California State University Monterey Bay Stadium Expanded Use Project

Final Environmental Impact Report

Volume II

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

Final Environmental Impact Report – Volume II

SCH No. 2025021013

PREPARED FOR:

California State University, Board of Trustees and
California State University Monterey Bay
100 Campus Center
Seaside, CA 93955
Contact: Matthew McCluney, AICP

PREPARED BY:

Denise Duffy & Associates, Inc.
947 Cass St. Suite 5
Monterey, California 93940
Contact: Erin Harwayne, AICP

September 2026

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Facilities Management
Campus Planning & Development
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Cal State Monterey Bay

NOTICE OF PREPARATION

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

DATE: February 27, 2025

TO: Agencies, Organizations, and Interested Parties

PROJECT TITLE: California State University Monterey Bay Stadium Expanded Use Project

LEAD AGENCY: The Board of Trustees of the California State University
401 Golden Shore
Long Beach, California 90802-4210

California State University Monterey Bay (CSUMB)
100 Campus Center
Seaside, California, 93955

SUBJECT: Notice of Preparation of an Environmental Impact Report for the CSUMB Stadium Expanded Use Project

The Board of Trustees of the California State University (Board of Trustees) is the lead agency for the preparation of an Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (Title 14 of the California Code of Regulations [CCR] 1500 et seq.). 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.

This Notice of Preparation (NOP) has been prepared in accordance with CEQA Guidelines (14 CCR 15082 and 15375). The EIR will address the environmental effects of the proposed CSUMB Stadium Expanded Use Project (proposed project or project). Implementation of the proposed

project would include two components at the existing 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 new locker room facilities, two new restroom buildings, and a gated event 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 project would allow the CSUMB Stadium to host three new teams under the oversight of the MBFC (the existing professional team in a Facilities Shared-Use Agreement with CSUMB): one USL League Two (Men's Amateur), one USL Super League (Women's Pro), and one USL W League (Women's Amateur). The 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 6,500 attendees, respectively.

Proposed new facilities include the following:

1. **Men's & Women's Locker Room and Shower Facility.** Two permanent 1,400-sf locker room facilities would be constructed. One facility would replace the existing portable showers utilized by the men's teams and would be built at the stadium entrance northwest of the field house. Another facility would be constructed to accommodate the women's teams southwest of the field house.

2. **Permanent Restroom Facilities.** Two permanent restroom buildings, each approximately 1,000 sf, would be constructed within the existing beer garden area to replace the 3,000-sf area containing approximately 36 portable facilities currently used.

3. **Storage and Staging Area.** A new 1.25-acre dedicated storage and staging area would be established north of the stadium to support event operations, equipment storage, and logistical needs. No permanent construction of any structures besides fencing is planned for this site. Shipping containers, or other temporary units that do not require construction, may be moved into the staging area to protect equipment from the weather.

Construction of these facilities is anticipated to take approximately nine months beginning in spring 2026.

Agencies: The Board of Trustees requests agencies' views on the scope and content of the environmental information that is germane to an agency's statutory responsibilities in connection with the project, in accordance with Sections 15082(b) and 15103 of the CEQA Guidelines. Agencies may need to use the EIR to consider permits or other approvals.

Organizations and Interested Parties: The Board of Trustees requests comments and concerns regarding the proposed scope of environmental topics to be evaluated in the Draft EIR.

Public Review Period: The Board of Trustees issued this NOP for public review and comment pursuant to the CEQA Guidelines (14 CCR 15082 and 15375). The Board of Trustees established a 30-day review and scoping period from **February 27, 2025,** through **March 31, 2025**, in accordance with the CEQA Guidelines (14 CCR 15082). The NOP is available for review online here: https://csumb.edu/facilities/planning/.

Scoping Comments: At this time, the Board of Trustees of the California State University is soliciting comments on the scope and content of the Draft EIR. Comments may be submitted by mail, email, or by attending the Public Scoping Meeting (see details below) and submitting a written comment. All comments should indicate a contact person for the agency or organization, if applicable. All comments should be sent to the following address, to arrive no later than 5 p.m. on **March 31, 2025**:

Matthew S. McCluney, AICP
Director of Campus Planning & Development
100 Campus Center
Seaside, CA 93955
T: 831-582-4721
mmccluney@csumb.edu

Public Scoping Meeting: The Board of Trustees will hold a Scoping Meeting to give the public an opportunity to receive more information on the proposed project, and to provide written comments on the scope of the Draft EIR. All members of the public and interested persons are welcome to attend and provide written comments at that time. The meeting will be held on **March 12, 2025**, from 5:30 p.m. to 7:00 p.m. both in person and online at the Otter Student Union, 3118 Inter-Garrison Rd, Seaside, CA 93955 and Zoom (access information below). See the campus map provided at the following location for details about the meeting location: csumb.edu/maps.

Zoom access information:
Join Zoom Meeting
ID: 84221858320
(US) +1 309-205-3325

Join Zoom Meeting:
https://csumb.zoom.us/j/84221858320

Further Information: For environmental review information or questions about the project, please contact Matthew McCluney (831)-582-4721 or mmccluney@csumb.edu).

2/24/25

Matthew S. McCluney, AICP
Director of Campus Planning & Development
California State University Monterey Bay

Date

NOTICE OF PREPARATION

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

1 INTRODUCTION

The purpose of an Environmental Impact Report (EIR) is to inform decision makers and the general public of the potential environmental effects of a proposed project. The environmental review process is intended to provide public agencies with the environmental information necessary to evaluate a proposed project to determine whether it may have a significant effect on the environment, to establish methods for reducing adverse environmental impacts, and to consider alternatives prior to approval. This section provides a project overview, location of the project, and project background.

1.1 Project and CEQA Overview

The Draft EIR will address the potential environmental effects of implementation of the proposed California State University Monterey Bay (CSUMB) Stadium Expanded Use Project (proposed project or project). The proposed project would involve two components: 1) an expansion of the programming and facilities at the CSUMB Stadium by CSUMB and the Monterey Bay Football Club (MBFC); and 2) the construction and operation of two new locker room facilities, two new restroom buildings, and a gated event staging area just north of the stadium. The EIR will describe each of the proposed project components and evaluate potential impacts on the environment.

Under State California Environmental Quality Act (CEQA) Guidelines, the EIR is being prepared as a project EIR. A project EIR examines the environmental impacts of a specific development project. This EIR will focus on the changes in the environment that would result from the proposed expanded programming of the CSUMB Stadium, in terms of the number and frequency of events hosted by CSUMB and the MBFC and the construction and operation of the proposed facilities.

1.2 Project Location

The proposed project encompasses physical improvements to the existing CSUMB Stadium located at 4111 2nd Avenue, Seaside, California, 93955, in Monterey County (County) (Assessor's

Parcel Number 0311-0104-4000). 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. Directly south of the stadium are the CSUMB baseball and softball fields, with two additional 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 two existing parking lots located to the north/northwest and to the south/southwest.

The CSUMB Stadium is accessible via Divarty Street and 2nd Avenue. Regional and local access to the project site is provided by State Highway (Hwy) 1, which is located approximately 0.6 miles west of the project site, and Lightfighter Drive. **Figures 1** and **2** illustrate the project's regional context and the project's location, respectively.

