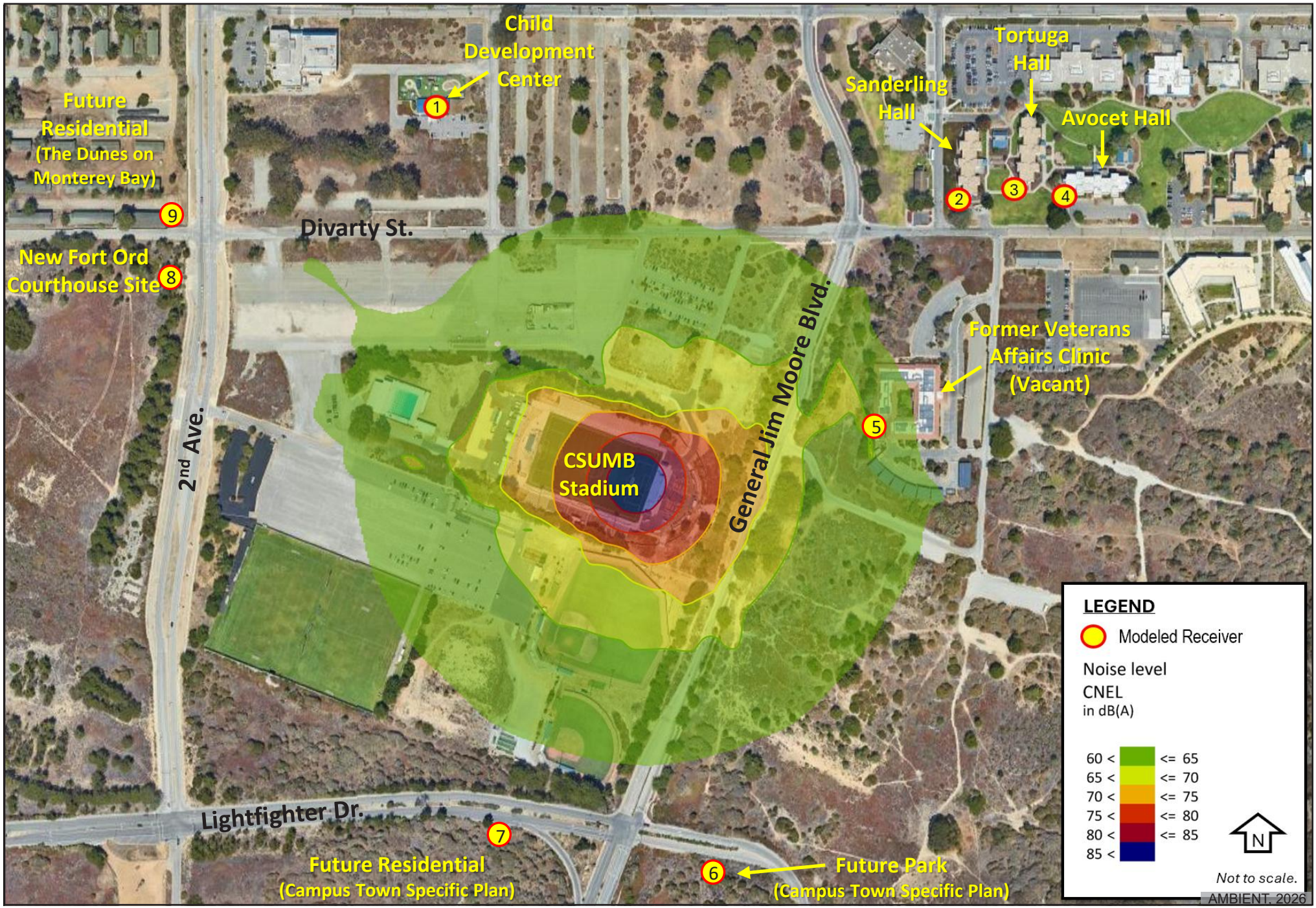
Amplified Public Address and Sound System Noise

The Noise & Groundborne Vibration Impact Analysis states that noise levels associated with events are dependent on the size of the spectator crowd and the frequency of use associated with amplified sound systems (i.e., public address systems and amplified music). Noise levels from athletic events can range from less than 70 dBA L_{eq} for smaller events (e.g., practices and competitive events having less than 1,500 spectators) to roughly 75 dBA L_{eq} for larger events, such as competitive athletic events having an estimated 6,000 spectators (AMBIENT, 2026). Based on representative noise measurements conducted at an outdoor concert event, which included the use of an amplified sound system and a mix of contemporary/pop, country, and alternative rock music, measured noise levels averaged approximately 87 dBA L_{eq} at approximately 100 feet in front of the stage (AMBIENT, 2026).

To be conservative, the Noise & Groundborne Vibration Impact Analysis evaluated noise generated from events generating the highest anticipated on-site noise levels. These events would be associated with the proposed concerts (i.e., Winter Festival and weekend concerts, please refer to **Table 4.11-9** above). The analysis modeled concert-related noise levels based on an average of 87 dBA L_{eq} at approximately 100 feet. The Noise & Groundborne Vibration Impact Analysis modeled two (2) scenarios: one (1) scenario included an individual concert occurring during the evening hours of 7:00 p.m. to 10:00 p.m., and the second included an all-day concert occurring between the hours of 7:00 a.m. to 10:00 p.m., consistent with the hourly limitations noted in Section 9.12.030 of the City of Seaside's Municipal Code for the use of amplified sound systems (AMBIENT, 2026). As stated, CSUMB is not subject to local noise ordinances; however, noise ordinances from the City of Seaside Municipal Code were used in the Noise & Groundborne Vibration Impact Analysis to determine significance at nearby noise sensitive land uses. Additionally, this EIR considers the City of Marina's noise standards for noise sensitive land uses located in the City of Marina in proximity to the project site.

To maintain a conservative approach, the Noise & Groundborne Vibration Impact Analysis assumed each concert event would occur continuously during the time periods noted (i.e., continuous and consistent noise levels between 7:00 p.m. and 10:00 p.m. for the first scenario and 7:00 a.m. and 10:00 p.m. for the second scenario). Predicted noise levels for the evening concert and all-day music festival at nearby noise-sensitive land uses are summarized in **Table 4.11-10**. Predicted noise contours for the evening concert and all-day music festival are depicted in **Figure 4.11-1** and **Figure 4.11-2**. In comparison to ambient noise levels, noise generated by on-site events could be detectable at nearby noise-sensitive land uses. Noise generated by larger events, such as concerts, could result in a substantial increase in ambient noise levels. However, as noted in **Table 4.11-10**, predicted noise levels for the Winter Festival and weekend concerts would not exceed the City of Seaside's or the City of Marina's noise standards at nearby noise-sensitive land uses. Noise levels associated with other on-site events, including athletic practices and competitive events, would be less than those generated during evening concerts and all-day music festivals.

As discussed in **Section 4.11.1.2**, the Campus Town Specific Plan area is currently under construction in the City of Seaside and would introduce new residential units as close as 990 feet from the project site. These planned residential units would be located south of the project site and across Lightfighter Drive. The majority of the Campus Town Specific Plan area is outside of the modeled noise contours contained in **Appendix F**, and the areas within the contours would experience noise levels less than 60 dBA and, therefore, remain below the City of Seaside's residential noise standard of 65 dBA. Similarly, future residences associated with the Dunes development in the City of Marina are outside of the 60 dBA noise contour. Therefore, operational noise generated by the proposed expanded use of the stadium would remain below the City of Marina's residential noise standard of 60 dBA (please also refer to **Figure 4.11-1** and **Figure 4.11-2**). Regardless, noise generated by the expanded use would not exceed the thresholds set by the City of Seaside or City of Marina, as used as the threshold of the analysis. For these reasons, the proposed project would have a less than significant impact with respect to noise generation.



Title: Predicted Operational Noise - Evening Concerts

Date	4/22/2026
Scale	N/A
Project	2024-84
Revised	7/27/2026

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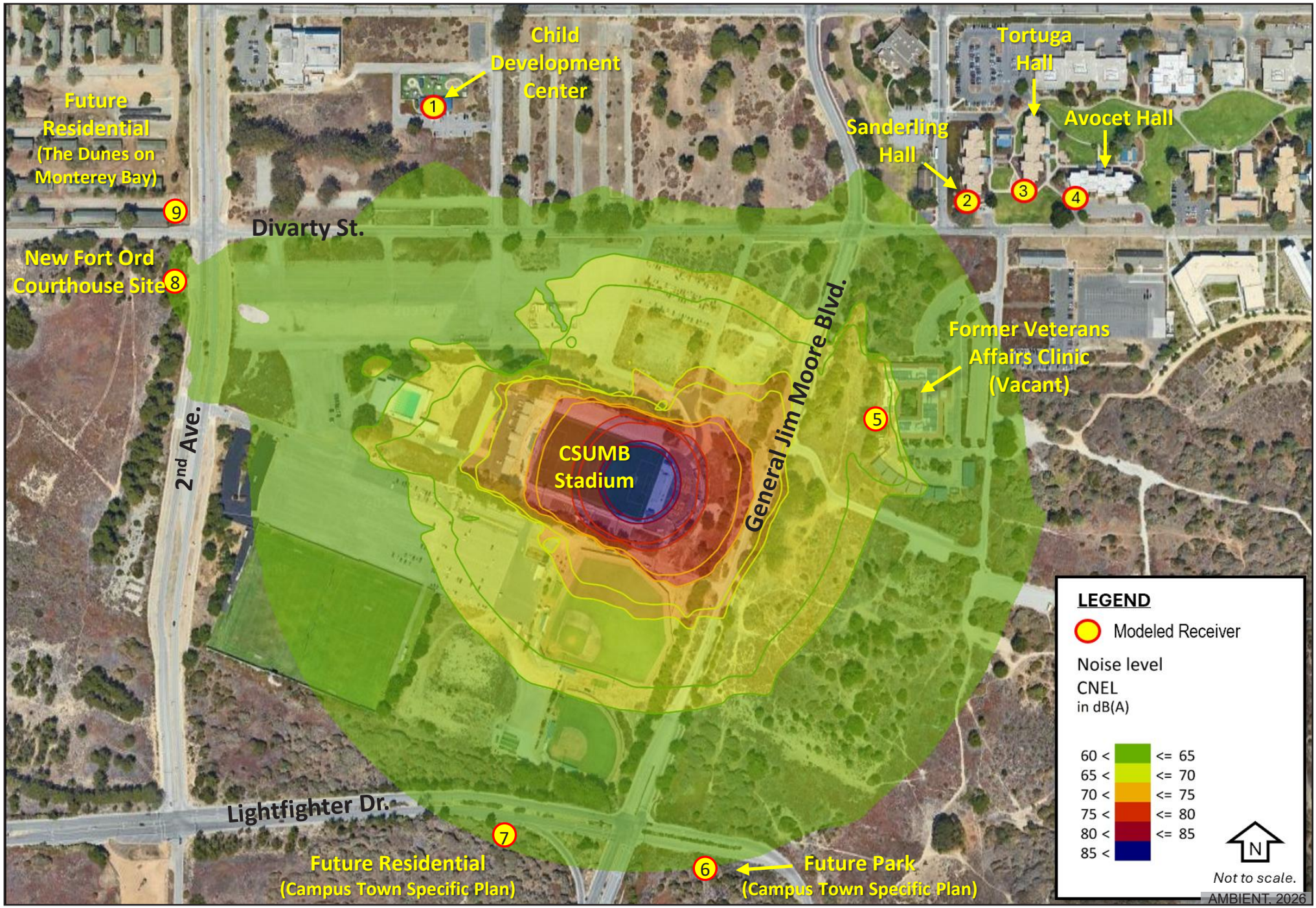
Figure
4.11-1



Title: Predicted Operational Noise - All Day Festival	Date 4/22/2026 Scale N/A Project 2024-84 Revised 7/27/2026	Monterey | San Jose Denise Duffy and Associates, Inc. Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 4.11-2

Table 4.11-10
Predicted Operational Noise Levels at Nearby Land Uses (dBA CNEL)

Event	Receiver 1	Receiver 2	Receiver 3	Receiver 4	Receiver 5	Receiver 6	Receiver 7	Receiver 8	Receiver 9
Evening Concert[2]	54	56	55	53	65	57	58	58	56
All-Day Music Festival[3]	57	59	58	56	68	60	61	61	60
Existing Land Use	Child Daycare	Student Housing	Student Housing	Student Housing	Vacant[4]	Future Park[5]	Future Residential[5]	~~Future Hotel~~ New Fort Ord Courthouse[5]	Future Commercial Space[5,7]
City of Seaside's Noise Standards[6]	--	65	65	65	70	70	65	65	--
City of Marina's Noise Standards[8]	60	--	--	--	--	--	--	--	67
Exceeds Noise Standards?	No	No	No	No	No	No	No	No	No

Source: AMBIENT, 2026

1 Noise levels were calculated assuming continuous hourly operations for the scenario periods modeled. Based on an average-hourly noise level of 87 dBA at 100 feet from the stage. To be conservative, noise source directionality was not applied. Modeled receiver locations and predicted noise contours for evening and all-day events are depicted in **Figures 4.11-1** and **4.11-2**. Predicted noise levels for other onsite events (e.g., practices, tournaments) would be less.

2 Evening concert assumes amplified musical concert between the hours of 7:00 p.m. and 10:00 p.m.

3 All-day festival assumes amplified musical concert between the hours of 7:00 a.m. and 10:00 p.m.

4 Site is currently vacant. Potential future mixed-use transition center assumed (AMBIENT, 2026).

5 Future land uses are based on development plans for the Campus Town Specific Plan, The Projects at Main Gate Specific Plan, the New Fort Ord Courthouse, and The Dunes on Monterey Bay. Modeled receivers were placed at the nearest noise-sensitive land use planned for future development.

6 Based on the City of Seaside General Plan exterior noise standards (please refer to **Table 4.11-6**). To be conservative, student residence halls and ~~future hotel~~ New Fort Ord Courthouse (Receivers 2 through 4, 7, and 8) were based on the City's residential noise standard. Receiver 5, planned for future development of the veterans' transition center was based on the City's residential mixed-use noise standard.

7 Receiver 9 is mislabeled as "Future Residential." While Receiver 9 is within the Dunes on Monterey Bay development area, this site is listed as an employment center in the University Village Specific Plan (City of Marina, 2005). Furthermore, the City of Marina currently designates this location for commercial and retail/service land uses (City of Marina, 2011; City of Marina, 2026).

8 City of Marina Noise standards are included in **Table 4.11-8** above. These standards are applicable to the modeled receivers located at land uses within the City of Marina (Receivers 1 and 9). To be conservative, the evaluation of child daycare is based on the City's residential noise standard.

Transportation-Related Noise Impacts

In addition to noise generated from operation of the stadium, the Noise & Groundborne Vibration Impact Analysis also considered noise generated from users traveling to and from the stadium. The analysis reviewed the traffic analysis prepared by Fehr & Peers (please refer to **Section 4.14, Transportation**, and **Appendix G**). For context, **Table 4.11-11** provides existing ambient traffic noise in the vicinity of the project site. A doubling of roadway traffic would cause a three (3) dB increase in existing roadway noise levels. If a doubling of traffic were to occur, the maximum expected traffic-generated noise levels would range from 80.8 dBA to 71.4 dBA. As shown in **Table 4.11-6**and **Table 4.11-8**, the maximum exterior noise levels for residential land uses in the City of Seaside and City of Marina are 65 dBA and 70 dBA, respectively.

Table 4.11-11
Noise & Traffic Measurements

Measurement Location	Nearest Noise Sensitive Receptors Potentially Affected	Primary Noise Source	Measured Noise Levels	
			L_{eq}	L_{max}
Near 2nd Avenue, 70 feet from the roadway.	Planned Residential – The Dunes, 20 feet from the roadway.	Vehicles on roadway	57.3	77.8
Near Divarty Street, on Division Hill, 55 feet from the roadway.	Child daycare facility, 250 feet from the roadway.	Vehicles on roadway	52.2	71.5
Near Divarty Street, 225 feet east of General Jim Moore Boulevard, 15 feet from the roadway	CSUMB student housing, 104 feet from the roadway.	Vehicles on roadway	53.5	74.9
East of General Jim Moore Boulevard near former Veterans Affairs Clinic (vacant), 352 feet from General Jim Moore Boulevard.	Former Veterans Affairs Clinic (vacant), 220 feet from the roadway.	Vehicles on roadway	54.1	68.4

Source: AMBIENT, 2026

The proposed expanded use of the stadium would increase the number of vehicle trips associated with staff and participants traveling to and from the stadium. Depending on the average vehicle ridership, average daily vehicle trips for most events, excluding larger non-athletic events, would be approximately 200 to 300 vehicle trips/day. Vehicle trips associated with these smaller events would not be anticipated to result in a doubling of vehicle traffic along area roadways. However, larger events, such as the weekend concerts and Winter Festival, could generate daily trips of approximately 4,000 trips/day, or more. Vehicle trips associated with larger events, such as the weekend concerts and Winter Festival, could result in a substantial increase in average-daily traffic noise levels along the roadways as identified in **Table 4.11-11.** Noise generated by traffic could exceed the City of Seaside and City of Marina's noise standards at nearby noise-sensitive land uses. As identified in **Section 4.11.1.2**, noise-sensitive land uses potentially impacted by traffic-generated noise would include: student housing located approximately 1,500 feet northeast of the stadium along Divarty Street; a child daycare facility located approximately 900 feet north of the stadium, along 3rd Avenue; existing residential land uses located approximately 2,366 feet (0.45 miles) south of the project site along Gigling Road in Seaside and 2,900 feet (0.55 miles) north of the project site near 8th Street in Marina (i.e., The Dunes); and new planned residential areas (i.e., Campus Town Specific

Plan) located approximately 990 feet south of the proposed project site between Lightfighter Drive and Gigling Road (AMBIENT, 2026). Exceeding the local noise standards would constitute a potentially significant impact regarding generation of a substantial increase in ambient noise levels.

CSUMB and MBFC are required to implement a TMP and TDM for the lifetime of the project as stated in the MMRP from the Freeman Stadium Renovations Project, and discussed in **Section 4.14, Transportation**. Therefore, the TMP's transportation demand management measures would continue to be implemented in association with the proposed project. Please refer to **Mitigation Measure TR-1** through **Mitigation Measure TR-6** in **Section 4.14, Transportation**. The purpose of this plan is to shift travel mode share away from single-occupancy vehicle use and towards safe and convenient non-automotive modes of transportation. However, as activities grow, an increase in vehicle trips would still be anticipated to occur (Fehr & Peers, 2026). There are no additional feasible mitigation strategies available to CSUMB to reduce transportation impacts to a less than significant level. Therefore, noise generated from the increase in traffic trips would be considered significant and unavoidable.

Stadium Improvements

Construction and operation of the proposed stadium improvements have the potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of local noise standards. The City of Seaside has not adopted noise standards that apply to short-term construction activities. However, based on screening noise criteria recommended by FTA, construction activities would generally be considered to have a potentially significant impact if average-hourly daytime noise levels exceed 80 dBA L_{eq} at noise-sensitive land uses, such as residential land uses (FTA, 2006). Likewise, construction activities would be considered to have a potentially significant impact if average-hourly nighttime noise levels exceed 70 dBA L_{eq} at noise-sensitive land uses (AMBIENT, 2026). Construction-generated noise levels that would result in a substantial increase in ambient noise levels that would exceed these daytime or nighttime noise standards (80 dBA Leq and 70 dBA Leq, respectively) would be considered to have a potentially significant impact regarding noise generation.

Construction

Construction activities would consist of installation of the locker room and shower facilities and permanent restroom facilities, and site clearing and grading for the gated event storage and staging area. **Table 4.11-12** summarizes noise levels associated with construction equipment anticipated to be used during construction.

Table 4.11-12
Typical Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source	
	L_{max}	L_{eq}
Air Compressor	78	74
Backhoe	78	74
Crane, Mobile	81	73
Dozer	82	78
Loader	79	71
Forklift/Gradall	79	83
Plate Compactor	83	76

Source: AMBIENT, 2026

As noted in **Table 4.11-12**, instantaneous noise levels generated by off-road construction equipment range from approximately 78 to 82 dBA L_{max} at 50 feet (AMBIENT, 2026). Typical operating cycles may involve two (2) minutes of full power, followed by three (3) or four (4) minutes at lower settings. Based on typical off-road construction equipment usage rates, average-hourly noise levels for individual equipment would be approximately 83 dBA L_{eq}, or less, at 50 feet.

The nearest noise-sensitive land uses include a child daycare facility, located approximately 900 feet northwest of the project site, and student housing located in excess of approximately 1,500 feet northeast of the project site. Based on the individual equipment noise levels noted in **Table 4.11-12** and assuming that all equipment was to operate simultaneously over a one (1)-hour period, predicted average-hourly construction noise levels at the child daycare center would be approximately 58 dBA L_{eq}. Predicted construction noise levels at the nearest student housing, which is located approximately 1,500 feet from the project site, would be approximately 53 dBA L_{eq}. Additionally, construction has begun for the Campus Town Specific Plan project, which would introduce new residential units as close as 990 feet from the project site. These planned residential units would be slightly farther from the project site than the existing child daycare facility. In the event these planned homes are constructed and occupied prior to construction for the proposed stadium improvements, anticipated noise levels at the property line of these planned residential units would be approximately 58 dBA L_{eq}.

Depending on the construction activities being conducted and time of day, substantial increases in ambient noise levels could potentially occur for short periods of time. However, predicted construction-generated noise levels would not exceed the daytime or nighttime noise standard of 80 dBA L_{eq} or 70 dBA L_{eq}, respectively. For these reasons, the proposed project would have a less than significant impact regarding noise generation during construction.

Operation

Operational noise sources associated with the new locker room and shower facilities and permanent restroom facilities would consist of mechanical equipment, such as AC units and fans. Depending on the type and size of the units installed, operational noise levels associated with AC units and fans would generate noise levels of approximately 60 dBA L_{eq} at three (3) feet, or less. Assuming that each building would include an AC unit and exhaust fan, combined operational noise levels would be approximately 36 dBA L_{eq} at 100 feet. The operation of AC units and fans would be primarily limited to the daytime hours during onsite event operations. Operational noise associated with the storage and staging area would be generated by CSUMB and MBFC personnel and vehicles (e.g., standard trucks and vans) moving event equipment to and from the field. No stationary noise sources would be located at the proposed storage and staging area, and all noise generated at this site would be primarily limited to daytime hours during onsite event operations. Operational noise levels from the proposed stadium improvements would not result in a substantial increase in ambient noise levels that would exceed the City's noise standards and would be largely masked by event and traffic noise occurring within and adjacent to the stadium. Therefore, the operation of the proposed stadium improvements would have a less than significant impact regarding generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of local noise standards.

Mitigation Measures

Please refer to **Section 4.14, Transportation** for the full text of **Mitigation Measure TR-1** through **TR-6**.

Impact NV-2: The proposed project would not generate excessive groundborne vibration or groundborne noise levels (criterion b).

Expanded Use

The proposed expanded use of the stadium would not generate excessive groundborne vibration or groundborne noise levels as no construction activities are required beyond the proposed stadium improvements (please refer to the discussion below under **Stadium Improvements**). The increase in the number of and frequency of events annually at CSUMB Stadium would not generate excessive groundborne vibration or groundborne noise levels that would be perceptible to nearby sensitive receptors or that would potentially damage nearby structures. Therefore, the proposed expanded use would have a less than significant impact regarding the generation of excessive groundborne vibration or groundborne noise levels.

Stadium Improvements

The proposed stadium improvements would not generate excessive groundborne vibration or groundborne noise levels. Groundborne vibration levels associated with representative construction equipment are estimated to range from approximately 0.003 to 0.076 in/sec PPV at 25 feet (AMBIENT, 2026). The nearest off-site existing structures include other athletic facilities and support structures in the Athletics and Recreation District, including a swimming pool located approximately 216 feet from the project site, two (2) storage buildings associated with the adjacent baseball field located approximately 143 feet and 176 feet, respectively, to the south, and the baseball field office located approximately 370 feet to the south. The nearest sensitive receptor would be the child daycare facility located approximately 900 feet north from the project site. Furthermore, existing student housing is located approximately 1,500 feet north of the project site and planned residential units associated with the Campus Town Specific Plan project are currently under construction approximately 990 feet south of the project site. Assuming a maximum groundborne vibration level of 0.076 in/sec PPV at 25 feet, predicted groundborne vibration levels at these nearby land uses would be approximately 0.005 in/sec, or less. Predicted groundborne vibration levels at the nearest off-site structures associated with operational activities would not exceed commonly applied thresholds for potential structural damage or human annoyance (i.e., 0.5 and 0.2 in/sec ppv). Therefore, the proposed stadium improvements would have a less than significant impact regarding the generation of excessive groundborne vibration or groundborne noise levels.

Mitigation Measures

No mitigation is required for **Impact NV-2**.

Impact NV-3: The proposed project would not expose people residing or working in the project area to excessive noise levels as the project site is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport (criterion c).

Expanded Use

The proposed expanded use of the stadium would not occur within two (2) miles of an airstrip. The nearest airports include the Marina Municipal Airport, which is located approximately 2.8 miles northeast of the project site, and the Monterey Regional Airport, located approximately 4.6 miles to the southeast. The

project is not located within the predicted noise contour zones of these airports. Therefore, the proposed expanded use would not subject on-site individuals to potentially hazardous noise conditions associated with aircraft operations, nor would the proposed increase in the number and frequency of events affect airport operations. No impact would occur.

Stadium Improvements

Please refer to the discussion above under **Expanded Use**. The project site is not located within two (2) miles of an airstrip; therefore, construction and operation of the proposed stadium improvements would not subject on-site individuals to potentially hazardous noise conditions associated with aircraft operations, nor would the activities result from these improvements affect airport operations. No impact would occur.

Mitigation Measures

No mitigation is required for **Impact NV-3**.

4.11.5 Significance After Mitigation

Implementation of **Mitigation Measure TR-1** through **Mitigation Measure TR-6** would require the implementation of the TDM. The purpose of the TDM is to shift travel mode share away from single-occupancy vehicle use and towards safe and convenient non-automotive modes of transportation, which would reduce vehicle use and minimize vehicle-generated noise. However, as discussed above, implementation of these measures would not reduce traffic-related impacts to a less than significant level. Specifically, VMT generated by the proposed project would continue to exceed thresholds and the impact would remain significant and unavoidable. As a result, traffic-generated noise impacts would also remain significant and unavoidable.

4.11.6 References

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4.12 POPULATION AND HOUSING

This section provides an overview of existing conditions within the proposed project area that concerns local population and housing. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments were received concerning population and housing during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.12.1 Environmental Setting

4.12.1.1 Regional Overview

REGIONAL POPULATION

The Association of Monterey Bay Area Governments (AMBAG) is the MPO responsible for planning and overseeing regional planning efforts in Monterey, Santa Cruz, and San Benito counties. Such efforts include developing and maintaining a regional travel demand model, long range transportation planning and programming, and conducting regional growth forecasts. AMBAG adopted the *2022 Regional Growth Forecast* in June 2022, which provides projections through 2045. The growth forecast is based on employment as the primary driver for long-term population change at a regional scale (AMBAG, 2022). The 2022 Regional Growth Forecast projects that the region will add 65,500 jobs between 2015 and 2045 for a total of just over 442,800 jobs by 2045. Population will grow by approximately 107,500 people between 2015-2045 for a total population just under 869,800 in 2045. To accommodate population growth the region is projected to add approximately 42,200 housing units by 2045. AMBAG's growth projections account for special populations such as college students; but while reflected in the forecast, the projections are adjusted to reflect the shifting nature of campuses.

The 2022 CSUMB Master Plan Guidelines provide "baseline condition" population statistics for students, faculty, and staff members for the academic year 2016-2017. These statistics were used to forecast student and faculty member growth in the 2022 CSUMB Master Plan Guidelines. For the baseline academic year, 2016-2017, student enrollment was 7,021 students and the number of faculty and staff were 1,410 people. Between the baseline 2016-2017 academic year and 2035, CSUMB estimates a growth of 6,323 students and 1,036 faculty and staff members totaling 13,344 and 2,445 people, respectively. These totals include both full and part time students and faculty and staff members. The 2022 CSUMB Master Plan Guidelines projects totals for full time students and faculty and staff members as 12,700 students and 1,776 employees, respectively (CSU, 2022b). **Table 4.12-1** summarizes CSUMB's enrollment projections and **Table 4.12-2** summarizes CSUMB's faculty and staff projections.

Table 4.12-1
Summary of CSUMB's Enrollment Projections

Total Students (2016-2017)	Full Time Students Baseline Year (2016-2017)	Total Students Master Plan Buildout	Full Time Students Master Plan Buildout
7,021	6,634	13,344	12,700

Source: CSU, 2022a

Table 4.12-2
Summary of CSUMB's Faculty and Staff Projections

Total Faculty and Staff (2016-2017)	Full Time Faculty and Staff Baseline Year (2016-2017)	Total Faculty and Staff (Master Plan Buildout)	Full Time Faculty and Staff (Master Plan Buildout)
1,410	1,024	2,445	1,776

Source: CSU, 2022a

CSUMB shared growth projections for students, faculty, and staff with AMBAG at the time of preparation of the 2022 Master Plan EIR. During preparation of the 2022 Growth Forecast, CSUMB projected their enrollment to consist of 12,700 full-time equivalent students by 2045 (AMBAG, 2022). AMBAG estimates that the City of Seaside's population will increase by 13 percent, or 4,501 people, between 2015 and 2045, 535 of those being CSUMB students that reside within the CSUMB portion of the City of Seaside.[1] For the City of Marina, AMBAG forecasts the population will increase by 43 percent, or 8,987 people, between 2015 and 2045, with 4,787 of those being CSUMB students that reside within the CSUMB portion of the City of Marina. AMBAG also estimates that the population of unincorporated Monterey County will increase by six (6) percent, or 6,317 people, between 2015 and 2045, with zero of those being CSUMB students that reside within the CSUMB portion of Monterey County. AMBAG's total population forecast for CSUMB students between 2015 and 2045 anticipates an increase of 5,322 people, or 72 percent of the current student enrollment of CSUMB (AMBAG, 2022). **Table 4.12-3** summarizes AMBAG's subregional population forecast for the City of Seaside, City of Marina, unincorporated Monterey County, and CSUMB.

[1] These are students that live on campus but in the City of Seaside. AMBAG modifies the City of Seaside's total population by discounting the population that lives on the CSUMB campus.

Table 4.12-3
Summary of AMBAG's Subregional Population Forecast

Region	2015	2045	Change 2015-45 (Numeric)	Change 2015-45 (Percentage)
Seaside	33,815	38,316	4,501	13%
Marina	21,057	30,044	8,987	43%
Unincorporated Monterey County	104,009	110,326	6,317	6%
CSUMB (Seaside)	3,817	4,352	535	14%
CSUMB (Marina)	1,020	5,807	4,787	469%
CSUMB (Unincorporated Monterey County)	2,541	2,541	0	0%
CSUMB (Total)	7,378	12,700	5,322	72%

Source: AMBAG, 2022

EMPLOYMENT

The tri-county area had approximately 377,355 employment opportunities in 2015. AMBAG forecasts a total of approximately 442,824 employment opportunities in the region accounting for a 17 percent increase, or 65,489 new jobs (AMBAG, 2022). The Regional Growth Forecast projects employment opportunities in the City of Seaside to increase by 19 percent, or 1,876 jobs, between 2015 and 2045. For the City of Marina, AMBAG projects employment opportunities to increase by 18 percent, or 1,110 jobs, between 2015 and 2045. Additionally, AMBAG projects employment opportunities to increase by 15 percent, or 8,633 people, between 2015 and 2045 in unincorporated Monterey County (AMBAG, 2022). **Table 4.12-4** summarizes AMBAG's subregional employment forecast for the City of Seaside, City of Marina, and unincorporated Monterey County.

Table 4.12-4
Summary of AMBAG's Subregional Employment Forecast

Region	2015	2045	Change 2015-45 (Numeric)	Change 2015-45 (Percentage)
Seaside	9,667	11,543	1,876	19%
Marina	6,107	7,217	1,110	18%
Unincorporated Monterey County	55,762	64,395	8,633	15%

Source: AMBAG, 2022

REGIONAL HOUSING

In 2015, AMBAG notes that the tri-county area had 262,660 housing units available. AMBAG anticipates construction of approximately 42,200 housing units by 2045, of which AMBAG expects 62 percent, or 27,430 housing units, would occur in Monterey County (AMBAG, 2022). Additionally, AMBAG forecasts the number of housing units to increase by 21 percent, or 2,279 housing units, between 2015 and 2045 in the City of Seaside. For the City of Marina, AMBAG projects the number of housing units to increase by 32 percent, or 2,359 units, between 2015 and 2045. For unincorporated Monterey County, AMBAG projects the number of housing units to increase by 7 percent, or 2,625 units, between 2015 and 2045. AMBAG

also forecasts an increase in the number of housing units of 106 percent, or 948 housing units, available to CSUMB students across the Cities of Seaside and Marina as well as unincorporated Monterey County (AMBAG, 2022). **Table 4.12-5** summarizes AMBAG's subregional housing forecast for the City of Seaside, City of Marina, unincorporated Monterey County, and CSUMB.

Table 4.12-5
Summary of AMBAG's Subregional Housing Forecast

Region	2015	2045	Change 2015-45 (Numeric)	Change 2015-45 (Percentage)
Seaside	10,913	13,192	2,279	21%
Marina	7,334	9,693	2,359	32%
Unincorporated Monterey County	38,783	41,408	2,625	7%
CSUMB (Seaside)	886	966	80	9%
CSUMB (Marina)	0	76	76	--
CSUMB (Unincorporated Monterey County)	0	792	792	--
CSUMB (Total)	886	1,834	948	106%

Source: AMBAG, 2022

While AMBAG's 2022 Housing Forecast evaluates housing for CSUMB, it states that housing demand is still placed on surrounding cities and jurisdictions, and CSUMB's projected growth has placed pressure on surrounding jurisdictions who are actively working with the campus to meet demand through housing development plans in areas close to campus (AMBAG, 2022). CSUMB's 12,700 full-time enrollment goal would be supported by CSUMB's plans to provide 65 percent housing for all students and 65 percent of faculty and staff. As of 2016, CSUMB provided housing for 60 percent of students and 45 percent of faculty and staff (CSU, 2022a).

4.12.2 Regulatory Environment

4.12.2.1 Federal

METROPOLITAN PLANNING ORGANIZATION

The Federal-Aid Highway Act of 1962 mandated the formation of MPOs. MPOs provide local elected officials input into the use of federal transportation funds in areas with populations exceeding 50,000 people, as determined by the U.S. Census. As such, MPOs oversee federal funding for transportation projects and programs in the planning process. AMBAG, formed in 1968, is a Joint Powers Authority governed by a 23-member Board of Directors from cities and counties across the tri-county region of San Benito, Santa Cruz, and Monterey counties. AMBAG oversees and manages transportation demand models and prepares regional housing, population, and employment forecasts for the tri-county area (AMBAG, 2025).

4.12.2.2 State

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The following 2022 CSUMB Master Plan Guidelines goals and policies provide context for the regional population and housing resources in the vicinity of the proposed project (CSU, 2022b):

Goal LU 2 House 60 percent of [Full Time Equivalent (FTE)] students and 65 percent of FTE staff and faculty

LU 2.6 Convert East Campus Housing to exclusive use by faculty, staff, students with families, and if space permits, Community Housing Partners.

4.12.2.3 Local

CITY OF SEASIDE'S GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis. The City of Seaside's General Plan includes the following relevant policies (City of Seaside, 2024):

Balanced Land Use. Maintain a land use pattern to support a broad range of housing choices, retail businesses, employment opportunities, educational and cultural institutions, entertainment spaces, and other supportive uses on former Fort Ord lands and within long-established Seaside neighborhoods.