1.3 Project Background

The former Freeman Stadium (now the CSUMB Stadium) was constructed over 70 years ago. Historically, the Freeman 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 MBFC approached CSUMB with a proposal to renovate, utilize, and maintain the existing Freeman Stadium and Field House at CSUMB as a shared campus-United Soccer League (USL) facility with the intent of bringing sports entertainment (soccer) to the Monterey Bay area. CSUMB and the MBFC entered into a 14-year Facilities Shared-Use Agreement to share the use of the stadium. 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, a 3,000-sf portable restroom facility, four sets of seating areas, four 90-foot-tall poles for broadcast-quality light standards, a 200-sf illuminated scoreboard, and a beer garden with space for vendors. Seating improvements included seatbacks and bleacher seats that accommodate 6,000 spectators. Renovations to the stadium also involved improvements to three campus roadways that provide access from the parking lots to the stadium.

The renovations allowed CSUMB and the MBFC to share the stadium for professional and collegiate sporting events, practices, and CSUMB-sponsored community events such as Spring Commencement. Currently, the men's USL Championship (Men's Professional) team hosts 18 games 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.

The renovations and operations were evaluated in a Mitigated Negative Declaration (MND) adopted by the California State University Chancellor's Office on September 8, 2021 (State Clearinghouse [SCH] # 2021070153).[1]

Currently, the men's USL Championship (Men's Professional) team hosts 18 games 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. The MBFC also hosts one post-season game, one tournament, and one international-friendly game; each event requires one day and attracts approximately 5,600 spectators. Currently, the CSUMB women's soccer program consists of 28-32 student athletes and four staff members. The women's program hosts 12-14 games, two to three recruiting camps, and one youth camp annually. The men's soccer program consists of 28-32 student athletes and four staff members. Like the women's program, the men's program hosts 12-14 games, two to three recruiting camps, and one youth camp annually. For both programs, CSUMB occasionally hosts tournaments depending on post-season opportunities each year.

2 PROJECT DESCRIPTION

The proposed project consists of two primary components: 1) an expansion of programmed use of the CSUMB Stadium by CSUMB and the MBFC; and 2) the construction and operation of two new locker room facilities, two new restroom buildings, and a gated event staging area just north of the stadium (**Figure 3**).

2.1 CSUMB Stadium Expansion of Use

California State University Monterey Bay

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 National Collegiate Athletic Association (NCAA) Division II National Championships, involving approximately three events over two days and three events over five days, respectively, for both the men's and women's soccer programs.

CSUMB would also host the following non-athletic events that would last for one day each: 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.

[1] 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.

Monterey Bay Football Club

Additionally, the project would allow the CSUMB Stadium to host three new teams under the oversight of the MBFC (the existing professional team in a Facilities Shared-Use Agreement with CSUMB): one USL League Two (Men's Amateur), one USL Super League (Women's Pro), and one USL W League (Women's Amateur). The 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 6,500 attendees, respectively. The Winter Festival would require 10 set-up days, and the weekend concerts would require one to two set-up days per event.

2.2 New Facilities

The proposed new facilities would involve the construction of a men's and a women's locker room and shower facility, permanent restroom facilities, and a storage and staging area. Both the men's and women's locker room facilities would be permanent 1,400-sf concrete facilities located at the stadium entrance. The men's locker room and shower facility would be located to the northwest of the field house while the woman's facility would be located to the southwest of the field house. The project would also construct two permanent 1,000-sf concrete restroom buildings within the existing beer garden area to replace the 3,000-sf area containing approximately 36 portable facilities currently in use. A new 1.25-acre dedicated storage and staging area would be established north of the stadium to support event operations, equipment storage, and logistical needs. No permanent construction of any structures besides fencing is planned for this site. Shipping containers, or other temporary units that do not require construction install, may be moved into the staging area to protect equipment from the weather. Construction of these facilities is anticipated to take approximately nine months beginning in spring 2026.

3 ENVIRONMENTAL TOPICS TO BE ADDRESSED IN THE DRAFT EIR

The Draft EIR will summarize the following key environmental issues for the proposed project. Direct and indirect impacts will be analyzed for the short-term (construction) and long-term (life of the project) based on thresholds of significance that meet State guidelines and accepted professional standards and practice. The Draft EIR will identify mitigation measures for impacts determined to be significant. Issues not anticipated to result in significant impacts and, therefore, not proposed to be evaluated in detail in the Draft EIR include agricultural/forestry resources,

hazards and hazardous materials, mineral resources, population/housing, recreation, and wildfire. The Draft EIR will address those topics determined not to result in significant impacts or require detailed evaluation in the "Other CEQA Considerations" chapter.

Aesthetics. The Draft EIR will review and describe the existing visual characteristics of the stadium and surrounding area and evaluate whether the proposed expanded programming and facilities would have a potentially significant impact on aesthetic resources. If potentially significant visual impacts are identified, the Draft EIR will include feasible mitigation measures.

Air Quality. This section of the Draft EIR will be based on estimates of emissions and associated changes in air quality that are likely to occur based on activities that result from the implementation of the proposed project. The Draft EIR will summarize air quality regulations and ambient air pollutant data from the local monitoring station and other stations representative of regional air quality conditions. Pollutants of concern include criteria pollutants and toxic air contaminants. An assessment of the air quality impacts will be conducted, and emissions estimated using the California Emissions Estimator Model (CalEEMod) land use and air quality model. The results will be compared to significance thresholds developed by the Monterey Bay Air Resources District. The Draft EIR will identify feasible mitigation measures to reduce the significance of air quality impacts, if identified.

Biological Resources. The Draft EIR will identify, characterize, and evaluate biological resource issues, including sensitive habitats, special-status species, and wildlife nesting/breeding. Existing biological resources will be described based on a biological study conducted for the project site. The Draft EIR will analyze the potential adverse effects to sensitive biological resources that may result from implementing the proposed project. The Draft EIR will identify feasible mitigation measures to reduce the significance of biological resource impacts, if identified.

Cultural Resources. According to the Record of Decision for acquisition of the campus, there are no historic sites on the campus that have been identified in past studies as eligible or potentially eligible for listing in the National Register. The Draft EIR will use existing documentation, supplemented with updated records searches and field reconnaissance surveys, to evaluate potential impacts to cultural resources that may result from implementation of the proposed project. The Draft EIR will address archaeological, historical, and cultural resource issues. The Draft EIR will identify mitigation measures to reduce potentially significant cultural resources impacts, if required, and ensure that cultural resources that may be discovered unexpectedly during construction are protected.

Energy. The Draft EIR will assess impacts resulting from the proposed project relating to the use of energy and determine whether implementation of the proposed project would result in significant impacts. Specifically, the Draft EIR will examine whether the project would use energy in a wasteful or inefficient manner and compare proposed activities against energy standards expressed in existing State and local renewable energy plans. Evaluation of the project's potential energy impacts will be consistent with CEQA Guidelines Appendix G. Mitigation measures will be identified to reduce potentially significant energy impacts, if identified.

Geology/Soils. The Draft EIR will assess the geologic and soils impacts resulting from the proposed project and determine whether implementation of the proposed project would result in significant impacts. Mitigation measures will be identified to reduce potentially significant geology and soils impacts, if identified.

Greenhouse Gas Emissions. The Draft EIR will include a setting and background discussion consisting of a summary of the greenhouse effect and global climate change; potential changes to the global climate system and to California; and emissions inventories at the federal, State, and local levels. It will also include a summary of the key regulatory measures at the federal and State levels as the regulatory setting for this topic. GHG emissions resulting from the project will be estimated using the CalEEMod emissions model. The net change in operational GHG emissions relative to those under the baseline scenario will be calculated. Impact significance will be assessed in accordance with State and regional guidelines and standards. Mitigation measures will be identified to reduce potentially significant GHG impacts, if identified.

Hydrology and Water Quality. Drainage and water quality impacts will be evaluated with respect to compliance with campus stormwater management plans and applicable State requirements. The Draft EIR will include a review of the project's regulatory context, development standards pertaining to water quality, and their applicability to the proposed project. Potential impacts will be compared against existing conditions, and additional mitigation measures will be identified, where necessary, to avoid or substantially reduce impacts.

Land Use and Planning. The Draft EIR will evaluate the proposed project to determine whether the project would physically divide an established community or conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, per Appendix G of the CEQA Guidelines. Conflicts with existing or planned land uses adjacent to the project site will also be evaluated where such conflicts could result in environmental impacts.

Noise. The existing noise environment on and in the vicinity of the project site will be discussed based on existing environmental documentation and onsite reconnaissance data. As part of the onsite reconnaissance, up to five short-term (e.g., 10-30 minute) noise measurement surveys at various locations within the project area will be conducted to document current ambient noise conditions. Nearby existing noise-sensitive receptors and noise sources contributing to the ambient noise environment will be identified and discussed. Relevant background information, including noise fundamentals, descriptors, and applicable State and local regulatory framework, will be described. The Draft EIR will also evaluate noise levels generated by various construction activities and equipment. Mitigation measures will be identified to reduce potentially significant noise impacts, if identified.

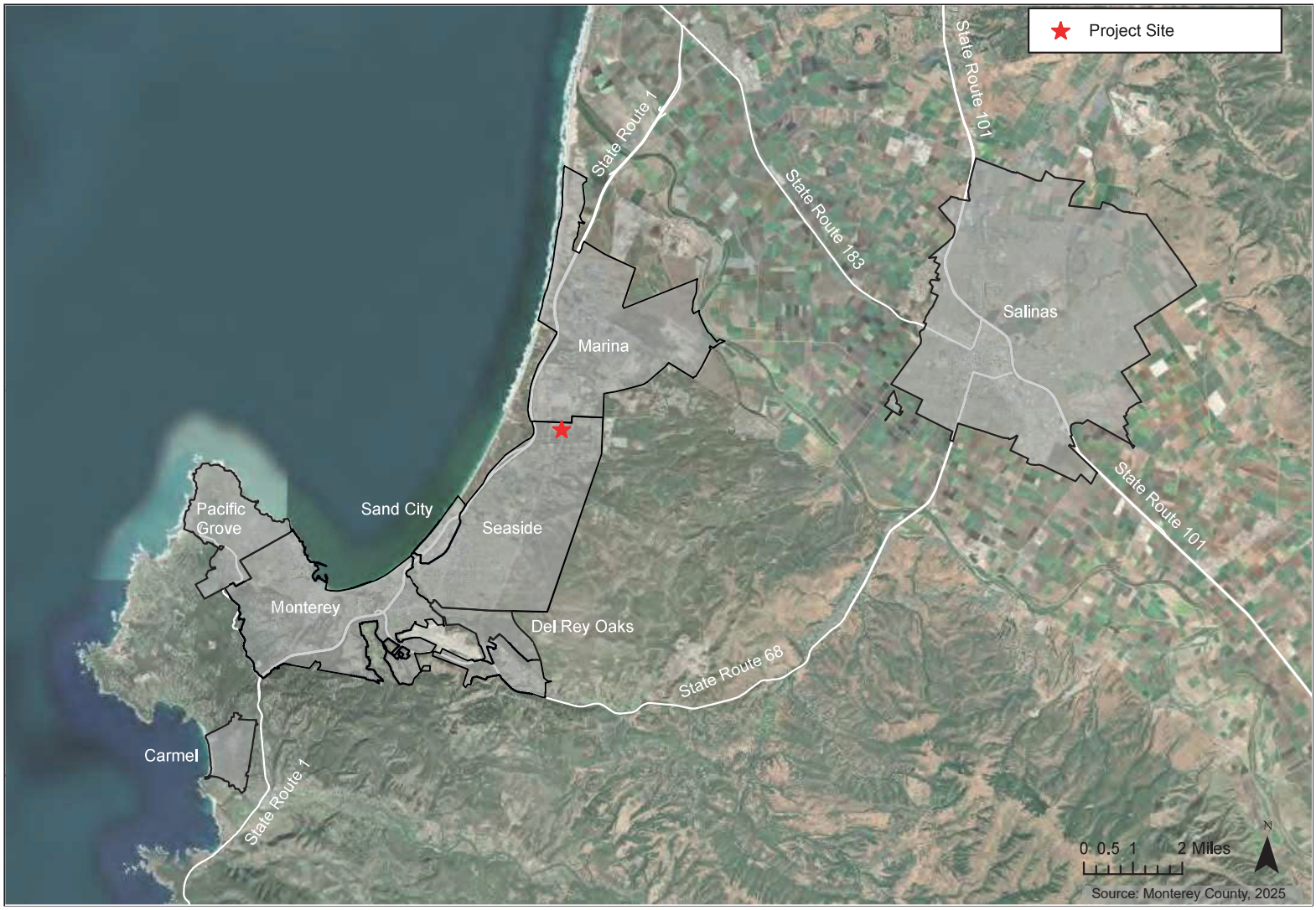
Public Services. Existing conditions related to fire protection service, police protection service, parks and recreation, and schools will be described. The Draft EIR will examine whether the project would result in potentially significant impacts to performance levels of these public services and thus result in substantial physical impacts associated with the provision of new or physically altered governmental facilities, consistent with CEQA Guidelines Appendix G.

Transportation. The Draft EIR will assess transportation and traffic impacts on Vehicle Miles Traveled (VMT). A VMT impact analysis will be conducted that will compare the estimated project generated VMT and project's effects on VMT by specific geographic scale, such as County-level, or regional-level, against thresholds of significance. If potentially significant impacts are identified, mitigations for those impacts will be provided.

Tribal Cultural Resources. The Draft EIR will address tribal cultural resources based on consultation between the Board of Trustees and Native American Tribes, per Assembly Bill 52.

Utilities and Service Systems. The Draft EIR will address potential impacts to water supply, wastewater treatment, solid waste, and electrical and natural gas utility services. Stormwater drainage utilities will be addressed in the Hydrology and Water Quality Section of the Draft EIR. The Draft EIR will document and update existing conditions and provide impact assessments for these utilities. Mitigation measures will be identified to reduce potentially significant utility and service systems impacts, if identified.