Coordination with CSUMB. Strengthen the relationship between the City and Cal State University Monterey Bay, Marina, and other regional partners. Hold regular meetings with CSUMB to discuss plans for the "campus town" area.

MARINA GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Marina. However, this document summarizes goals and policies from the City of Marina's General Plan for information purposes only, to provide context for the analysis. The City of Marina's General Plan includes the following relevant policies (City of Marina, 2000):

Policy 2.31 It is the City of Marina's intent to promote construction of new housing that is environmentally and socially responsible and that adheres to the following policies:

- New housing shall accommodate a broad range of life-styles, including those associated with the presence of CSUMB and the MBEST Center, with people wishing to combine living and workspace, and with retired residents who will make up an increasing proportion of the region's population in the future.

- California State University at Monterey Bay should provide housing opportunities for both faculty and students in order to reduce commuter travel to and from the campus. The supply of on-campus housing should increase at least as fast as the level of on-campus enrollment.

Policy 2.97 Excluding portions of the CSUMB campus lying within the City of Marina's jurisdiction, another 60 acres of land is designated for use by educational institutions. This land allocation is largely the result of conveyances made in conjunction with the decommissioning of Fort Ord. Areas of the CSUMB campus located within the City of Marina's jurisdiction occupy approximately 222 acres.

4.12.3 Methodology

Population and housing impacts were evaluated based on a review of project characteristics, applicable land use designations, and relevant regional and local planning documents, including population and housing projections. The analysis considers whether the project would directly or indirectly induce substantial population growth, displace existing housing or residents, or result in the construction of replacement housing. The potential for growth inducement was assessed qualitatively by examining whether the project would introduce new housing, employment opportunities, or infrastructure that could facilitate additional development beyond that anticipated in adopted plans.

4.12.4 Impacts and Mitigation

4.12.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would have a significant population and housing impact if it would:

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.12.4.2 Impacts and Mitigation Measures

Impact PH-1: The proposed project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) (criterion a).

Expanded Use

The proposed expanded use of the existing stadium would not directly or indirectly induce population growth. The proposed expanded use consists of an increase in the number and frequency of events at the existing CSUMB Stadium. The expanded use of the stadium does not involve construction of any new housing or new infrastructure that would induce population growth. As discussed in **Chapter 3.0, Project**

Description, the CSUMB Stadium is currently used by both CSUMB and MBFC for collegiate and professional soccer matches, and campus-sponsored community events (e.g., Spring Commencement, concerts). Operation of the stadium for both CSUMB and MBFC events utilizes both CSUMB employees and Monterey County residents (employed and volunteers). MBFC matches currently require 20 full-time employees and 210 part-time match personnel; while CSUMB hosted events require 10-500 event personnel. The expanded use of the existing stadium would consist of CSUMB athletic and non-athletic events, in addition to existing events, and require an approximately 36 to 150 extra staff members. These personnel are assumed to be existing CSUMB employees and Monterey County residents. MBFC would introduce 69 new players and 16 new coaching and training staff members. No new staff is anticipated for MBFC match events, nor non-athletic events such as the Winter Festival. In summary, the proposed expanded use would introduce a total of 85 new persons to Monterey County, consisting primarily of new players, coaches, and training staff associated with the proposed USL soccer teams.

AMBAG's Subregional Employment Forecast accounts for an increase in employment opportunities of 1,876 jobs from 2015-2045. Although a total of 85 players, coaches, and training staff may relocate to the area, this number is not substantial compared to the overall projected increase in employment and would not induce substantial population growth in the area.

Attendance or spectator visitation associated with the expanded use would similarly not result in population growth. Event attendees would be associated with CSUMB and MBFC and either live in the tri-county area or temporarily visit the region for events. Therefore, the proposed expanded use of the existing stadium would have a less than significant impact with respect to population growth.

Stadium Improvements

The proposed stadium improvements would involve the construction and operation of locker room and shower facilities, permanent restroom facilities, and a storage and staging area. These improvements would not include new housing or infrastructure that would directly or indirectly induce population growth. While construction of the proposed stadium improvements would result in temporary employment opportunities for construction staff, construction workers are assumed to live and work in the tri-county region covered in AMBAG's Subregional Housing Forecast. Therefore, temporary construction staff would not contribute to substantial and unplanned population growth. General use of the facilities would be limited to attendees, players, students, faculty, and staff present during events. Therefore, the proposed stadium improvements would have a less than significant impact with respect to unplanned population growth.

Mitigation Measures

No mitigation is required for **Impact PH-1**.

Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (criterion b).

Expanded Use

The proposed expansion of use would not displace existing housing or people necessitating construction of replacement housing elsewhere. Rather, expanded use of the existing stadium would involve an increase in athletic and non-athletic events at the project site; no demolition or replacement of buildings

is proposed. The proposed expanded use of the stadium would have no impact regarding the substantial displacement of existing people or housing.

Stadium Improvements

The proposed stadium improvements would not displace existing housing or people necessitating construction of replacement housing elsewhere. All proposed stadium improvements (i.e., locker room and shower facilities, permanent restroom facilities, and the storage and staging area) would occur at or adjacent to the existing CSUMB Stadium. Furthermore, these improvements are an addition to an existing developed and disturbed site and would not impact housing priorities identified in the 2022 CSUMB Master Plan or the Seaside General Plan, as noted above. These improvements would not displace any existing people or housing; therefore, the proposed stadium improvements would not require the construction of replacement housing elsewhere. Therefore, the proposed stadium improvements would have no impact regarding the displacement of a substantial number of people or housing.

Mitigation Measures

No mitigation is required for **Impact PH-2**.

4.12.5 References

[AMBAG] Association of Monterey Bay Area Governments. 2022. *2022 Regional Growth Forecast*. Available online at: https://ambag.org/sites/default/files/2022-12/REVISED_PDFAAppendix%20A_2022%20RGF.pdf

[AMBAG] Association of Monterey Bay Area Governments. 2025. *About Us*. Available online at: https://ambag.org/index.php/about-us

City of Marina. 2000. *General Plan*. Amended 2025. Available online at: https://www.cityofmarina.org/164/General-Plan

City of Seaside. 2024. *City of Seaside General Plan*. Resolution GPA-24-01. Available online at: https://www.ci.seaside.ca.us/DocumentCenter/View/15999/Seaside2040-General-PlanPDF?bidId=

[CSU] California State University. 2022a. *California State University Master Plan Environmental Impact Report*. State Clearinghouse Number 2017051042. Available online at: https://ceqanet.lci.ca.gov/2017051042/3

[CSU] California State University. 2022b. *2022 Master Plan Guidelines*. Available online at: https://csumb.edu/media/csumb/section-editors/facilities/2022-master-plan/CSUMB-Master-Plan-Guidelines-2022.pdf

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4.13 PUBLIC SERVICES AND RECREATION

This section assesses the proposed project's potential impacts on public services and recreation. Public services within the proposed project area include law enforcement services, fire protection services, schools, and recreation facilities (e.g., parks, trails, and athletic facilities). The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments concerning public services were received during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.13.1 Environmental Setting

4.13.1.1 Police

UNIVERSITY POLICE

The University Police Department (UPD) serves CSUMB's campus directly and is located at the University Police Station on campus at Valley Hall, 2081 Inter-Garrison Road, approximately 0.2 miles north of the proposed project site. The University Police provide bike patrols to areas of campus that vehicles are not able to reach and offer night walk services to students, faculty members, and staff. The University Police are composed of three (3) divisions: Emergency Management, Parking Services, and Transportation. The Emergency Management Division works with the CSUMB community to plan and coordinate emergency readiness, training, response, and recovery during disasters (e.g., earthquakes, floods, civil unrest, fires) (CSUMB, 2025a). As part of their emergency readiness activities, this division oversees an emergency notification system, conducts public education campaigns, coordinates training exercises, and collaborates with regional emergency responders at both County and local levels to prepare and respond to disasters (CSUMB, 2025b).

The Parking Services Division oversees all on-campus parking for students, faculty members, and visitors. This division oversees parking permit issuance and enforcement for each of the 34 parking lots on campus, and enforces CSUMB's traffic and parking regulations (CSUMB, 2025c).

The Transportation Division oversees campus transportation and provides resources for shuttles, buses, regional transportation connections, rideshare and taxis, and zip cars. The Transportation Division oversees bike registrations on campus and provides information on the location of transportation services, accessible parking, and EV charging stations. Students and faculty members may also call the Transportation Division in case they need to take advantage of the Emergency Ride Home service, which is available to commuters using alternative transportation in case they become stranded (CSUMB, 2025d).

SEASIDE POLICE DEPARTMENT

The project site is located on CSUMB's campus and within the City of Seaside. University Police has a mutual aid agreement with the Seaside Police Department, to organize planning and response efforts. Seaside Police Department provides additional law enforcement resources to the University Police Department if a significant incident occurs that requires additional assistance from other agencies (CSU, 2022a). The Seaside Police Department is located at 440 Harcourt Avenue in the City of Seaside, approximately 4.17 miles south (approximately five (5) miles when considering driving distance) of the project site. The department consists of 40 sworn personnel and 11 non-sworn personnel that respond to over 46,000 service calls per year (City of Seaside, 2024).

MARINA POLICE DEPARTMENT

The Marina Police Department services the entire City of Marina. University Police has a mutual aid agreement with the Marina Police Department, to organize planning and response efforts. Marina Police Department provides additional law enforcement resources to the University Police Department if a significant incident occurs that requires additional assistance from other agencies (CSU, 2022a). The Marina Police Department is located at 211 Hillcrest Avenue (fronting on Palm Avenue) and is co-located with the Marina Fire Department. The Marina Police Department currently operates with 29 sworn and eight (8) non-sworn personnel (CSUMB, 2021).

4.13.1.2 Fire

The CSUMB campus falls within three (3) fire service jurisdictions. For the Main Campus (west of 7th Avenue), fire protection services are provided by the Marina Fire Department and Seaside Fire Department on the parts of campus that fall within their respective city limits. Both cities have agreements in place with one another, as well as with the Presidio of Monterey Fire Department (POMFD), to provide automatic or mutual aid relative to fire protection services (CSU, 2022a). Protections include fire and rescue mutual aid, and emergency management mutual aid. Details pertaining to each department is provided below.

SEASIDE FIRE DEPARTMENT

The City of Seaside operates one (1) fire station located at 1635 Broadway Avenue. This station employs approximately 34 full-time shift personnel, with a minimum of seven (7) personnel on-duty. The City of Seaside employs nine (9) firefighters, six (6) engineers, six (6) captains, three (3) division chiefs, one (1) administrator assistant, one (1) fire chief, and nine (9) reserve firefighters. The Seaside Fire Department operates five (5) fire engines, a Haz Mat unit, one (1) medium duty rescue vehicle, and two (2) SUVs (City of Seaside, 2024). Excluding mutual aid calls, the average response time is 3.5 minutes (CSU, 2022a)

MARINA FIRE DEPARTMENT

The Marina Fire Department operates two (2) stations located at 208 Palm Ave., and 3260 Imjin Road. Marine Fire Department is staffed with 11 full-time firefighters, 15 reserve firefighters (City of Marina, 2026). Average response time in the former Fort Ord area was approximately 6.5 minutes in 2014 (CSU, 2022a).

PRESIDIO OF MONTEREY FIRE DEPARTMENT

The POMFD operates fire station 4400 located on General Jim Moore Boulevard in the vicinity of the project site.

MONTEREY COUNTY REGIONAL FIRE DISTRICT

The Monterey County Regional Fire District's (MCRFD) East Garrison Fire Station has full-time staffing of two (2) to three (3) paramedics/firefighters and has a five (5)-minute response time goal. CSUMB campus lands within the MCRFD's service area are within five (5) minutes of the East Garrison station (CSUMB, 2021).

4.13.1.3 Schools

The proposed project site is located in the southwestern portion of CSUMB's campus between 2nd Avenue, General Jim Moore Boulevard, Divarty Street, and Lightfighter Drive. Schools located in the vicinity of the project site include the Monterey College of Law, George C. Marshall Elementary School, and Chartwell School. The Monterey College of Law is located approximately 0.28 miles south of the project site, George C. Marshall Elementary School is located approximately 0.87 miles south, and Chartwell School is located approximately 0.92 miles south. No schools are located within a quarter of a mile (0.25 miles) of the project site.

4.13.1.4 Recreation

As described in **Chapter 3.0, Project Description** of this EIR, the proposed project consists of improvements to and the expansion of use of the existing CSUMB Stadium to increase the number of athletic and non-athletic events held by both CSUMB and MBFC. The stadium is part of the Otter Sports Complex, also referred to as the Athletics and Recreation District in the *2022 CSUMB Master Plan Guidelines*, which comprises a baseball field, softball field, and two (2) existing soccer fields south of the main stadium as well as the CSUMB Aquatic Center located directly west of the stadium. The Cypress Disc Golf Course is also located adjacent to and north of the project site. These sporting facilities provide a range of recreational opportunities for students and visitors, including NCAA athletic events, CSUMB Recreation Department activities (i.e., intramurals), sport club events, and professional events. These professional events are specific to the project site where MBFC hosts USL soccer games.

The Fort Ord National Monument operated by the Bureau of Land Management, Fort Ord Dunes State Park, and Bayonet & Blackhorse Golf Course are located in the vicinity of the project site. The Fort Ord National Monument offers hiking and biking trails to visitors on land once part of the former Fort Ord U.S. Army base. The Fort Ord Dunes State Park provides hiking and coastal access opportunities to visitors. Additionally, the Bayonet & Blackhorse Golf Course in the City of Seaside provides recreational opportunities for golfers. The Fort Ord National Monument is located approximately 2.13 miles east, and Fort Ord Dunes State Park is located approximately 0.5 miles west of the project site. The Bayonet & Blackhorse Golf Course is located approximately 1.15 miles south of the project site.

4.13.2 Regulatory Environment

4.13.2.1 State

CALIFORNIA FIRE CODE

The 2022 California Fire Code is based on the 2021 International Fire Code with further amendments and additions relevant to implementation in the State of California. The California Fire Code provides regulations addressing fire safety and prevention, which are applicable to all structures in the state. CCR Title 23, Part 9 contain these regulations.

LEROY F. GREENE SCHOOL FACILITIES ACT

A qualified agency, such as a local school district, may impose fees on new residential construction to compensate for the impact that a residential project will have on existing school facilities or services. The California Legislature passed Senate Bill (SB) 50 in 1998 to insert new language into California Government Code Sections 65995.5-65985.7, which authorized school districts to impose fees on new residential construction in excess of mitigation fees authorized by California Government Code Section 66000. School districts must meet a list of specific criteria, including the completion and annual update of a School Facility Needs Analysis, to impose additional fees under the Government Code. Under the terms of this statute, payment of statutory fees for new residential construction is considered to mitigate in full, for the purposes of CEQA, any impacts to school facilities associated with a qualifying project. The fees are assessed based upon the proposed square footage of the new or expanded residential development. These statutory fees do not apply because as a state entity, CSU campuses are not subject to these fees for this type of development at CSU campuses.

QUIMBY ACT

California Government Code Section 66477, commonly known as the Quimby Act, was intended to help local communities generate the resources necessary to provide park and recreational facilities. The Quimby Act preserves open space and parkland in urbanizing areas of the state by authorizing local governments to establish ordinances that require private developers of new subdivisions to dedicate land for parks, pay an in-lieu fee, or a combination of the two (2). The Quimby Act was designed to ensure "adequate" open space acreage in jurisdictions adopting Quimby Act standards. The Act requires three (3) acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area already exceeds that limit, in which case the City may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act requires that standards for recreational facilities be adopted in the local general plan recreation element if a parkland dedication/fee ordinance is to be enacted. The Quimby Act does not apply to the CSU, including CSUMB, because CSUMB is not a local government entity, does not assess fees from private developers, and, therefore, is exempt.

While the Quimby Act does not apply to the CSU system, standards under this act are used as a proxy for what would constitute adequate park and recreational space for project-related on-campus residents in the impact analysis presented in **Section 4.13.4.2, Impacts and Mitigation Measures**.

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The following policies from the 2022 CSUMB Master Plan Guidelines are applicable to the proposed project (CSU, 2022b):

LU 1.4 Develop the Athletics and Recreation District to meet future Campus needs and host regional conference tournaments; and consider shared-use agreements with the surrounding community.

LU 4.4 Consider establishing a facilities use agreement within the Athletics and Recreation District between Campus programs and the broader Monterey Bay community.

DT 1.5 Follow the guiding principles and strategies identified in the special area plans to redesign the Main Quad, Divarty Street Mall, Inter-Garrison Road, and the Athletics and Recreation District.

4.13.2.2 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis. The City of Seaside's General Plan includes the following relevant policies (City of Seaside, 2024):

Goal S-1: High standard of police services with a focus on community-based crime prevention.

Coordination. Coordinate with local, state, and federal law enforcement agencies to reduce the risk of criminal activity. Coordinate with local partners, including schools, neighborhood groups, and community-based organizations, to encourage community-based crime prevention efforts.

Goal S-2: Effective emergency response following a natural or human-caused disaster.

Coordinate Emergency Response. Implement coordinated emergency response planning.

Emergency Evacuation. Maintain emergency procedures for the evacuation and control of population in identified floodplain areas in accordance with Section 8589.5 of the California Government Code. Inform residents and visitors about alternate routes in case of coastal flooding and tsunamis. Design evacuation maps to minimize and mitigate exposure to flood hazards to the maximum extent possible.

Evacuation Route Maintenance. Maintain roadways that are likely to function as key evacuation routes including but not limited to the following major routes: General Jim Moore Boulevard, Canyon Del Ray Boulevard (SR 218), Fremont Boulevard/Fremont Street, Broadway Avenue, Hilby Avenue, and Del Monte Boulevard.

Emergency Communications. Encourage implementation of communication systems to coordinate advanced mobilization and facilitate evacuations during flood and wildfire events with hazard alert

notifications through a Traffic Control Center. This center would have up to the minute reports on traffic patterns and can communicate directly with the broadcast media to let drivers know about roadway congestion and conditions and direct them to alternate routes.

Goal S-6: Minimization of risk of fire hazards in the city and wildfire hazards on former Fort Ord lands through fire prevention design and fuel reduction strategies.

Water Pressure. Coordinate with water districts to ensure that water pressure for existing developed areas is adequate for firefighting purposes during the season and time of day when domestic water demand on a water system is at its peak.

MARINA GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of Marina. However, this document summarizes goals and policies from the City of Marina's General Plan for information purposes only, to provide context for the analysis. The City of Marina's General Plan includes the following relevant policies (City of Marina, 2000):

Policy 2.105 Police and fire services to all parts of the City are provided from the City of Marina's Public Safety Building on Palm Avenue. A site and building at the Marina Municipal Airport has also been acquired for use as a fire station. This small facility was transferred to the City of Marina in 1996. An additional site in former Fort Ord (on Imjin Road, between Imjin Parkway and Eighth Street) has been approved as a station for future emergency services to provide fire and police protection to the surrounding communities.

Policy 2.106 As the population of Marina grows, the police force should be sufficiently staffed and deployed to maintain an average emergency response time of four (4) minutes. Similarly, a maximum response time for fire protection of three to four (4) minutes should be maintained. Where new development would be located beyond a three (3)-to-four-(4) minute response time, consideration should be given to the need for Class A fire-resistant roofing.

4.13.3 Methodology

Public services and recreation impacts were evaluated based on a review of project characteristics and applicable planning documents to determine whether the project would increase demand for public services (e.g., fire, police, and schools) or recreational facilities. The analysis considers whether the proposed project would introduce population, visitors, or activities that could require new or expanded facilities, and whether such changes could result in physical environmental impacts. This evaluation is based on a qualitative comparison of project related demand to existing and planned service capacity, as well as consistency with applicable plans and policies.

4.13.4 Impacts and Mitigation

4.13.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact on public services and recreation if it would:

a. 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 of the public services:

   i. fire protection;

   ii. police protection;

   iii. schools;

   iv. parks;

   v. other public facilities.

b. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

c. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.13.4.2 Impacts and Mitigation Measures

Impact PSR-1: The proposed project would not 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 of the public services: fire protection, police protection, schools, or other public facilities (criterion a).

Expanded Use

The proposed expanded use of the stadium would not result in a substantial adverse physical impact associated with the provision of new or physically altered fire or police services. Expanded use of the stadium would involve an increase in the number and frequency of athletic and non-athletic events held at the stadium, and would not induce new housing or substantial population growth, as discussed further in **Section 4.12, Population and Housing**. The UPD provides law enforcement services to the proposed project site, but has mutual aid agreements with local law enforcement agencies including Marina Police Department and Seaside Police Department. The Seaside Fire Department provides fire protection

services at the project site. However, calls for fire service on campus are handled by the POMFD due to proximity to the campus through mutual aid agreements (CSU, 2022a). While the proposed project would not induce population growth or exceed planning population growth based on AMBAGs forecasts on or off campus (please refer to **Section 4.12, Population and Housing**), the increase in the frequency and number of events could result in an increase in operational demand.

The 2022 CSUMB Master Plan Guidelines considered expanded use of the existing stadium and evaluated service provider capacity during the environmental review process. The 2022 Master Plan EIR did not identify any concerns regarding the need for expanded service police or fire services, and moreover identified that independent from the implementation of the 2022 CSUMB Master Plan Guidelines, three (3) new or replacement fire stations were planned by Marina Fire Department, Seaside Fire Department, and POMFD (CSU, 2022a). Both the Seaside and Marina Fire Departments will serve the campus, including the stadium. Therefore, the proposed project would have a less than significant impact regarding a substantial adverse physical impact associated with the provision of new or physically altered fire and police services.

The proposed expanded use of the existing stadium would not result in a substantial adverse physical impact associated with the provision of new or physically altered schools. While the proposed expanded use of CSUMB Stadium would occur on a university campus, an increase in the number and frequency of events would not impact existing educational services provided CSUMB. The expanded use of the stadium would not directly or indirectly increase the size of the student body, nor would the proposed expanded use contribute to substantial population growth that would have a regional impact on neighboring schools and school districts. For these reasons, the proposed expanded use of the existing stadium would have a less than significant impact regarding a substantial adverse physical impact associated with the provision of new or physically altered schools.

Stadium Improvements

The proposed stadium improvements would not result in a substantial adverse physical impact associated with the provision of new or physically altered fire or police services. The proposed stadium improvements would include the construction and operation of locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area. These facilities would not contribute to substantial population growth that would increase the demand for regional fire and police services, rather these facilities would support existing and planned uses at the CSUMB Stadium. Furthermore, these improvements would be subject to and incorporate design elements required by the California Fire Code, CBC, and Uniform Fire Code to reduce risk of fire at the project site. For these reasons, the proposed stadium improvements would have a less than significant impact regarding a substantial adverse physical impact associated with the provision of new or physically altered fire and police services.

The proposed stadium improvements would not result in a substantial adverse physical impact associated with the provision of new or physically altered schools. The proposed stadium improvements would support the use of the existing CSUMB Stadium by providing upgraded locker room and shower facilities, permanent restrooms, and a gated event storage and staging area. These improvements would not directly or indirectly contribute to an increase in the student body at CSUMB, nor would these improvements directly or indirectly contribute to population growth regionally that would require new or expanded school facilities at neighboring schools and school districts. Therefore, the proposed stadium improvements would have a less than significant impact.

Mitigation Measures

No mitigation is required for **Impact PSR-1**.

Impact PSR-2: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (criteria b and c).

Expanded Use

The proposed expanded use would not result in an increase of use at existing neighborhood or regional parks or other recreational facilities. The proposed expanded use would result in a net increase of 85 new persons (please refer to **Chapter 4.12, Population and Housing**). The addition of 85 people would represent a minor increase in regional population and would not substantially raise demand for existing off-site municipal and regional parks and recreation facilities such that there would be a deterioration of said facilities. Moreover, the proposed project does not include any neighborhood or regional parks and recreation facilities or require the expansion of existing facilities such that an adverse environmental effect would occur. For these reasons, the proposed expanded use of the stadium would have a less than significant impact with respect to causing a substantial physical deterioration or requiring construction or expansion of neighborhood and regional parks and recreation facilities.

Stadium Improvements

The proposed stadium improvements would not directly induce population growth; please refer to **Expanded Use**, above. As such, the proposed stadium improvements would not result in an increase of use at existing neighborhood or regional parks and recreation facilities. Therefore, the proposed stadium improvements would have a less than significant impact with respect to causing a substantial physical deterioration or requiring construction or expansion of neighborhood and regional parks and recreation facilities.

Mitigation Measures

No mitigation is required for **Impact PSR-2**.

4.13.5 References

City of Marina. 2000. *General Plan*. Amended 2025. Available online at: https://www.cityofmarina.org/164/General-Plan

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4.14 TRANSPORTATION

This section evaluates potential transportation impacts associated with the implementation of the proposed project, including direct project-generated VMT. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible.

A transportation analysis titled *Vehicle Miles Traveled Impact Analysis – CSUMB Stadium Expansion* (herein referred to as the Transportation Study) and dated January 2026 was prepared by Fehr & Peers and informs the evaluation of potential transportation impacts. **Appendix G** contains the full Transportation Study.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies, according to CEQA. Comments were received regarding transportation during the public scoping period. These comments are summarized below:

- Analyze the potential impacts to the transportation system and potential VMT impacts through preparation of a traffic analysis.
- Encourage an increase of local transit frequency on one (1) or more transit lines serving the university to reduce the number of single-occupancy vehicles traveling to and from the project site.
- Recommendation to include bike facilities (e.g., bike racks and bike fix-it stations) as part of the project to encourage multimodal transportation.
- Monterey Salinas Transit (MST) currently provides transit services to the CSUMB campus, and the 4th Avenue/CSUMB Alumni and Visitor Center Stop is within walking distance to the project site.
- Collaborate with MST to establish timed connections at the proposed MST SURF! 5th Street Station to accommodate visitors to the project site during operation.
- Recommendations to incorporate mitigation measures to implement a Transportation Demand Management Program that encourages the use of MST's Group Discount Program or Commute with Enterprise Vanpool Program.
- Provide and improve pathways to the stadium's entrances with updated sidewalks, crosswalks, and bike lane improvements.
- Requests consideration for widening 2nd Avenue to accommodate the potential increase in traffic.

For a complete list of public comments received during the public scoping period; please refer to **Appendix A, NOP and Public Comment Letters**.

4.14.1 Environmental Setting

4.14.1.1 Study Area

The study area for the VMT analysis summarized in this section is Monterey County because a substantial majority of the campus population (nearly 90 percent of students, faculty, and staff) lives in and, therefore, commutes to CSUMB from within this geographic area. Similarly, the anticipated additional service population associated with the proposed project, including new front-office employees, team personnel, and event attendees, is expected to live in Monterey County.

4.14.1.2 Project Site Setting

EXISTING TRANSPORTATION FACILITIES

The proposed project is located in the southwestern portion of CSUMB between Divarty Street, 2nd Avenue, General Jim Moore Boulevard, and Lightfighter Drive (please refer to **Figure 3-3**). SR 1 provides regional access to the project site and the CSUMB Main Campus. Primary access to the proposed project site is provided by 2nd Avenue, Divarty Street, General Jim Moore Boulevard, and Lightfighter Drive. Traffic from Seaside and the Monterey Peninsula access the proposed project site from General Jim Moore Boulevard and Lightfighter Drive, while traffic from Santa Cruz, Marina, and Salinas access the proposed project site from 2nd Avenue and Divarty Street via the nearby roads of Imjin Parkway and Inter-Garrison Road. Entrances to the project site are available on Divarty Street and 2nd Avenue. The street network that provides access to the proposed project site are described below:

State Route 1

SR 1 is a state highway within Monterey County, providing access to Watsonville and Santa Cruz to the north via Seaside, Marina, and Castroville, and to San Luis Obispo to the south via Monterey and Carmel. Through its connection to SR 156 in Castroville, SR 1 also provides access to US 101 and the greater San Francisco Bay Area. Through the Cities of Marina and Seaside, SR 1 has a posted speed limit of 65 miles per hour (mph) and provides four (4) lanes north of the Del Monte Boulevard interchange, six (6) lanes south of Del Monte Boulevard interchange to the Fremont Boulevard/Del Monte Boulevard interchange, and returns to four (4) lanes south of the Fremont Boulevard/Del Monte Boulevard interchange. SR 1 average daily traffic (ADT) counts range between 51,560 to 96,960 for the segments between Del Monte Boulevard and Canyon Del Rey Boulevard, with the highest ADT between Imjin Parkway and Del Monte Boulevard (CSU, 2022a).

Imjin Parkway

Imjin Parkway is an arterial street within the City of Marina limits. Imjin Parkway is a two (2)-lane road at the interchange with SR 1, a four (4)-lane divided street with left-turn channelization east of the northbound SR 1 ramps, and a two (2) lane road east of Imjin Road. Imjin Parkway has bike lanes on each side of the road starting east of 2nd Avenue, with the eastbound bike lane ending at Reservation Road. The speed limit on Imjin Parkway is 45 mph. Imjin Parkway has an ADT of 22,500 east of 2nd Avenue and an ADT of 28,220 west of 2nd Avenue toward SR 1 (CSU, 2022a).

Inter-Garrison Road

Inter-Garrison Road extends from 2nd Avenue to Reservation Road as a two (2)-lane arterial. The extension of Inter-Garrison Road (referred to as the Inter-Garrison Road Connection in this analysis) to Reservation Road, completed in 2013, provides a regional connection from the Marina-Salinas area to SR 1. The speed limit on Inter-Garrison Road is 35 mph between 8th Avenue and Schoonover Road, and 25 mph between 2nd Avenue and 8th Avenue. Inter-Garrison Road has an ADT of 8,450 between 8th Avenue and Abrams Drive, and an ADT of 2,630 between 2nd Avenue and 3rd Avenue (CSU, 2022a).

Lightfighter Drive

Lightfighter Drive starts from the SR 1 ramps as an east-west street. From the SR 1 interchange to General Jim Moore Boulevard, the street is a four (4)-lane divided major arterial with a speed limit of 40 mph. East of General Jim Moore Boulevard, Lightfighter Drive is a two (2)-lane minor arterial with a speed limit of 25 mph. West of General Jim Moore Boulevard, the ADT on Lightfighter range between 13,250 and 15,000 vehicles (CSU, 2022a).

Divarty Street

Divarty Street is a two (2)-lane local street from 1st Avenue to 5th Avenue providing access to the core of the CSUMB campus. The speed limit along Divarty Street is 25 mph.

2nd Avenue

2nd Avenue connects Lightfighter Drive in Seaside with Imjin Parkway in Marina, along the western edge of CSUMB. 2nd Avenue is a north-south arterial street in Marina and Seaside with four (4) lanes from Imjin Parkway to 10th Street, two (2) lanes from 10th Street to Divarty Street, and four (4) lanes south of Divarty Street. 2nd Avenue has right turn and left turn channelization on the entire stretch of the street, and bike lanes north of Divarty Street to Imjin Parkway. The speed limit on 2nd Avenue is 35 mph. The lowest ADT on 2nd Avenue is 2,500 vehicles south of Divarty Street. 2nd Avenue's ADT is highest north of 5th Street, with ADT of 6,330 vehicles (CSU, 2022a).

General Jim Moore Boulevard

General Jim Moore Boulevard is a four (4)-lane arterial that extends from Canyon del Rey Boulevard to Lightfighter Drive in Seaside. Once it enters the campus at Lightfighter Drive, the street becomes a two (2)-lane arterial to 5th Street with a posted speed limit of 25 mph on campus. The ADT on General Jim Moore Boulevard ranges between 5,230 to 9,600 vehicles, with the lowest ADT north of Lightfighter Drive (on campus) and highest ADT between Lightfighter Drive and Gigling Road (south of campus) (CSU, 2022a).

8th Avenue

8th Avenue is a north-south two (2)-lane local street that extends from Gigling Road on the south to Inter-Garrison Road in the north.

EXISTING PEDESTRIAN AND BIKE FACILITIES

Pedestrian accommodations, such as sidewalks, are provided along the streets adjacent to the proposed project site. Specifically, Lightfighter Drive, General Jim Moore Boulevard, 2nd Avenue, and Divarty Street have sidewalks on one (1) or both sides of the street. Bicycle facilities are also provided along the adjacent streets. These facilities include bike lanes and separated bike paths or trails. CSUMB defines bicycle boulevards (class III facilities) as roads that provide bicyclists the priority on campus roadways. CSUMB identifies Divarty Street from 2nd Avenue to A Street, A Street from Divarty Street to 7th Avenue, 7th Avenue from Inter-Garrison Road to Colonel Durham Street, and Inter-Garrison Road from 7th Avenue to 2nd Avenue. These bicycle boulevards comprise approximately 3.8 miles of bike amenities on CSUMB's campus (CSU, 2022b). The CSUMB Stadium provides short-term bike racks (LEED compliant) for bicycle parking. The stadium also provides E-scooter parking alongside bicycle parking. Furthermore, the planned FORTAG CSUMB Loop trail alignment would run on the south side of Divarty Street and provide pedestrian and bicycle access to the stadium once complete (CSU, 2022b).

EXISTING PUBLIC TRANSIT FACILITIES

The public transit system that connects the CSUMB campus to the greater Monterey and Salinas area is operated by MST. Three (3) bus routes serve stops in or along the boundary of the CSUMB campus throughout the academic year: Routes 17, 18, and 25 (MST, 2026). MST bus routes that serve CSUMB are described in **Table 4.14-1** and shown in **Figure 4.14-1** and **Figure 4.14-2**, below.

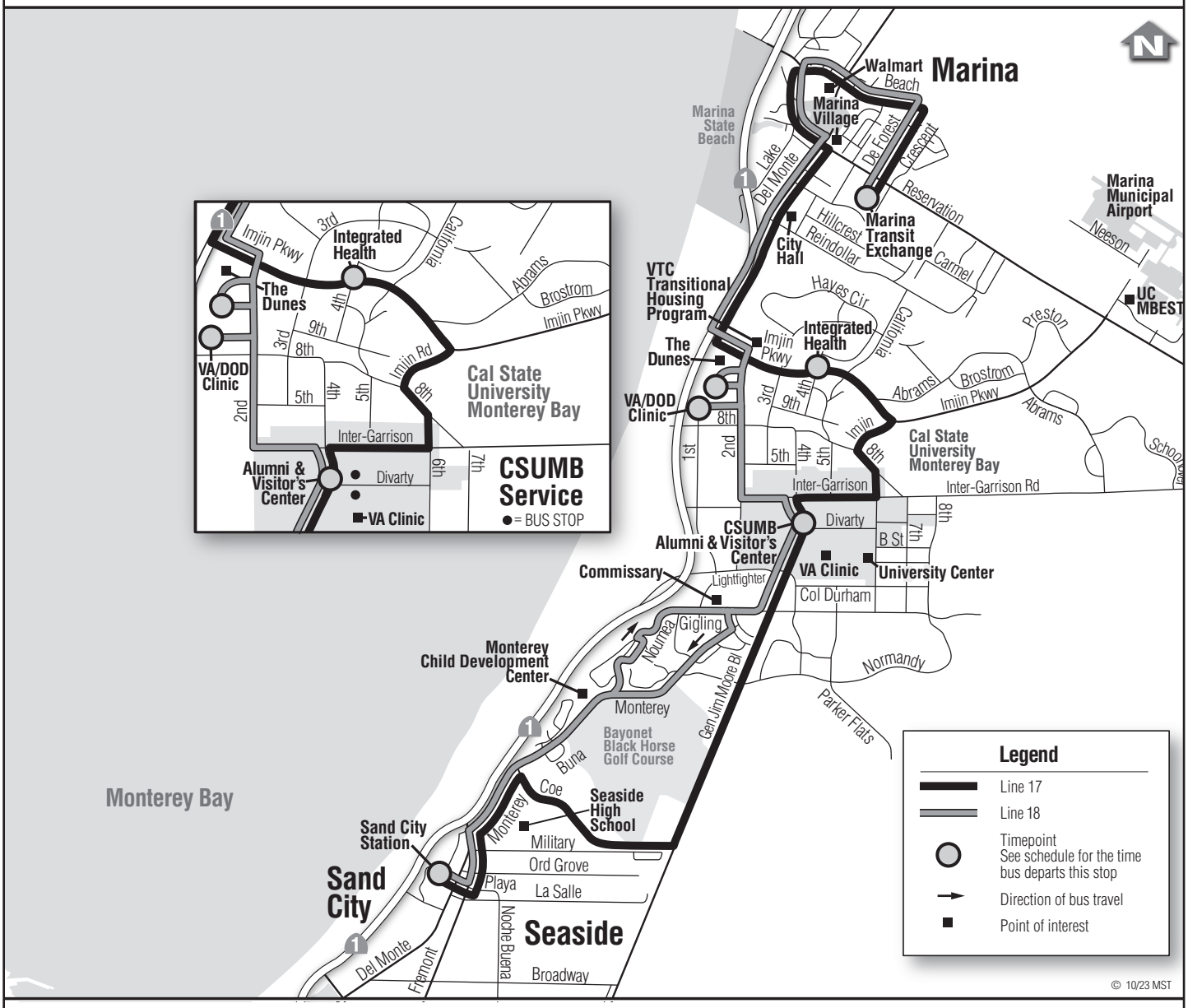
Table 4.14-1
Existing MST Transit Service Summary

Route	Description	CSUMB Transit Stop	Service Areas	Hours of Operation	Average Weekday Headway
17	Marina – The Dunes	CSUMB Alumni & Visitor Center	Marina and Sand City	Weekdays Only: 7:00 AM to 7:00 PM	Every 60 Minutes
18	Marina – The Dunes, VA Clinic	CSUMB Alumni & Visitor Center	Marina and Sand City	7:00 AM to 7:00 PM Weekends: 7:00 AM to 10:00 PM	Every 60 Minutes
25	CSUMB – Salinas	CSUMB Alumni & Visitor Center	East Campus and Salinas	Weekdays: 6:20 AM to 10:35 PM	Every 60 Minutes

Source: MST, 2026.