Other CEQA-Required Sections. In accordance with CEQA requirements, topics screened out because they were determined to result in less than significant impacts, cumulative impacts, alternatives, and growth-inducement effects of the proposed project will be discussed in this chapter.



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 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
Monterey, CA 93940
(831) 373-4341

Figure 2

Title:

Proposed Site Plan

Date	2-19-2025
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

US Fish and Wildlife Service

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

Comments regarding NOP of an EIR for the CSUMB Stadium Expanded Use Project

2 messages

Sinclair, Karen D <karen_sinclair@fws.gov> Mon, Mar 31, 2025 at 4:59 PM
To: "mmccluney@csumb.edu" <mmccluney@csumb.edu>
Cc: "Takano, Leilani" <leilani_takano@fws.gov>, Erin Harwayne <eharwayne@ddaplanning.com>

Dear Matthew S. McCluney:

We have reviewed the Notice of Preparation of an Environmental Impact Report for the California State University Monterey Bay (CSUMB) Stadium Expanded Use Project in Monterey County (NOP; CSUMB 2025), received on February 28, 2025, and the relevant documents provided on CSUMB's web pages. The project consists of construction of two 1,400-square feet (sf) locker room facilities, two 1,000-sf restroom buildings, and a 1.25-acre gated event staging area just north of the stadium. Construction of these facilities is anticipated to take approximately nine months beginning in spring 2026. The project site is located at 4111 2nd Avenue (assessor's parcel number 0311-0104-4000) in the City of Seaside in Monterey County, California.

As part of our review, we crossed referenced the figures provided in the NOP with the information on the CSUMB's website, specifically within the 2007 Campus Master Plan. According to the Appendix E, Monterey spineflower (*Chorizanthe pungens var. pungens*), sand gilia (*Gilia tenuiflora ssp. arenaria*), and California tiger salamander (*Ambystoma californiense*) have been observed on the CSUMB campus. Yadon's rein orchid (*Piperia yadonii*) has a moderate likelihood to occur on campus and Smith's blue butterfly (*Euphilotes enoptes smithi*) has a low likelihood to occur on campus. According to the biological resources section, Monterey spineflower is common throughout the CSUMB project area, occurring in several different habitat types, and appropriate habitat for sand gilia is present in open, sandy areas distributed throughout the entire campus.

The project occurs within the west campus zone, an area that is almost entirely developed except for small, fragmented stands of vegetated habitat. According to figure 3 of the NOP, the new locker rooms and restrooms would occur within the footprint of the existing stadium and the new fenced storage area would occur within a 1.25-acre undeveloped area that is surrounded by existing parking and roads.

According to this information, we recommend conducting comprehensive, species-specific surveys within the 1.25-acre undeveloped area, and any other areas of suitable habitat for federally listed species that may be impacted by the project. Comprehensive floristic surveys should be conducted within the appropriate blooming periods for all potentially occurring species onsite and should be conducted in accordance with the pertinent (Service, CDFW, and California Native Plant Society [CNPS]) survey protocols and guidelines. Floristic surveys must be conducted by a qualified botanist, and in certain circumstances prior approval of qualified personnel by the Service may be required. Please note that federally listed annual plant species may not always be present above ground in any given year, unless environmental conditions are favorable for seed germination, growth, and development. If federally listed annual plant species are not observed onsite during floristic surveys, they may still be present as a dormant seedbank. We also recommend that you plan to conduct floristic surveys for federally listed plant species during the spring and summer/ (appropriate blooming periods) in the year immediately prior to the start of construction. If floristic surveys are not possible, the listed plant species will be assumed to be present in all suitable habitats within the project area.

Thank you for the opportunity to provide comments. Feel free to reach out if you have any questions.
Karen Sinclair

Karen Sinclair, *Fish and Wildlife Biologist*
pronouns: she/her
U.S. Fish and Wildlife Service, Ventura Field Office
2493 Portola Road, Suite B | Ventura, California 93003

(805) 677-3315 | karen_sinclair@fws.gov
Visit us online or on social media, and check out our Year in Review magazine and video for our latest stories.

Matthew McCluney <mmccluney@csumb.edu> Mon, Mar 31, 2025 at 8:47 PM
To: "Sinclair, Karen D" <karen_sinclair@fws.gov>
Cc: "Takano, Leilani" <leilani_takano@fws.gov>, Erin Harwayne <eharwayne@ddaplanning.com>

Karen,
Thank you for your comment. It has been entered into the record.

Regards,
Matt

Matthew S. McCluney, AICP
Facilities Management - Campus Planning & Development
Director of Campus Planning & Development
Phone: 831-582-4721
Email: mmccluney@csumb.edu
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amdg

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California Department of Transportation

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

California State University Monterey Bay Stadium Expanded Use Project NOP

2 messages

Hernandez, Jacob@DOT <Jacob.M.Hernandez@dot.ca.gov> Wed, Mar 19, 2025 at 9:54 AM
To: "mmccluney@csumb.edu" <mmccluney@csumb.edu>
Cc: "Mcclendon, Kelly D@DOT" <kelly.mcclendon@dot.ca.gov>

Hello Matthew,

Please see my comment letter attached for the California State University Monterey Bay Stadium Expanded Use Project Notice of Preparation (NOP). Please let me know if you have any questions or need anything further.

Thank you,

Jacob Hernandez (he/him/his)
Local Development Review Coordinator- North
Regional Planner- AMBAG
Caltrans District 5
805-835-6543

Comments_NOP_CSUMB Stadium Expanded Use Project.pdf
159K

Matthew McCluney <mmccluney@csumb.edu> Wed, Mar 26, 2025 at 7:40 AM
To: Jacob.M.Hernandez@dot.ca.gov
Cc: "Mcclendon, Kelly D@DOT" <kelly.mcclendon@dot.ca.gov>

Jacob,
Thank you for your comment. It has been included in the record.

Regards,
Matt

Matthew S. McCluney, AICP
Facilities Management - Campus Planning & Development
Director of Campus Planning & Development
Phone: 831-582-4721
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csumb.edu/facilities

amdg

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California Department of Transportation

CALTRANS DISTRICT 5
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415
(805) 549-3101 | FAX (805) 549-3329 TTY 711
www.dot.ca.gov

March 19, 2025

SCH #2025021013
MON/1/R83.085

Matthew S. McCluney, Director of Campus Planning & Development
California State University, Monterey Bay
100 Campus Center
Seaside, CA 93955

Re: California State University Monterey Bay Stadium Expanded Use Project Summary - Notice of Preparation (NOP) of a Draft EIR

Dear Mr. McCluney:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the NOP for the California State University Monterey Bay (CSUMB) Stadium Expanded Use Project Summary, which proposes an expansion of existing programming at the CSUMB Stadium by CSUMB and the Monterey Bay Football Club (MBFC) and the construction and operation of two new locker room facilities, two new restroom buildings, and a gated event staging area just north of the stadium. Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. Caltrans offers the following comments in response to the NOP:

1. Caltrans looks forward to reviewing the traffic analysis that includes impacts on Vehicle Miles Traveled (VMT). Please include the following items in the analysis:
    a. How many added trips will special events generate, other than just the United Soccer League
    b. Cumulative impacts of special events when considering typical traffic volumes
    c. Assumptions of vehicle occupancy rate
    d. Land use type assumed from ITE trip generation manual
    e. Day of week for each type of special event

2. As part of CSUMB's goal to support mode shift from single occupancy vehicles; double the percentage of bicycle, walking, and bus/shuttle commute trips by 2030, please consider transit service frequency for the expanded use of the stadium

project. An increase of transit frequency on one or more transit lines serving the university/community reduces waiting and overall travel times, which improves the user experience and increases the attractiveness of the transit service. This results in a mode shift from single occupancy vehicles to transit, which reduces VMT.