MST provides additional service lines that connect to the routes above. Transfer stations are provided in Monterey, Sand City, and Salinas.

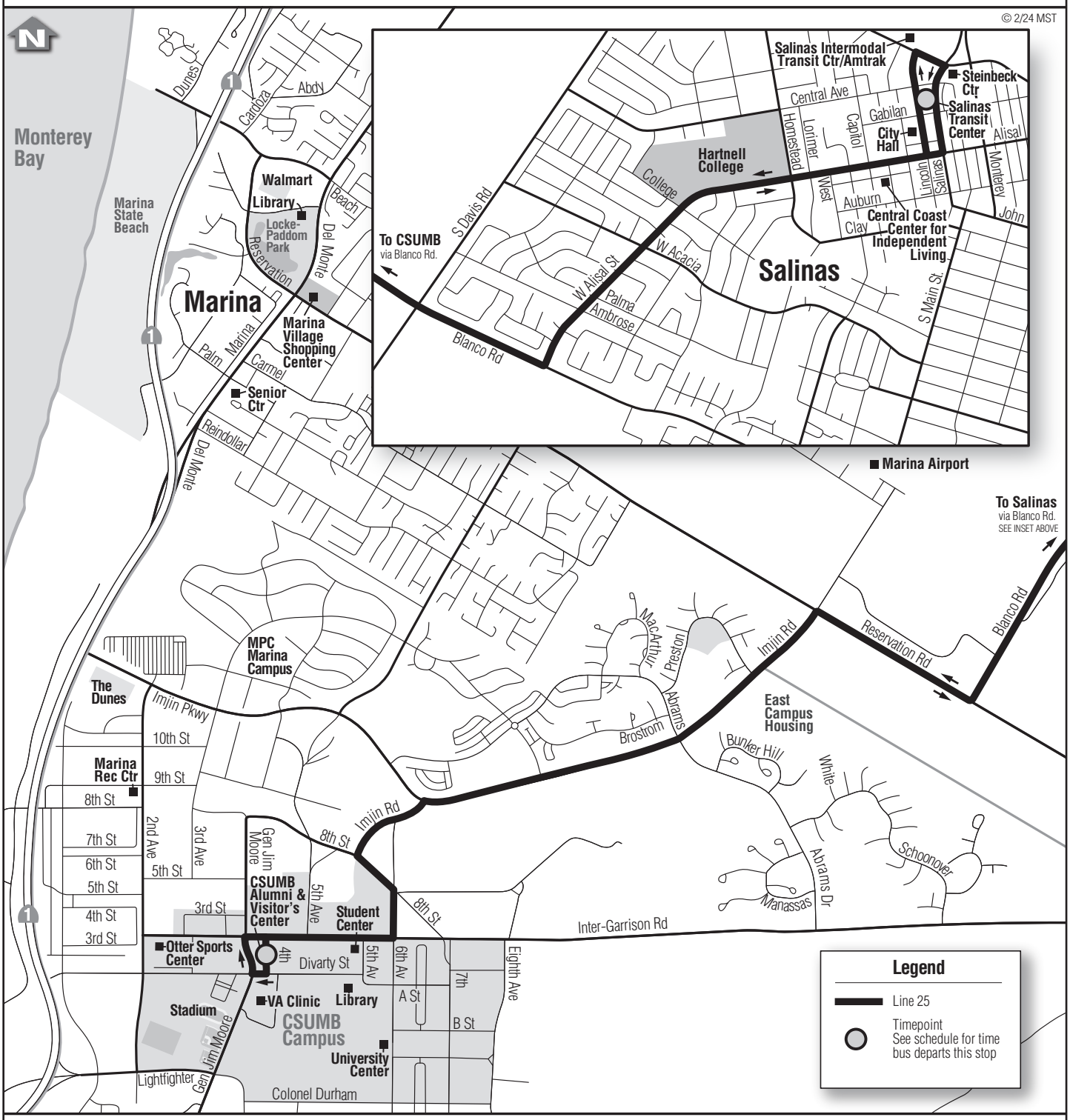
17 Sand City–Marina
18 Sand City–Marina



MST, 2026

Title: MST Bus Route Lines 17 & 18	Date 4/23/2026 Scale N/A Project 2024-84	Monterey | San Jose Denise Duffy and Associates, Inc. Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 4.14-1

25 Salinas–CSUMB



Title: MST Bus Route Line 25	Date 4/23/2026 Scale N/A Project 2024-84	Monterey | San Jose Denise Duffy and Associates, Inc. Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 4.14-2

PROJECT SITE ACCESS AND PARKING

The 2nd Avenue entrance at the west end of the project site and the entrance on Divarty Street on the northwest end provide access to the stadium. Existing operation of the stadium provides on-site parking. Event parking utilizes three (3) parking areas adjacent to the stadium. More specifically, general admission uses the existing lot to the northwest of the stadium; overflow/VIP utilizes the existing lot to the southwest; and teams, buses, event staff, and facility staff utilize the existing lot west of the field house.

4.14.1.3 2021 Freeman Stadium Renovations Project Transportation Study

As discussed in **Chapter 1.0, Introduction,** and described in **Chapter 3.0, Project Description**, CSUMB previously renovated the stadium to accommodate CSUMB and MBFC athletic and non-athletic events. The Freeman Stadium Renovations Project MND evaluated the potential VMT impacts, as well as the long-term effects on Monterey County's VMT, which included a transportation study by Fehr & Peers (CSUMB, 2021; Fehr & Peers, 2021).

The VMT analysis in Fehr & Peers' previous transportation study estimated the new vehicle miles generated by the events and the new full-time equivalent employees proposed under that project. The impact analysis converted the CSUMB and MBFC special event activities to VMT by calculating the following (Fehr & Peers, 2021):

- Total Annual Person Trips
    - **A** persons * **B** days per week * **C** weeks or events per year * 2 daily person trips = **D** total annual person trips
- Total Annual Vehicle Trips
    - (**D** total annual person trips * **E** vehicle mode share) / **F** persons per vehicle = **G** total annual vehicle trips
- Annual Project-Generated VMT
    - **G** total annual vehicles trips *** H** average trip length = **I** Annual Project Generated VMT
- Daily Project-Generated VMT
    - **I** Annual Project Generated VMT / **J** days of operation = **K** project generated VMT
- Service Population
    - Service population for is the MBFC employees, visitor team personnel for MBFC, and full-time equivalents for the CSUMB part-time team personnel.
- Daily Project-Generated VMT per Service Population
    - The project generated VMT is the VMT from all vehicle trips for all trip purposes and types. It is calculated by summing the "VMT from" and "VMT to" a specified area

To determine whether the 2021 project would have a direct impact on the environment, Fehr & Peers compared the proposed project-generated VMT per service population to the proposed project-generated VMT per service population threshold under existing conditions. The indirect and cumulative impacts of the proposed project were evaluated under cumulative conditions using the Boundary VMT per service population method, which evaluates the vehicle travel on Monterey County roads divided by the service population of Monterey County (Fehr & Peers, 2021). To establish the VMT threshold, the analysis took the following steps:

- Select VMT calculation tool.
- Select VMT accounting methods.
    - Direct impacts.
    - Cumulative impacts.
- Calculate baseline and cumulative regional VMT estimates.
- Set VMT thresholds.

The 2021 Freeman Stadium Renovations Project generated new employment, including front-office employees, team personnel, and 210 part-time match staff. Notably, Fehr & Peers converted part-time employment to full-time employment; and match spectators were not included. The 210 part-time match staff were assumed to work four (4) to 16 hours for each match, which equates to 34,128 annual hours of work. Based on 2,080 hours per year for a full-time position, Fehr & Peers determined the 210 part-time match staff to be equivalent to 16 full-time equivalent (FTE) employee jobs. The service population for the 2021 Freeman Stadium Renovations Project was 100 employees.

2021 VMT THRESHOLDS

At the time Fehr & Peers evaluated the 2021 Freeman Stadium Renovations Project, the regional threshold for a project's VMT was 15 percent below the existing project-generated VMT per service population for Monterey County. The 15 percent reduction relative to Monterey County was selected based on the Office of Planning and Research (OPR) Technical Advisory, which set a similar threshold, and because most students, faculty, and staff live within Monterey County (OPR, 2018). As such, the 2021 project was determined to result in a significant project-generated VMT impact if the VMT per service population for the CSUMB campus under existing project conditions was greater than 23.91 VMT. The 2021 project's effect on regional VMT, or its cumulative effect, would be significant if it increased the cumulative countywide daily Boundary VMT per service population above 14.07 VMT.

2021 VMT ESTIMATES

Fehr & Peers evaluated non-athletic event activities by converting vehicle trips and VMT by estimating the total number of annual person trips, total annual vehicle trips, total annual project-generated VMT, and daily proposed project-generated VMT. Fehr & Peers determined that the previous stadium renovations project would generate 4,471 daily project-generated VMT, which is 87 percent greater than the VMT threshold on a per-service-population basis. **Table 4.14-2** outlines these results.

Table 4.14-2
Project-Generated VMT for SB 743 VMT Assessment

	Project
Project Site	***Generated VMT***
Project Generated Vehicle Miles Traveled (A)[1]	4,471
Service Population (B)[1,2]	100
Project Generated VMT per Service Population (A/B = C)	44.71
Initial Impact Assessment	
Project-Generated VMT per Service Population Threshold (28.12 * 85%)	(23.91)
(Impact Conclusion)	Potentially Significant

Source: Fehr & Peers, 2021

[1] Rounded service population and VMT to nearest 100.

[2] Service population is defined as the sum of all employees, residents, and students (Kindergarten through University).

Fehr & Peers' previous VMT analysis stated that if events reach maximum stadium capacity (i.e., 6,000 attendees) and all attendees were to arrive and depart in single occupancy vehicles, the previous project would generate the following (CSUMB, 2021):

- 269,350 person trips,
- 108,070 vehicle trips, and
- 1,630,930 project-generated VMT

To remain below the significance threshold of 23.91 VMT per service population, operations would need to generate no more than 872,715 project-generated VMT, calculated as 23.91 project-generated VMT per service population multiplied by a service population of 100 and 356 days.

MBFC expected to average 4,140 spectators per match (69 percent of its 6,000-spectator capacity), with approximately 75 percent of the spectators arriving in carpool vehicles with an average of 3.5 persons per vehicle. Based on these assumptions, which formed the basis for the previous impact analysis, the project generation rate was reduced to 25.57, which was 6.9 percent greater than the project-generated VMT per service population threshold. Therefore, even with reduced event attendance and higher vehicle occupancy, the previous stadium renovations project would result in a potentially significant VMT per service population impact. This potentially significant VMT impact would conflict with applicable transportation and circulation policies, plans, and CEQA Guidelines Section 15064.3(b) (CSUMB, 2021; Fehr & Peers, 2021).

To minimize impacts, the Freeman Stadium Facilities Renovation Project MND and MMRP included mitigation measures that included (CSUMB, 2021):

- Developing and implementing a TMP and TDM prior to opening day of the MBFC season (TR-1 and TR-4).
- Event monitoring to evaluate the effectiveness of the TDM program for the lifetime of the project (TR-2) and for the first year of operation (TR-5).

- Establish performance objectives for CSUMB and MBFC special events (TR-3).
- Develop an alternative monitoring approach for regionwide VMT monitoring (TR-6); and
- Taking remedial action for subsequent environmental review if the TMP and TDM show that the trip reduction target assumed in the MND is not being met (TR-7).

STADIUM OPERATION AND VMT UNDER EXISTING CONDITIONS

CSUMB developed and implemented a TMP with a TDM program, as required by mitigation from the Freeman Stadium Facilities Renovation Project MND. Together these tools would manage and monitor CSUMB and MBFC event spectator attendance to assess whether operation could adequately achieve the following performance standard objectives:

- A daily project generates VMT per service population of 23.91 or less.
- Annual travel supporting performance standards:
    - Fewer than 61,185 annual vehicle trips.
    - Less than 872,715 annual project-generated VMT.

Operation of the renovated stadium began in Spring 2022 with the start of the MBFC season. Monitoring of events found that the following:

- Annual Project-Generated VMT = 1,630,900 (exceeding the 872,715 annual project-generated VMT).
- Actual Annual Vehicle Trips = 108,1000 (exceeding the 61,185 Vehicle Trips).

Therefore, the thresholds established in the prior stadium MND have been exceeded and the need for additional environmental review of the project is required in compliance with the MND's MMRP.

4.14.2 Regulatory Environment

4.14.2.1 State

CALIFORNIA DEPARTMENT OF TRANSPORTATION.

Caltrans is the responsible agency for constructing, enhancing, and maintaining the state highway and interstate freeway systems. As a result, any change to the state roadway system or work requiring movement of oversized or excessive loads requires either an encroachment or transportation permit, respectively, from Caltrans. In addition to maintaining highways and general regulations and laws dealing with licensing, traffic signage, and other noncommercial driver requirements, state laws and regulations also govern motor carriers on roadways within the state.

SENATE BILL 743

SB 743 establishes criteria for determining the significance of transportation impacts using a VMT metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. SB 743 was enacted in 2013 and became effective in July 2014. It requires OPR and the Natural Resources Agency to amend the CEQA Guidelines through developing criteria for determining the way transportation impacts are measured in California for new development projects, making sure they are built in a way that allows Californians more options to drive less (PRC Section 21099(b)). Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts.

CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN GUIDELINES

The following goals and policies from the 2022 CSUMB Master Plan Guidelines are applicable to the proposed project (CSU, 2022b):

Goal MO 1 Create a transportation system that fosters health and wellness.

MO 1.1 Prioritize pedestrian travel as the primary mode of travel on campus.

MO 1.2 Reduce Campus commuter dependency on single-occupancy vehicle travel.

MO 1.3 Build a multi-modal Campus transportation system linking all existing and proposed buildings and Campus destinations.

MO 1.5 Follow the CSU TDM Manual (2012) as a guide for program development. Adhere to its six (6) goals: 1) encourage non-automobile modes; 2) maintain financial sustainability; 3) ensure equitable access; 4) preserve valuable land; 5) promote environmental sustainability; and 6) build partnerships. The manual identifies CSUMB as an 'Exurban' Campus, for which it prioritizes TDM strategies as such: housing, carpool, ride-matching, parking pricing and shuttle services.

MO 1.12 Provide transit service within one quarter mile of existing and new development.

MO 1.13 Locate a Campus shuttle stop at all Campus periphery parking lots.

Goal MO 2 Improve the safety of active transportation networks.

MO 2.2 Design intersections and transportation routes to give pedestrians and bicyclists the right-of-way at conflict points.

MO 2.4 Provide accessible pedestrian pathways at every parking lot, bus stop, and bicycle storage facility, both internal to the lot or facility, as well as connecting to the closest appropriate building.

MO 2.11 Adhere to the roadway design guidelines developed by Monterey Salinas Transit (MST) on roadways with existing or potential MST transit service.

MO 4.1 Prioritize Campus development strategies to promote transit, bicycling, and walking.

MO 4.2 Use data from regularly updated Campus travel surveys to determine the transportation mode access and amenities necessary and appropriate for new development.

MO 4.3 Ensure continued access to off-campus transit service to surrounding cities, as well as to the East Campus Housing.

MO 4.5 Develop a new Campus shuttle route.

MO 5.5 Incorporate enhanced alternative transportation options into new development before considering adding any new general parking.

MO 5.13 Create incentives to encourage students, faculty and staff commuters to take alternative modes of travel to Campus.

MO 5.16 Consider Level of Service D to be an acceptable standard for operating conditions on roadways, segments, and intersections within the CSUMB boundaries.

4.14.3 Methodology

Consistent with analysis prepared for the 2021 for the Freeman Stadium Renovations Project MND, Fehr & Peers used the existing operations described in the Freeman Stadium Renovations Project MND as the baseline conditions for the updated analysis (CSUMB, 2021).[1] Moreover, the analysis evaluated the project-generated VMT per service population compared to the project-generated VMT per service population threshold under existing conditions, using the same 15 percent below Monterey County's project-generated VMT threshold. The analysis evaluated indirect and cumulative impacts of the proposed project focused on VMT for all trip purposes and vehicle types, and the study developed project-generated VMT threshold using the Existing Conditions VMT for Monterey County since more than 90 percent of the CSUMB campus and MBFC spectators population live in Monterey County. Moreover, the analysis identifies that most of the project-generated VMT would take place within Monterey County and, therefore, impacts assessed against the Monterey County baseline is the appropriate assessment of a project's direct impact. Like the project-generated VMT baseline, the Boundary VMT baseline measures the project's effect on the Monterey County Boundary VMT because project effects are likely to be localized, occurring near the CSUMB campus and within Monterey County.

The Transportation Study, provided in **Appendix G**, provides additional details regarding the analytical methodology.

4.14.3.1 Project-Generated VMT per Service Population (Direct Impacts)

The regionwide threshold for project-generated VMT applied in the Transportation Study is 15 percent below the Existing Conditions VMT per service population for Monterey County. The OPR Technical Advisory suggests a similar threshold for residential and office land uses (i.e., 15 percent below VMT in a geographic area) (OPR, 2018). A 15 percent reduction relative to Monterey County was selected based on

[1] The Freeman Stadium Renovations Project Mitigated Negative Declaration (SCH #2021070153) is available online at: https://ceqanet.lci.ca.gov/2021070153

the OPR Technical Advisory since most students, faculty, and staff live within Monterey County, and similarly most of the MBFC spectators live in Monterey County. As such, most of the CSUMB and MBFC special event activity project-generated VMT would be within Monterey County and, therefore, impacts assessed against the Monterey County baseline is the most appropriate assessment of a project's direct impact. **Table 4.14-3** shows how the project-generated VMT per service population threshold was determined to be 23.91 VMT, or 15 percent below the existing VMT of 28.12.

Table 4.14-3
Project-Generated VMT Threshold

Item	Monterey County
Project-Generated Vehicle Miles Traveled (A)[1]	19,158,300
Service Population (B)[1,2]	681,200
Project-Generated VMT per Service Population (A/B = C)	28.12
Project-Generated VMT per Service Population Threshold (C*85% = D)	23.91

Source: Fehr & Peers, 2026.

1. Rounded service population and VMT to nearest 100.
2. Service population is defined as the sum of all employees, residents, and students (Kindergarten through University).

A significant project-generated VMT impact would occur if project-generated VMT per service population for the campus under existing project conditions is greater than 23.91 VMT. The impact threshold for the project's effect on regional VMT, or its cumulative effect, is based on cumulative countywide daily Boundary VMT per service population threshold of 14.07 VMT (as discussed above in **Section 4.14.1.3**).

4.14.4 Impacts and Mitigation

4.14.4.1 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, the project would result in significant impacts related to traffic and circulation if the project would:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

b. Conflict or be inconsistent with CEQA Guidelines § 15064.3(b) (VMT);

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

d. Result in inadequate emergency access.

4.14.4.2 Impacts and Mitigation Measures

Impact TR-1: The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (criterion a).

Expanded Use

The expanded use would continue to utilize existing stadium facilities, including several large parking lots directly adjacent to the stadium and existing driveway access along 2nd Avenue and Divarty Street that currently accommodate traffic associated with stadium events. The expanded use would not require construction of new transportation facilities or introduce vehicle types that are incompatible with the local or regional roadway network. Additionally, and as discussed in **Impact TR-4**, **Section 4.8, Hazards and Hazardous Materials**, and **Section 4.13, Public Services and Recreation**, the expanded use would not interfere with emergency access or response.

As discussed in **Impact TR-2** below, the expanded use would result in new VMT that would exceed the allowable thresholds. However, as summarized in **Section 4.14.1.3**, the existing use of the CSUMB Stadium, which was evaluated in the previous Freeman Stadium Renovations Project MND (i.e., the baseline condition) currently exceeds the VMT thresholds. As a requirement of that MND, CSUMB has implemented a TMP and TDM program which address circulation and traffic conditions during stadium events by managing event-related traffic and minimizing potential effects on the surrounding circulation system consistent with the circulation strategies identified in the 2022 Campus Master Plan. The TDM is intended to provide strategies to shift travel mode share away from single occupancy vehicle use toward safe and convenient non-automotive modes of transportation for all new activities in the stadium (CSUMB, 2021; Fehr & Peers, 2021). The TMP with TDM program manages and monitors MBFC and CSUMB event traffic with the primary performance standard of achieving less than 23.91 daily project-generated VMT per service population and achieving the following annual travel supporting performance standards:

- Less than 872,715 annual project-generated VMT
- Fewer than 61,185 annual vehicle trips

While the TMP establishes the performance standards and objectives for minimizing the effects of event generated VMT; the TDM program defines measures to be implemented to meet performance standards and objectives. These measures include, but are not limited to campus bicycle rental, maintenance, and parking; and an annual agreement for universal access to MST and three (3) supplemental campus-serving and subsidized bus routes. Continued implementation of the TMP and TDM program would be required for the proposed project; and would be implemented for the lifetime of the project consistent with the Freeman Stadium Renovations Project MND. Moreover, The TMP and TDM program are adaptable by design and require annual monitoring to ensure measures are effective.

Several comments were received during the NOP public scoping period regarding transportation. First, the comments suggested that the proposed project improve pathways to the CSUMB Stadium entrances. Pathways would include updated sidewalks, crosswalks, and bicycle improvements. Sidewalk, crosswalk, and bicycle improvements would continue to be addressed with implementation of the TMP. Moreover, improvements to these features were included in implementation of Freeman Stadium Renovations Project, and continue to be addressed as the Campus implements the 2022 Master Plan. To accommodate the increase in vehicles, and reduce potential effects to the circulation on the adjacent street network, widening of 2nd Avenue was suggested. Circulation impediments (i.e., Level of Service) are no longer required to be evaluated under CEQA (please refer to SB 743). Moreover, the increase in capacity of a road would not reduce the VMT impact, which is the basis of review for transportation related impacts. Regardless, circulation effects during CSUMB and MBFC events associated with the proposed expanded

use would be mitigated with implementation of the TMP and TDM program (please refer to **Impact TR-2**, below). Therefore, with implementation of **Mitigation Measures TR-1** through **TR-6,** the proposed expanded use would have a less than significant impact with respect to conflicting with adopted programs or plans addressing the circulation system.

Stadium Improvements

The improvements consist of new locker room and shower facilities, permanent restroom facilities, and a gated event storage and staging area to support existing stadium operations. These facilities would not be located within or adjacent to public roadways and would not require modifications to existing ingress or egress serving the Athletics and Recreation District. Access to the stadium would continue to occur via existing driveways and circulation routes serving the facility. In addition, the improvements would not increase stadium seating capacity, event frequency, or attendance and, therefore, would not generate additional vehicle trips or alter traffic circulation patterns associated with stadium events. Because the proposed stadium improvements would maintain existing access points and operational characteristics of the CSUMB Stadium, it would not affect the performance of the surrounding circulation system or conflict with adopted circulation planning documents**.** Therefore, the proposed stadium improvements would have a less than significant impact regarding conflict with adopted programs or plans addressing the circulation system.

Mitigation Measures

Mitigation Measure TR-1: Transportation Management Plan.

CSUMB shall continue to develop and implement its TMP with a TDM program component, prior to the commencement of and during events proposed as part of the project's expanded use. The TMP shall provide a management and operating plan for minimizing undesirable transportation-related effects at CSUMB Stadium and adjacent developments during events, while providing safe and convenient access for employees and spectators to the project. The TDM program shall provide a plan to reduce the amount of vehicle traffic generated by the MBFC and CSUMB special event activities by shifting employees, team personnel, match spectators, and CSUMB visitors from driving alone to using transit, carpooling, cycling, and walking modes.

Mitigation Measure TR-2: Transportation Management Plan Monitoring.

CSUMB shall continue to monitor all CSUMB and MBFC athletic and non-athletic events to evaluate the effectiveness of the TDM program and the supporting performance measures of mode share, vehicle occupancy, and average vehicle distance traveled. These event-specific performance measures are necessary to determine the effectiveness of the TDM program and help identify additional VMT reduction measures. The TDM program shall continue to be implemented for the lifetime of the project; and CSUMB shall modify measures as needed during the life of the project to ensure the TDM achieves the overall vehicle miles traveled reduction objective.

Mitigation Measure TR-3: Transportation Management Plan Objectives.

The TMP with the TDM program shall be updated to reflect the project's expanded use of the CSUMB Stadium. Specifically, the objectives should reflect the addition of CSUMB and MBFC athletic and non-athletic events as described in the EIR while reflecting:

- The reduction of overall automobile trips to and from the stadium to achieve fewer than 61,185 annual vehicle trips;
- Achieving a 75% vehicle mode share for MBFC event attendees;
- Achieving a 58% vehicle mode share for CSUMB Students attending the CSUMB events;
- Achieving a 77% vehicle mode share for community members attended CSUMB events; and,
- Achieving average vehicle occupancy of 3.91 persons per vehicle (or greater).

The event-specific supporting performance standard shall continue to be monitored and shall reflect less than 23.91 project generated VMT per service population, and achieve less than 872,715 annual project generated VMT.

Mitigation Measure TR-4: Transportation Demand Management Program.

To the extent possible and effective, the TDM program shall continue to rely on the existing CSUMB TDM program to reduce CSUMB student, faculty, and staff vehicle travel. Prior to the operation of the expanded use of the CSUMB Stadium, the following measures shall be in place:

- Otter Cycle Center – on-campus bicycle repair shop that also offers bicycle rentals and other services to facilitate bicycle ridership.
- Bicycle Storage and Amenities – several hundred bicycle racks have been installed on campus outside of residence halls and popular academic, recreation and administrative buildings. Additionally, a secure bicycle bunker storage room has been installed, as well as three (3) 'fix-it' stations that provide 24/7 access to bicycle repair tools and air pumps. Bicycle registration is also available through the University Police Department to simplify that process. Three (3) skateboard storage racks also have been installed in the popular destinations on campus.
- Paid Parking – to discourage non-CSUMB related trips and parking on campus, as well as manage the vehicles allowed on campus, a fee structure is in place that is based upon user type. The fees have increased several times over the last two decades to more accurately match the true cost of providing managed parking.
- MST – the campus has entered into an annual agreement with MST that provides universal access on the MST bus network for all active CSUMB ID card holders, three (3) supplemental campus-serving and subsidized bus routes, and funding for a shared transit marketing student intern.
- Main Campus Shuttle – the campus has secured funding and has begun the procurement process to initiate a shuttle program provider to run frequent circulating shuttle service around the Main Campus, connecting all major parking areas to academic, administrative, and co-curricular campus destinations.

- Emergency Ride Home Program – campus community members can sign up for a program run by the Transportation Agency for Monterey County (TAMC) that reimburses taxi or ridesharing trips home in emergency situations for commuters who use alternative means of transportation.

- Carsharing and Ridesharing – CSUMB hosts four cars for carsharing. These are cars stationed on the campus available to be used by carshare members on the campus. CSUMB students, faculty and staff can use Go831, a regional ride share program. Additionally, CSUMB includes information for the Commute with Enterprise vanpool program on its website to facilitate information dissemination and encourage ridesharing to stadium events.

- Transportation Services Website – information for most of the TDM strategies are included on a campus website to facilitate information dissemination.

- Delivery Vehicle Limitations – to discourage delivery vehicle trips, frequent delivery services to campus, such as office supplies, have been instructed to reduce their deliveries to campus to no more than three (3) days per week.

- Bicyclist/Pedestrian Malls – to encourage pedestrian and bicycle use, a section of Divarty Street and a section of Sixth Avenue are closed to regular vehicular traffic and encourage pedestrians and bicyclists to use the entire roadway.

- Traffic Calming – to discourage auto use (and improve safety), speed humps and flashing beacon crosswalk devices have been installed on several campus roadways to encourage lower vehicle speeds, particularly near high traffic pedestrian crosswalks.

- E-Scooter Share – The campus has entered into a multi-year agreement with an electric scooter share program provider. Students, faculty, staff, and campus visitors can use the app-based program to ride a scooter across campus instead of driving or walking.

Mitigation Measure TR-5: Transportation Demand Management Program Monitoring.

During the first year of operations, each CSUMB and MBFC athletic and non-athletic event shall be monitored by CSUMB to identify how the activities meet the anticipated primary performance standard (project-generated VMT per service population), annual travel supporting performance standards (annual project generated VMT, and annual vehicle trips) and event specific supporting performance standards (mode share, average vehicle occupancy). An annual monitoring memorandum shall be submitted to CSUMB's Director of Campus Planning & Development. If the CSUMB and MBFC athletic and non-athletic events are found not to meet the anticipated performance standards, then additional travel reducing measures from the TMP and TDM program will be implemented to aim to achieve the performance standard. CSUMB may propose new strategies that develop over time to further reduce annual project generated VMT per service population if substantial evidence is provided to support the efficacy of the strategy.

Mitigation Measure TR-6 :Alternative Monitoring Approach.

CSUMB may develop a regionwide VMT monitoring program to allow global monitoring of the stadium VMT, which may provide cost efficiencies and be a more effective way to track VMT generation foreach event. This monitoring program may make use of emerging technologies including location-based services

on cell phones and in vehicles to track trip lengths, along with traditional technologies such as driveway traffic counts. If such a program is developed, CSUMB shall ensure the project is monitored and achieves the required performance with respect to the project's VMT target.

Impact TR-2: The proposed project would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) (criterion b).

Expanded Use

CEQA Guidelines Section 15064.3, subdivision (b)(1) requires the evaluation of transportation impacts of projects based on VMT. CEQA uses the VMT metric to evaluate a project's transportation impacts. Fehr & Peers evaluated VMT impacts using the 2019 CSUMB Transportation Impact Study Manual. As discussed in **Section 4.14.3, Methodology**, to determine whether the project has a direct impact on the environment, the Traffic Study compared project-generated VMT per service population to the project-generated VMT per service population threshold under Existing Conditions (this threshold is defined as 15 percent below Monterey County's project-generated VMT threshold under Existing Conditions).

Service Population

The service population for the proposed project is 235 employees (85 home team personnel, 144 visitor team personnel, and six [6] full-time equivalents for the CSUMB part-time team personnel), as detailed in **Chapter 3.0, Project Description** and summarized below.

MBFC will generate new employment for the three (3) additional teams with team personnel (85 staff, coaches, and players for the home team and 144 staff, coaches, and players for the visiting team).

The 85 home team personnel include:

- 31 USL Super League players and staff,
- 27 USL League Two players and staff, and
- 27 USL W League players and staff.

The 144 visitor team personnel include:

- the 23 players and 25 staff for the USL Super League visiting team,
- the 23 players and 25 staff for the USL League Two visiting team, and
- the 23 players and 25 staff for the USL W League visiting team.

The additional CSUMB and MBFC events will share existing part-time event staff. Some employees would be part-time while others would be full-time. To be consistent with the AMBAG travel model employment inputs, Fehr & Peers converted the part-time employment to full-time employment. Match spectators are not included as an independent variable in the AMBAG travel model equations and, therefore, are not included in the service population.

The Transportation Study treats the CCAA and NCAA team personnel for the championships as part-time staff for the service population and anticipates these staff members would work three (3) to 14 hours for each match based on information from CSUMB. CSUMB staff have estimated that these new part-time team personnel would work approximately 13,328 annual hours of work per year. A full-time job is 2,080 hours per year, which would translate into six (6) full-time equivalent employee jobs.

VMT Calculation

Using StreetLight Data for 2024 and 2025, Fehr & Peers evaluated spectator distribution for all CSUMB and MBFC matches and events. Due to the lack of granularity, and more specifically, because it would be speculative at this time to define and distinguish each CSUMB and MBFC event that could occur, CSUMB and MBFC were assigned the same spectator distribution. Consistent with the earlier stadium renovation project's VMT analysis, special event activities were converted to vehicle trips and VMT by estimating the total annual person trips, total annual vehicle trips, total annual project-generated VMT, and daily project-generated VMT.

Table 4.14-4
Summary of VMT Analysis Metrics

	Total
Number of People	33,889
Annual Person Trips	1,239,562
Annual Vehicle Trips	474,665
Annual Project-Generated VMT	5,961,317
Daily Project-Generated VMT	16,326

Source: Fehr & Peers, 2026

Project-Generated VMT (Direct Impacts)

As shown in **Table 4.14-4**, the 16,326 daily project-generated VMT would occur with the new MBFC leagues and CSUMB special event activities. On a per service population basis, project-generated VMT would exceed the VMT threshold of 23.91 by almost 300 percent. This is due to MBFC hosting three (3) new leagues and special events that would have 3,000–6,000 attendees per day, and CSUMB hosting four (4) championship events and community events that would have 1,200 - 6,000 attendees per event/day.

As stated previously, the significance threshold for project-generated VMT is 23.91, which is 15 percent below the Existing Conditions VMT per service population for Monterey County of 28.12 VMT. Under the Existing with Project Conditions, the project would generate a VMT per service population of 69.47 VMT, as shown in **Table 4.14-5**, below. As this number is above the threshold of 23.91, the project-generated VMT under Existing with Project Conditions would be a significant impact.

MBFC plans to host three (3) new leagues (plus associated practices and matches for each league) and other events on 48 days annually, and CSUMB plans to host four (4) championships and 32 other community events, with most of the spectators for each event expected to travel by vehicle. Annually, the project would generate the following:

- 1,239,562 person trips,
- 474,665 vehicle trips, and

- 5,961,317 annual project-generated VMT

Most of the annual project-generated VMT is generated by the MBFC match spectators, MBFC event participants, and CSUMB and community visitors to the CSUMB community events.

- The 300-4,000 MBFC match spectators per match have an 84% vehicle mode share and an average vehicle occupancy of 2.45 persons per vehicle and an average vehicle distance of approximately 13 miles.

- The 3,000 daily attendees for the Winter Festival and 6,000 daily attendees for the concerts have an 84% vehicle mode share and an average vehicle occupancy of 2.45 persons per vehicle and an average vehicle distance of approximately 13 miles.

- The 300-400 CSUMB NCAA and CCAA championship match spectators have an 83% vehicle mode share and an average vehicle occupancy of 2.45 persons per vehicle and an average vehicle distance of approximately 13 miles.

- The 1,200-6,000 community guests for the CSUMB community events have an 84% vehicle mode share and an average vehicle occupancy of 2.45 persons per vehicle and an average vehicle distance of approximately 13 miles.

It should be noted that current and past matches and events in 2024 and 2025 drew predominantly local spectators. If the current project's matches and events draw spectators from a larger regional "commute-shed," VMT may be greater still.

Table 4.14-5
Project-Generated VMT

CSUMB Campus Comparison	Existing Conditions	Project Generated VMT	Existing with Project Conditions
Daily Project-Generated VMT	178,500	16,326	194,826
Service Population	8,000	235	8,235
Project-Generated VMT per Service Population	22.31	69.47	23.66

Source: Fehr & Peers, 2026

CSUMB will continue to monitor implementation of the TMP and adjust programs to further lower vehicle trips and the percentage of spectators arriving by car for matches and special events. While the TMP provides tools to reduce the transportation impacts of additional activities, it cannot fully eliminate those impacts. Increased activity will inevitably generate more travel demand. However, the implementation of the TMP will help reduce trips and is a reflection of CSUMB's best effort to reduce VMT impacts.

Mitigation Measure TR-1, which requires continued implementation of the TMP with a TDM program, was developed for the 2021 Freeman Stadium Renovations Project. **Mitigation Measure TR-1** would be adapted to reflect the additional activities proposed under the current project, to reduce project-generated VMT to the maximum extent feasible. The TMP is designed as a flexible framework that can be updated to address new or expanded activities at the stadium or on campus. CSUMB would adapt the TMP in the following ways:

- **Flexible, Scalable Strategies**
  - The TMP's core strategies shifting travel away from single-occupancy vehicles, enhancing non-auto modes, and managing parking are scalable. As new activities are added, these strategies can be expanded or intensified to address increased travel demand.
  - The plan includes a process for ongoing monitoring and annual review, allowing CSUMB to identify emerging needs and adjust measures accordingly.
- **Targeted Improvements for New Activities**
  - For each new or expanded activity, the TMP would assess expected attendance, travel patterns, and peak periods.
  - Additional or modified pedestrian, bicycle, transit, and parking improvements would be prioritized based on the specific needs of the new activities.
  - Operational procedures (e.g., traffic control, wayfinding, event communications) would be updated to reflect the unique requirements of each event type.
- **Enhanced Coordination and Communication**
  - The TMP calls for regular coordination meetings among CSUMB, stadium tenants, and local agencies. These meetings would be used to plan for new activities, share event calendars, and minimize conflicts.
  - Communication strategies (such as updated wayfinding, event information, and incentives for non-auto travel) would be tailored to reach new audiences.
- **Monitoring and Adaptive Management**
  - The TMP's monitoring program would track the effectiveness of strategies as new activities are introduced.
  - If monitoring shows that VMT, vehicle trips, or parking demand are approaching or exceeding thresholds, CSUMB would implement additional measures or refine existing ones.

Consistent with the previous Freeman Stadium Renovations Project MND, implementation of **Mitigation Measure TR-1** through **Mitigation Measure TR-6** would be required. While the TMP is adaptable and provides a set of tools to reduce transportation impacts of the expanded use, a TMP cannot always fully eliminate the proposed project's VMT impacts. Increased activity will inevitably generate more travel demand, and no additional mitigation measures are available to minimize impacts to a less than significant level. Therefore, the expanded use component of the project would have a significant and unavoidable VMT impact.

Stadium Improvements

The proposed stadium improvements involve construction and operation of proposed locker room and shower facilities, permanent restroom facilities, and a storage and staging area. Operation of these improvements would not increase the capacity of the stadium or increase the frequency of events; and therefore, would not generate additional vehicle trips. Construction, albeit temporary, would require construction vehicle trips, however, due to the limited intensity and size of improvements the construction VMT effects would likely result in fewer than 110 vehicle trips per day and would not result in a significant impact. For these reasons, the proposed stadium improvements would have a less than significant impact.

Mitigation Measures

Please refer to **Impact TR-1** for full text of **Mitigation Measure TR-1** through **Mitigation Measure TR-6**.

Impact TR-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (criterion c).

Expanded Use

The proposed expanded use would utilize the existing stadium facilities located in the Athletics and Recreation District of the CSUMB's campus. This area contains several large parking lots directly adjacent to the stadium, and existing driveway improvements along 2nd Avenue and Divarty Street that would continue to accommodate traffic associated with stadium events. The proposed expanded use would not directly require construction of new facilities and would not include the use of vehicles incompatible with local and regional roadways. Furthermore, the continued use of the stadium for athletic and non-athletic events is compatible with surrounding land uses in the Athletics and Recreation District of campus. For these reasons, the proposed expanded use of the stadium would not substantially increase hazards due to a geometric design feature or incompatible uses, and, therefore, would have no impact related to hazardous geometric design.

Stadium Improvements

The proposed stadium improvements involve construction and operation of proposed locker room and shower facilities, permanent restroom facilities, and a storage and staging area. These facilities would be located within and adjacent to the existing stadium and away from local roadways. The storage and staging area would rely on an existing paved drive lane with a curb cut for improved access. However, the storage and staging area would be located among the northern parking lot area adjacent to the stadium and away from local roadways. Therefore, the proposed stadium improvements would not require construction to or along local roadways and would not change the existing ingress or egress of the stadium. Furthermore, the proposed stadium improvements would facilitate future use of the existing stadium, and are, therefore, compatible with existing infrastructure and uses at the project site. For these reasons, stadium improvements would not substantially increase hazards due to a geometric design feature or incompatible uses, and, therefore, would have no impact related to hazardous geometric design.

Mitigation Measures

No mitigation is required for **Impact TR-3**.

Impact TR-4: The proposed project would not result in inadequate emergency access (criterion d).

Expanded Use

The proposed expanded use of the stadium would not result in inadequate emergency access to the project site. The proposed expanded use of the stadium would increase the annual number and frequency of events at the CSUMB Stadium. However, the existing occupancy of the stadium, approximately 6,000 ticketed seats, would remain unchanged. The existing stadium and adjacent parking facilities are designed to accommodate approximately 6,000 attendees and staff members for each event. Furthermore, the proposed expanded use would not require construction of new facilities, especially those within the roadways or along the ingress or egress of the adjacent parking facilities. Therefore, the proposed expanded use of the stadium would have a less than significant impact regarding inadequate emergency access.

Stadium Improvements

Please refer to **Expanded Use,** above**.** The proposed stadium improvements would not result in inadequate emergency access to the project site. The proposed stadium improvements consist of new locker room and shower facilities, permanent restroom facilities, and a storage and staging area. None of these facilities would be located along a roadway or require improvements to the existing ingress or egress of the Athletics and Recreation District. Both construction and operation of the stadium improvements would occur either in the stadium or in the adjacent parking facility north of the stadium. Therefore, the proposed stadium improvements would have a less than significant impact regarding inadequate emergency access.

Mitigation Measures

No mitigation is required for **Impact TR-4**.

4.14.5 Significance After Mitigation

Implementation of **Mitigation Measure TR-1** through **Mitigation Measure TR-6** would minimize the proposed project's VMT impacts (please refer to **Impact TR-1** and **Impact TR-2,** above) by requiring continued implementation of CSUMB's TMP and TDM program. The TMP with the TDM program manages and monitors CSUMB and MBFC event traffic with the primary performance standard of achieving less than 23.91 daily project-generated VMT per service population and achieving the annual travel supporting performance standards of less than 872,715 annual project-generated VMT, fewer than 61,185 annual vehicle trips. The TMP and TDM Program also include project objectives to address circulation and public transit to reduce single occupancy vehicle use and manage event-day circulation effects. Implementation of the mitigation measures would reduce Impact TR-1 to less than significant; however, the proposed project would still exceed the VMT thresholds and, therefore, result in a significant and unavoidable VMT impact.

4.14.6 References

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4.15 UTILITIES AND SERVICE SYSTEMS

This section assesses the proposed project's potential impacts on utilities and service systems within the proposed project area. The following section: 1) describes the environmental setting, 2) identifies the regulatory requirements applicable to the proposed project, and 3) evaluates the potential environmental effects associated with the proposed project and identifies applicable mitigation measures to reduce the extent of impacts to a less than significant level, where feasible. The utilities discussed include potable water service, wastewater service, solid waste facilities, and electricity and natural gas. **Section 4.9, Hydrology and Water Quality,** discuss impacts related to water quality and stormwater/drainage infrastructure.

This EIR identifies and addresses issues raised in public comments that may have potentially significant effects on the environment and issues raised by responsible agencies according to CEQA. No comments were received concerning utilities and service systems during the public scoping period for the ~~Draft~~ EIR (please refer to **Appendix A, NOP and Public Comment Letters**).

4.15.1 Environmental Setting

4.15.1.1 Water Supply

The proposed project is located within CSUMB's main campus. As discussed in **Section 4.9, Hydrology and Water Quality**, water supplied to the project site is primarily sourced from groundwater from the SVGB and provided to the campus by MCWD. MCWRA regulates water withdrawals from the SVGB. Per the agreements with the MCWRA, 6,600 AFY of groundwater are allocated to the service area that includes CSUMB. The campus's water supply infrastructure is divided into separate zones. Zone B services the northern and western areas of campus as well as the main campus and east campus housing. The project site currently receives water from Zone B infrastructure. Existing water use at CSUMB Stadium consists of permanent facilities in the Field House and beer garden and occasional watering of the turf field. Furthermore, the existing water fixtures in the Field House are equipped with low flow facilities including dual-flush toilets and waterless urinals (CSUMB, 2021). CSUMB Stadium uses approximately 41 portable restrooms, six (6) handwashing stations, and a portable shower in place of permanent fixtures and facilities.

Of the 6,600 AFY, MCWD specifically allocated CSUMB 1,035 AFY of potable water. At full buildout of the Master Plan, CSUMB expects to have 404 AFY of this allocation remaining for additional uses (CSU, 2022a; CSU, 2022b). Additionally, CSUMB receives reclaimed/recycled water at a rate of approximately 87 AFY from MCWD, and has installed recycled water irrigation piping for all newly created landscapes (CSU, 2022b). **Section 4.15.2** describes 2022 CSUMB Master Plan Guidelines policies for reducing water use. As discussed, the stadium was previously renovated and evaluated in the Freeman Stadium Renovations Project MND; which evaluated the existing use and facilities (please refer to **Chapter 3.0, Project Description**). This prior environmental evaluation estimated water demand at approximately 1.03 AFY (CSUMB, 2021). CSUMB constructed the Freeman Stadium Facilities Renovation Project in 2021, and operation of the stadium for CSUMB and MBFC events began thereafter. CSUMB reviewed the water demand based on one (1) year of operation between July 2024 and June 2025 and determined that the existing stadium required approximately 0.48 AFY of potable water (per communications between DD&A and CSUMB dated September 11, 2025).

4.15.1.2 Wastewater

MCWD owns, operates, and maintains the sanitary sewer system serving CSUMB. Two (2) distinct systems made up of various pipe collectors and one (1) lift station serve CSUMB. One (1) of these two (2) sewer systems also collects waste from areas adjacent to CSUMB whose wastewater flows pass through the campus in MCWD's system. The campus buildings include dining commons, residence halls, classrooms, and recreation buildings. Wastewater derived from the existing stadium and the proposed project site utilizes MCWD Collector N. This line continues off campus to the west where it connects to the Monterey Water One (M1W) pump station at SR 1 (CSU, 2022a). Here, wastewater is pumped to the M1W treatment plant two (2) miles north of Marina. The M1W Regional Treatment Plant north of Marina began operation in 1990, currently treats approximately 18 million gallons per day (MGD), and maintains a daily operational capacity of 29.6 million gallons (M1W, 2025). The Freeman Stadium Renovations Project MND identified that the existing Field House accounts for approximately 248 gallons per day (GPD) of wastewater, which is equivalent to 90,520 gallons per year (0.27 AFY) (CSUMB, 2021). Based on more recent data provided by CSUMB, the project site currently generates approximately 420 GPD of wastewater, or 153,300 gallons per year (0.47 AFY) of wastewater in the Field House and beer garden (per communications between DD&A and CSUMB dated September 11, 2025).

4.15.1.3 Solid Waste

CSUMB is located within the jurisdiction of the Monterey Regional Waste Management District (ReGen Monterey). ReGen Monterey's jurisdiction encompasses approximately 853 square miles and includes the cities of Carmel-by-the-Sea, Del Rey Oaks, Marina, Monterey, Pacific Grove, Sand City, Seaside, and unincorporated areas of Big Sur, Carmel Highlands, Carmel Valley, Castroville, Corral De Tierra, Laguna Seca, Moss Landing, Pebble Beach, San Benancio, and Toro Park. ReGen Monterey's landfill is located two (2) miles north of the City of Marina and consists of a 315-acre permitted sanitary landfill site, 20 acres of resource recovery facilities, a 12-acre Community Franchise Collection Facility, and administrative offices and maintenance buildings (ReGen Monterey, 2025).

ReGen Monterey holds three (3) permits for their operations. These permits allow operation of the solid waste landfill, large volume transfer/processing facility, and composting facility. The landfill has a total permit capacity of 49,700,000 cubic yards. The California Department of Resources, Recycling, and Recovery (CalRecycle) last updated the remaining capacity of the landfill in 2004, which CalRecyle estimates to be approximately 48,560,000 cubic yards. The solid waste landfill permit allows for a maximum daily volume of 3,500 tons per day, and ReGen Monterey's permit for the landfill lasts through February of 2107. The large volume transfer/processing facility permit encompasses 15 acres of operation at ReGen Monterey's site. The permit allows for this permitted facility to process a maximum of 1,500 tons of waste per day. The composting facility permit allows ReGen to conduct composting activities, which comprise 10 acres of their site (CalRecycle, 2025).

GreenWaste collects solid waste and processes these materials with a goal of diverting more than 75 percent of debris for recycling. Additionally, GreenWaste collects organic materials generated from both food and yard waste. In Monterey County, GreenWaste operates the Community Franchise Collection Facility located at ReGen Monterey's site outside the City of Marina (Regen Monterey, 2025; GreenWaste, 2025).

Solid waste generated by the operation of the CSUMB Stadium was previously evaluated in the Freeman Stadium Renovations Project MND; and determined that 0.2478 tons of waste annually would be generated.

4.15.1.4 Natural Gas and Electricity

PG&E is the main service provider of natural gas to the campus, including the project site, at one (1) metered location. PG&E's infrastructure connects with a campus-owned natural gas distribution system, which supplies most buildings across the CSUMB campus with natural gas (CSU, 2022a). PG&E and SunEdison provide energy to CSUMB and the project site. CSUMB owns a medium-voltage electricity distribution system that connects with every building on campus. PG&E provides electricity at a single metered location, and SunEdison provides electricity from a 1.0 MW solar tracking PV generation facility. Sun Edison owns this facility and operates it under a 20-year contract with CSUMB (CSU, 2022a). This EIR discusses state and regional energy use, as well as PG&E's partnership with 3CE, in greater detail in **Section 4.5, Energy.** Existing utility connections at the project site provide these energy resources to the Field House and stadium lighting facilities. Operation of the proposed locker room and restroom facilities would connect with this existing utility infrastructure.

4.15.2 Regulatory Environment

4.15.2.1 Federal and State

SAFE DRINKING WATER ACT

The Safe Drinking Water Act is the primary Federal law, administered by the EPA, which regulates the quality of drinking water and establishes standards protecting public health and safety. The California Department of Health Services implements the Safe Drinking Water Act and oversees public water system quality statewide, establishing legal drinking water standards for contamination that could threaten public health.

ENERGY STAR PROGRAM

Energy Star is a government-backed symbol for energy efficiency, administered by the US EPA. The Energy Star program provides energy and water use requirements for a range of appliances including washing machines and ice machines. Energy Star washing machines use, on average, 14 gallons of water per load compared to standard machines (Energy Star, 2025a). The Energy Star program identifies a range of requirements for air-cooled ice machines based on the design and type of ice each machine produces. For a smaller athletic training facility, this analysis assumes that CSUMB will install a self-contained unit air-cooled continuous-type ice maker producing around 200 pounds of ice per day (Energy Star, 2025b). Continuous-type ice makers produce flaked ice, as opposed to cubed, which offers better malleability for treatment of sports injuries. Additionally, an athletic facility of this size is unlikely to require ice machines capable of producing 800 to 4,000 pounds of ice per day as these quantities better serve large restaurants or medical facilities.

CALIFORNIA CODE OF REGULATIONS TITLE 20

CCR Title 20 requires manufacturers of appliances to meet state and federal standards for energy and water efficiency, and the CEC regulates and certifies all manufactured appliances in the state. Title 20 sets forth three (3) appliance standards comprised of federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances. Appliance regulated under Title 20 includes refrigerators, refrigerator-freezers and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 is currently amended through 2024 to reflect changes in federal law, revise data submittal requirements, and update product compliance review and administrative procedures (CEC, 2024).

CALIFORNIA GREEN BUILDING STANDARDS CODE

In 2025, California adopted the most recent version of CalGreen, which establishes mandatory green building standards for new and remodeled structures in California. These standards include a mandatory set of guidelines and more stringent voluntary measures for new construction projects, to achieve specific green building performance levels, such as recycle and salvage 65 percent of nonhazardous construction and demolition debris.

Additionally, Section 5.303 of the 2025 CalGreen requirements sets the following maximum water use rates for toilets, sinks, and showers:

- Toilets: 1.28 gallons/flush
- Sink: 0.5 gallons/minute
- Shower: 1.8 gallons/minute

CALIFORNIA PUBLIC UTILITIES COMMISSION

The CPUC is responsible for ensuring that investor-owned (private) water, energy, and telecommunications utilities deliver safe, clean, and reliable services to their customers at reasonable rates. The CPUC adopts Rules of Practice and Procedure and issues General Orders to regulate various aspects of rates, services, facilities, and the safety and financial practices of utilities, including provisions regarding water quality.

CALIFORNIA INTEGRATED WASTE MANAGEMENT ACT OF 1989

The California Integrated Waste Management Board (CIWMB) was created to oversee, manage, and track waste generated in California. AB 939 and SB 1322 promulgated the authority and responsibilities of the CIWMB, and these policies which were signed into law as the California Integrated Waste Management Act of 1989 (PRC, Division 30). The California Integrated Waste Management Act, as modified by subsequent legislation, mandated all California cities and counties to implement programs to reduce,

recycle, and compost at least 50% of waste by 2000 (PRC Section 41780). In January 2010, the CIWMB changed its name to the California Department of Resources, Recycling, and Recovery, or CalRecycle.

AB 341, which amends the Integrated Waste Management Act of 1989 and was adopted by the California legislature in October 2011, directs CalRecycle to adopt a state policy that actively seeks to achieve diversion of 75% of solid waste from landfills by 2020. This legislation focuses largely on commercial waste generators, as the state identified this sector as most in need of improved waste management. AB 341 does not alter the 50% diversion mandate; rather, AB 341 is a "legislative declaration of policy" to guide CalRecycle's administration of the California Integrated Waste Management Act.

A jurisdiction's diversion rate is the percentage of total generated waste diverted from disposal through source reduction, reuse, and recycling programs. The state determines compliance with the 50% diversion mandate through a complex formula described in PRC Section 41780.2. Use of this formula requires cities and counties to conduct empirical studies to establish a base-year waste generation rate against which future diversion is measured. The diversion rate in subsequent years is determined through deduction instead of direct measurement. Rather than counting the amount of material recycled and composted, the city or county tracks the amount of material disposed of at landfills and then subtracts that amount from the base-year amount; the difference is assumed to be diverted (PRC Section 41780.2).

CSU Systemwide Sustainability Policy

The CSU implements sustainability policies across its universities. The policies applicable to the proposed project's potential impact on utilities and service systems include requirements for solid waste reduction and energy use and dependance. The CSU had previously instituted policies to reduce water use by 10 percent and 20 percent by 2016 and 2020, respectively (CSU, 2024). In Spring 2024, the Board of Trustees adopted an update to the CSU Systemwide Sustainability Policy, which was first adopted in 2014 with subsequent updates in 2019, 2020, and 2022. The current update became effective October 18, 2024. The policy aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. The CSU Sustainability Policy established the following goals:

The CSU implemented waste management policies to reduce solid waste disposal to 50 percent by 2030, and divert at least 80 percent from landfill by 2040, and move towards zero waste. This policy has been revised since its inclusion in the CSUMB Master Plan Guidelines where the sustainability policy aimed for 50 percent waste diversion by 2016 and 80 percent by 2020 (CSU, 2024; CSU, 2022b).

CSU institutions must implement policies to address energy use and dependence. The CSUMB Climate Action Plan and 2022 CSUMB Master Plan Guidelines incorporate the CSU Sustainability Policy. These policies direct CSU institutions to increase on-site self-generation capacity to 80 megawatts, procure more than one-third of electricity from renewable sources, and implement energy efficiency measures to reach GHG reduction goals (CSU, 2024; CSU, 2022b).

California State University, Monterey Bay Master Plan Guidelines

The following goals and policies described in the 2022 CSUMB Master Plan Guidelines may be applicable to the proposed project (CSU, 2022b):

WS 1.6 Reduce potable water use to levels below CalGreen standards in all new construction projects.

WS 1.9 Use non-potable water supply for all non-potable water demands in any new improvement on Campus, such as landscaping, toilet flushing, and industrial uses.

WS 1.10 Pursue ambitious water conservation goals for all buildings.

WS 1.11 Avoid relocation of existing sewer mains, if possible, in new development.

WS 1.12 Expand the Campus greywater system with each new development.

Goal ES 1 Achieve carbon neutrality and pursue net positive energy.

ES 1.3 Strive to limit natural gas usage to lab space and necessary food preparation areas, sourcing heating needs from renewable, electric sources.

ES 2.2 Target a minimum 15 percent energy performance improvement over current Title 24 code in new construction.

ES 2.3 Target a minimum 5 percent energy performance improvement over current usage in existing facilities.

Additionally, the 2022 CSUMB Master Plan Guidelines encourage the building design standards separate from specific policies to address energy, water, and waste on campus. These standards include (CSU, 2022b):

- Utilize efficient technologies to minimize the amount of energy needed to meet heating or cooling loads not met through passive strategies.
- Utilize occupancy sensors to automatically turn off equipment and lighting in order to lower demand and reduce peak equipment sizing.
- Design buildings to meet lower-temperature heat distribution.
- Design buildings with high water use, such as residence halls, recreation centers, etc., to be ready for future recycled.
- Pursue aggressive water conservation goals for all buildings.
- Incorporate signage with detailed information on where to place materials.

4.15.2.2 Local

SEASIDE GENERAL PLAN

As a campus within the CSU system, which is a state entity, CSUMB is not subject to local government permitting, regulations, policies, or ordinances, such as the general plans and ordinances for the City of

Seaside. However, this document summarizes goals and policies from the City of Seaside's General Plan for information purposes only, to provide context for the analysis. The City of Seaside's General Plan includes the following relevant policies (City of Seaside, 2024):

Resource Efficiency. Provide incentives to encourage new development to be more water and energy efficient and use fewer natural resources to increase long-term neighborhood resilience.

Conservation and Efficiency. Increase energy and water conservation and efficiency at new and existing park and recreation facilities.

Infrastructure for New Development. Require a plan to provide adequate infrastructure and utility service levels before approving new development.

Utilities Below Grade. To the maximum extent feasible, install infrastructure to facilitate the delivery of all utilities below grade when feasible.

Regional Coordination. Continue to work cooperatively with local and regional water utilities, suppliers and agencies to maintain an adequate water supply for existing uses and develop new water supplies for development of the former Fort Ord lands and redevelopment within the city.

Service Levels. Ensure that adequate utility and telecommunication infrastructure support future development.

Water Conservation. Continue to actively promote water conservation by City residents and businesses through policies and programs outlined within the Climate Change and Sustainability Element. Provide disadvantaged communities with guidance and funding to increase water conservation and lessen rate burdens.

4.15.3 Methodology

Utilities and service systems impacts were evaluated based on a review of project characteristics, anticipated demand, and applicable planning and regulatory documents to determine whether the project would require new or expanded water supply, wastewater treatment, stormwater drainage, solid waste, or energy facilities. The analysis considers whether the project would result in increased demand that could exceed existing or planned capacity, require construction of new or expanded infrastructure, or conflict with applicable regulations, including solid waste diversion requirements. This evaluation is informed by applicable campus planning documents, including the CSUMB Master Plan and relevant campus infrastructure and sustainability policies, as well as local and regional utility planning documents, where available. The analysis also considers compliance with applicable regulatory requirements and service provider standards governing water supply, wastewater conveyance and treatment, stormwater management, solid waste, and energy use. Impacts were evaluated qualitatively through a comparison of project-related demand to existing and planned system capacity, considering the developed nature of the campus and the availability of existing infrastructure to serve the project. Where applicable, the analysis incorporates available information from utility providers and assumes adherence to established planning frameworks, design standards, and operational requirements.

4.15.4 Impacts and Mitigation

4.15.4.1 Thresholds of Significance

In accordance with Appendices G of the State CEQA Guidelines, the project would have a significant impact on utilities and service systems if it would:

a. 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;

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

d. 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; or

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.15.4.2 Impacts and Mitigation Measures

Impact UTL-1: The proposed project would not 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 (criterion a).

Expanded Use

The proposed expanded use of the existing stadium consists of an increase in the number and frequency of events per year. The increase in annual events would result in an increase in the use of water, electricity, wastewater treatment infrastructure, solid waste, and telecommunications transmissions. However, the proposed expanded use of the stadium would rely on the existing utility infrastructure available at the project site. Potential impacts for each utility are discussed below.

Water and Wastewater

The proposed expanded use of the stadium, as discussed further in **Impact UTL-2** and **Impact UTL-3** below, would utilize existing potable water and wastewater sewer connections at the project site. The proposed expanded use would not require the construction of new infrastructure and would rely on all existing facilities at the project site, including the portable shower and restroom facilities, until such time as the proposed stadium improvements are installed. This EIR evaluates construction and operation of the

proposed stadium improvements separately from the proposed expanded use. Impacts related to the proposed stadium improvements are discussed below.

The existing stadium provides portable restroom facilities, use of which does not require connection to or use of wastewater infrastructure. All attendees and most event staff would continue to use portable restroom facilities until such time the new permanent restrooms would be installed. The fieldhouse would continue to primarily serve athletic events and personnel; therefore, CSUMB and MBFC players, coaches and training staff, existing administrative staff, and visiting team personnel would use the existing restroom and showers in the fieldhouse, in addition to the portable showers that are currently on-site. The increase in use of the fieldhouse facilities would constitute a limited intensification of use and limited expansion of wastewater generated at the project site and new or expanded wastewater facilities would not be necessary.

Stormwater Drainage

As discussed in **Section 4.9, Hydrology and Water Quality**, the proposed expanded use of the stadium would not introduce new impervious surfaces. The project site is relatively flat with minimal sloping on the north and south sides of the site. The project site is also currently developed and largely paved, and the increase in the number and frequency of events would not impact the existing drainage system. Therefore, no new drainage system improvements would be required.

Electricity and Natural Gas

The proposed expanded use of the stadium would connect to existing electricity and natural gas infrastructure available at the project site. The CSU and CSUMB implement strict energy conservation policies, as discussed in **Section 4.5, Energy**. These policies include CSU Systemwide Sustainability Policy requiring all CSU facilities be operated in the most energy efficient manner, CSUMB Climate Action Plan and 2022 CSUMB Master Plan sustainability policy for identifying and implementing energy efficiency measures to reach GHG reduction goals, and 2022 CSUMB Master Plan Guidelines Policy ES 2.2 and Policy ES 2.3 requiring energy performance improvements over current CBC Title 24 code in new construction and a minimum five (5) percent energy performance improvement over current usage in existing facilities (CSU, 2024; CSU, 2022b). Therefore, the proposed expanded use of the stadium would not require new or expanded electrical or natural gas infrastructure.

Telecommunications

The proposed expanded use of the stadium would use existing electrical, natural gas, and telecommunications infrastructure at the project site. Since the occupancy at the stadium would remain the same as existing conditions, the proposed expanded use of the stadium would not increase the use of telecommunications services per event compared to existing conditions. These services would continue to serve the project site without the need for new or expanded infrastructure.

For these reasons, the proposed expanded use of the existing stadium would have a less than significant impact with respect to the relocation or construction of new or expanded utility infrastructure.

Stadium Improvements

The proposed stadium improvements would require extension of existing water and sanitary sewer lines within the project site for the proposed restroom and shower facilities and new permanent restroom facilities. Potential impacts are discussed based on each type of utility below.

Water and Wastewater

The proposed stadium improvements, as discussed in more detail in **Impact UTL-2** and **Impact UTL-3** below, would require extension of the existing potable water lines and sanitary sewer lines within the project site, specifically for the locker room and shower facilities and permanent restroom facilities. Improvements to the gated event storage and staging area would consist of permanent fencing and would not require installation of water fixtures.

As previously discussed, CSUMB indicated that water use for the most recent operational year, measured between July 2024 and June 2025, equated to approximately 0.48 AFY. DD&A used data provided by CSUMB, consisting of existing and proposed event attendance, number of events, visiting and home athletic team players and athletic staff (please refer to **Chapter 3.0, Project Description**), along with CalGreen Section 5.303 standards detailing the maximum water use rates for toilets, sinks, and showers to estimate the projected increase in water use under the proposed project. Additionally, the locker room and shower facilities would each have a washing machine and ice machine. Since CalGreen does not contain regulatory standards for these types of appliances, the water use calculations incorporated average performance based on Energy Star program standards, a government backed energy conservation program.

For the purposes of the analysis, water use calculations assumed that sinks, showers, and toilets would adhere to CalGreen standards; washing machines and ice machines would be Energy Star certified; and all water fixtures would use potable water rather than grey water. Additionally, to accurately estimate future water use associated with the proposed stadium improvements, DD&A calculated water use scenarios for existing athletic and non-athletic events and future events associated with the proposed expanded use of the stadium. Water use associated with locker room and shower facilities would largely occur for athletic events. Operation of the proposed locker room and shower facilities would account for approximately 2.15 AFY, and the permanent restroom facilities would account for approximately 6.30 AFY. Combined, the proposed stadium improvements would use approximately 8.45 AFY of the remaining campus allocation of 404 AFY. The proposed staging and storage area would not require installation of water fixtures that could increase water use. **Table 4.15-1** and **Table 4.15-2** below which summarizes the total water use demand by event type (i.e., athletic and non-athletic) for both CSUMB and MBFC and detail the assumptions inherent to the analysis.

Table 4.15-1
Locker Room and Shower Facilities – Estimated Water Use Demand

CSUMB Athletic Events	MBFC Athletic Events	Ice Machine	Total
0.58 AFY	1.5 AFY	0.07 AFY	2.15 AFY

The locker room and shower facilities would include the following fixtures: 1) toilets, 2) sinks, 3) showers, 4) washing machines, and 5) ice machines. This EIR estimates water use based on the average use of each appliance during each event over the course of a given year. The formulas used to estimate water use for the locker room and shower facilities are defined below:

- Toilets: (X) players + (X) athletic staff x 2 flushes x 1.28 gallons/flush x (X) events/year = (X) gallons/year --> convert to AFY

- Sinks: (X) players + (X) athletic staff x (0.5 gallons/minute x 0.33 minutes) x (X) events/year = (X) gallons/year --> convert to AFY

- Showers: (X) players + (X) athletic staff x 10 minutes x1.8 gallons/minute x (X) events/year = (X) gallons/year --> convert to AFY

- Washing Machines: X machines x 14 gal/load x 2 loads x (X) events = (X) gal/year --> convert to AFY.

- Ice Machines: X machines x 200lbs x (15gal/100lbs) x 365 days = (X) gal/year --> convert to AFY.

Except for ice machines, each formula was used to for each type of event throughout a modeled year of operation.[1] For the purposes of these calculations, events would include practices for both CSUMB and MBFC in addition to the matches and tournament described in **Chapter 3.0, Project Description**. Since the proposed locker room and shower facilities would replace existing water fixtures, existing athletic events (i.e., CSUMB men's and women's soccer practices and regular season matches and MBFC USL men's existing practices and regular season matches) were factored into the events variable for the water use calculations. The water use calculations factored in practices for each team by multiplying the number of days per week each team would practice by the number of months each team anticipates their seasons lasting. Every team is assumed to practice five (5) days a week. Existing CSUMB teams (i.e., the men's and women's programs) practice five (5) times a week for seven (7) months equaling 140 practices. Existing USL Men's team practices five (5) times a week for 10 months equaling 200 practices. Proposed USL teams would practice five (5) times a week for 11 months equaling 220 practices.

An important consideration for the locker room and shower facilities is that they would only be accessible to players and athletic staff for athletic events. Stadium visitors and event staff for athletic events and non-athletic events are assumed to use the proposed restroom facilities discussed further below. Additionally, non-athletic events are not assumed to use the locker room and shower facilities as the primary purpose of these facilities is to serve athletic events. The number of players and athletic staff were derived from the totals listed in **Chapter 3.0, Project Description**. Additionally, the players and athletic staff variables consist of both home and away teams for all athletic match and tournament events.

Water use rates for toilets, sinks, and showers were derived from Section 5.303 of the 2025 CalGreen requirements, as discussed in **Section 4.15.2.1**. Specifically, toilets operate at a rate of 1.28 gallons per flush, sinks at a rate of 0.5 gallons per minute, and showers at a rate of 1.8 gallons per minute. Based on preliminary design plans for the locker room and shower facilities (please refer to **Figure 3-4**), the water use calculations estimated the inclusion of two (2) washing machines and two (2) ice machines for each locker room and shower facility. As discussed in **Section 4.15.2.1**, the Energy Star program provides energy and water use requirements for washing machines and ice machines.

[1] Ice Machines are calculated on a per day basis rather than a per event basis since they operate continuously. Therefore, the total water use demand for ice machines are factored in independent of athletic events.

Energy Star washing machines use, on average, 14 gallons of water per load compared to standard machines (Energy Star, 2025a). The Energy Star program identifies a range of requirements for air- cooled ice machines based on the design and type of ice each machine produces. For a smaller athletic training facility, this analysis assumes that CSUMB will install a self-contained unit air-cooled continuous-type ice maker producing around 200 pounds of ice per day (Energy Star, 2025b). The following assumptions are inherent to the water use calculations:

- Players and athletic staff are each assumed to average two (2) flushes and two (2) washes per event.
- 0.33 minutes accounts for 20 seconds, which is the recommended time to wash one's hands from the Centers for Disease Control.
- 10 minutes per shower is a conservative time estimate, with greater shower time accounting for more water used per shower.
- Washing machines are assumed to operate at a rate of two (2) loads per athletic event, where the number of practices are included in the event totals.

Based on the presented formulas, data, variables, and assumptions, the locker room and shower facilities are estimated result in a total water use of 2.15 AFY (please refer to **Table 4.15-1**).