3. In addition, as part of CSUMB's goal to expand the campus multi-modal transportation system incrementally in every infrastructure project and new program, please consider providing bike facilities as part of the project. Examples of these facilities include bike racks, bike fix-it stations, or facilities similar to the existing Bike Bunker.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions or need further clarification on the items discussed above, please contact me at (805) 835-6543 or email Jacob.m.Hernandez@dot.ca.gov.

Sincerely,

Jacob Hernandez

Jacob Hernandez
Transportation Planner
District 5 Local Development Review Coordinator

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California Department of Fish and Wildlife

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 9, 2025

Matthew McCluney, AICP
California State University Monterey Bay
100 Campus Center Seaside, California 93955
(831) 582-4721
mmccluney@csumb.edu

Subject: California State University Monterey Bay Stadium Expanded Use Project (Project)
Notice of Preparation (NOP)
SCH No.: 2025021013

Dear Matthew McCluney:

The California Department of Fish and Wildlife (CDFW) received a NOP to prepare a Draft Environmental Impact Report (DEIR) from the Board of Trustees of the California State University (Board of Trustees) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. While the comment period may have ended, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish and Game Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802).

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

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need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, activities evaluated in a project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish and Game Code, § 1600 et seq.). Likewise, to the extent implementation of a project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

PROJECT DESCRIPTION SUMMARY

Proponent: California State University Monterey Bay (CSUMB)

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

Location: The Project is located at 4111 2nd Avenue, Seaside, within Assessor's Parcel Number (APN) 0311-0104-4000.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Board of Trustees in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for this Project.

Based on a review of the Project description, a review of California Natural Diversity Database (CNDDB) records, and the surrounding habitat, the Project site is within the geographic range of several special-status wildlife species, including the State candidate Crotch's bumble bee (*Bombus crotchii*) and Western bumble bee (*Bombus occidentalis*).

Additionally, the Project site is within the geographic range of several special-status plant species including, but not limited to, the State endangered and California Rare Plant Rank (CRPR) 1B.1 seaside bird's-beak (*Cordylanthus rigidus ssp. Littoralis)*, and the State threatened, federally endangered, and CRPR 1B.2 Monterey gilia (*Gilia tenuiflora ssp. Arenaria*).

Crotch's and Western Bumble bee

The Project site is within the geographic range of Crotch's bumble bee (CBB) and Western bumble bee (WBB). CBB and WBB are known to inhabit areas of grasslands

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and scrub that contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses, and these habitat elements appear to be present within the Project site. As such, CDFW recommends that a qualified biologist conduct a habitat assessment to assess Project related impacts to CBB and WBB as part of the biological technical studies conducted in support of the DEIR. If suitable habitat is identified during these surveys, CDFW recommends that a qualified biologist conduct focused surveys for CBB and WBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023) as part of the biological technical studies conducted in support of the DEIR.

In addition to conducting CBB and WBB habitat assessments and surveys, CDFW recommends the DEIR include the following measures:

Recommended Mitigation Measure 1: CBB Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment prior to construction to determine if portions of the Project site and immediate surrounding vicinity contain habitat suitable to support CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

Recommended Mitigation Measure 2: CBB and WBB Surveys

If potentially suitable habitat is identified, CDFW recommends that additional surveys be conducted for CBB and WBB, and their requisite habitat features, following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

Recommended Mitigation Measure 3: CBB and WBB Avoidance

If CBB or WBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB or WBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 4: CBB and WBB Take Authorization

If take cannot be avoided, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take

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authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Special-status Plants

The Project site is within a geographic range of Monterey gilia and seaside bird's-beak and historical occurrences have been documented for both species within two miles of the Project site. As the Project site may contain suitable habitat for special-status plant species, including the species mentioned above, CDFW recommends that the Project site(s) be surveyed for special-status plants within areas of suitable habitat by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities" (CDFW 2018) as part of the biological technical studies conducted in support of the DEIR. This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period.

In addition to conducting special-status plant surveys, CDFW recommends the DEIR include the following:

Recommended Mitigation Measure 5: Special-Status Plant Focused Surveys

Depending on the time between the initial survey efforts conducted in support of the DEIR and Project activities, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities" (CDFW 2018) during the survey season immediately prior to initiation of Project activities. This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary.

Recommended Mitigation Measure 6: Special-Status Plant Avoidance

CDFW recommends special-status plant species be avoided whenever possible by delineation and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

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Recommended Mitigation Measure 7: Special-Status Plant Take Authorization

If a State-listed plant species is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization would need to occur through issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), or Fish and Game Code section 1900 and California Code of Regulations, title 14, section 786.9.

EDITORIAL NOTES AND SUGGESTIONS

CNDDB

Please note that the CNDDB is populated by and records voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDB does not mean a species is not present. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project site.

Cumulative Impacts

CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). Cumulative impacts are recommended to be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area should also be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the Board of Trustees in identifying and mitigating this Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Please

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see the enclosed, Attachment 1, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Evelyn Barajas-Perez, Environmental Scientist, at (805) 503-5738 or evelyn.barajas-perez@wildlife.ca.gov.

Sincerely,

DocuSigned by:
FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT

ec:

State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Docusign Envelope ID: B8472F1E-7A32-4230-9D00-EED04114E7CA

REFERENCES

California Department of Fish and Wildlife. 2018. Protocols for surveying and evaluating impacts to special status native plant populations and sensitive natural communities. California Department of Fish and Wildlife. Sacramento, California, USA.

California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act (CESA) candidate bumble bee species. Sacramento, California, USA.

California Department of Fish and Wildlife. 2025. Biogeographic information and observation system. <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 29 March 2025.

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: California State University Monterey Bay Stadium Expanded Use Project

SCH No.: 2025021013

RECOMMENDED MITIGATION MEASURE	**STATUS/DATE/INITIALS**
Before Disturbing Soil or Vegetation	
Crotch's bumble bee *(CBB*) and Western bumble bee (*WBB)*	
Recommended Mitigation Measure 1: CBB and WBB Habitat Assessment	
Recommended Mitigation Measure 2: CBB and WBB Surveys	
Recommended Mitigation Measure 4: CBB and WBB Take Authorization	
Special-status Plants	
Recommended Mitigation Measure 5: Special-Status Plant Focused Surveys	
Recommended Mitigation Measure 7: Special-Status Plant Take Authorization	
During Construction	
Crotch's bumble bee *(CBB*) and Western bumble bee (*WBB)*	
Recommended Mitigation Measure 3: CBB and WBB Avoidance	
Special-Status Plant	
Recommended Mitigation Measure 6: Special-Status Plant Avoidance	

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City of Marina

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

CSUMB Stadium Expanded Use Project

2 messages

Brian Kim <bkim@cityofmarina.org> Thu, Mar 13, 2025 at 4:24 PM
To: "mmccluney@csumb.edu" <mmccluney@csumb.edu>

Hi Matthew,

My name is Brian, and I am the Assistant Planner for the City of Marina.
I attended last night's Notice of Preparation event for the project, and my director wants for me to keep track of the project.
Is there a mailing list that I can join for progress updates?

Best regards,

Brian Kim
Assistant Planner

City of Marina | Community Development Department
211 Hillcrest Ave, Marina, CA 93933
www.cityofmarina.org

Matthew McCluney <mmccluney@csumb.edu> Mon, Mar 17, 2025 at 8:00 AM
To: Brian Kim <bkim@cityofmarina.org>
Cc: Erin Harwayne <eharwayne@ddaplanning.com>

Hi Brian,
Thanks for reaching out. We can keep you looped in to the project now that we have your email. Thank you.

Regards,
Matt
--

Matthew S. McCluney, AICP
Facilities Management - Campus Planning & Development
Director of Campus Planning & Development
Phone: 831-582-4721
Email: mmccluney@csumb.edu
csumb.edu/facilities

amdg

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Monterey Bay Air Resources District

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

CSUMB Stadium Expanded Use Project NOP Scoping Comments

2 messages

Eddie Ballaron <EBallaron@mbard.org> Thu, Mar 13, 2025 at 11:27 AM
To: "mmccluney@csumb.edu" <mmccluney@csumb.edu>
Cc: Richard Stedman <Rstedman@mbard.org>, David Frisbey <DFrisbey@mbard.org>, Shawn Boyle <SBoyle@mbard.org>

Hello Mr. McCluney,

Attached is the MBARD comment letter for the CSUMB Stadium Expanded Use Project. Please feel free to reach out if you have any questions. Thank you.

Cheers,

Edward Ballaron
Air Quality Planner I

50TH Anniversary 1974-2024 MBARD Monterey Bay Air Resources District

24580 Silver Cloud Ct.
Monterey, CA 93940
(831) 718-8030 (Ext. 241)

MBARD Comments NOP EIR CSUMB Stadium Expansion Project.pdf
192K

Matthew McCluney <mmccluney@csumb.edu> Thu, Mar 13, 2025 at 11:35 AM
To: Eddie Ballaron <EBallaron@mbard.org>
Cc: Richard Stedman <Rstedman@mbard.org>, David Frisbey <DFrisbey@mbard.org>, Shawn Boyle <SBoyle@mbard.org>

Edward Ballaron,
Thank you for your comment. It has been included in the record.

Regards,
Matt
--

Cal State Monterey Bay

Matthew S. McCluney, AICP
Facilities Management - Campus Planning & Development
Director of Campus Planning & Development
Phone: 831-582-4721
Email: mmccluney@csumb.edu
csumb.edu/facilities

amdg

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Monterey Bay Air Resources District
Serving Monterey, San Benito, and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940

PHONE: (831) 647-9411 • FAX: (831) 647-8501

March 13, 2025

Matthew S. McCluney, AICP
Director of Campus Planning & Development
100 Campus Center
Seaside, CA 93955
Submitted via email: mmccluney@csumb.edu

Re: CSUMB Stadium Expanded Use Project NOP Scoping Comments

Dear Mr. McCluney,

Thank you for providing the Monterey Bay Air Resources District (MBARD) with the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the CSUMB Stadium Expanded Use Project. MBARD has reviewed the NOP and has the following comments:

CEQA Guidelines
MBARD recommends the CSUMB utilize the MBARD CEQA Air Quality Guidelines as a resource for preparing the EIR.

Asbestos Cement Pipe (ACP) and Other Asbestos Piping Infrastructure
MBARD has prior experience with the abatement of asbestos cement pipe (ACP) and other buried asbestos utility infrastructure components near Fort Ord buildings on undeveloped/vacant land. Proper procedures must be followed during construction activities when encountering active or abandoned ACP or other asbestos-containing subsurface infrastructure.

Construction Equipment
To further reduce construction emissions, MBARD recommends using cleaner than required equipment that conforms to the California Air Resources Board's (CARB) Tier 3 or Tier 4 emission standards. We further recommend that whenever feasible; construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity, or biodiesel. This would have the added benefit of reducing diesel exhaust emissions and odors.

Engine Permitting
If a generator, boiler, or other stationary source of air pollutants is needed to support the construction process or will be installed for use in the operation of the project, a permit may be required. Per Rule 201, any stationary piston-type internal combustion engine of greater than or equal to 50 brake horsepower (bhp) requires a permit. Please contact MBARD's Engineering Division if there are any questions regarding the permitting process.

Portable Equipment Registration Program

If project construction uses portable equipment registered with CARB in the Portable Equipment Registration Program (PERP), MBARD must be notified within two working days of commencing operations when the registered unit will be at the location for more than five days. Portable equipment not registered with CARB may be subject to MBARD permit requirements.

MBARD appreciates the opportunity to comment on the NOP of an EIR for the CSUMB Stadium Expanded Use Project. Please let me know if you have any questions. I may be reached at (831) 718-8030 or eballaron@mbard.org.

Regards,

Edward Ballaron
Air Quality Planner I

cc: Richard A. Stedman, Air Pollution Control Officer
David Frisbey, Planning and Air Monitoring Manager
Shawn Boyle, Planning and Air Monitoring Supervisor

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Monterey-Salinas Transit

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

NOP CSUMB Stadium Expanded Use Project MST Comments

2 messages

Emma Patel <epatel@mst.org> Tue, Mar 25, 2025 at 2:59 PM
To: "mmccluney@csumb.edu" <mmccluney@csumb.edu>
Cc: Michelle Overmeyer <movermeyer@mst.org>

Good afternoon,

Please find attached MST's comments on the CSUMB Stadium Expanded Use Project NOP.

Thank you,

Emma

Emma Patel

Planning Manager

(831) 264-9288

epatel@mst.org

Monterey-Salinas Transit

19 Upper Ragsdale Drive, Suite 200

Monterey, CA 93940

www.mst.org

Our mission is advocating and delivering quality public transportation as a leader within our community and industry.

MST Comments - CSUMB Stadium Expanded Use NOP.pdf
276K

Matthew McCluney <mmccluney@csumb.edu> Thu, Mar 27, 2025 at 11:25 AM
To: Emma Patel <epatel@mst.org>
Cc: Michelle Overmeyer <movermeyer@mst.org>

Emma,
Thank you for this comment. It has been entered into the record.

Regards,
Matt

Matthew S. McCluney, AICP
Facilities Management - Campus Planning & Development
Director of Campus Planning & Development
Phone: 831-582-4721
Email: mmccluney@csumb.edu
csumb.edu/facilities

amdg

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March 25, 2025

Mathew S. McCluney
CSU Monterey Bay
100 Campus Center
Seaside, CA 93955

RE: Notice of Preparation CSUMB Stadium Expanded Use Project

Dear Mr. McCluney:

Monterey-Salinas Transit District (MST) provides public transportation throughout Monterey County and operates fixed-route services to the California State University, Monterey Bay (CSUMB). MST has a long history of partnering with CSUMB to allow students, faculty, and staff to ride MST services for free using their Otter ID. MST is excited to continue their partnership with CSUMB in the coming years and continue connecting students with higher education and services.