Table 4.15-2
Permanent Restroom Facilities – Estimated Water Use Demand

CSUMB Athletic Events	CSUMB Non-Athletic Events	MBFC Athletic Events	MBFC Non-Athletic Events	Total
0.44 AFY	2.34 AFY	1.82 AFY	1.7 AFY	6.30 AFY

The proposed permanent restroom facilities would include the following fixtures: 1) toilets, and 2) sinks. This EIR estimates water use based on the average use of each appliance during each event over the course of a given year. The formulas used to estimate water use for the permanent restroom facilities are defined below:

- Toilets: (X) people x 2 flushes x 1.28 gallons/flush x (X) events/year = (X) gallons/year --> convert to AFY
- Sinks: (X) people x 2 washes x (0.5 gallons/minute x 0.33 minute) x (X) events/year = (X) gallons/year --> convert to AFY

Similar to the water use calculations for the locker room and shower facilities above, the calculations for the permanent restroom facilities consider existing and proposed events since the restroom facilities would accommodate both. The variable for number of people includes the maximum number of attendees and the commensurate number of staff for each type of event (i.e., CSUMB athletic events, CSUMB non-athletic events, MBFC athletic events, and MBFC non-athletic events) as described in **Chapter 3.0, Project Description**. Please note that MBFC plans to host 21 non-athletic events. However, the Winter Festival would be a 28 day event with an estimated attendance of 6,000 spectators per day. For the purposes of this analysis, each of the 28 days constitutes one (1) event.

Players and athletic staff for athletic events are not factored into the water use calculations for the permanent restroom facilities, as these calculations assume they would use the fixtures provided in the locker room and shower facilities. Additionally, athletic practices are not considered in the water use calculations for the permanent restroom facility since these events would not include spectators or non-athletic event staff that would be expected to use the permanent restroom facilities. As previously stated, players and athletic staff are anticipated to use the locker room and shower facilities, not the permanent restroom facilities.

As with the locker room and shower facilities calculations, water use rates for toilets and sinks were derived from Section 5.303 of the 2025 CalGreen requirements, as discussed in **Section 4.15.2.1**. Specifically, toilets operate at a rate of 1.28 gallons per flush and sinks at a rate of 0.5 gallons per minute. The following assumptions are inherent to the water use calculations:

- Attendees and event staff using the permanent restroom facilities are assumed to average two (2) flushes and two (2) washes per event.

- 0.33 minutes accounts for 20 seconds, which is the recommended time to wash your hands from the Centers for Disease Control.

Based on the presented formulas, data, variables, and assumptions, the locker room and shower facilities are estimated result in a total water use of 6.30 AFY (please refer to **Table 4.15-2**).

The estimated water use demand of 8.45 AFY would be reduced with implementation of 2022 CSUMB Master Plan Guidelines policies for water conservation. Specifically, Policy WS 1.6 requires all new construction projects to reduce potable water use to levels below those required by the CalGreen standards, Policy WS 1.10 requires the campus to pursue ambitious water conservation goals for all buildings on campus, and Policies WS 1.9 and WS 1.12 encourage campus-wide use of grey water systems, especially for toilet flushing. Furthermore, the proposed locker room and shower facilities and permanent restroom facilities would legally be required to reduce water use below the remaining CSUMB water allocation provided by MCWD, which accounts for 404 AFY per year.

Regarding wastewater services, the proposed locker room and shower facilities and permanent restroom facilities would increase the amount of wastewater generated on-site**.** CSUMB provided wastewater data from 2024 which showed that existing stadium facilities generated approximately 0.47 AFY, or approximately 420 GPD (per communications between DD&A and CSUMB dated September 11, 2025). As specified above, DD&A calculated the estimated water use demand associated with the operation of the proposed stadium improvements, and found that the combined increase in water use under the proposed project would account for approximately 8.45 AFY. The water use calculations comprised water fixtures that would directly generate wastewater (i.e., toilets, sinks, showers, washing machines, and ice machines).[2] Therefore, the proposed project would generate an equivalent amount of wastewater, being 8.45 AFY, or 2,753,404 gallons per year. Annual wastewater generation of 2,753,404 gallons averages to approximately 7,543 GPD. Therefore, based on the estimated increase in wastewater generated under

[2] Ice machines could produce wastewater indirectly depending on how an individual disposes of the ice. For example, if ice is poured down a sink after being used, then this method of disposal would contribute to wastewater generation. This EIR assumes ice from ice machines contributes to wastewater generation.

the proposed project, the proposed stadium improvements would not exceed the remaining 11 million GPD capacity at the regional wastewater treatment plant.

Land previously associated with part of the former Fort Ord military base contains underground utility infrastructure with asbestos casings. As discussed in **Section 4.8, Hazards and Hazardous Materials**, the project would adhere to the requirements of MBARD Rule 424. This regulation requires an asbestos survey of existing structures prior to demolition or renovation. If asbestos-containing material is identified, Rule 424 requires that the asbestos hazard is abated and notification to MBARD may be necessary prior to demolition or renovation activities. Compliance with MBARD Rule 424 would minimize the risk for asbestos exposure.

Stormwater Drainage

As discussed in **Section 4.9, Hydrology and Water Quality**, the shower and locker room facilities would be located in the existing footprint of CSUMB Stadium and would not constitute an increase in impervious surfaces. As evaluated in the Freeman Stadium Renovations Project MND, the existing stadium facility does not pose an adverse substantial impact on the existing drainage system (CSUMB, 2021). The project site is relatively flat, with minimal sloping on the north and south sides of the site. The gated event storage and staging area would include installation of fencing. While storage containers may be periodically located at the gated event storage and staging area site, these facilities would be temporary. The proposed stadium improvement would not result in a net increase in impervious surfaces.

Construction of the proposed stadium improvements would disturb approximately 1.35 acres. Construction activities that disturb one (1) acre or more would be subject to NPDES Construction General Permit requirements and will require preparation and implementation of a SWPPP and appropriate best management practices to control erosion and sediment runoff. Implementation of the SWPPP and associated NPDES best management practices would reduce potential construction-related water quality impacts to a less than significant level.

Furthermore, the proposed stadium improvements would have to incorporate stormwater goals and polices identified in the 2022 CSUMB Master Plan Guidelines, which include collection of stormwater runoff onsite and within the campus footprint, percolation of said runoff to LID water-quality treatment areas, and a reduced reliance on storm drain infrastructure per Goal WS 3 and Policies WS 2.4 and WS 3.3. Furthermore, Policy OS 3.6 encourages the use of athletic fields, which would be located adjacent to the locker room and shower facilities and permanent restroom facilities, for stormwater percolation. For these reasons, the proposed stadium improvements would not require the relocation, expansion, or construction of new stormwater drainage facilities.

Electricity and Natural Gas

The proposed locker room and shower facilities and new permanent restroom facilities would be constructed in the existing footprint of CSUMB Stadium and connect to existing electricity and natural gas connections located at the project site. As discussed in **Section 4.5, Energy**, construction activities would be temporary in nature and designed to be efficient to reduce costs. Operation of the proposed stadium improvements would also use energy efficiently since new facilities must incorporate the CBC Title 24 energy efficiency building requirements and the stricter CSU and CSUMB energy efficiency policies. These policies include CSU Systemwide Sustainability Policy requiring all CSU facilities use energy efficiently, implementation of energy efficiency measures to reach GHG reduction goals, and require energy

performance improvements greater than those identified in the current CBC Title 24 requirements in new construction. Additionally, the staging and storage area would not require new connections to electrical and natural gas lines as the proposed project would install fencing and temporary equipment at this site. For these reasons, this component of the proposed project would not require the relocation, expansion, or construction of new electrical or natural gas facilities.

Telecommunications

The proposed stadium improvements would not require additional telecommunication services. Therefore, this component of the proposed project would not require the relocation, expansion, or construction of new telecommunication facilities.

For these reasons, the proposed stadium improvements would have a less than significant impact with respect to the relocation or construction of new or expanded utility infrastructure.

Mitigation Measures

No mitigation is required for **Impact UTL-1**.

Impact UTL-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (criterion b).

Expanded Use

CSUMB has an existing water allocation agreement with MCWD for 1,035 AFY, with 404 AFY of this allocation available for additional projects not expressly identified in the 2022 CSUMB Master Plan Guidelines (CSU, 2022b). The proposed expanded use of the stadium would not require the construction of new facilities, but would increase the use of potable water at the Field House and beer garden as well as periodic watering of the turf field after events. However, existing permanent water fixtures in the Field House are equipped with low flow facilities including dual-flush toilets and waterless urinals, which with expanded use of these fixtures would reduce the amount of potable water needed on-site relative to water inefficient fixtures as discussed in the previous environmental report for the CSUMB Stadium (CSUMB, 2021). Other existing facilities include portable restrooms, a portable shower facility, and an existing water connection at the beer garden as well as occasional watering of the turf field.

MCWD and the SVBGSA strictly manage water pumped from the Monterey subbasin of the SVGB through the MCWD 2020 and SVBGSA GSP; therefore, water allocated to the project site must remain within the existing allocation provided to CSUMB. The proposed expanded use of the stadium does not include any new site development that would substantially increase water use, and water use data provided by CSUMB for the most recent year of operation, July 2024 to June 2025, indicated that the project site used approximately 0.48 AFY of potable water (per communications between DD&A and CSUMB dated September 11, 2025). The increase in the number and frequency of events would increase water consumption on the site compared to existing operation, particularly at the Field House where most of the existing fixtures are located. All attendees and many of the event staff at each event would still use portable restrooms until such time the stadium improvements, analyzed separately below, are installed. Additionally, bottled drinking water would continue to be available for purchase by vendors during events. Visiting and home players, coaches, and training staff and the existing administrative staff would use

water supplied in the Field House. However, the proposed number of annually occurring events would require limited intensification of water use during events, especially with the continued use of portable facilities. For these reasons, the proposed expanded use of the stadium would have a less than significant impact with respect to sufficient water supplies.

Stadium Improvements

MCWD sources water from the SVGB and allocates 1,035 AFY to CSUMB of which CSUMB has 404 AFY remaining. To avoid a potentially significant impact, the proposed stadium improvements would need to stay within the yearly water allocation provided by MCWD to CSUMB. Existing water uses at the site accounted for approximately 0.48 AFY for the most recent year of operation, measured between July 2024 and June 2025 (per communications between DD&A and CSUMB dated September 11, 2025). The proposed stadium improvements would increase the number of water fixtures at the project site, particularly for the locker room and shower facilities and permanent restroom facilities, and each facility would connect to the existing water utility lines that serve the stadium.

As discussed in **Impact UTL-1** , the water use calculations assumed that sinks, showers, and toilets would adhere to CalGreen standards; washing machines and ice machines would be Energy Star certified; and all water fixtures would use potable water rather than grey water. The locker room and shower facilities would require approximately 2.15 AFY and the permanent restroom facilities would require approximately 6.30 AFY, a total water demand of 8.45 AFY; and a net increase of 7.97 AFY from current conditions. During operation, the 8.45 AFY of water would remain well below CSUMB existing MCWD's water allocation, and below the remaining 404 AFY which CSUMB has identified as water allocated for additional uses after full campus buildout (CSU, 2022b). The proposed staging and storage area would not require the installation of water fixtures that could increase water use.

The estimated increase in water use of approximately 8.45 would be reduced with implementation of the water conservation policies presented in the 2022 CSUMB Master Plan Guidelines. Specifically, the locker room and shower facilities and permanent restroom facilities must be consistent with Policy WS 1.6 requiring all new construction projects to reduce potable water use to levels below those required by the CalGreen standards, and Policy WS 1.10 directs CSUMB to pursue ambitious water conservation goals for all buildings on campus. The locker room and shower facilities and permanent restroom facilities would also incorporate the use of grey water systems, especially for toilet flushing, as directed by Policies WS 1.9 and WS 1.12 (CSU, 2022b). With implementation of CSUMB's water conservation policies, the proposed stadium improvements would remain well below the remaining MCWD water allocation of 404 AFY. Furthermore, MCWD and the SVBGSA strictly manage water pumped from the Monterey subbasin of the SVGB; therefore, water allocated to the project site must remain within the existing allocation provided to CSUMB. For these reasons, the proposed stadium improvements would have a less than significant impact with respect to sufficient water supplies.

Mitigation Measures

No mitigation is required for **Impact UTL-2**.

Impact UTL-3: The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (criterion c).

Expanded Use

The proposed expanded use of the existing stadium would increase the number and frequency of events and not expressly require new infrastructure that would have the potential to exceed wastewater capacity or increase the use of existing facilities in a manner that would require new or expanded wastewater services and infrastructure. The existing stadium provides portable restroom facilities, use of which does not require connection to or use of wastewater infrastructure. All attendees and most event staff would continue to use portable restroom facilities until such time the new permanent restrooms would be installed. Construction and operation of the proposed stadium improvements are analyzed separately below. The fieldhouse would continue to primarily serve athletic events and personnel; therefore, CSUMB and MBFC players, coaches and training staff, existing administrative staff, and visiting team personnel would use the existing restroom and showers in the fieldhouse.

CSUMB provided wastewater data from the most recent year of operation, July 2024 to June 2025, which showed that existing events at the stadium (i.e., practices, matches, commencement addresses, convocation, homecoming, and the spring concert) accounted for approximately 0.47 AFY, or approximately 420 GPD (per communications between DD&A and CSUMB dated September 11, 2025). The addition of three (3) new MBFC soccer teams consisting of 85 new personnel and the increase in the number and frequency of events would not result in a substantial increase of wastewater generation relative to the 11 million GPD capacity remaining at the M1W treatment facility. Therefore, the proposed expanded use of the stadium would have a less than significant impact on the capacity of the local wastewater treatment provider to serve the project site.

Stadium Improvements

The proposed stadium improvements consist of restroom and shower facilities, new permanent restroom facilities, and a gated event storage and staging area; of which, the locker room and shower facilities and new permanent restroom facilities would increase the amount of wastewater produced on-site. The locker room and shower facilities and new permanent restroom facilities would connect to existing sewer lines at the project site and would not require expansion of the existing sewer lines outside of the project site. As discussed above, CSUMB provided wastewater data from the most recent year of operation, July 2024 to June 2025, which showed that existing stadium facilities generated approximately 0.47 AFY, or approximately 420 GPD (per communications between DD&A and CSUMB dated September 11, 2025). Installation of new locker room and shower facilities and permanent shower facilities with new permanent sink, toilet, and shower fixtures as well as two (2) washing machines and two (2) ice machines would increase the amount of wastewater generated throughout the year.

As specified above, DD&A calculated the estimated water use demand associated with the operation of the proposed stadium improvements, and determined that the combined increase in water use under the proposed project would account for approximately 8.45 AFY; please refer to **Table 4.15-1** and **Table 4.15-2** above. The water use calculations comprises fixtures that would directly generate wastewater (i.e., toilets, sinks, showers, washing machines, and ice machines). Therefore, the proposed project would generate an equivalent amount of wastewater, being 8.45 AFY, or 2,753,404 gallons per year. Annual wastewater generation of approximately 2,753,404 gallons averages to approximately 7,543 GPD. Therefore, based on the estimated increase in wastewater generated under the proposed project, the proposed stadium improvements would not exceed the remaining 11 million GPD capacity at the regional wastewater treatment plant.

Based on the estimated increase in wastewater generated under this component of the proposed project, the proposed stadium improvements would not exceed the 11 million GPD capacity remaining at the M1W wastewater treatment facility. For these reasons, the proposed stadium improvements would have a less than significant impact on the capacity of the local wastewater treatment provider to serve the project site.

Mitigation Measures

No mitigation is required for **Impact UTL-3**.

Impact UTL-4: The proposed project would not 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. And comply with federal, state, and local management and reduction statutes and regulations related to solid waste (criteria d and e).

Expanded Use

Solid waste generated by existing CSUMB and MFBC events was estimated to be 0.2478 tons of waste annually (please refer to Freeman Stadium Renovations Project MND). The expanded use of the stadium would increase the frequency and number of events per year, and would increase the waste generated by events. Using CalRecyle's report titled *Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups* dated June 2006, conservative estimates for solid waste generated by CSUMB and MBFC events were calculated. Specifically, waste generated was calculated using the "Public Venues & Events" characterization, which uses a factor of 244 pounds (lbs.) per ~~person~~ 100 people per day (CalEPA, 2026). Using this solid waste generation factor, each event was evaluated and solid waste calculated; please refer to **Tables 4.15-3** through **4.15-7** below.

Table 4.15-3
New California State University, Monterey Bay Athletic Events Estimated Solid Waste

Team	Matches	Attendance	Players	Staff	Total # of Days	Total Persons (per day)	Solid Waste Generated (lbs.)
Men's CCAA Championships	3 events over 2 days	300 spectators	120	36.0	2	456	~~222,528~~ 2,225.3
Women's CCAA Championships	3 events over 2 days	300 spectators	120	36.0	2	456	~~222,528~~ 2,225.3
Men's NCAA Division II National Championships	3 events over 5 days	400 spectators	120	40.0	5	560	~~683,200~~ 6,832
Women's NCAA Division II National Championships	3 events over 5 days	400 spectators	120	40.0	5	560	~~683,200~~ 6,832
Total Solid Waste (lbs.)							**~~1,811,456~~ 18,114.6**

Table 4.15-4
New California State University, Monterey Bay Non-Athletic Events Estimated Solid Waste

Event	# of Events	Attendance (per day)	Staff	Total # of Days	Total Persons (per day)	Solid Waste Generated (lbs.)
Latinx Affinity Ceremonies	1	2,000	60	1	2060	~~502,640~~ 5,026.4
Monte's 5k and post-race	1	1,200	150	1	1350	~~329,400~~ 3,294
New Student Fall Convocation	1	2,000	150	1	2150	~~524,600~~ 5,246
Fall and Spring Concerts	2	2,000	150	2	2150	~~1,049,200~~ 10,492
OC3 Affinity Celebration	1	2,500	50	1	2550	~~622,200~~ 6,222
Relay for Life	1	6,000	50	1	6050	~~1,476,200~~ 14,762
Additional Events	25	2,000	75	25	2075	~~12,657,500~~ 126,575
Total Solid Waste (lbs.)						**~~17,161,740~~ 171,617.4**

Table 4.15-5
New Monterey Bay Football Club Athletic Events – Matches Estimated Solid Waste

Team	Matches	Match Attendance	Match Players[2]	Match Staff[3]	Total # of Days	Total Persons (per day)	Solid Waste Generated (lbs.)
USL Super League	12 events over 10 days	4,000 spectators	46	143	10	4189	~~10,221,160~~ 102,211.6
USL League Two	7 events over 7 days	300 spectators	46	44	7	390	~~666,120~~ 6,661.2
USL W League	7 events over 7 days	300 spectators	46	44	7	390	~~666,120~~ 6,661.2
Total Solid Waste (lbs.)							**~~11,553,400~~ 115,534**

Table 4.15-6
Monterey Bay Football Club Non-Athletic Events Estimated Solid Waste

Event	# of events	Days (per event)	Attendance (per day)	Staff	Set-up Days (per event)	Total # of Days	Total Persons (per day)	Solid Waste Generated (lbs.)
Winter Festival	1	28	3,000	150	10	28	3,150	~~21,520,800~~ 215,208
Weekend Concerts	20	3	6,000	200	1-2	60	6,200	~~90,768,000~~ 907,680
Total Solid Waste (lbs.)								**~~92,920,800~~ 1,122,888**

The proposed expanded use of the stadium includes daily practice by MBFC USL men and women teams. These events are characterized differently and smaller in nature to the athletic and non-athletic events in the tables above. Therefore, the waste generator factor of 0.5 pounds per person per day was utilized, and waste generated is illustrated in **Table 4.15-7** below (CalRecylcle, 2026).

Table 4.15-7
Monterey Bay Football Club Daily Practice Estimated Solid Waste

Team	Practices	Practice Attendance	Total # of Days	Total Persons (per day)	Solid Waste Generated (lbs.)
USL Super League	5 x per week	31	300	31	4,650
USL League Two	5 x per week	27	300	27	4,050
USL W League	5 x per week	27	300	27	4,050
Total Solid Waste (lbs.)					**12,750**

In totality, the proposed expanded use would generate ~~123,460,146~~ approximately 1,440,904 lbs. of waste (~~61,730~~ 720.5 tons per year), which averaged across 365 days equals ~~169~~ two (2) tons per day. As discussed in **Section 4.15.2 Regulatory Environment**, CSUMB is set to divert 80% of waste by 2030; and as of 2017 the 5-year average diversion of waste was 35 percent (CSU, 2022b). Assuming a 35 percent diversion rate, solid waste generated would total at ~~110~~ 1.3 tons per day; please refer to **Table 4.15-8** for a summary.

Table 4.15-8
Summary of Solid Waste Generated by CSUMB and MBFC Events

Waste Generation Categories	Solid Waste Generated
Total solid waste generated by CSUMB and MBFC Events (lbs.)	~~123,460,146~~ 1,440,904.04
Total solid waste in ton per year	~~61,730~~ 720.5
Total solid waste in ton per day (averaged)	~~169~~ 2.0
CSUMB Master Plan Diversion Rate of 35% (2013-2017 5-year average)	~~110~~ 1.3

As identified previously, solid waste is collected and taken to ReGen. ReGen's solid waste landfill permit allows for a maximum daily volume of 3,500 tons per day, and ReGen Monterey's permit for the landfill lasts through February of 2107. While events that attract larger numbers of attendees (e.g., concerts), daily solid waste generated at such events would not exceed the daily allowable volume of solid waste at ReGen's facility. Moreover, the project must adhere to CSU systemwide sustainability policies requiring campuses to move towards a zero waste initiative (CSU, 2024; CSU, 2022b). While the evaluation of solid waste above utilizes a 35 percent diversion rate, current campus operations are likely trending towards 50 percent diversion based on goals set forth in the CSU Systemwide Sustainability Policies, and CSUMB's Master Plan (CSU, 2024; CSU, 2022b). Therefore, the waste generated by the proposed project would not exceed ReGen's allowable daily volume of 3,500 tons. The proposed expanded use of the stadium would have a less than significant impact with respect to the generation of solid waste in excess of the capacity of local infrastructure or the impairment of solid waste reduction goals, management and reduction statutes, and regulations.

Stadium Improvements

Please refer to **Expanded Use** above for an analysis of waste generated by the operation of the stadium improvements. This analysis focuses on the construction of the proposed stadium improvements. The proposed stadium improvements would involve site clearance and grading of approximately 1.35 acres (58,806 square feet). Construction would be completed in nine (9) months. Utilizing CalRecylce's waste generation factor of .007 lbs. per square feet per day, construction-generated waste could total 111,143 lbs. (55.5 tons). Construction staff would oversee the separation and transport of construction waste and recycling off-site. All construction activities would be designed and implemented in accordance with CalGreen and CSU Systemwide Sustainability Policies. Between 2013 and 2017, CSUMB diverted (on average) 98 percent of construction generated waste (CSU, 2022a). Therefore, under a similar diversion rate, construction of the proposed stadium improvements would generate very minor amounts of solid waste as it would be required to comply with the CSU Sustainability Systemwide Policies governing waste generation and minimization (CSU, 2024; CSU, 2022b). For these reasons, the proposed stadium improvement would have a less than significant impact with respect to the generation of solid waste in

excess of the capacity of local infrastructure or the impairment of solid waste reduction goals, management and reduction statutes, and regulations.

Mitigation Measures

No mitigation is required for **Impact UTL-4**.

4.15.5 References

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Chapter 5.0 ALTERNATIVES

5.1 INTRODUCTION AND APPROACH

CEQA Guidelines Section 15126.6 requires the consideration of a range of reasonable alternatives to the proposed project that could feasibly attain the basic objectives of the project. Section 15126.6 further states that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." CEQA further requires that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project, or reducing them to a less than significant level, even if the alternative would not fully attain the project objectives or would be more costly. The range of alternatives discussed in an EIR is governed by the "rule of reason" that requires an EIR to evaluate only those alternatives necessary to allow a reasoned choice (CEQA Section 15126.6(f)). An EIR need not consider an alternative where the effects cannot be reasonably ascertained, or where implementation is remote and speculative (CEQA Section 15126.6(f)(3)).

5.2 ALTERNATIVES NOT ANALYZED IN DETAIL

5.2.1 Alternative Location

CEQA Guidelines Section 15126.6(f)(2) provides guidance regarding when it is appropriate to analyze an alternative location as part of the alternatives analysis. Alternative locations should be analyzed if the location would avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines Section 15126.6(f)(2)(a)). Applicable case law indicates that an off-site alternative should be analyzed where significant impacts can be avoided by choosing another site.

An alternative location for the proposed expanded use of the stadium was determined not to be feasible because the project is intended to build upon existing, ongoing use of the existing CSUMB Stadium, by expanding the existing athletic and non-athletic programming at the stadium and proposing interior capital improvements within the Field House and the construction of an adjacent one-acre staging and storage area. As discussed in **Chapter 3.0, Project Description**, the existing stadium and Field House were recently renovated in order to serve as a shared campus-USL facility, a project approved by the CSU Board of Trustees in September 2021 (*Freeman Stadium Facilities Renovation Project at California State University, Monterey Bay – Mitigated Negative Declaration*; SCH #2021070153). CSUMB and the MBFC entered into a 14-year facility use agreement in January 2020 to share the use of the stadium. Construction of a new stadium on a different site is not needed to accommodate the project and would not meet the stated objectives of the proposed project, as presented in **Chapter 3.0, Project Description**.

With regard to the proposed stadium improvements (i.e., the proposed restroom and locker room facilities, permanent restroom facilities, and gated event storage and staging area), those facilities are logically suited for location within the existing developed footprint of the stadium complex to continue to support stadium use and best serve the needs of CSUMB students, as well as to minimize potential environmental impacts.

However, as discussed in **Chapter 4.3, Biological Resources,** and **Chapter 4.4, Cultural and Tribal Cultural Resources**, the proposed project's gated event storage and staging area would result in potentially significant impacts to biological and cultural and Tribal cultural resources. More specifically, as proposed, the gated event storage and staging area would be constructed in an area that contains Monterey spineflower and could potentially result in impacts to protected nesting birds as a result of proposed tree removal activities (please refer to **Impact BIO-1**, **Chapter 4.3, Biological Resources**). With respect to cultural and Tribal cultural resources, construction of the gated event storage and staging area could result in impacts to unknown buried cultural and Tribal cultural resources (please refer to **Impact CTR-2 b** through **CTR-4, Chapter 4.4, Cultural and Tribal Cultural Resources).**

Alternative locations for the proposed gated event storage and staging area were not pursued during the proposed project planning process for several reasons. First, the gated event storage and staging area needs to be in close proximity to the CSUMB Stadium. Proximity ensures efficiency during event setup and breakdown and minimizes delays and logistical errors, which can be disruptive to events and conflict with objectives of the proposed project. Proximity to the CSUMB Stadium also minimizes security concerns, as well as minimizes damage or loss of equipment during transportation to and from the gated event storage and staging area and the CSUMB Stadium. Lastly, proximity to the CSUMB Stadium minimizes operation costs related to transporting equipment between sites. Although cost alone is not determinative under CEQA, the off-site gated event storage and staging area alternative would result in substantially greater ongoing operational expenditures due to the need for repeated equipment transport. These increased costs reflect a corresponding increase in vehicle trips and associated emissions, and would reduce operational efficiency. Therefore, an alternative location may be considered economically and environmentally infeasible, and would not fully meet the project objectives.

Additionally, the gated event storage and staging area would need to be constructed on existing pavement to eliminate impacts to biological resources. Utilizing existing paved areas in the vicinity of the CSUMB Stadium would result in the elimination of parking available for the existing use and proposed project expanded use (i.e., additional CSUMB and MBFC athletic and non-athletic events). Elimination of on-site parking would reduce the site's ability to support event operations and would likely increase off-site parking demand and associated circulation effects. Reduction in on-site parking would diminish operational efficiency and conflict with project objectives, especially with regards to remedying the existing functional limitations of the site regarding space, capacity, configuration, and athlete support infrastructure. Furthermore, unknown cultural and Tribal cultural resources may be present elsewhere throughout the CSUMB campus. Utilizing an alternative location for the gated event storage and staging area would not avoid this potentially significant impact, and mitigation measures would still be necessary.

5.2.2 Reduced Athletic Event Alternative

The proposed project is intended to build on the demonstrated success of the CSUMB–USL partnership and MBFC events at the stadium to date and continue to, in the words of the project description in the MND prepared for the MBFC's original proposal to CSUMB, "bring sports entertainment to the Monterey Bay area." Since establishment of the partnership, MBFC practices, matches, preseason and postseason games, exhibition matches, and related events have generated substantial attendance and broad community participation, demonstrating strong regional support

for expanded athletic and entertainment programming at the stadium. As discussed in **Section 5.4.1, Objectives**, the project's fundamental underlying purpose is not limited to accommodating a discrete number of athletic events, but rather to establish and sustain a long-term, community-serving partnership that enhances the stadium as a regional venue for collegiate athletics, professional sports, and community-oriented entertainment opportunities. Accordingly, elimination or substantial reduction of the proposed additional athletic and related events would impede achievement not only of specific project objectives, but also of the project's fundamental underlying purpose by materially limiting the University's ability "to modernize and enhance the existing stadium to function as a flexible, multipurpose venue that better supports CSUMB's academic and athletic programs while accommodating expanded use, including partnerships with external organizations such as professional athletic entities (e.g., USL)." The record further reflects broad community support for the USL partnership, MBFC programming, and expanded event opportunities at the CSUMB Stadium because these activities provide recreational, cultural, and economic benefits that serve both the University and the broader Monterey Bay region.

In addition, the proposed stadium improvements (i.e., the proposed restroom and locker room facilities, permanent restroom facilities, and gated event storage and staging area) would remain necessary and desirable to support ongoing stadium operations and existing campus and community event functions, even under a reduced athletic programming scenario. However, implementation of these improvements could become financially constrained, and potentially economically infeasible, absent the revenue generation and operational support associated with the proposed additional athletic events and related programming.

Consistent with CEQA's requirement to evaluate alternatives capable of reducing significant environmental effects while feasibly attaining most of the project's basic objectives, Fehr & Peers evaluated the transportation impacts associated with the proposed project, including project-generated VMT, and prepared a qualitative assessment of an alternative intended to reduce VMT impacts. As part of this evaluation, Fehr & Peers determined that approximately 70 percent of project-generated VMT would be attributable to the proposed Winter Festival and weekend concert events, which are anticipated to generate the highest attendance levels and occur over multiple consecutive days throughout the year. This assessment informed development of the Reduced Non-Athletic Event Frequency and Attendance Alternative, analyzed in **Section 5.6** below. Because athletic events would not significantly contribute to project-generated VMT (and associated significant and unavoidable noise impacts) compared to the proposed Winter Festival and weekend concert events and the existing stadium operations already exceed applicable VMT thresholds, reducing the scale and frequency of athletic events would not substantially reduce overall VMT and would not alter the level of significance of the project's VMT and noise impacts. At the same time, substantial reductions in athletic events would materially curtail the project's ability to fulfill its fundamental underlying purpose by limiting the viability of the stadium as a regional destination for sports and related events and diminishing the community benefits that form a central component of the project objectives. Therefore, reducing athletic events would not meet most of the project objectives and would not reduce the project's significant and unavoidable VMT and noise impacts.

5.3 ALTERNATIVES ANALYSIS

The following section discusses the two alternatives evaluated in detail in this EIR and the environmental effects of each. The alternatives considered in this analysis are as follows:

- *No Project Alternative*
- *Reduced Non-Athletic Event Frequency and Attendance Alternative*

The alternatives chosen for this analysis, beyond those mandated by CEQA, were developed specifically to avoid or substantially reduce the significant impacts of the proposed project. As identified below, all project-related impacts would be reduced to a less than significant level through the incorporation of mitigation except for significant and unavoidable GHG emissions, noise, and vehicle miles traveled (VMT) transportation impacts. It is important to note that certain aspects of a given alternative may minimize the extent of the impact, but may not necessarily change the overall level of significance of the impact. For instance, an alternative may result in fewer vehicle trips than the proposed project and thereby a corresponding reduction in VMT related effects, but the level of significance would likely remain unchanged.

5.4 SUMMARY OF PROJECT OBJECTIVES AND SIGNIFICANT IMPACTS

5.4.1 Objectives

The underlying purpose of the proposed project is to modernize and enhance the existing stadium to function as a flexible, multipurpose venue that better supports CSUMB's academic and athletic programs while accommodating expanded use, including partnerships with external organizations such as professional athletic entities (e.g., USL). By improving the functionality, capacity, and quality of the facility, the proposed project would increase its utility for intercollegiate athletics, campus events, and community-serving activities, thereby strengthening community partnerships and elevating CSUMB's regional presence. The renovated stadium would also expand opportunities for student learning and research, particularly within the College of Health Sciences and Human Services, and enhance support for student-athlete development.

To achieve the underlying purpose outlined above, the proposed project would authorize the physical development of the CSUMB Stadium to accommodate new CSUMB athletics and non-athletic events, while simultaneously supporting new professional athletic and non-athletic events through an existing partnership with MBFC. The following project objectives support its underlying purpose:

1. Strengthen the stadium as a campus resource and shared community asset that can attract and support more intensive use and partnerships with external organizations, including professional athletic organizations, in a manner that aligns with CSUMB's academic mission.

2. Modernize and improve the usability, safety, and operational efficiency of the existing stadium through targeted physical improvements that extend its functional lifespan and better serve students, faculty, staff, and community.

3. Renovate and upgrade existing stadium facilities to address functional limitations of the current venue; including constraints related to space capacity, configuration, and athlete support infrastructure, and to better align with collegiate athletic program needs and

applicable professional standards (e.g., USL facility requirements); while increasing visibility and awareness of athletics within the Monterey Bay region.

4. Renovate existing stadium facilities to support multiple programming needs including academic instruction, experiential learning, and applied research opportunities for students, including those related to health sciences, kinesiology, sports management, and community health, consistent with CSUMB's role as a comprehensive public university. Improvements would include the provision of permanent restroom facilities to replace existing temporary portable units, thereby improving visitor capacity, accessibility, and overall user experience.

5. Site new development in the already developed campus core, which is served by existing infrastructure, to avoid unnecessary expansion into undeveloped land, consistent with smart growth principles and long-term campus planning goals.

5.4.2 Significant Impacts

The proposed project would result in potentially significant impacts that would be mitigated to a less than significant level with implementation of the identified mitigation measures, as described in this EIR. The following impacts are primarily associated with construction of proposed stadium improvements:

- **Chapter 4.3, Biological Resources;** please refer to **Impact BIO-1**.
- **Chapter 4.4, Cultural and Tribal Cultural Resources**; please refer to **Impact CTR-2** through **Impact CTR-4.**

Based on the analysis contained in this EIR, these impacts would be reduced to a less than significant level with implementation of mitigation. As identified in **Section 4.3, Biological Resources,** and **Section 4.4, Cultural and Tribal Cultural Resources**, the proposed project would result in potentially significant impacts with respect to having a substantial adverse effect on a special-status species, causing a substantial adverse change in the significant of an archeological resource, disturbance of human remains, and causing a substantial adverse change in the significance of a Tribal cultural resource. These impacts are directly related to the construction of the gated event storage and staging area (please refer to the **Stadium Improvements)**; and would be reduced to a less than significant level through implementation of **Mitigation Measures BIO-1** through **BIO-3**, and **Mitigation Measure CTR-1** through **CTR-4**.

The proposed project would result in significant and unavoidable impacts that can be mitigated to reduce the level of effect, but would remain significant and unavoidable. These impacts are primarily driven by the proposed expanded use of the stadium and include:

- **Chapter 4.7, Greenhouse Gas Emissions**; please refer to **Impact GHG-1** and **Impact GHG-2**.
- **Chapter 4.11, Noise and Vibration**; please refer to **Impact NV-1**.
- **Chapter 4.14, Transportation**; please refer to **Impact TR-2**.

As discussed in **Section 4.7, Greenhouse Gas Emissions**, **Section 4.11, Noise and Vibration**, and **Section 4.13, Transportation**, the operation of the expanded use component of the proposed project would result in significant and unavoidable operational GHG emissions, noise, and traffic-related

impacts. Specifically, these impacts are a result of the VMT associated with the proposed expanded use of the stadium. **Mitigation Measures TR-1** through **TR-6** would reduce these impacts; however, due to the nature of the proposed project, and more specifically the increase in number and frequency of events, there are no feasible mitigation measures to reduce these effects to less than significant.