MST has reviewed the Notice of Preparation of an Environmental Impact Report for the CSUMB Stadium Expanded Use Project and would like to submit the following comments for your consideration:

Existing and Future MST-CSUMB Services
During each school year, MST enters into an annual agreement with CSUMB to operate Line 25 (Salinas-CSUMB), which is typically scheduled to operate during the academic school year. This route provides hourly service between the Salinas Transit Center and the CSUMB Alumni and Visitors Center. MST also currently operate Lines 17 and 18 year-round, which connects the CSUMB Campus to the communities of Marina and Sand City. All MST route transfers may occur on the 4th Avenue / CSUMB Alumni and Visitor Center Stop (Stop ID: 1133), which is within walking distance of the CSUMB stadium.

As part of the SURF! Busway and Bus Rapid Transit (BRT) Project, MST will construct the 5th Street Station in the former Ford Ord area west of campus. The new multimodal mobility-hub will include a safe drop-off and pick-up area, public parking with EV charging, and bicycle and mobility amenities including a bicycle repair station. The CSUMB Wave Shuttle will also have the opportunity to access the 5th Street Station and can help students connect to campus, CSUMB Stadium, and other MST routes. CSUMB staff and contractors should coordinate with MST for timed connections. Stadium visitors could benefit from more frequent transit services without getting stuck on Highway 1, while traveling on modern zero-emission buses when using the SURF!. The SURF! BRT Line is scheduled for kick-off in Spring of 2028.

MST Recommended Mitigation
Transportation
To address potential transportation and traffic impacts on Vehicle Miles Traveled (VMT), MST recommends the following mitigation strategies:

The Lead Agency should develop and implement a Transportation Demand Management Program (TDM) prior to the completion of the proposed Stadium Expanded Use Project. MST should be a major stakeholder in the development of the TDM Program and should be included in future meetings. The TDM Program should address strategies and incentives to reduce the overall number of VMT/automobile trips to and from the CSUMB stadium. As stated above, CSUMB students, faculty, and staff can board MST's services for free using their Otter ID, which provides a great alternative for potential vehicle trips to the stadium.

For CSUMB Stadium staff who don't have access to an Otter ID, staff can enroll in MST's Group Discount Program or the Commute with Enterprise Vanpool Program:

- **MST' Group Discount Program:** Provides 31-Day MST GoPasses at a substantially reduced price if bus passes are purchased in bulk, five (5) or more.
- **Commute with Enterprise Vanpool Program:** MST has partnered with Commute with Enterprise to provide vanpooling options for commuters in Monterey County. Commute with Enterprise connects a minimum of four (4) employees, who travel to or from Monterey County, and provides them with a van or SUV. Vanpools receive up to a $450 monthly subsidy per vehicle from MST if they complete monthly ridership reports.

MST's programs should be incorporated in the TDM Program. Please contact MST staff or visit MST's website for more information regarding the programs outlined above: https://mst.org/

The Lead Agency should also improve pathways to the stadium's entrances by identifying and completing sidewalk, crosswalk, and bike lane improvements near the Project's Site. General Jim Moore Blvd, for example, has potential for sidewalk and crosswalk improvements, which can help promote walkability to the stadium if improved. MST would also like to be involved in the process of identifying bike and pedestrian improvements to ensure that all pathway improvements have connections to existing MST transit stops and future 5th Street station.

MST remains a committed partner with CSUMB to provide services to the campus throughout the academic school year and looks forward to a partnership with the CSUMB Stadium and teams. If you have any questions about the above comments, please do not hesitate to contact me at epatel@mst.org or 831-264-9288.

Sincerely,

Emma Patel

Emma Patel
Planning Manager

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Amah Mutsun Tribal Band of Mission San Juan Bautista

From: Amah Mutsun Tribal <irennezwierlein@gmail.com>
Sent: Friday, February 28, 2025 10:08 AM
To: Erin Harwayne <eharwayne@ddaplanning.com>
Subject: Re: Notice of Preparation of an EIR and Notice of Public Scoping Meeting for the CSUMB Stadium Expanded Use Project

Hello Erin,

Thank you for the information on the proposed project, and please see the attached documents with our recommendations. If you have any questions about the attached documents, or would like to set up a meeting to discuss consultation, please give us a call at 650-851-7489 or email us at amtbinc21@gmail.com.

Thank you,

Lorelei Alli

AMTB Inc.

The Amah Mutsun Tribal Band of San Juan Bautista & AMTB

Letter of Response

To whom it may concern:

It is our pride and privilege to be of service for any Native American Cultural Resource Monitoring, Consulting and/ or Sensitivity Training you may need or require. We take our Heritage and History seriously and are diligent about preserving as much of it as we can. Construction is a constant in the Bay Area and with that new discoveries are bound to happen. If you choose our services, we will gladly guide all personnel through proper procedures to safely protect and preserve: Culture, Heritage, and History.

It is highly recommended, if not previously done, to search through Sacred Lands Files (SLF) and California Historical Resource Information Systems (CHRIS) as well as reaching out to the Native American Heritage Commission (NAHC) In order to determine whether you are working in a Cultural and/ or Historic sensitivity.

If you have received any positive cultural or historic sensitivity within 1 mile of the project area here are A.M.T.B Inc's and Amah Mutsun Tribal Band of San Juan Bautista's recommendations:

- All Crews, Individuals and Personnel who will be moving any earth be Cultural Sensitivity Trained.
- A Qualified California Trained Archaeological Monitor is present during any earth movement.
- A Qualified Native American Monitor is present during any earth movement.

If further Consultation, Monitoring or Sensitivity Training is needed please feel free to contact A.M.T.B. Inc. or Myself Directly. A.M.T.B. Inc. 650-851-7747

Irenne Zwierlein

Irenne Zwierlein

2451 Tyrolean Way, Sacramento CA
95821
amtbinc21@gmail.com
(650)851-7747

Amah Mutsun Tribal Band of San Juan Bautista
&
AMTB

2451 Tyrolean Way, Sacramento CA 95821

Our rates for 2025 are

$200.00 per hour.

4 hours minimum

Cancellations not 48 hours (about 2 days) prior will be charged as a 4-hour minimum. There is a round trip mileage charge if canceled after they have traveled to site.

Anything over 8 hours a day is charged as time and a half.

Weekends are charged at time and a half.

Holidays are charged at double the time.

For fiscal year (FY) 2025, standard per diem rate of $425. ($333. lodging, $92 M&IE).

M&IE Breakdown FY 2025

M&IE Total	Continental Breakfast/ Breakfast	Lunch	Dinner	Incidental Expenses	First & Last Day of Travel
$92.00	$23.00	$26.00	$38.00	$5.00	$69.00

Beginning 2025, the standard mileage rates for the use of a car round trip (also vans, pickups or panel trucks) will be: $.70 cents per mile driven for business use or what the current federal standard is at the time.

Our Payment terms are 5 days from date on invoice.

Our Monitors are Members of the Amah Mutsun Tribal Band of Mission San Juan Bautista.