5.5 NO PROJECT ALTERNATIVE

CEQA requires the discussion of the No Project Alternative "to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." (CEQA Guidelines Section 15126.6(e)(1)). The No Project Alternative analysis should discuss the existing conditions at the time the Notice of Preparation ("NOP") is prepared, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved (CEQA Guidelines Section 15126.6[6][2]). The discussion of the No Project Alternative generally proceeds along one of two lines: the project site remaining in its existing undeveloped state or development of the project site under existing underlying land use designations (CEQA Guidelines Section 15126.6[e][3]). In certain instances, the No Project Alternative means "no build;" however, where failure to proceed with the project would not result in preservation of existing conditions, the analysis should identify the practical result of the project's non-approval (CEQA Guidelines Section 15126.6[e][3][B]). Here, the No Project Alternative consists of the site remaining in its current state and with continuation of the existing uses.

5.5.1 Description

Under the No Project Alternative, the CSUMB Stadium would continue to operate as currently improved and programmed following completion of the 2022 renovations. The stadium would remain a 6,000-seat facility featuring the renovated 5,700-square-foot field house, 90,000-square-foot synthetic soccer pitch, portable restroom facilities, seating areas, broadcast-quality lighting, scoreboard, beer garden, and improved access roads.

Operations would be consistent with events evaluated in the 2021 MND (SCH #2021070153), including daily collegiate practices during the academic season; 12 men's and 12 women's collegiate home matches; periodic tournaments; and approximately 10 campus-coordinated events such as commencement and concerts. MBFC events would consist of 18 MBFC regular season home matches annually (with average attendance of approximately 4,200 spectators), one (1) postseason match, one (1) tournament, and one (1) international tournament; and MBFC camps and off-season activities. No expansion of facility infrastructure or event programming beyond the existing levels would occur.

5.5.2 Impacts

5.5.2.1 Aesthetics

As discussed in **Chapter 4.1, Aesthetics**, the proposed project would have no impact related to scenic vistas or resources, and would have less than significant impacts related to scenic quality and light and glare (see **Impact AES-1** through **Impact AES-3**).

Under the No Project Alternative, impacts would be substantially the same as the proposed project. The No Project Alternative would have no impact with respect to scenic vistas or scenic quality (*no impact, equal to*). Impacts related to light and glare would be less than significant. However, the impacts regarding light and glare would be reduced under the No Project Alternative as no improvements to the stadium would occur (i.e., new indoor and outdoor lighting associated with the new locker room and shower facilities and permanent restroom facilities) and the number and frequency of athletic and non-athletic events would be significantly less than the proposed project. Specifically, the No Project Alternative would result in 34 events annually, compared to the estimated 91 events that would be hosted by CSUMB and MBFC annually under the proposed project. The reduced number of events would directly correlate to the reduction in use of stadium lighting, consistent with existing use. As such, aesthetic impacts under the No Project Alternative would be less as compared to the proposed project (*less than significant; lesser than*).

5.5.2.2 Air Quality

As discussed in **Chapter 4.2, Air Quality**, the proposed project would have a less than significant impact with respect to conflicting with an air quality plan, criteria air pollutant emissions, exposure to substantial pollutant emissions, and emissions affecting a substantial number of people (please refer to **Impact AQ-1** through **Impact AQ-4**).

Under the No Project Alternative, no impact would occur with respect to conflicting with, or obstructing an air quality plan, as no new persons would be contributing to the regional growth (*no impact, lesser impact*). Operation of the CSUMB Stadium would be consistent with existing use, and, therefore, generation of emissions would be similar to those evaluated in the Freeman Stadium Renovations Project MND, which found operational emissions to be less than significant. While the level of impact related to air quality is comparable between the proposed project and the No Project Alternative, the level of impact would be less under the No Project Alternative since no new construction would occur and the stadium would not expand event programming at the stadium (*less than significant; lesser than*).

5.5.2.3 Biological Resources

As discussed in **Chapter 4.3, Biological Resources**, the proposed project would result in less than significant impacts to special-status species with implementation of the identified mitigation measures. These impacts are directly related to the construction of the proposed stadium improvements, specifically the proposed gated event storage and staging area. The proposed project would have no impact to riparian habitats or other sensitive natural communities, including wetlands (please refer to **Impact BIO-2** and **Impact BIO-3**). With respect to interfering with migratory wildlife, conflicting with local policies or ordinances regarding tree preservation, or conflicting with an adopted habitat conservation plan, the proposed project would have a less than significant impact (please refer to **Impact BIO-4** through **Impact BIO-6**).

Under the No Project Alternative, no impacts to special-status species would occur as no physical improvements would be implemented that would result in impacts to special-status species or their habitat. Similarly, no impacts would occur to sensitive habitats or migratory wildlife, and would not conflict with biological resource policies or conservation plans. Therefore, the level of impact for all thresholds of significance under the No Project Alternative would be less than the proposed project (*no impact, lesser than*).

5.5.2.4 Cultural and Tribal Cultural Resources

As discussed in **Chapter 4.4, Cultural and Tribal Cultural Resources**, the proposed project would not result in impacts to historic resources (please refer to **Impact CTR-1**), but would potentially impact cultural and Tribal cultural resources that were not previously known (please refer to **Impact CTR-2** through **CTR-4**). Impacts to cultural and Tribal cultural resources would be less than significant with implementation of **Mitigation Measures CTR-1** through **CTR-4**.

The No Project Alternative would have no impacts on historical resources (*no impact, equal to).* The No Project Alternative would not result in changes beyond existing use of the CSUMB Stadium and no physical improvements would be constructed. Therefore, the No Project Alternative would have no impact on cultural and Tribal cultural resources (*no impact, lesser than*).

5.5.2.5 Energy

As discussed in **Chapter 4.5, Energy**, the proposed project would not result in a potentially significant impact with respect to wasteful, inefficient, or unnecessary consumption of energy or conflict with a renewable energy plan (please refer to **Impact E-1** and **Impact E-2**).

The No Project Alternative would result in a comparable impacts, albeit reduced as the energy required for operation would be much less than the energy required for the proposed project. The No Project Alternative would have a less than significant impact with respect to use of energy; however, it would not be wasteful or inefficient (*less than significant, lesser than*). Similarly, the No Project Alternative would not conflict with a local plan for energy efficiency. The operation of the CSUMB Stadium under the No Project Alternative would comply with the CSU's energy efficiency requirements. As such, the impacts would be comparable between the No Project Alternative and proposed project, but the No Project Alternative would result in less overall energy use than the proposed project (*less than significant, lesser than*).

5.5.2.6 Geology, Soils, and Seismicity

As discussed in **Chapter 4.6, Geology, Soils, and Seismicity**, the proposed project would have no impact with respect to having soils incapable of adequately supporting the use of septic (please refer to **Impact GEO-5**). Less than significant impacts would occur with respect to seismic hazards, soil erosion, unstable geologic units, or paleontological resources (please refer to **Impact GEO-1** through **GEO-5**, and **Impact GEO-6**).

The No Project Alternative would not result in significant impacts to geologic resources. No physical changes to the CSUMB Stadium would occur, and the frequency and number of events would not change beyond the existing use. The No Project Alternative would still be subject to seismic ground shaking, and seismic related hazards could occur during the lifetime of the No Project Alternative; however, given the reduction of use, the potential for damage or loss of life during a seismic event would be reduced (*less than significant, lesser than*). The existing stadium was previously renovated, and renovations were constructed in accordance with a geotechnical report and compliance with California Building Codes. Therefore, the No Project Alternative would have no impacts with respect to soil erosion, landslides, liquification (n*o Impact, lesser than*). The No Project Alternative would not

require septic system, and, therefore, would not have soils incapable of adequately supporting septic use, consistent with the proposed project (*No Impact, equal to*). Lastly, the No Project Alternative would not result in impacts to paleontological resources, as no physical changes to the existing CSUMB Stadium would occur (n*o Impact, lesser than*).

5.5.2.7 Greenhouse Gas Emissions

As discussed in **Chapter 4.7, Greenhouse Gas Emissions**, the proposed project would result in significant and unavoidable emissions and would conflict with plans and policies to reduce GHG emissions (please refer to **Impact GHG-1** and **Impact GHG-2**). These impacts are directly related to the proposed project's VMT, and the GHG emissions generated by vehicles. While implementation of mitigation measures related to transportation would minimize these effects, the impacts would remain significant and unavoidable.

The No Project Alternative would result in comparable impacts with respect to GHG emissions. As discussed throughout this EIR, the existing use of the CSUMB Stadium exceeds the VMT thresholds. The No Project Alternative would maintain the existing level of use at the CSUMB Stadium and, therefore, would result in a significant and unavoidable VMT impact, which has a direct impact on vehicle-generated GHG emissions. CSUMB is required to implement mitigation measures related to transportation, including a TMP and TDM program, which aims to reduce single-occupancy vehicles, and establishes objectives to move toward a reduction in VMT. However, implementation of these measures will not reduce the level of impact to less than significant with mitigation, and the VMT will continue to exceed the thresholds. Therefore, the No Project Alternative would have a significant and unavoidable GHG impact, albeit lesser than the proposed project (s*ignificant and unavoidable, lesser than*).

5.5.2.8 Hazards and Hazardous Materials

As discussed in **Chapter 4.8, Hazards and Hazardous Materials**, the proposed project would result in less than significant impacts with respect to: routine transport, use, or disposal of hazardous materials; upset and release of hazardous materials; hazardous materials use near schools; emergency response; and wildfire hazards (please refer to **Impact HAZ-1** through **HAZ-2**, and **Impact HAZ-4** through **HAZ-5**). No impact would occur because of airport noise (**Impact HAZ-3**).

Impacts related to hazards and hazardous materials would also be less than significant under the No Project Alternative, albeit less. Operation of the No Project Alternative would still require the transport, use, or disposal of hazardous materials for maintenance (e.g., cleaning supplies such as ammonia and bleach). However, given the frequency and number of events under this alternative would be less compared to the proposed project, the use, disposal, transport of hazardous materials would be reduced (*less than significant, lesser than*). Under the No Project Alternative, the CSUMB Stadium would host CSUMB and MBFC events consistent with the existing use, and the use would not conflict with adopted emergency response plans or interfere with emergency evacuation plans. The impact would remain less than significant, albeit lesser than the proposed project (*less than significant, lesser than*). Similar to the proposed project, the No Project Alternative would not expose persons to excessive airport noise, nor would this alternative expose people or structures to the risk of wildfires (n*o Impact, equal to*).

5.5.2.9 Hydrology and Water Quality

As discussed in **Chapter 4.9 Hydrology and Water Quality**, impacts related to surface water quality standards or waste discharge requirements, groundwater supplies and recharge, stormwater drainage patterns, or risk of flooding would be less than significant; please refer to **Impact HYD-1** through **HYD-4**.

Impacts generated by the No Project Alternative with respect to hydrology and water quality would be less than significant. The No Project Alternative would not result in new improvements to the CSUMB Stadium, and, therefore, no changes in impermeable surfaces would occur. All runoff would continue to be captured by the existing drainage basins. Consistent with the proposed project, the No Project Alternative is located in a FEMA floodplain, but the risk of flood inundation would be low. Moreover, the site is not near any surface water features (lakes, ponds, rivers), and improved with drainage infrastructure (e.g., drainage basins). No surface water or groundwater quality would be degraded under the No Project Alternative, nor would this alternative result in a conflict with a water quality control plan or sustainable groundwater management plan. The No Project Alternative would have a less than significant impact on hydrology and water quality (*less than significant, lesser than*).

5.5.2.10 Land Use and Planning

As discussed in **Chapter 4.10, Land Use and Planning**, the proposed project would have no impact with respect to the physical division of a community; nor would an impact result from conflict with a land use plan, policy, or regulation (please refer to **Impact LU-1** and **LU-2**).

The No Project Alternative would consist of the continued use of the existing CSUMB Stadium. The No Project Alternative would not result in physical changes to the stadium, nor would it increase the use of the stadium, CSUMB and MBFC would continue to host approximately 34 events annually. This alternative would not divide an established community, as it would consist of the utilization of an existing stadium (*no impact, equal to*). Similar to the proposed project, the No Project Alternative would not conflict with a land use plan, policy, or regulations. The No Project Alternative, and more specifically the use of the stadium, would be consistent with the 2022 CSUMB Master Plan. CSUMB would continue to coordinate with neighboring jurisdictions (i.e., City of Marina and City of Seaside) to ensure continued plan consistency (*less than significant, lesser than*).

5.5.2.11 Noise and Vibration

As discussed in **Chapter 4.11, Noise and Vibration**, the proposed project would result in a significant and unavoidable impact with respect to conflicting with applicable noise standards (**Impact NV-1**). This impact is directly related to the VMT. Traffic generated noise would be reduced with implementation of **Mitigation Measure TR-1** through **TR-6**. The proposed project would have a less than significant impact regarding groundborne vibration (**Impact NV-2**); and no impact would occur with respect to airport noise.

The No Project Alternative would have similar impacts, albeit lesser than the proposed project. The No Project Alternative would operate under existing conditions; however, as discussed throughout this document, the existing CSUMB Stadium is exceeding the VMT threshold. Therefore, noise generated by vehicles would be significant and unavoidable for the No Project Alternative, although

significantly reduced as the number and frequency of events under this alternative is lesser than (*significant and unavoidable, lesser than*). Similar to the proposed project, the No Project Alternative would continue to implement the TMP and TDM program as required by the Freeman Stadium Renovations Project MND, which would reduce VMT. However, the level of significance would remain significant and unavoidable. The CSUMB Stadium is not located near an airport where airport noise would generate a safety concern (*no impact, equal to*).

5.5.2.12 Population and Housing

As discussed in **Chapter 4.12, Population and Housing**, the proposed project would have a less than significant impact with respect to inducing unplanned population growth (**Impact PH-1**); and no impact with respect to displacing people or housing (**Impact PH-2**).

The No Project Alternative would not add new persons to the Monterey Bay area, as no changes to the existing operation of the CSUMB Stadium would occur. Specifically, the No Project Alternative would not result in new MBFC teams that would bring new persons to the area. Therefore, no unplanned population growth would occur (*no impact, lesser than*). Similarly, no persons or housing would be displaced by the No Project Alternative (*no impact, equal to*).

5.5.2.13 Public Services and Recreation

As discussed in **Chapter 4.13, Public Services and Recreation**, the proposed project would result in a less than significant impact with respect to new or physically altered fire, police, or schools (**Impact PSR-1**). No impact would occur with respect to the increase in use of neighborhood or regional parks (**Impact PSR-2**).

The No Project Alternative would have similar impacts with respect to public services and recreation. The No Project Alternative would maintain existing levels of operation at the CSUMB Stadium, which would require police and fire services, and would not result in the need for expanded service or increase demand; the No Project Alternative would have a less than significant impact (*less than significant, lesser than*). Similarly, the existing operation of the CSUMB Stadium under this alternative would not increase the student body at CSUMB or contribute directly or indirectly to population growth that would require new or expanded school facilities at neighboring schools or school districts (*no impact, equal to*).

5.5.2.14 Transportation

As discussed in **Section 4.14, Transportation**, the proposed project would have a less than significant impact with respect to conflicting with an adopted program or plan addressing circulation with implementation of **Mitigation Measures TR-1** through **TR-6** (**Impact TR-1**). The proposed project would result in a significant and unavoidable project-generated VMT impact as well as a significant and unavoidable cumulative VMT impact. The primary measure identified to reduce VMT impacts is implementation of the TMP and TDM program described in **Mitigation Measures TR-1** through **TR-6** (**Impact TR-2).** No impact would occur with respect to a hazardous design feature or incompatible use (**Impact TR-3**); and a less than significant impact would occur with respect to inadequate emergency access (**Impact TR-4**).

The No Project Alternative would result in similar impacts as compared to the proposed project. As discussed throughout this document the existing stadium operations already exceed applicable VMT thresholds; therefore, the No Project Alternative would have a significant and unavoidable impact with respect to VMT. The No Project Alternative would continue to implement the TMP and TDM program; however, implementation of the TMP and TDM program would not reduce VMT below the threshold, similar to the proposed project. Therefore, the No Project Alternative would still result in a significant and unavoidable impact with respect to the VMT, albeit lesser than the proposed project (*significant and unavoidable, lesser than*). As with the proposed project, the No Project Alternative would have a potentially significant impact with respect to conflicting with a program or plan addressing circulation that would be reduced to less than significant through implementation of the existing TMP and TDM program. Since the number and frequency of events would be less under the No Project Alternative as compared to the proposed project, the level of impact would be comparable albeit lesser (*less than significant, lesser than*). The No Project Alternative would not result in inadequate emergency access, similar to the proposed project (*less than significant, lesser than*). No impact due to hazardous design feature or incompatible use would occur (*no impact, equal to*).

5.5.2.15 Utilities and Service Systems

As discussed in **Chapter 4.15, Utilities and Service Systems**, the proposed project would have a less than significant impact with respect to the need for new or replacement utilities (e.g., water, wastewater, stormwater drainage, electricity and natural gas, telecommunications); adequacy of water supplies and wastewater treatment capacity; and solid waste (**Impact UTL-1** through **UTL-4)**.

Impacts to utilities and services systems would also be less than significant for the No Project Alternative. The No Project Alternative would be serviced by all the same providers as the proposed project, and would not require new or upgraded water, wastewater, electrical or natural gas, or telecommunication infrastructure. Water required, and wastewater generated would not exceed the allocation or capacity of the service provider (i.e., MCWD). The No Project Alternative would operate under the existing conditions evaluated in the Freeman Stadium Renovations Project MND, and operation would comply with all existing CSU policies regarding water and energy efficiency standards. The No Project Alternative would result in a less than significant effect on utilities and services system, but lesser than the proposed project (*less than significant, lesser than*).

5.5.3 Ability to Meet Project Objectives

The No Project Alternative would largely fail to meet the project's underlying purpose and objectives. While it would maintain current operations and avoid construction impacts, it would not modernize the facility, expand its capacity or functionality, or enhance its role as a flexible, multipurpose venue. The stadium would continue to operate with existing limitations, restricting its ability to support CSUMB's academic mission, student development opportunities, and broader community engagement. Consequently, the No Project Alternative would not achieve the intended benefits of strengthening regional partnerships, increasing visibility, or maximizing the long-term utility of the stadium, as described below.

1. Strengthen the stadium as a campus resource and community asset (*Partially Met)*

Under the No Project Alternative, the stadium would continue to function as a shared venue for CSUMB and MBFC events; however, its ability to attract expanded partnerships or support more intensive use would remain constrained by existing facility limitations. Without upgrades to capacity, amenities, and functionality, the stadium would be less competitive in accommodating higher-profile events or additional professional partnerships (e.g., expanded USL activities). As a result, this alternative would partially meet this objective, but would not meaningfully enhance the stadium's role as a regional asset.

2. Modernize and improve usability, safety, and operational efficiency (*Not Met*)

The No Project Alternative would not meet this objective. Existing deficiencies related to infrastructure, operational inefficiencies, and limited amenities to support existing operations would persist. Without targeted improvements, the stadium would not achieve the intended modernization, and its long-term functional lifespan could be reduced. Safety and user experience improvements associated with upgraded facilities would also not be realized.

3. Address functional limitations and align with collegiate and professional standards (*Not Met*)

This objective would not be met under the No Project Alternative. Current constraints, such as limited seating capacity, suboptimal facility configuration, and insufficient athlete support spaces, would remain unchanged. Additionally, the stadium may continue to fall short of evolving collegiate and professional facility standards (including those associated with leagues such as the USL), potentially limiting its ability to host certain events or maintain existing partnerships at a competitive level.

4. Support academic programming and student opportunities (*Partially Met*)

The No Project Alternative would only minimally meet this objective. While the stadium would remain available for some academic and athletic uses, it would not provide the enhanced facilities needed to expand experiential learning, applied research, or interdisciplinary programming. Limitations such as the continued reliance on temporary portable restrooms and lack of dedicated instructional or research-support spaces would constrain opportunities for students in fields such as health sciences, kinesiology, and sports management.

5. Site development within the existing campus core (*Met*)

The No Project Alternative would meet this objective, as it would continue to operate the existing CSUMB Stadium within the developed core of the campus. However, the No Project Alternative would not meaningfully upgrade the stadium to support campus and campus-partner events. Regardless, the No Project Alternative would continue to operate the stadium within a developed area of the campus, and would not require development of previously undeveloped areas in and around CSUMB's campus.

5.6 REDUCED NON-ATHLETIC EVENT FREQUENCY AND ATTENDANCE ALTERNATIVE

The following alternative description and analysis was developed with the support of Fehr & Peers, based on the findings presented in the Transportation Study prepared for the proposed project (please refer to **Appendix G)**. Fehr & Peers examined the transportation impacts, more specifically the VMT generated by the proposed project, and provided a qualitative assessment of an alternative that would minimize the VMT impact. This qualitative assessment informed the development of the *Reduced Non-Athletic Event Frequency and Attendance Alternative* by identifying the primary contributors to project-generated VMT and evaluating how reductions in event frequency and spectator attendance could meaningfully reduce transportation impacts while maintaining the core recreational and community objectives of the proposed project.

5.6.1 Description

The Reduced Non-Athletic Event Frequency and Attendance Alternative would decrease transportation impacts by reducing both the number of event days and the number of tickets available for the proposed Winter Festival and weekend concerts. Under the proposed project, the Winter Festival would span approximately 28 days annually and up to 20 weekend concerts would be held each year spanning 60 days. These two (2) event types are anticipated to generate the majority of project-related travel demand, with estimated daily attendance ranging from 3,000 to 6,000 persons and approximately 4.4 million annual VMT, representing roughly 70 percent of the total annual VMT associated with the proposed project (personal communications. Fehr & Peers, 2026).

Under this alternative, the duration of the Winter Festival and the number of weekend concerts would be reduced, and attendance at each event would be capped below the proposed maximum daily levels to substantially reduce event-related trip generation and associated VMT. By reducing both the frequency of events and spectator volumes for the highest-attendance non-athletic events, this alternative would meaningfully reduce total annual VMT compared to the proposed project. The following discussion addresses only those areas where this alternative would reduce and/or avoid potential adverse environmental effects associated with the proposed project.

5.6.2 Impacts

5.6.2.1 Aesthetics

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in similar impacts to aesthetics as compared to the proposed project. This alternative would have no impacts with respect to scenic vistas or scenic quality, and impacts related to light and glare would be less than significant. With respect to light and glare, the level of impact under this alternative would be the same as the proposed project but reduced given that this alternative reduces the events that have the highest number of attendees and occur over the longest periods of time (e.g., the Winter Festival and weekend concerts) (*less than significant, lesser than*). This alternative would result in fewer annual events by reducing the number of days for the Winter Festival and weekend concerts compared with the proposed project. The reduced number of events would directly correlate to the

reduction in use of stadium lighting, consistent with existing use. As such, aesthetic impacts under the Reduced Non-Athletic Event Frequency and Attendance Alternative would be reduced as compared to the proposed project (*less than significant, lesser than*).

5.6.2.2 Air Quality

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in similar impacts to air quality as compared to the proposed project. This alternative would still add 85 new persons associated with new MBFC teams to the regional population, consistent with the proposed project. Therefore, this alternative would have a less than significant impact with respect to conflicting with, or obstructing to an air quality plan, as no new persons would be contributing to the regional growth (*less than significant, equal to*). Construction of the proposed stadium improvements would still occur under this alternative, and, therefore, construction-generated air quality impacts would be consistent with the proposed project. Operation, however, would be slightly reduced with the elimination of the Winter Festival and weekend concerts. While the elimination of these events would reduce operational air quality effects compared to the proposed project, the impact would remain less than significant (*less than significant, lesser than*).

5.6.2.3 Biological Resources

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in the same impacts to biological resources as compared to the proposed project. Construction of the proposed gated event storage and staging area would still occur under this alternative, and, therefore, impacts to special-status species would occur, consistent with the proposed project. As discussed in **Section 4.3, Biological Resources**, the area proposed for use of the gated event storage and staging area contains Monterey spineflower, a special-status species, and may result in impacts to protected nesting birds through removal or disturbance of trees. This alternative would not eliminate the construction of the proposed gated event storage and staging area, and, therefore, these impacts would still occur. Implementation of **Mitigation Measures BIO-1** through **BIO-3** would reduce impacts to less than significant. Therefore, the level of significance for impacts to biological resources under this alternative would not change (*less than significant, equal to*).

5.6.2.4 Cultural and Tribal Cultural Resources

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in the same impacts to cultural resources and Tribal cultural resources as compared to the proposed project. The construction of the proposed gated event storage and staging area would result in potential impacts to cultural and Tribal cultural resources. As discussed in **Section 4.4, Cultural and Tribal Cultural Resources**, the gated event storage and staging area may contain cultural and Tribal cultural resources not previously identified resulting in a potentially significant impact if discovered during construction. This alternative would still include the construction of the proposed stadium improvements (i.e., the gated event storage and staging area), and, therefore, the impact would still occur. Similar to the proposed project, this alternative would implement **Mitigation Measures CTR-1** and **CTR-2** to minimize impacts to a less than significant level (*less than significant, equal to*).

5.6.2.5 Energy

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in a comparable impacts to the proposed project, albeit reduced as the energy required for operation would be lessened because of the reduction in events. The Reduced Non-Athletic Event Frequency and Attendance Alternative would have a less than significant impact with respect to use of energy, which would not be wasteful or inefficient, consistent with the proposed project. Similarly, this alternative would not conflict with a local plan for energy efficiency. The operation of the CSUMB Stadium under the Reduced Non-Athletic Event Frequency and Attendance Alternative would comply with the CSU's energy efficiency requirements. As such, the impacts would be comparable between the Reduced Non-Athletic Event Frequency and Attendance Alternative and proposed project, albeit lesser than. (*less than significant, lesser than*).

5.6.2.6 Geology, Soils, and Seismicity

The Reduced Non-Athletic Event Frequency and Attendance Alternative would not result in significant impact to geologic resources. This alternative would still result in renovations to the existing stadium, which would result in the same impacts as the proposed project (*less than significant, equal to*). The CSUMB Stadium would still be subject to seismic ground shaking, and seismic related hazards could occur during the lifetime of the alternative; therefore, all seismic induced impacts related to geology would remain less than significant (*less than significant, equal to*).

5.6.2.7 Greenhouse Gas Emissions

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in similar impacts to GHG emissions as compared to the proposed project. As identified in **Section 4.7, Greenhouse Gas Emissions**, the proposed project would result in temporary construction-generated greenhouse gas emissions. The emissions generated by construction would be below the acceptable threshold set by SMAQMD. This alternative does not propose to change the construction of stadium improvements, and, therefore, construction emissions would remain the same as those modeled for the proposed project.

As discussed in **Section 4.7, Greenhouse Gas Emissions**, operational greenhouse gas emissions would exceed the thresholds set by MBARD. The emissions generated by the operation of the proposed project are directly correlated to the VMT impact, which is significant and unavoidable. This alternative would not reduce the extent of operational greenhouse gas effects since this impact is driven by transportation. Although this alternative would reduce VMT due to the reduction in the number and duration the two (2) events (i.e., Winter Festival and weekend concerts), the corresponding reduction to VMT would not likely minimize the level of significance. Therefore, the Reduced Non-Athletic Event Frequency and Attendance Alternative would have a significant and unavoidable impact on GHG emissions and conflict with a plan or policy regarding GHG emissions, albeit reduced as compared to the proposed project (*significant and unavoidable, lesser than*)

5.6.2.8 Hazards and Hazardous Materials

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in similar impacts to hazards and hazardous materials as compared to the proposed project. CSUMB Stadium would host CSUMB and MBFC events but reduce the number of days for the Winter Festival and weekend concerts included in the proposed project. Impacts related to hazards and hazardous materials would be less than significant for the Reduced Non-Athletic Event Frequency and Attendance Alternative, albeit less as operation would still require the transport, use, or disposal of hazardous materials for maintenance (e.g., cleaning materials such as ammonia and bleach); however, the use, disposal, and transport would be reduced because of fewer events. Additionally, construction of the proposed stadium improvements would occur under both the Reduced Non-Athletic Event Frequency and Attendance Alternative and proposed project requiring use of potentially hazardous materials including petroleum lubricants, diesel fuels, and gasoline (*less than significant, lesser than*). The use of the CSUMB Stadium would not conflict with adopted emergency response plans or interfere with emergency evacuation plans. This impact would remain less than significant, albeit lesser than the proposed project (*less than significant, lesser than*). Similar to the proposed project, the Reduced Non-Athletic Event Frequency and Attendance Alternative would not expose persons to excessive airport noise, nor would this alternative expose people or structures to the risk of wildfires (*no impact, equal to*).

5.6.2.9 Hydrology and Water Quality

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in similar impacts to hydrology and water quality as compared to the proposed project. Both this alternative and proposed project would result in construction of new improvements within the existing footprint of the stadium. Additionally, both this alternative and the proposed project would not pave or install permanent structures on the proposed event storage and staging area site, and, therefore, no changes in impermeable surfaces would occur as compared to the proposed project. Consistent with the proposed project, the Reduced Non-Athletic Event Frequency and Attendance Alternative is located in a FEMA floodplain, but the risk of flood inundation would be low. Moreover, the site is not near any surface water features (i.e., lakes, ponds, rivers), and the site is improved with drainage infrastructure (e.g., drainage basins). No surface water or groundwater quality would be degraded because of this alternative, nor would this alternative result in a conflict with a water quality control plan or sustainable groundwater management plan. The Reduced Non-Athletic Event Frequency and Attendance Alternative would have a less than significant impact on hydrology and water quality, consistent with the proposed project (*less than significant, equal to*).

5.6.2.10 Land Use and Planning

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in the same physical changes to the stadium as compared with the proposed project. However, this alternative would reduce the number of events annually by reducing the number of days for the Winter Festival and weekend concerts. This alternative would not divide an established community, as it would consist of the utilization of an existing stadium (*no impact, equal to*). Similar to the proposed project, the Reduced Non-Athletic Event Frequency and Attendance Alternative would not conflict with a land use plan, policy, or regulations. This alternative would be consistent with the 2022 CSUMB Master Plan and CSUMB would continue to coordinate with neighboring jurisdictions (i.e., City of

Marina and City of Seaside) to ensure continued plan consistency. The Reduced Non-Athletic Event Frequency and Attendance Alternative would not generate new or additional changes to land use beyond that of the proposed project. As such, no changes to the level of significance would occur (*less than significant, equal to*).

5.6.2.11 Noise and Vibration

The Reduced Non-Athletic Event Frequency and Attendance Alternative would result in similar impacts to noise and vibration as compared to the proposed project. As identified in **Section 4.11, Nosie and Vibration,** the proposed project would result in temporary construction-generated noise. The noise generated by construction would be below the acceptable thresholds. This alternative does not propose to change the construction of stadium improvements, and, therefore, construction noise would remain the same as those modeled for the proposed project.

As discussed in **Section 4.11, Noise and Vibration**, operational impacts would be generated from vehicles traveling on roadways, the noise of which would exceed the acceptable thresholds. The impacts generated by the operation of the proposed project are directly correlated to the VMT impact, which is significant and unavoidable, and a result of the increase in frequency and attendance of events. This alternative would not reduce the extent of operational noise since this impact is driven by transportation. Although reducing the duration of the Winter Festival and the number of weekend concerts, as well as reducing the number of attendees, would reduce the VMT, the reduction to VMT would not likely minimize the level of significance. Therefore, this alternative would have a significant and unavoidable impact (*significant and unavoidable, lesser than*) The CSUMB Stadium is not located near an airport where airport noise would generate a safety concern (*no impact, equal to*).

5.6.2.12 Population and Housing

The Reduced Non-Athletic Event Frequency and Attendance Alternative would not change the level of impact with respect to population and housing as compared to the proposed project. Moreover, the reduced duration of the Winter Festival and weekend concerts would not change the anticipated growth in the Monterey Bay region. This alternative would still add 85 new persons to the Monterey Bay area from the addition of new MBFC teams, consistent with the proposed project. Specifically, the Reduced Non-Athletic Event Frequency and Attendance Alternative would result in new MBFC teams that would bring 85 new persons to the area. However, as with the proposed project, this increase in people would not result in population growth that was not previously planned or anticipated. Similar to the proposed project, no persons or housing would be displaced by the Reduced Non-Athletic Event Frequency and Attendance Alternative. As with the proposed project, this alternative would construct the proposed stadium improvements, and operation would be entirely within the existing CSUMB Stadium (*no impact, equal to*).

5.6.2.13 Public Services and Recreation

The Reduced Non-Athletic Event Frequency and Attendance Alternative would have similar impacts with respect to public services and recreation as compared to the proposed project. This alternative would reduce the number of annual events by reducing the number of days in which the Winter Festival and weekend concerts would last. The events hosted under this alternative would require police and fire services, but would not result in the need for expanded service or increased demand;

this alternative would have a less than significant impact albeit lesser than (*less than significant, lesser than*). Similarly, the existing operation of the CSUMB Stadium under this alternative would not increase the student body at CSUMB or contribute directly or indirectly with population growth that would require new or expanded school facilities at neighboring schools or school districts. As discussed in Section **5.6.2.12, Population and Housing**, the Reduced Non-Athletic Event Frequency and Attendance Alternative would generate new persons but would not result in population growth that exceeds regional growth plans; a less than significant impact would occur (*less than significant, equal to*).

5.6.2.14 Transportation

The Reduced Non-Athletic Event Frequency and Attendance Alternative would have similar impacts with respect to transportation as compared to the proposed project. As discussed in **Section 4.14, Transportation**, Fehr & Peers prepared a VMT analysis for the proposed project. The analysis determined that the proposed expanded use would result in a significant and unavoidable project-generated VMT impact as well as a significant and unavoidable cumulative VMT impact. Consistent with the prior environmental analysis for the Freeman Stadium Renovations Project, the primary measure identified to reduce VMT impacts is implementation of the TMP and TDM program. The TMP includes strategies designed to shift travel away from single-occupancy vehicles toward safe and convenient non-automotive modes for all new stadium activities. The TMP would be implemented for the life of the project, and CSUMB would continue to monitor and refine TMP and TDM program over time to further reduce vehicle travel to the extent feasible, as set forth in **Section 4.14, Transportation**, **Mitigation Measure TR-1** through **Mitigation Measure TR-6**.

As part of the alternatives evaluation, Fehr & Peers conducted a qualitative analysis of event types and found that approximately 70 percent of project-generated VMT would be attributable to the proposed Winter Festival and weekend concert events. These events generate the highest attendance levels and typically occur over multiple consecutive days throughout the year. An alternative that reduced the frequency or scale of these events would reduce overall VMT; however, such reductions would not alter the level of significance of the project's VMT impacts.

This conclusion is based on several factors. First, existing stadium operations already exceed applicable VMT thresholds. While implementation of the TMP and TDM program reduces current VMT effects, it does not fully mitigate them to a less than significant level. As a result, any expansion of operations beyond existing conditions would further exacerbate VMT impacts. Second, the events generating the majority of VMT are discretionary, and CSUMB and MBFC have limited methods for substantially reducing VMT while still meeting the fundamental objectives of the project. The project sponsors cannot directly control how attendees travel to and from the stadium, and attendee trips account for the majority of project-generated VMT.

Finally, the Fehr & Peers analysis incorporates conservative, site-specific assumptions indicating that most attendees are expected to originate from nearby cities and towns rather than from outside the region, limiting the extent to which additional reductions in VMT could be feasibly achieved. Accordingly, while alternative event scenarios could incrementally reduce VMT, no feasible alternative would avoid or substantially lessen the project's significant and unavoidable VMT impacts while still meeting the project objectives. Therefore, this alternative would still result in a significant and unavoidable impact with respect the VMT, albeit less than the proposed project (*significant and unavoidable, lesser than*). Similar to the proposed project, this alternative would have a less than

significant impact with respect to conflicting with a program or plan addressing circulation with implementation of the mitigation measures related to the TMP and TDM program (**Mitigation Measures TR-1** through **TR-6**) (*less than significant, lesser than*). The Reduced Non-Athletic Event Frequency and Attendance Alternative would not result in inadequate emergency access, similar to the proposed project (*less than significant, lesser than*). No impact due to a hazardous design feature or incompatible use would occur (*no impact, equal to*).

5.6.2.15 Utilities and Service Systems

The Reduced Non-Athletic Event Frequency and Attendance Alternative would have similar impacts with respect to utilities and service systems as compared to the proposed project. This alternative would be serviced by all the same providers as the proposed project, and would not require new or upgraded water, wastewater, electrical or natural gas, or telecommunication infrastructure. Water required and wastewater generated would not exceed the allocation or capacity of the service provider (i.e., MCWD and M1W, respectively). While this alternative would reduce the use of utilities (e.g., water, wastewater, energy) and generate less solid waste because of the reduced number of annual events, the Reduced Non-Athletic Event Frequency and Attendance Alternative would still result in a less than significant effect on utilities and services system, but lesser than the proposed project (*less than significant, lesser than*).

5.6.3 Ability to Meet Project Objectives

The Reduced Non-Athletic Event Frequency and Attendance Alternative would partially meet some project objectives, but would not fully achieve the project's underlying purpose. While it could maintain core athletic functions and potentially realize the benefits of physical improvements, it would limit the stadium's evolution into a fully flexible, multipurpose venue. By constraining non-athletic programming, this alternative would reduce opportunities for community engagement, external partnerships, and student learning experiences tied to diverse events. Consequently, it would represent a more conservative operational approach that balances impact reduction with continued use, but at the cost of diminished functionality, reduced regional presence, and underutilization of upgraded facilities.

1. Strengthen the stadium as a campus resource and community asset (Partially Met*)*

This alternative would partially meet, but ultimately constrain, this objective. While the stadium would continue to serve as a shared facility and support some level of community engagement, reducing non-athletic event frequency and attendance would limit opportunities to expand partnerships with external organizations. In particular, the ability to host a diverse range of events including large-scale community gatherings or expanded professional programming would be diminished. As a result, the stadium's role as a regional destination and community asset would not be fully realized.

2. Modernize and improve usability, safety, and operational efficiency (*Met*)

The Reduced Non-Athletic Event Frequency and Attendance Alternative would construct the proposed stadium improvements, consistent with the proposed project. Construction of the proposed locker room and shower facilities, permanent restroom facilities, and gated event storage

and staging area would address existing deficiencies related to infrastructure, operational inefficiencies, and limited amenities to support stadium operations. Therefore, the Reduced Non-Athletic Event Frequency and Attendance Alternative would achieve this objective through construction and operation of the physical improvements described throughout this EIR, which are intended to extend the stadium's functional lifespan and better serve students, faculty, staff, and community.

3. Address functional limitations and align with collegiate and professional standards (*Partially Met*)

This alternative would partially meet this objective through the construction and operation of physical upgrades (i.e., the proposed stadium improvements), as improvements to stadium support infrastructure could still bring the stadium closer to collegiate and professional standards. However, by limiting non-athletic events and potentially constraining overall usage intensity, the stadium may be less attractive to professional organizations or event promoters seeking venues capable of accommodating larger or more frequent events. This could indirectly limit alignment with evolving professional expectations and reduce visibility within the broader Monterey Bay region.

4. Support academic programming and student opportunities (*Partially Met*)

This alternative would partially meet this objective. The stadium could still support academic instruction, athletics, and some experiential learning opportunities; however, reduced non-athletic programming would limit the diversity and scale of events available for student engagement. Opportunities for applied research, event management experience, and interdisciplinary learning particularly those tied to large or varied events would be diminished. While stadium improvements (if implemented) could improve baseline conditions (e.g., permanent restrooms and improved infrastructure), the overall expansion of student opportunities would be constrained.

5. Site development within the existing campus core (*Met*)

This alternative would meet this objective, as it would still focus improvements within the already developed campus core and utilize existing infrastructure. Similar to the proposed project, it would avoid expansion into undeveloped land and remain consistent with campus planning and smart growth principles.

5.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the fewest adverse environmental impacts on the project site and surrounding area. According to CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Of the alternatives considered, the No Project Alternative would maintain current event frequency, attendance levels, and associated travel demand. However, it would not reduce or avoid the existing significant transportation impacts since the existing operations already exceed standard thresholds for transportation. However, under this alternative, no new travel demand would be generated and,

therefore, significant and unavoidable impacts related to GHG emissions and noise would not occur. Consistent with CEQA Guidelines Section 15126.6(e)(2), the No Project Alternative would be considered the environmentally superior alternative as it would result in the fewest adverse environmental impacts. However, the No Project Alternative would not meet the fundamental objectives of the proposed project, which includes modernizing and enhancing the existing stadium to function as a flexible, multipurpose venue that better supports CSUMB's academic and athletic programs while accommodating expanded use, including partnerships with external organizations such as professional athletic entities (e.g., USL). The No Project Alternative is not considered feasible because it would not achieve the basic purposes of the project.

As noted above, CEQA Guidelines states that if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)). An alternative to the No Project Alternative would be the Reduced Non-Athletic Event Frequency and Attendance Alternative. This alternative reduces the scale and frequency of proposed events and would, thus, reduce project-generated VMT and corresponding GHG emissions and noise relative to the proposed project. However, as discussed in **Section 4.14, Transportation**, existing stadium operations already exceed applicable VMT thresholds, and even with implementation of the TMP and TDM program, VMT impacts would remain significant and unavoidable. While a reduced-intensity alternative would incrementally lessen VMT, and GHG emissions and noise as a result, it would continue to result in a significant and unavoidable VMT, GHG, and noise impact. Therefore, the Reduced Non-Athletic Event Frequency and Attendance Alternative would not eliminate the need for a Statement of Overriding Considerations.[1] In addition, such an alternative would only partially meet the project objectives listed above (please see **Section 5.6.3, Ability to Meet Project Objectives**). Consequently, while a reduced-intensity alternative would provide some environmental benefits compared to the proposed project, it would neither fully meet the project objectives nor avoid the project's significant and unavoidable transportation, GHG, and noise impacts.

[1] A Statement of Overriding Considerations is a finding adopted by a lead agency under CEQA when an EIR identifies significant environmental impacts that cannot be fully mitigated. In such cases, the agency may still approve the project if it determines that the project's economic, legal, social, technological, or other benefits outweigh these unavoidable adverse effects, consistent with CEQA Guidelines Section 15093.

Chapter 6.0 Cumulative Impacts and Other CEQA Considerations

CEQA Guidelines Section 15126 requires that all aspects of a project, including planning, acquisition, development, and operation, must be considered when evaluating the proposed project's potential effects on the environment. As part of this analysis, an EIR must evaluate the:

a. Significant environmental effects of the proposed project;

b. Significant environmental effects which cannot be avoided if the project is implemented;

c. Significant irreversible environmental changes which would be involved in the project, should it be implemented;

d. Growth-inducing impacts of the project;

e. Mitigation measures proposed to minimize the significant effects; and,

f. Alternatives to the project.

Consistent with the requirements of CEQA Guidelines Section 15126, this chapter evaluates the proposed project's potential growth-inducing effects (CEQA Guidelines Section 15126(d)), significant and unavoidable effects (CEQA Guidelines Section 15126.2(a) and 15126.2(b)), and significant irreversible environmental changes (15126.2(c)). This chapter also includes an evaluation of potential cumulative effects (CEQA Guidelines Section 15130) and effects found not to be significant (CEQA Guidelines Section 15128). An evaluation of project alternatives (CEQA Guidelines Section 15126.6) is included in **Chapter 5.0, Alternatives.**

6.1 GROWTH INDUCEMENT

CEQA requires an EIR to discuss the ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(e)). Projects that could potentially induce growth include projects that would remove obstacles to population growth, such as the lack of available infrastructure or water supply. Recognizing the inherent difficulties involved in forecasting the extent and type of development that a particular project might foster, CEQA calls for a general assessment of possible growth-inducing impacts rather than a detailed analysis of a project's specific impacts on growth.

The CEQA Guidelines state that "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment" (ibid). Typically, a project's growth inducing effects would be considered significant if the project:

- Provides infrastructure or capacity to accommodate growth beyond the levels currently permitted in applicable local and regional plans and policies.

- Encourages growth or a concentration of population in excess of what is planned for in the applicable general plan or other land use plan, or in projections made by regional planning agencies, in this instance the AMBAG.

- Adversely affects the ability of agencies to provide needed public services or infrastructure.

- In some other way significantly affects the environment, such as through a substantial increase in traffic congestion or deterioration of air quality.

As described below, the environmental effects of potential induced growth are considered secondary or indirect effects. Typically, potential growth-inducing projects can result in a variety of secondary effects, such as increased demand for public services and utilities, increased traffic and noise, and localized air quality impacts, which are described below.

6.1.2 Potential Growth Related to the Project

The proposed project would not facilitate growth on the CSUMB campus, or in the adjacent cities beyond what is reasonably expected for the region. As identified in **Section 4.12, Population, and Housing,** the proposed project would introduce 85 new persons to Monterey County, which would primarily consist of new players, coaches, and training staff associated with the proposed USL soccer teams. The addition of 85 new persons to Monterey County would not be considered significant in terms of regional population growth and would minimally increase demands on existing public services. The minor population growth associated with the proposed project is not anticipated to generate a substantial increase in economic activity in the region such that secondary impacts would occur.

Moreover, the proposed project would not generate indirect growth in connection with construction-related activities. The proposed project would generate short-term employment opportunities during the construction phase, which would be expected to draw workers primarily from the available regional workforce. Therefore, the proposed project would not directly or indirectly induce additional population growth beyond current levels.

The proposed project would contribute to growth; however, as discussed above, the addition of 85 new persons would be a minimal increase in the existing population. Moreover, the proposed project does not entail the construction of additional infrastructure that could accommodate additional growth and development.

6.2 CUMULATIVE IMPACTS

Cumulative impacts are defined as “two [2] or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor, but collectively significant, actions when added to those of other closely related past, present, or reasonably foreseeable future projects. Guidance for cumulative impact analysis is provided in Section 15130 of the CEQA Guidelines:

a. An EIR shall discuss cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable” (i.e., the incremental effects of an individual project are considerable

when viewed in connection with the effects of past, current, and probable future projects, including those outside the control of the agency, if necessary).

b. An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.

c. A project's contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

d. The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.

e. The focus of analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

6.2.1 Approach

CEQA Guidelines Section 15130 requires that an EIR discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. The following elements are necessary to an adequate discussion of significant cumulative impacts: either; 1) a list of past, present, and probable future projects producing related or cumulative impacts; or 2) a summary of projections contained in an adopted general plan or in a prior environmental document which has been certified and described or evaluated regional or area-wide conditions contributing to the cumulative impact. However, it is also common for the cumulative analysis to rely on a combined approach that includes elements of the list approach and projection approach.

For the purposes of this ~~Draft~~ EIR, the list approach is used to address cumulative impacts. As required by CEQA, the cumulative analysis presented in this chapter identifies the impacts of the proposed project that could contribute, when considered together with effects of other past, present, and reasonably foreseeable related projects, to a potentially considerable cumulative impact. Construction-related impacts of a project are typically short-term and, therefore, have a relatively narrow window of time related to past, present, and probable future projects that could contribute to a potentially significant cumulative impact.

Three criteria were used to determine an appropriate list of relevant past, present, and future projects to be considered in this cumulative analysis: (1) similar environmental impacts, (2) geographic scope and location, and (3) timing and duration of implementation. A relevant future probable project is defined as one that is "reasonably foreseeable," such as a proposed project that has approved funding or for which an application has been filed and deemed complete by an approving agency by the time of commencement of environmental review of the proposed project. In addition, some projects may be excluded from the cumulative list if the agency and/or applicant were not actively pursuing further entitlements at the time of preparation of this EIR.

Projects relevant to the cumulative impact analysis include those that could contribute to incremental environmental effects on the same resources as the project and have similar impacts to those discussed in this ~~Draft~~ EIR. This chapter analyzes potential cumulative impacts that could occur during

implementation of the proposed project when considered in combination with other relevant projects. For reference, the proposed project's potential environmental impacts are discussed in greater detail in **Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures**, **Sections 4.1** through **4.13** of this ~~Draft~~ EIR.

Projects relevant to the cumulative analysis include those that are within the defined geographic scope for the cumulative effect. CEQA Guidelines Section 15130(b)(3) requires that the "geographic scope of the area affected by the cumulative effect" is defined and that the analysis should "provide a reasonable explanation for the geographic limitation used." The defined geographic scope is dependent on the environmental resource topic affected. Generally, the geographic scope includes the area within and adjacent to the project site. However, for certain environmental resource topics the geographic scope extends farther, such as the regional roadway network or regional air basin. The geographic scope is described by resource topic in the section below. Projects in unincorporated Monterey County, City of Marina, City of Seaside, Sand City, and CSUMB campus were identified based on their geographic scope, and, more specifically, their proximity to the proposed project site.

Projects relevant to the cumulative analysis include projects that could contribute impacts that coincide with proposed project impacts during construction (short-term) or operation (long-term). Construction of the proposed project would last approximately nine months beginning in 2026 (please refer to **Chapter 3.0, Project Description, Section 3.3.2, Construction**). For temporal impacts such as air pollutant emissions, and increased noise levels and traffic during construction, cumulative effects could overlap with those of the proposed project and would affect the same environmental resources.

Table 6-1 includes a list of past, present, and reasonably foreseeable projects considered in this cumulative analysis based on these criteria. **Figure 6-1** displays the locations of each project relative to the proposed project site.

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. In addition to assessing the combined impacts of the project and past, present, and probable future projects, the EIR determines whether the impact of the proposed project is cumulatively considerable. The analysis considers whether there would be a significant, adverse cumulative impact associated with project implementation in combination with past, present, and reasonably foreseeable projects in the geographical area, and, if so, whether the proposed project's incremental contribution to the cumulative impact would be considerable. Both conditions must apply for a project's cumulative impacts to rise to the level of significance.

Title: Cumulative Projects	Date 4/23/2026 Scale N/A Project 2024-84 Revised 8/24/2026	Monterey | San Jose **Denise Duffy and Associates, Inc.** Environmental Consultants Resource Planners 947 Cass Street, Suite 5 Monterey, CA 93940 (831) 373-4341	Figure 6-1

Table 6-1
Projects Considered for Cumulative Analysis

Map ID	Project Name	Project Location	Project Description	Status/Timing
Monterey County				
1	East Garrison Specific Plan	Former Fort Ord military base, East Garrison area	Mixed-use development project comprising residential, commercial, office, institutional, and recreational uses on approximately 244 acres. The project includes the construction of up to 1,470 dwelling units, 75,000 square feet of commercial uses, 11,000 square feet of public and institutional uses, 100,000 square feet of art/cultural/ educational uses, and approximately 50 acres of open space. Development under the Specific Plan will be implemented in three phases	Under construction
City of Marina				
2	The Dunes on Monterey Bay	East of Highway 1 and south of Imjin Parkway	Mixed-use development project comprising 1,237 residential units, 500 hotel rooms, and retail and office space on 297 acres. Phase 1 (378,000- square-foot retail center) built in 2007-2008. Phase 2 includes the following: (1) South County Housing to develop and build 108 low- and very low-income affordable apartments, many of which were completed by spring/summer 2014; (2) Cinemark multiple screen movie theater completed 2015; (3) Plans approved for two approximately 15,000 square foot retail buildings to be built near the movie theater; (4) Veterans Affairs Monterey Health Care Center located on a 14.31-acre project site within the Dunes on Monterey Bay Specific Plan area completed 2016; and	Under construction

Map ID	Project Name	Project Location	Project Description	Status/Timing
			(5) Springhill Suites, a 67,328-square-foot, 4- story hotel with 106 hotel rooms. The hotel includes a 1,750-square-foot meeting room and guest parking and is scheduled to open in April 2017.	
3	Filiguera Apartment Complex	264 Carmel Avenue	Demolition of an existing single-family dwelling and construction of multifamily apartment (10 units)	Approved
4	Shores at Marina	3125 De Forest Road	Multifamily apartment (58 units)	Approved
5	Seacrest Apartments	3108 Seacrest Avenue	Multifamily apartment (10 units)	Approved
6	Cypress Knolls Senior Residential Project	Former Fort Ord military base, Third Avenue / Imjin Parkway	Senior residential community with active-adult housing, care services, senior community center, and supportive amenities and services on 188 acres.	Approved
7	Sea Haven	Former Fort Ord military base, Imjin Parkway / California Avenue	Removal of 828 abandoned residential units and replacement with a combination of 1,050 new townhome, cottages, estate homes, and single- family residential units. The project also includes 35 acres of parks, greenbelts, and open space. The first phase includes 299 housing units.	Under construction
8	Marina Downtown Vitalization Specific Plan	Reservation Road between Del Monte Boulevard and De Forest Avenue	Redevelopment plan for Marina's 225-acre downtown area comprising mixed-use commercial, residential, educational, and civic uses. At full buildout, the plan would result in a net increase of 2,440 residential dwelling units, 718,000 square feet of multiple use, 70,000 square feet of office space, and 50,000 square feet of civic facilities, and a net decrease of 161,000 square feet of retail/service uses, 27,000 square feet of visitor- serving uses, and 270,000 square feet of industrial uses.	Approved
9	Marina Station	Armstrong Ranch, along the northern	Development project comprising 1,360 residential units, approximately 60,000	Under construction

Map ID	Project Name	Project Location	Project Description	Status/Timing
		limits of the City of Marina, on either side of Del Monte Avenue	square feet of retail space, 144,000 square feet of office space, and 652,000 square feet of business park/industrial uses. The 1,360 residential units comprise approximately 887 single-family lots and 473 multi- family units.	
10	Six- Unit Apartment	225 Harben Circle	2-story, 6-unit apartment building.	Approved
			CSUMB Projects	
11	Monterey Bay Charter School New School Project	Colonel Durham Street between Sixth and Seventh Avenues	60,000-gross-square-foot school. Phase I includes the construction of 19 K-8 classrooms; work rooms for administrators, teachers, and custodians; resource and remedial instruction rooms; and storage. Phase II includes additional support facilities. Phase I is projected to accommodate approximately 430 students; full enrollment of 508 students is expected to be reached by Phase II.	Approved
12	Edward Taylor Science and Engineering Building		20,000 square-foot facility to support the existing CSTEM programs.	Approved
			City of Seaside	
13	The Projects at Main Gate Specific Plan	Bounded by First Street to the north, Second Avenue to the east, Lightfighter Drive to the south, and Highway 1 to the west	Development of a commercial center with up to 187,000 square feet of retail space, 410 housing units (210 single-family and 200 multifamily), 250 student housing units, and a 450-room hotel with a spa and conference facilities and 60,000 square feet of standalone restaurants on approximately 57 acres of the former Fort Ord.	Approved
14	Campus Town Specific Plan	Bounded by Lightfighter Drive to the north, Gigling Road to the south, First Avenue to the west and Eighth Avenue to the east	The proposed project involves development of 1,485 housing units, 250-room hotel, a 75-bed youth hostel, 150,000 square feet of retail, dining, and entertainment space, 50,000 square feet of light industrial, flex, office, or "maker space" on 60 acres. Construction would take place from 2021 through 2034.	Under construction

Map ID	Project Name	Project Location	Project Description	Status/Timing
15	The Seaside Resort	Bordered by Monterey Road, Coe Avenue, and General Jim Moore Boulevard	The first phase, completed in 2009, involved upgrades to the Bayonet and Black Horse Golf Courses. The next phase of development features a four-star hotel with approximately 275 hotel rooms, 175 timeshare units, and 125 residential units.	Under construction
16	Seaside Senior Living Project	550 Monterey Road	Removal of an existing vacant 5,000-square-foot structure and the development of a State of California licensed Residential Care Facility for the Elderly (RCFE) on a 5.47-acre site. The RCFE will include an assisted living facility (81,679 square feet; 88 residential units), a memory care facility (29,707 square feet; 43 residential units) and an assisted living co-housing facility (10,894 square feet; 13 residential units).	Approved
17	~~Monterey County Court House~~ New Fort Ord Courthouse	Divarty and 2nd Avenue	5-acre site to accommodate a regulatory compliant, seismically safe, and accessible courthouse. The proposed facility consists of a 3-story approximately 83,000 square-foot courthouse with flanked parking to the east and west of the building. Parking would accommodate 280 staff and public spaces. 150 of the parking spaces will have solar panel coverage and a corresponding battery energy storage system.	Approved
18	Seagrove (previously the Ascent Project)	Terrace Street and Broadway Avenue	The project will build rental housing consisting of 106 one-bedroom, two-bedroom, and three-bedroom units and townhouses, as well as 4,000 square feet of retail space, a shared vehicular court and green space areas for residents.	Construction Completed
Sand City				
19	Monterey Bay Shores	Oceanfront, west of Highway 1 near Fremont / Highway 1	Coastal resort project on 39.04-acre oceanfront site with 92 residential condominium units, 92 visitor- serving condominium units, and a 184-	Approved; preliminary grading completed

Map ID	Project Name	Project Location	Project Description	Status/Timing
		interchange, bounded by Sand City limit to the north	room hotel.	
20	The Collection at Monterey Bay	West of Highway 1, north of Tioga Avenue, and intersected by Playa Avenue	342-room coastal resort on the 26.46-acre site that may be constructed in two phases. Phase I is a 139-room hotel on a 7.9-acre site. Phase II is a coastal resort on a 16.25-acre site consisting of 203 visitor rooms, a restaurant with banquet facilities, a health/wellness spa, parking, and other ancillary and related improvements, and public parking improvements on a 2.31-acre site.	Approved
21	Catalina Lofts	Bounded by Ortiz Avenue to the north, Elder Avenue to the south, and Catalina Street to the west	18,636-square-foot mixed-use project on a 15,000- square-foot vacant property with 8 residential units and 7 commercial units.	Approved
22	South of Tioga	Bounded by Tioga Avenue to the northeast, California Avenue to the southeast, East Avenue to the southwest, and the Merle Street right-of-way to the northwest	Mixed-use project on 10.64-acre site replacing industrial uses with 356 residential units and a 216- room hotel, and a restaurant.	Under construction
23	Stepanek Mixed-Use Project	414 Orange Avenue	8,000-square-foot, 2-story mixed-use development on a 5,625-square-foot parcel replacing existing commercial building with 1 residential unit and 1 commercial unit.	Approved
24	Dayton Residential Project	Bounded by Ocean View Avenue to the southeast and Fell Street to the	Two new single-family homes (one with an accessory unit) on a property previously used as a fenced commercial yard.	Approved

Map ID	Project Name	Project Location	Project Description	Status/Timing
		northeast		
			California State Parks	
25	Fort Ord Dunes State Park Campground	Fort Ord Dunes State Park (immediately west of the Transportation Agency for Monterey County rail corridor and Highway 1, west of the former Fort Ord military base)	Construction and operation of a campground facility and associated infrastructure within Fort Ord Dunes State Park, including 45 RV sites and two host sites with electrical and water hookups, 10 hike/bike sites, and 43 tent sites; parking for 40 vehicles; restrooms with showers; a multi-purpose building; an outdoor campfire center; interpretation/ viewing areas; renovated bunkers; an entrance station near the 1st Street underpass; modular structures; storage yard and maintenance shop; improved beach access/trails; one plumbed restroom with outdoor shower for beach use; a 200-foot wildlife/habitat corridor; internal campground trail network, trail improvements, and roadway improvements; and off-site utilities.	Under construction
			Transportation Agency of Monterey County	
26	Fort Ord Regional Trail and Greenway (FORTAG)	Fort Ord (Cities of Seaside and Marina, CSUMB, Monterey County)	30-mile regional network of paved recreational trails and greenways within the Fort Ord	Approved; Del Rey Oak Segment under construction

6.2.2 Aesthetics

The geographic context for the analysis of cumulative impacts related to aesthetics includes the project site and immediate vicinity that are visible from the same public vantage points. Based on the list of cumulative projects provided in **Table 6-1. Projects Considered for Cumulative Analysis**, the following projects are within the same viewshed of the project site: The Projects at Main Gate Specific Plan, Campus Town Specific Plan, and Monterey County Court House. **Table 2-1** in **Chapter 2.0, Executive Summary**, provides a summary of potential impacts from the proposed project to the aesthetic environment and significance determinations by impact area for construction and operations. The proposed project would not result in impacts to any scenic vistas or scenic resources visible from a designated State Scenic Highway. Therefore, pursuant to CEQA Guidelines Section 15130(a)(1), the cumulative analysis does not further discuss these impacts since any such cumulative impacts would not result in part from the proposed project.

As discussed in **Section 4.1, Aesthetics**, the construction and operation of the proposed project would have a less than significant impact with respect to a conflict with applicable zoning and other regulations for scenic quality (**Impact AES-2**). The existing CSUMB Stadium is located within the Athletics and Recreation District, and the proposed project would be consistent with the current uses and existing improvements located within this district and surrounding area, which are defined by and developed in accordance with the current approved Master Plan for the CSUMB campus. The proposed project would be located on a developed site and surrounded by land used for a range of athletic facilities and uses. While CSUMB is not subject to local ordinances and policies as stated in **Chapter 1.0, Introduction**, the cumulative projects in the project viewshed are also consistent with applicable City of Seaside zoning and other regulations regarding scenic quality. Therefore, the proposed project would have a less than significant cumulative impact, combined with cumulative development in the project viewshed, with respect to conflicting with applicable zoning or other regulations governing scenic quality.

The proposed project would largely rely on existing stadium lighting for the proposed expanded use of the stadium, the increased use of which would not substantially or adversely impact other nearby land uses, as discussed in **Impact AES-3**. Renovated lighting sources associated with the proposed locker room and shower facilities and permanent restroom facilities would be contained in the existing stadium facility at the project site. Nighttime lighting would be employed more frequently but would be temporary in nature and would not increase in intensity. EXP modeled and evaluated the expected stadium lighting and found that the proposed project would not substantively increase ambient nighttime light levels or create overspill or sky glow.

Construction and operation of the proposed project, in combination with other cumulative projects in the project viewshed, could potentially result in cumulative impacts to light or glare that could adversely affect day or nighttime views in the area. Their effects, however, are not anticipated to be cumulatively considerable. While CSUMB is not subject to local ordinances and policies as stated in **Chapter 1.0, Introduction**, the facility currently operates, and would continue to operate, in compliance with the City of Seaside's outdoor lighting policies and energy efficiency policies outlined in the City of Seaside's General Plan and Municipal Code. In addition, the other cumulative projects will be required to comply with the City of Seaside's outdoor lighting policies and energy efficiency policies outlined in the City of Seaside's General Plan and Municipal Code. Therefore, the proposed project, combined with cumulative

development in the project viewshed, would have a less than significant cumulative impact related to light and glare.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on aesthetic resources. No mitigation measures would be required.

6.2.3 Air Quality

Consistency with the AQMP is determined, in part, by comparing cumulative population growth to the population forecasts contained in the 2017 AQMP for Monterey County, which is the geographic context for the analysis of potential conflicts with the AQMP due to cumulative development. The AQMP accommodates growth by projecting the growth in emissions based on population forecasts prepared by AMBAG. As discussed in **Impact AQ-1**, the proposed project would have a less than significant impact since operation would not contribute to significant population growth that could exceed AMBAG's regional growth forecast or would produce emissions in conflict with implementation of the 2017 AQMP for achievement of state ozone standards. While there could be future projects proposed within Monterey County not anticipated by the AMBAG growth forecasts that would exceed the forecasts contained in the AQMP, evaluation of such impacts would be speculative at this time. Further, subsequent Regional Growth Forecasts in 2018 and 2022 reveal that population projections are decreasing in Monterey County over time and, therefore, the higher 2017 population estimates for Monterey County used in the AQMP are likely to account for cumulative development. Therefore, significant conflicts with the AQMP are not likely to result with cumulative development in Monterey County. Furthermore, the proposed project would be consistent with the AQMP, as discussed in **Impact AQ-1**. Therefore, the proposed project would have a less than significant cumulative impact related to conflicts with the AQMP.

Air pollution by nature has a cumulative impact. The NCCAB is the geographic context for the evaluation of cumulative air quality impacts related to criteria air pollutants. The nonattainment status of regional pollutants is a result of past and present development, and MBARD develops and implements plans for future attainment of ambient air quality standards within the NCCAB. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. **Impact AQ-2** addresses the potential for the proposed project to result in a cumulatively considerable impact, specifically a cumulatively considerable new increase of any criteria air pollutant for which the project region is nonattainment under an applicable NAAQS and/or CAAQS. As discussed in **Impact AQ-2**, daily construction and the net operational emissions of the proposed project would not exceed the MBARD significance for any criteria air pollutants. Therefore, construction and operational cumulative air quality impacts would be less than significant.

The NCCAB is the geographic context for the evaluation of cumulative air quality impacts related to substantial pollutant concentrations. As addressed in **Impact AQ-3**, construction and operation of the proposed project would not result in the exceedances of the MBARD significance thresholds for criteria air pollutants. MBARD thresholds are based on levels that the NCCAB can accommodate without affecting the attainment date for the NAAQS and CAAQS established to protect public health and welfare. Therefore, the proposed project would not result in cumulative exposure to substantial pollutant concentrations. The proposed project would have a less than significant cumulative impact regarding substantial pollutant concentrations.

As indicated in **Impact AQ-4**, the project impact related to odors would be less than significant. As odors have a localized impact, the geographic scope considered in the cumulative analysis related to odors consists of the cumulative projects in the immediate project vicinity: The Projects at Main Gate Specific Plan, Campus Town Specific Plan, and Monterey County Court House. None of these projects are odor-producing land uses. The MBARD does not have a specific regulation or rule that addresses objectionable odors. Any actions related to odors would be based on public complaints made to MBARD. Additionally, all future projects would be subject to MBARD Rule 402 (Nuisances), which prohibits the discharge of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health, or safety of any such persons or the public; or which cause, or have a natural tendency to cause, injury or damage to business or property. Therefore, the proposed project would have a less than significant cumulative impact related to odor.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on air quality. No mitigation measures would be required.

6.2.4 Biological Resources

The geographic area considered in the cumulative analysis for biological resources is described in the impact analysis below. The proposed project would not result in impacts to any riparian habitat or other sensitive natural community and would not result in impacts to state or federally impacted wetlands. Therefore, pursuant to CEQA Guidelines Section 15130(a)(1), the cumulative analysis does not further discuss these impacts given that any such cumulative impacts would not result in part from the proposed project.

The geographic context for the analysis of cumulative impacts related to special-status species and protected avian species includes the campus and other cumulative project sites on the former Fort Ord. As discussed under **Impact BIO-1**, the proposed stadium improvements would remove vegetation and install gravel in the gated event storage and staging area where a population of Monterey spineflower, a federally threatened and CNPS CRPR 1B species, was observed during biological resource surveys of the Project site. The construction of the proposed gated event storage and staging area would result in mortality or loss of the individual or seedbank stock as well as permanent habitat loss, which would be considered a potentially significant impact under CEQA. Implementation of **Mitigation Measure BIO-1** would reduce this impact to a less than significant level. In addition, the construction of the gated event storage and staging area would result in the removal of 16 trees, which have the potential to provide nesting habitat to protected avian species. Construction impacts to raptors and other protected avian species would be significant and would conflict with the MBTA and California Fish and Game Code. These impacts would be reduced to a less than significant level with the implementation of **Mitigation Measures BIO-2** and **BIO-3**.

Implementation of the proposed project, specifically the construction of the proposed gated event storage and staging area, and other on- and off-campus cumulative development located on the former Fort Ord could impact Monterey spineflower and protected avian species if any are present at these sites at the time of construction. As discussed above, proposed project impacts to Monterey spineflower and protected avian species would be reduced to a less than significant level with implementation of **Mitigation Measures BIO-1** through **BIO-3**. A review of project documents (where available) revealed that some or all these species were found at the following cumulative project sites: Cypress Knolls, The Projects at Main Gate, The Dunes at Monterey, Sea Haven, and East Garrison Specific Plan. Due to the presence

throughout the region of Monterey spineflower and protected avian species, other cumulative development projects may also result in impacts to these species. The impacts of cumulative development projects on Monterey spineflower and protected avian species should be evaluated as part of the discretionary approval process and should incorporate all feasible mitigation measures to reduce impacts. However, it is possible that these cumulative projects could have significant cumulative impacts on Monterey spineflower and protected avian species due to construction if these cumulative projects are not properly mitigated. With implementation of the identified mitigation measures, potential project-related impacts would be avoided, minimized, or compensated for such that they would not result in a considerable contribution to the significant cumulative impact. Therefore, the proposed project would not result in a cumulatively considerable contribution to the significant cumulative impacts on Monterey spineflower and protected avian species. As such, the proposed project would have a less than significant cumulative impact with respect to Monterey Spineflower and protected avian species.

The proposed expanded use of the stadium would not impact the movement of any native resident or migratory fish or wildlife species, or impede the use of wildlife nursery sites, as discussed under **Impact BIO-4**. The construction of the proposed gated event storage and staging area would result in the removal of ruderal/disturbed habitat that is surrounded by pavement, which is considered marginal foraging and dispersal habitat for wildlife in the area. Therefore, the proposed project would have a less than significant impact on the movement of any native resident or migratory wildlife species. The impacts of cumulative development projects on wildlife movement should be evaluated as part of the discretionary approval process and should incorporate all feasible mitigation measures to reduce impacts. However, it is possible that these cumulative projects could have significant cumulative impacts on wildlife movement due to construction if these cumulative projects are not properly mitigated. The proposed project would not result in significant impacts to wildlife movement, and, thus, would not result in a considerable contribution to the significant cumulative impact. Therefore, the proposed project would not result in a cumulatively considerable contribution to the significant cumulative impacts on wildlife movement. As such, the proposed project would have a less than significant cumulative impact with respect to wildlife movement and wildlife nursery sites.

As discussed in **Impact BIO-5**, the construction of the proposed gated event storage and staging area would require site clearing and grading, including the removal of trees. The proposed project would comply with the CSUMB Tree Restoration Program, which is required for all projects that would result in impacts to trees on the campus. Therefore, the proposed project would be in compliance with all applicable policies and ordinances protected biological resources and would have a less than significant impact. Cumulative projects would be required to comply with all applicable policies and ordinances within their relative jurisdictions and would not result in a cumulative impact related to conflicts with local policies and ordinances that protect biological resources. As such, the proposed project would have a less than significant cumulative impact with respect to local policies and ordinances that protect biological resources.

As discussed in **Impact BIO-6**, the proposed project is consistent with the Fort Ord HMP and would not conflict with the provisions of the HMP. The proposed project would comply with all applicable requirements of the HMP, and, therefore, would have a less than significant impact related to conflicts with provisions of an approved habitat management plan. Cumulative projects on former Fort Ord would also be required to comply with all applicable provisions of the Fort Ord HMP and would not result in a cumulative impact related to conflicts with an approved habitat management plan. As such, the proposed project would have a less than significant cumulative impact with respect to conflict with the provisions of an HMP.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on biological resources. No mitigation measures would be required.

6.2.5 Cultural and Tribal Cultural Resources

The geographic area considered in the cumulative analysis for cultural and Tribal cultural resources is described in the impact analysis below. The proposed project would not result in impacts to known historic resources, as no known historic resources eligible for listing in the NRHP or CRHR are located on the campus. Therefore, pursuant to CEQA Guidelines Section 15130(a)(1), the cumulative analysis does not further discuss this impact given that any such cumulative impacts would not result in part from the proposed project.

The geographic context for the analysis of cumulative impacts related to archaeological resources, human remains, and Tribal cultural resources includes the campus and other cumulative project sites on the former Fort Ord.

As discussed in **Section 4.4, Cultural and Tribal Cultural Resources**, implementation of the proposed project and other cumulative development could impact unknown subsurface archaeological resources of the prehistoric or historic period. As discussed in **Impacts CTR-2** through **CTR-4**, the proposed project impacts related to unknown archaeological resources, human remains, and Tribal cultural resources would be reduced to a less than significant level through implementation of **Mitigation Measures CTR-1** through **CTR-4**. CSUMB would require similar mitigation measures for any future on-campus cumulative projects. Off-campus cumulative development projects will also be required to assess impacts to archaeological resources, human remains, and Tribal cultural resources as part of the discretionary approval process and should incorporate individual mitigation for site-specific impacts identified on each individual project site. It is possible that these cumulative off-campus projects could have a potentially significant cumulative impact if individual projects are not properly mitigated. However, with implementation of **Mitigation Measures CTR-1** through **CTR-4**, the proposed project would not have a considerable contribution to a potentially significant cumulative impact. As such, the proposed project would have a less than significant cumulative impact on archaeological resources, human remains, and Tribal cultural resources. No mitigation measures would be required.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact on cultural and Tribal cultural resources. No mitigation measures would be required.

6.2.6 Energy

Potential cumulative impacts on energy would result if the proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, would not achieve building energy sufficiency standards, or would result in the unnecessary use of energy during construction and operation.

All cumulative projects would be required to comply with regulatory measures such as CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to five (5) minutes,

minimizing construction fuel consumption. Additionally, petroleum use by cumulative projects relative to construction activities is reasonably expected to continue to decline, as Tier 4 construction equipment, which is more fuel efficient, becomes more widely available. While construction activities related to the proposed project would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Regarding operations, the cumulative impacts within the areas serviced by PG&E would be applicable to this analysis. Projects including developments of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. However, as discussed in **Impacts E-1** and **E-2**, comprehensive state regulations are designed and would be implemented to increase and ensure energy efficiency.

As described in **Impact E-1**, the proposed project would not result in wasteful, inefficient, or unnecessary use of energy due to implementation of CSU and CSUMB policies for increasing energy efficiency, and compliance and exceedance of Title 24 building standards. For the same reason, the proposed project would not conflict with energy-related plans, as discussed in **Impact E-2**. Cumulative projects that include long-term energy demand, such as residential and non-residential developments, would be subject to CALGreen, which provides energy efficiency standards for commercial and residential buildings. CALGreen issues increasingly stringent energy efficiency standards that would require cumulative projects to minimize wasteful and inefficient use of energy. In addition, cumulative projects would be required to meet or exceed the Title 24 building standards, further reducing the inefficient use of energy.

In consideration of cumulative energy use, the proposed project would not contribute to a wasteful or inefficient demand for energy resources or services and would not conflict with energy-related plans. As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to the use of energy. No mitigation measures would be required.

6.2.7 Geology, Soils, and Seismicity

The geographic area for the analysis of cumulative impacts resulting from seismic-related ground shaking and failure, landslides, soil erosion, and unstable soils is generally site-specific. Impacts related to geologic and seismic hazards depend on the specific conditions and features on the particular project site and its immediate vicinity, such as soil composition and slope. Thus, these site-specific impacts would not combine with one another to create cumulative impacts, unless the project sites overlapped or were immediately adjacent. Therefore, the geographic area considered for potential cumulative seismic-related ground shaking and failure, landslides, soil erosion, and unstable soils impacts consists of the project site and areas immediately adjacent to the project site.

Based on a review of **Table 6-1** and **Figure 6-1**, the proposed project would not physically overlap with other cumulative development sites located on campus or adjacent to the project site. The cumulative projects that are proposed adjacent to the campus include the Campus Town Specific Plan to the south, and The Projects at Main Gate Specific Plan and Monterey County Court House to the west.

The effects of the proposed project and other cumulative development would not result in significant cumulative impacts related to seismic-related ground shaking and failure, landslides, soil erosion, and unstable soils. Such impacts would be similar to what is described for the proposed project under **Impacts GEO-1** through **GEO-4** and would be addressed on a project-by-project basis through compliance with the CBC, NPDES Construction Stormwater General Permit discharge requirements, California Safety and

Health Administration regulations, Occupational Safety and Health Administration regulations, CSU Seismic Requirements for CSUMB development projects, and local agency code requirements for local development projects. Compliance with these requirements would: 1) offset potential risks to structures and people associated with a major earthquake event; 2) ensure that all structures are designed and built to current standards to minimize impacts associated with ground failure and landslides; 3) avoid or minimize erosion and sedimentation; and 4) prevent caving of collapsable soils and associated risks to construction workers. Additionally, the proposed project and other cumulative development would not themselves exacerbate the potential for seismic activity to occur, and, therefore, would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure. Given the above, the proposed project would have a less than significant cumulative impact related to seismic-related ground shaking and failure, landslides, soil erosion, and unstable soils. No mitigation measures are required.

As discussed in **Impact GEO-6**, there are no known paleontological resources existing on or near the project site. While the proposed project site is located on soils associated with ancient sand dunes, the site is developed and extensively disturbed. Furthermore, the stadium was previously evaluated in the Freeman Stadium Renovations Project MND, which concluded no paleontological resources or geologic features were located on the site (CSUMB, 2021). Therefore, the proposed stadium improvements would have a less than significant impact with respect to the potential to destroy a unique paleontological resource or site or unique geological feature. Off campus cumulative development projects will also be required to assess impacts to paleontological resources as part of the discretionary approval process and should incorporate individual mitigation for site-specific impacts identified on each individual project site. Cumulative off-campus projects could have a potentially significant cumulative impact if individual projects are not properly mitigated. As the proposed project would have a less than significant impact on paleontological resources, it would not have a considerable contribution to a potentially significant cumulative impact. As such, the proposed project would have a less than significant cumulative impact on paleontological resources. No mitigation measures would be required.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to geology, soils, and seismicity. No mitigation measures would be required.

6.2.8 Greenhouse Gas Emissions

The geographic area for the analysis of cumulative impacts resulting from GHG emissions is global. Cumulative development throughout the NCCAB region would generate GHG emissions that could have a significant impact on the environment. Given the significant adverse environmental effects associated with anthropogenic climate change, increased GHG emissions have the potential to result in cumulatively considerable air quality impacts. Simply stated, GHG impacts are cumulative impacts; therefore, the assessment of significance is based on a determination of whether the GHG emissions from a project represent a cumulatively considerable contribution to the global atmosphere. However, statewide and regional GHG-reduction regulations or strategies would continue to improve and reduce cumulative GHG emissions.

If a project exceeds the identified significance thresholds, its contribution of GHG emissions would be cumulatively considerable. **Section 4.7, Greenhouse Gas Emissions**, evaluated the proposed project's potential GHG-related impacts. Annual GHG emissions from operation of the proposed project would

exceed the significance threshold of 1,100 $MTCO_2e$/year (**Impact GHG-1**). Therefore, the operation of the proposed project would result in GHG emissions that would have a significant and unavoidable impact. As discussed in **Section 4.7, Greenhouse Gas Emissions**, and **Section 4.14, Transportation**, GHG emissions are primarily associated with the proposed project's increase in VMT. The increase in VMT was identified as a significant and unavoidable impact that would be minimized by CSUMB's continued implementation of the TMP and TDM program, which is required for the life of the proposed project. While impacts are unavoidable, they will be minimized through the existing TMP and TDM program and through compliance with applicable GHG-reduction plans, policies, and regulations. In addition, as described in **Impact GHG-2**, exceeding the GHG threshold would conflict with CSU and CSUMB policies for the reduction of GHG emissions. Specifically, the proposed expanded use would conflict with the CSUMB Climate Action Plan and CSUMB Master Plan Guidelines objective to reduce GHG emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2040, as well as conflict with the overall CSU Sustainability Policy (CSU, 2022b; CSU, 2024). Therefore, the proposed expanded use of the stadium would result in a significant and unavoidable impact regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

As a result, the proposed project would result in a considerable contribution to a significant cumulative GHG impact and cumulative impacts would be significant and unavoidable.

6.2.9 Hazards and Hazardous Materials

Cumulative impacts related to hazards and hazardous materials could occur where development patterns place structures and people in proximity to significant sources of safety hazards or hazardous materials, emissions, or where regional patterns develop new cumulatively hazardous sources near sensitive receptors. Impacts related to hazards and hazardous materials depend on the specific conditions on the particular site and immediate vicinity. Thus, these site-specific impacts would not combine with one another to create cumulative impacts, unless the cumulative development sites overlapped or were immediately adjacent to one another. Therefore, the geographic area considered for potential cumulative hazards and hazardous materials impacts consists of the project site and areas immediately adjacent to the project site. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5. In addition, the proposed project would not result in safety hazards or excessive noise for people residing or working in the project area as the project site is not located within the vicinity of an airport. Therefore, the cumulative analysis does not further discuss these impacts given that any such cumulative impacts would not result in part from the proposed project.

Significant cumulative impacts related to hazards and hazardous materials could occur if impacts of the proposed project combined with impacts of one (1) or more cumulative projects to result in a substantial increase in the risk of exposure to hazardous materials through the routine use or accidental release of such materials (**Impact HAZ-1**). However, based on a review of **Table 6-1** and **Figure 6-1**, significant cumulative impacts would not be expected to occur as the cumulative projects do not overlap and are not immediately adjacent to the project site. The cumulative projects that could be constructed adjacent, although not immediately adjacent, to the project site include the Campus Town Specific Plan to the south and The Projects at Main Gate Specific Plan and Monterey County Court House to the west. Based on the timing of the construction of these cumulative projects and the proposed project, the construction periods have the potential to overlap. While the construction periods may overlap, potential hazards and hazardous materials impacts would be localized to the particular development site. Further, construction

of the proposed project and adjacent cumulative projects would be required to comply with all applicable local, state, and federal regulations, which require proper management of hazardous substances and wastes on construction sites. Compliance with the NPDES Construction Stormwater General Permit, which requires a SWPPP and development of BMPs for all phases of construction on sites greater than one (1) acre (**Impact HAZ-1**). Adherence to these regulations would avoid or minimize the release of hazardous materials from construction sites.

Additionally, as discussed in **Impact HAZ-2**, the Army FOSTs determined the CSUMB campus, including the project site, was environmentally suitable for transfer and demonstrated that the campus was either uncontaminated or that all necessary remediation has been completed or in place and operating properly and successfully. Similar processes were conducted for other lands on the former Fort Ord prior to transfer by the Army, and, therefore, those lands would also be either uncontaminated or properly remediated.

The operation of the proposed project would involve the routine transport, use, and disposal of potentially hazardous materials in accordance with the manufacturer's labels for each product and would not pose a significant impact on the environment. Compliance with existing federal and state regulations governing the use, storage, transportation, and disposal of hazardous materials would lessen potential impacts. None of the adjacent cumulative projects would be expected to store or handle large quantities of hazardous materials. Similarly, the operation of these cumulative projects would routinely transport hazardous materials, which would be conducted in compliance with existing regulations.

Given the above, the construction and operation of the proposed project and adjacent cumulative development projects would not result in the substantial increase in the risk of exposure to hazardous materials through routine use of accidental release of such materials. Therefore, the proposed project would have a less than significant cumulative impact related to hazards and hazardous materials during construction and operation.

Monterey County is the geographic context for cumulative emergency response and wildfire impacts given wildfires can cause impacts to large areas. As discussed in **Impacts HAZ-4** and **HAZ-5**, the proposed project would have a less than significant impact related to impairing or interfering with an emergency response plan and exposing people and structures to a significant risk of loss, injury, or death involving wildland fires. The project site would be located on a developed and urban site located outside of a CalFire designated FHSZ. More specifically, the project site would be located in an LRA under the jurisdiction of the City of Seaside's Fire Department and outside of the wildland urban interface. Wildfire-related impacts in Monterey County could be significant if development is in rural or very high fire hazard areas that could exacerbate wildfire risks. While new development would be subject to statewide standards for fire safety in the California Fire Code, it is still possible that cumulative development projects could exacerbate wildfire risks such that cumulative impacts would be potentially significant. In the immediate vicinity of the project site, this cumulative risk would be lower given the existing urbanization and the distance to any designated very high FHSZs and SRAs. Given that the proposed project would not substantially impair an adopted emergency response or evacuation plan; exacerbate wildfire risk; require the installation or maintenance of infrastructure that would exacerbate wildfire risk; cause a significant risk of loss, injury, or death, involving wildfire hazards; or expose people or structures to significant post-fire risks, as discussed in **Impacts HAZ-4** and **HAZ-5**, the proposed project would not have a considerable contribution to a significant cumulative impact. Therefore, the proposed project would have a less than significant cumulative impact related to an adopted emergency response or evacuation plan as well as wildfire risk.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to hazards and hazardous materials. No mitigation measures would be required.

6.2.10 Hydrology and Water Quality

The geographic context for the analysis of cumulative surface water quality and drainage impacts is the southern portion of the Monterey hydrologic area (No. 309.50) in which the project site is located, This hydrologic area extends from the slopes of the Fort Ord National Monument on the east to the Pacific Ocean on the west. This area encompasses the cities of Marina, Seaside, Sand City, and Monterey. In this area, water generally flows from east to west or southeast to northwest, downhill towards Monterey Bay.

Cumulative development would generally increase impermeable surface area in the southern portion of the Monterey hydrologic area, which could potentially increase peak flood flows, alter drainage patterns, reduce groundwater recharge, and increase pollutants in regional stormwater. However, the regional stormwater system on the former Fort Ord no longer drains to the Pacific Ocean, but rather to temporary percolation ponds between the ocean and SR 1, with the long-term objective being to percolate all stormwater on the east side of SR 1 as a part of the redevelopment of the former Fort Ord.

Cumulative development is required to adhere to all applicable state and local regulations designed to control erosion and sedimentation and protect water quality during construction and post-construction operations. All construction sites larger than one (1) acre would be required to prepare a SWPPP under the NPDES Construction General Stormwater Permit, thereby reducing the risk of water quality degradation on- and off-site from soil erosion and other pollutants. In addition, the Central Coast RWQCB post-construction requirements for stormwater management encourage and require for certain projects, on-site treatment, and infiltration of stormwater runoff. This would reduce the quantity of stormwater runoff that enters the regional storm drainage system. Additionally, implementation of NPDES MS4 General Permit and municipal code requirements by local jurisdictions would reduce the potential for increased pollutants in stormwater from cumulative development located off-campus.

As discussed in **Impact HYD-1**, the proposed project would comply with the NPDES Construction General Stormwater Permit and submit a SWPPP, as the construction of the proposed project would occur on over one (1) acre. The proposed project site is improved with existing drainage infrastructure, and improvements associated with the proposed project would comply with the 2022 CSUMB Master Plan Guidelines policies and the requirements of the NPDES permit. Given the above requirements, cumulative development would not result in significant impacts related to surface water quality degradation, violations of water quality standards, or alterations of stormwater drainage patterns. Therefore, cumulative surface water impacts would be less than significant.

The geographic context for cumulative groundwater impacts is the SVGB – Monterey Subbasin (3-004.10) and specifically the Marina-Ord Area of the subbasin. While the 180/400-Foot Aquifer Subbasin and the Monterey Subbasin are connected and contain three (3) common aquifers, MCWD currently relies on groundwater extracted from the Marina-Ord of the Monterey Subbasin.

Cumulative development would increase the demand for water, most of which would be derived from groundwater extracted by MCWD from the Marina-Ord Area of the Monterey Subbasin. However, future projected sustainable yield of the Marina-Ord Subbasin, presented in the Monterey Subbasin GSP,

includes projected demands from MCWD's 2020 UWMP through 2040 and other pumping projections, which account for projected demands from cumulative development. The MCWD GSA and SVBGSA will work cooperatively on implementation of the Monterey Subbasin GSP and 180/400 Subbasin GSP, given the connection of the two (2) subbasins. The implementation of these GSPs will provide for sustainable groundwater management of these subbasins and cumulative development would not substantially decrease groundwater supplies or impede the implementation of these GSPs.

Additionally, the proposed project would comply with the existing water allocation from MCWD of 404 AFY. As discussed **in Section 4.9, Hydrology and Water Quality**, MCWRA regulates water withdrawal from the SVGB. Through agreements with the MCWRA, MCWD allocates 6,600 AFY of groundwater to the service area that includes CSUMB. CSUMB does not draw down groundwater for potable or non-potable water demand but utilizes water provided by MCWD. Furthermore, since the existing water use of the stadium accounts for 0.48 AFY, an increase in use of the stadium with existing facilities would be unlikely to exceed 404 AFY. As discussed in **Section 4.15, Utilities and Service Systems**, the proposed stadium improvements would result in an increase in water use of 8.45 AFY, totaling 8.93 AFY, which is well below the remaining allocation of 404 AFY. Implementation of and adherence to the 2022 CSUMB Master Plan Guidelines polices would further ensure the operation of the proposed project would not exceed the remaining water allocation. These policies require a reduction in water use below CalGreen standards, increase in non-potable water use for non-potable water demands (e.g., toilet flushing), and direct CSUMB to pursue water conservation and an expansion of greywater campuswide. Therefore, the proposed project would have a less than significant cumulative impact on groundwater resources.

The project site is not located in a tsunami or seiche zone as identified by FEMA and CGS (FEMA, 2025; CGS, 2025). However, the project site is located in the 500-year floodplain (i.e., 0.2% annual chance flood hazard area). As discussed in **Section 4.9, Hydrology and Water Quality**, the risk of inundation is low due to the developed nature of the project site (**Impact HYD-3**). Given that the project site has been previously developed with adequate drainage facilities. the proposed project would not result in a considerable contribution to a significant cumulative impact.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to hydrology and water quality. No mitigation measures would be required.

6.2.11 Land Use and Planning

The geographic context for the analysis of cumulative land use impacts is the CSUMB campus as the proposed project would occur entirely on campus. The proposed project is consistent with the 2022 Campus Master Plan Guidelines and complies, where appropriate as described in **Chapter 1.0, Introduction**, with the City of Seaside's General Plan. The proposed project would be consistent with the zoning provisions applicable to the project site; therefore, the proposed project would result in a less than significant cumulative land use impact. As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to land use and planning. No mitigation measures would be required.

6.2.12 Noise and Vibration

The geographic context for cumulative noise and vibration impacts is generally limited to areas within 0.5 miles of the project site or less, as described below.

Based on a review of **Table 6-1** and **Figure 6-1**, the Campus Town Specific Plan, The Dunes on Monterey Bay, the Projects at Main Gate, and ~~Monterey County Courthouse~~ New Fort Ord Courthouse are within the project's vicinity, and the timing of construction activities may overlap. These project sites are located more than 500 feet from the proposed project site. Development of one (1) or more of these off-campus projects concurrent with the construction of the proposed project (i.e., stadium improvements) would create the potential for a cumulative construction and vibration impact only when such sites are sufficiently proximate. Since sound is energy that attenuates naturally and rapidly with increasing distance traveled from a source, a potentially impacted noise-sensitive receptor would need to be physically near multiple concurrent projects. Therefore, unless construction of cumulative projects occurs at the same time and in proximity to the proposed project (i.e., less than 500 feet), noise and vibration from individual construction projects would not likely combine to create cumulative impacts. For these reasons, the proposed project would have a less than significant cumulative impact related to construction noise and vibration.

The Noise & Groundborne Vibration Impact Analysis states that noise levels associated with events are dependent on the size of the spectator crowd and the frequency of use associated with amplified sound systems (i.e., public address systems and amplified music). Much of the Campus Town Specific Plan area is outside of the modeled noise contours, and the areas within the contours would experience noise levels less than 60 dBA and, therefore, would remain below the City of Seaside's residential noise standard of 65 dBA. Similarly, future residences associated with The Dunes at Monterey Bay development in the City of Marina are outside of the 60 dBA noise contour. Therefore, while CSUMB is not subject to local ordinances and policies as stated in **Chapter 1.0, Introduction**, operational noise generated by the proposed expanded use of the stadium would remain below the City of Marina's residential noise standard of 60 dBA. Off-campus cumulative projects would need to comply with municipal requirements. Therefore, the proposed project would have a less than significant cumulative impact related to noise from public address systems and amplified music.

Noise generated by the proposed project, as perceived at nearby land uses, would be primarily associated with increases in vehicle traffic on area roadways. **Section 4.11, Noise and Vibration**, evaluated the noise impacts using the Noise & Groundborne Vibration Impact Analysis prepared by AMBIENT, which was based on the results of a traffic analysis prepared by Fehr and Peers. The proposed expanded use of the stadium would increase the number of vehicle trips associated with staff and participants traveling to and from the stadium. Depending on the average vehicle ridership, average daily vehicle trips for most events, excluding larger non-athletic events, would be approximately 200 to 300 vehicle trips/day. Vehicle trips associated with these smaller events would not be anticipated to result in a doubling of vehicle traffic along area roadways. However, larger events, such as concerts and festivals, could generate daily trips of approximately 4,000 trips/day, or more. Vehicle trips associated with larger events, such as concerts, could result in a substantial increase in average-daily traffic noise levels along some area roadways that could exceed the City's noise standards at nearby land uses. CSUMB and MBFC are required to implement the CSUMB Stadium Renovation TMP and TDM program for the lifetime of the project as stated in the Mitigation, Monitoring, and Reporting Program from the Freeman Stadium Renovations Project (SCH # 2021070153), and discussed in **Section 4.14, Transportation**. The TMP and TDM program measures would

continue to be implemented with the proposed project, aiming to shift travel mode share away from single-occupancy vehicle use towards safe and convenient non-automotive modes of transportation.

As future development in the region and corresponding traffic volumes along area roadways increase, the proposed project's contribution to cumulative increases in traffic noise levels would be anticipated to decline. However, as discussed in **Section 4.11, Noise and Vibration**, the proposed expanded use of the stadium would increase traffic such that a doubling of traffic noise would occur. Average noise on the roadway would be anticipated to range from 80.8 dBA to 71.4 dBA, which would exceed both maximum exterior noise levels for residential land uses in the City of Seaside and City of Marina, set at 65 dBA and 70 dBA, respectively (**Impact NV-1**). Since this increase in noise directly corresponds to the projected increase in traffic, which **Section 4.14, Transportation**, identified as significant and unavoidable, the proposed expanded use of the stadium would result in a significant and unavoidable impact with respect to operational traffic noise.

As a result, the proposed project would result in a considerable contribution to a significant cumulative noise impact, and cumulative impacts would be significant and unavoidable.

6.2.13 Population and Housing

The geographic context for the analysis of cumulative impacts related to population and housing includes the AMBAG region (i.e., Santa Cruz, Monterey, and San Benito Counties), with a focus on Monterey County, given the location of the proposed project.

The proposed project would not result in an increase in population or housing beyond what has reasonably been forecasted for the region. As discussed in **Section 4.12, Population and Housing**, the proposed project would increase the regional population by 85 new persons, which is well below the regional projections set by AMBAG. As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to population and housing. No mitigation measures would be required.

6.2.14 Public Services and Recreation

The geographic context for the analysis of cumulative impacts related to public services and recreation focuses on the CSUMB campus, the cities of Seaside and Marina, and Monterey County.

Regional development creates cumulative demand on all aspects of public services by increasing the number of residents, occupants, and visitors to the area. The proposed project would not result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities since the proposed project would not result in substantial population growth that would increase the demand for new or expanded government facilities. The proposed project would increase regional population by 85 new persons, an increase that would not require the expansion of new facilities or staffing, nor would the increase negatively impact response times of emergency service providers. The 2022 CSUMB Master Plan EIR considered expanded use of the existing stadium and evaluated service provider capacity during the environmental review process. The 2022 CSUMB Master Plan EIR identified that independent from the implementation of the 2022 CSUMB Master Plan, three (3) new or replacement fire stations were planned by Marina Fire Department, Seaside Fire Department, and Presidio of Monterey Fire Department (CSU, 2022a). The project site is currently under the service area of the City of Seaside's

Fire Department, the POMFD, the UPD, the City of Seaside's Police Department, and the City of Marina's Police Department. As a result, the increase in use of and proposed improvements to the existing stadium would not substantially increase the demand for these services.

Additionally, the proposed project would not directly or indirectly contribute to an increase in the student body at CSUMB or contribute to population growth regionally that would require new or expanded school facilities at neighboring schools and school districts. Therefore, the proposed project would have a less than significant cumulative impact related to public services.

Similarly, the proposed project would not increase the population such neighborhood and regional parks would experience a substantial increase in use or require an expansion of new recreational facilities. As discussed in **Section 4.12, Population and Housing**, the proposed project would increase the regional population by 85 new persons, which is well below the regional projections set by AMBAG. Additionally, the proposed project does not consist of activities that would increase the use of or impacts to neighborhood or regional parks and recreational facilities. Based on the above discussion, the cumulative impact on recreational facilities would be less than significant.

As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to public services and recreation. No mitigation measures would be required.

6.2.15 Transportation

The geographic context for the analysis of cumulative transportation impacts is Monterey County. The proposed project would not result in impacts related to geometric design hazards (**Impact TR-3**). Therefore, pursuant to CEQA Guidelines Section 15130(a)(1), the cumulative analysis does not further discuss these impacts given that any such cumulative impacts would not result in part from the proposed project.

As described in **Impact TR-1**, the proposed project would not conflict with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadways, and bicycle and pedestrian facilities through implementation of **Mitigation Measures TR-1** through **TR-6**. Therefore, the proposed project would not contribute to cumulative impacts related to plan conflicts that could result from the implementation of other cumulative projects.

Fehr & Peers evaluated cumulative VMT conditions by considering regional travel patterns and reasonably foreseeable growth within the County. The analysis determined that cumulative conditions, including the proposed project, would be slightly above the applicable countywide VMT significance threshold. Like the project-generated VMT baseline, the Boundary VMT baseline analysis measures the proposed project's effect on the Monterey County Boundary VMT since effects are likely to be localized, occurring near the CSUMB campus and within Monterey County.

The regional impact threshold for the project's effect on VMT is the Monterey County Cumulative Conditions Boundary VMT per service population of 14.07 VMT, as shown in **Table 6-2**, below. This represents the vehicle travel on Monterey County roads divided by the service population of Monterey County. The analysis found that the proposed expanded use would exceed the applicable thresholds relative to the proposed project's effect on VMT under cumulative with project conditions.

Table 6-2
Project's Effect on VMT (Boundary VMT) for SB 743 VMT Assessment

	Cumulative Conditions	Cumulative with Project Conditions
Monterey County		
Boundary Vehicle Miles Traveled (A)[1]	11,268,400	11,284,736
Service Population (B)[1,2]	800,900	801,135
Boundary VMT per Service Population (A/B = C)	14.07	14.09
Boundary VMT per Service Population Threshold (14.07) (Impact Conclusion)		14.09 (Significant)

Source: Fehr & Peers, 2026.

1 This table presents data side to side.

2 Rounded service population and VMT to nearest 100.

3 Service population is defined as the sum of all employees, residents, and students (Kindergarten through University).

The project's effect on VMT would be significant if the project causes the cumulative countywide daily Boundary VMT per service population to increase above 14.07. As shown in **Table 6-2**, the project would, albeit minimally, exceed the threshold of 14.07 for cumulative impacts. CSUMB and MBFC special event attendance and related trip generation represent a relatively small portion of Monterey County travel overall. Therefore, it is to be expected that the project would have predominantly localized VMT impacts rather than contributing measurably to the countywide VMT per service population.

Because the proposed project would contribute additional discretionary event-related travel demand to an already constrained regional transportation system, its incremental contribution to cumulative VMT would be cumulatively considerable. CSUMB would continue to implement and monitor its TMP and TDM program, which serves as the primary mitigation measure to reduce VMT by promoting alternative modes of travel, transportation demand management strategies, and coordination with regional transit providers. While implementation of the TMP and TDM program would reduce project-generated VMT to a feasible extent, it would not reduce impacts to a less than significant level. Accordingly, cumulative transportation impacts related to VMT would remain significant and unavoidable.

As described in **Impact TR-4**, the existing stadium and adjacent parking facilities are designed to accommodate approximately 6,000 attendees and staff members for each event, and the proposed project would not increase the occupancy of the stadium and result in inadequate on-site parking that could impact local roadways. Furthermore, the proposed expanded use would not require construction of new facilities, especially those within the roadways or along the ingress or egress of the adjacent parking facilities. Given that the proposed project would not interfere with emergency access the proposed project would not have a considerable contribution to a significant cumulative impact. Therefore, the proposed project would have a less than significant cumulative impact regarding inadequate emergency access.

As a result, the proposed project would result in a considerable contribution to a significant cumulative transportation impact, and cumulative impacts would be significant and unavoidable.

6.2.16 Utilities and Service Systems

The geographic area considered in the cumulative impact analysis related to relocation or construction of new water and wastewater facilities is the Ord Community service area of the MCWD. The geographic area considered in the cumulative impact analysis related to relocation or construction of new electric power, natural gas, and telecommunications is the cumulative projects on the former Fort Ord.

As discussed in **Impact UTL-1**, the proposed project would utilize existing utilities and would not require the relocation or expansion of new utility infrastructure. As discussed in **Section 4.15, Utilities and Service Systems**, the proposed project would utilize existing water and wastewater systems, stormwater drainage facilities, existing electrical and natural gas infrastructure, and telecommunication systems. All of these utilities were evaluated to ensure sufficient capacity for the proposed project was available. Water and wastewater system capacity at the existing stadium and CSUMB campus would be sufficient for the proposed project as presented in the analysis provided in **Section 4.15, Utilities and Service Systems**. While other past, present, and reasonably foreseeable projects in the applicable geographic area would also utilize public utilities, the proposed project's incremental demand would represent a small fraction of overall system capacity and would not require new or expanded treatment facilities, conveyance infrastructure, or energy generation facilities. Because the project would not trigger the need for construction of new utility infrastructure or exceed provider capacity, its contribution to cumulative impacts on utilities and service systems would not be cumulatively considerable. As a result, the proposed project, when considered with other cumulative projects, would not result in a cumulatively considerable impact related to utilities and service systems. No mitigation measures would be required.

6.3 EFFECTS NOT FOUND TO BE SIGNIFICANT

A significant effect on the environment is generally defined as a substantial or potentially substantial adverse change in the physical environmental (CEQA Guidelines Section 15358). The term "environment," as used in this definition, means the physical conditions that exist in the area that will be affected by a proposed project include land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. The area involved is the area in which significant effects would occur either directly or indirectly as a result of the project. The environment includes both natural and man-made conditions (CEQA Guidelines Section 15360).

A detailed analysis and discussion of environmental topics found to have a less than significant impact are provided in **Chapter 4.0, Environmental Setting, Impacts, and Mitigation Measures**, of this ~~Draft~~ EIR. Listed below are those environmental issues found to have no impact as a result of the proposed project. CEQA Guidelines Section 15128 states that an EIR shall contain a statement to briefly indicate the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail. The CEQA Guidelines indicate that such information may be included as part of the EIR in an attached copy of an Initial Study, although such a statement is not required to be attached in a copy of an Initial Study. Consistent with the requirements of CEQA Guidelines Section 15128, this section provides a brief explanation why certain effects were determined not to be significant.

The proposed project would not result in any significant adverse environmental effects to the topical CEQA resources areas identified below. As described previously, secondary or indirect effects associated with growth-inducement are evaluated separately (see above). The following briefly evaluates the proposed project's potential direct effects and explains why these effects would not be significant.

6.3.1 Aesthetics

The proposed project would have no impact related to scenic vistas or scenic resources visible from a designated State Scenic Highway. The proposed project site is not visible from designated public vantage points, with the only designated public vantage points in the vicinity of the project site consisting of SR 1 and the coastal area (beach and dunes) to the west. Additionally, no designated State Scenic Highway exists in the vicinity of the proposed project. The segment of SR 1 near the project site is eligible for listing as a State Scenic Highway; however, due to intervening topography and vegetation, the project site is not in view of SR-1. For these reasons, no impact would occur.

6.3.2 Biological Resources

The proposed project would have no impact on riparian habitat or other sensitive natural communities. The proposed project site consists of ruderal/disturbed habitat. Similarly, the proposed project site would have no adverse effect on state or federally protected wetlands, as none exist in or adjacent to the proposed project site. For these reasons, no impact would occur.

6.3.3 Cultural and Tribal Cultural Resources

The proposed project would not change the significance of a historical resource pursuant to CEQA Guidelines section 15064.5. No historical resources are present in or adjacent to the proposed project site. As discussed in **Section 4.4, Cultural and Tribal Cultural Resources**, Dudek previously evaluated the CSUMB Stadium to determine if the facility qualified as a historic resource. While more than 50 years old, the facility does not meet the criteria for inclusion in the CRHR; please refer to **Appendix E**. For these reasons, no impact would occur.

6.3.4 Geology and Soils

The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as the proposed project would not require these facilities. The proposed project would connect and utilize the existing wastewater system at the CSUMB Stadium. For these reasons, no impact would occur.

6.3.5 Hazards and Hazardous Materials

The proposed project is not located in an airport land use plan or where such a plan has not been adopted. Moreover, the proposed project is not located within two (2) miles of a public airport. Therefore, the proposed project would not be subject to potential airport-related hazards. For these reasons, no impact would occur.

6.3.6 Land Use and Planning

No established residential or business communities exist within the proposed project site. As such, the proposed project would not physically divide an established community. Therefore, no impact would occur.

6.3.7 Noise and Vibration

The proposed project site is not located within an airport land use plan area and is not located in the vicinity of a private airstrip. The nearest airport is located 2.8 miles to the northeast of the site. Therefore, no impact would occur.

6.3.8 Population and Housing

The proposed project would not result in the displacement of existing housing. Therefore, no impact would occur.

6.3.9 Transportation

The proposed project would not increase hazards due to a geometric design feature. The proposed project would not change the existing ingress or egress of the stadium. Therefore, no impact would occur.

6.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The proposed project would result in potentially significant impacts in the following categories, as described in this EIR: biological resources, cultural and Tribal cultural resources, GHG emissions, noise and vibration, and transportation. All project impacts can be reduced to a less than significant level with implementation of mitigation identified in this EIR except for the following:

- Project and cumulative impacts from GHG emissions associated with VMT generated by the expanded use component of the proposed project, and conflicts with adopted plans, polices, or regulations adopted for the purpose of reducing GHG emissions (**Impacts GHG-1** and **GHG-2**).
- Project and cumulative impacts from the increase in ambient noise generated by the increase in VMT from the expanded use component of the proposed project (**Impact NV-1**).
- Project and cumulative impacts from VMT generated by the expanded use component of the proposed project that would exceed allowable VMT thresholds (**Impact TR-2**).

As determined in **Section 4.7, Greenhouse Gas Emissions**; **Section 4.11, Noise and Vibration**; and **Section 4.14, Transportation,** the proposed project would result in significant and unavoidable impacts related to those environmental factors.

6.5 IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2[d] of the State CEQA Guidelines requires EIRs to include a discussion of significant, irreversible environmental changes that would result from project implementation. CEQA Section 15126.2(c) identifies irreversible environmental changes as those involving a large commitment of nonrenewable resources or irreversible damage resulting from environmental accidents.

The proposed project consists of the improvements to and expanded use of the existing CSUMB Stadium. Irreversible changes associated with the proposed project include the use of nonrenewable resources during construction, including building materials (such as concrete, glass, plastic) and use of petroleum products. During the operation of the proposed project, natural gas and electricity would be used for lighting, cooling, heating, and vehicle transportation. The proposed project site is currently developed with the existing CSUMB Stadium. The proposed project would, for all practical purposes, result in the irreversible commitment of resources for improvements to the existing stadium and emissions generated by vehicles to and from the stadium for the events.

6.6 REFERENCES

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