If you have any questions, please feel free to contact the A.M.T.B. Inc. at the below contact information.

Sincerely,

Irenne Zwierlein

Irenne Zwierlein

2451 Tyrolean Way, Sacramento CA
95821
amtbinc21@gmail.com

(650)851-7747

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 01/14/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATIONIS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
ALLIED BROKERS INSURANCE AGCY INC
57101434
591 LYTTON AVENUE
PALO ALTO CA 94301

CONTACT NAME:
PHONE (A/C, No, Ext): (866) 467-8730
FAX (A/C, No): (888) 443-6112
E-MAIL ADDRESS:

INSURER(S) AFFORDING COVERAGE		NAIC#
INSURER A :	Hartford Underwriters Insurance Company	30104
INSURER B :		
INSURER C :		
INSURER D :		
INSURER E :		
INSURER F :		

INSURED
AMTB LLC
2451 TYROLEAN WAY
SACRAMENTO CA 95821-4809

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED.NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/Y YYY)	LIMITS	
A	COMMERCIAL GENERAL LIABILITY CLAIMS-MADE [X] OCCUR X General Liability GEN'L AGGREGATE LIMIT APPLIES PER: X POLICY [ ] PRO-JECT [ ] LOC OTHER:			57 SBM BM9HAR	01/14/2025	01/14/2026	EACH OCCURRENCE	$1,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence)	$1,000,000
							MED EXP (Any one person)	$10,000
							PERSONAL & ADV INJURY	$1,000,000
							GENERAL AGGREGATE	$2,000,000
							PRODUCTS - COMP/OP AGG	$2,000,000
A	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS			57 SBM BM9HAR	01/14/2025	01/14/2026	COMBINED SINGLE LIMIT (Ea accident)	$1,000,000
							BODILY INJURY (Per person)	
							BODILY INJURY (Per accident)	
							PROPERTY DAMAGE (Per accident)	
	UMBRELLA LIAB EXCESS LIAB OCCUR CLAIMS-MADE DED RETENTION $						EACH OCCURRENCE	
							AGGREGATE	
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y/N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N/ A					PER STATUTE / OTH-ER	
							E.L. EACH ACCIDENT	
							E.L. DISEASE -EA EMPLOYEE	
							E.L. DISEASE - POLICY LIMIT	

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES **(ACORD 101, Additional Remarks Schedule, may be attached if more space is required)**
The Business Liability Coverage Part includes a Blanket Additional Insured By Contract Endorsement, Form SL 30 32.

CERTIFICATE HOLDER

CANCELLATION
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE
Susan L. Castaneda

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Amah Mutsun Tribal Band of Mission San Juan Bautista

I, Irenne Zwierlein, am making the following formal Most Likely Descendant (MLD) Recommendations on behalf of the Amah Mutsun Tribal Band, with regards to the treatment of our ancestral remains and any and all associated grave regalia and subsurface features discovered at this location:

Expose, analyze in the field, and remove for reburial: A complete systematic collection and/or excavation by a professional archaeologist (who meets the Standards established by the Secretary of the Interior) of any exposed Native American skeletal remains should be coordinated. The collection and/or excavation should be undertaken using standard contemporary archaeological techniques. All archaeological field work will be managed daily on site by an archaeological field director who must possess the following qualifications: a graduate degree (MA) in archaeology, along with two years of full-time professional experience and specialized training in archaeological research, administration, and management; two years of supervised field and analytic experience in North American archaeology, and has demonstrated the ability to carry research to completion within assigned schedules. The project archaeologist or his/her staff will expose any burial and grave objects in my presence as the designated Most Likely Descendant, or my appointed representative (Monitor). Should the Native Monitor not be on-site, arrive late or depart early, all burial recovery work must stop. Likewise, any archaeological work where it is suspected that human remains might be discovered a Native Monitor must be present, or work may not be undertaken. Burials in various stages of excavation shall be protected overnight, by placing standard construction metal plates over them. A metal plate must be on-site before exposure begins.

1. Since our Tribe believes that our ancestral dead needs to be treated with utmost respect, and since our ancestral people had been disturbed in the past and more recently by bioturbation and construction/subsurface excavation activities, I am recommending that this ancestral person, and any future findings (i.e., isolates, burials and associated assemblages), be removed from their location/gravesite. And after appropriate analysis (presented below), be reburied as close to the original cemetery or discovery location as possible, as part of our honoring ceremony. If reburial for an on site location is not possible, we will consult with the Redwood City on a suitable alternative location, where a reburial honoring ceremony will be conducted. Reburial Site must be land that has no future intentions of being developed.
2. I am also recommending that the land owner enter into a contractual agreement with the Amah Mutsun Tribal Band Ohlone Tribe of the San Francisco Bay Area (DBA Amah Mutsun Tribal Band Ohlone Tribe, Inc.) for a Burial and Archaeological Data Recovery Program, monitoring services, and laboratory analysis of our ancestral remains which will include a full skeletal inventory of all

3030 Soda Bay Road Lakeport, CA 95453
amtbinc21@gmail.com or amahmutsuntribal@gmail.com
650-851-7489

of the skeletal elements, AMS dating, Stable Isotope analysis, ancient DNA, as well as any artifact and faunal analysis which shall be conducted by Basin Research. Should additional ancestral Native American remains be uncovered, the same recommended treatment will be in place for any additional discoveries.

3. The burial removal process should include, but not be limited to, the screening of any adjacent back dirt (spoils) piles located by these human remains, and the use of hand excavation methods to help remove any over burden (if necessary) down to a level to be determined in the field in order to facilitate full access to the in situ remains. The in situ remains will be exposed and removed by Amah Mutsun Tribal Band Ohlone field crew or in concert with on-site Archeological field personnel. These remains will be drawn and photographed in conjunction with on-site archaeological field staff who will document on standard archaeological excavation forms information about the burial remains and map in the grave and any subsurface features and/or artifacts. On-site Archeological field staff shall be responsible for mapping and recording the reburial location using GPS. Copies of the Reburial forms and Final Archaeological Report will be sent to Northwest Information Center, Sonoma State University, the Amah Mutsun Tribal Band Ohlone Tribe, and the Native American Heritage Commission.
4. It is also my recommendation that all of the human remains, associated artifacts, and ecofacts be brought to a suitable lab for cleaning and sorting, and preparation for detailed skeletal inventory and analysis which will include as stated above, be conducted by qualified specialists (approved by our Tribe) in their respective field(s). Selecting small samples of human bone for AMS dating, Stable Isotope and ancient DNA. The first two studies will require minimum funding within the proposed budget and will be conducted in collaboration with the Tribe's leadership and membership. Also, if conducive a Strontium study may also be considered. The results of all analysis will be presented first to the Amah Mutsun Tribal Band Ohlone Tribal leadership. If the results of these studies are of a positive nature and of scientific significance to our Tribe, then only with the Amah Mutsun Tribal Band Ohlone Tribe's written approval, will these results be published in the final report, otherwise will be held in confidentiality.
5. As part of this laboratory phase of work, I am also recommending that any isolated or complete burials be cleaned, and a complete skeletal inventory be conducted by the Amah Mutsun Tribal Band's staff Osteologist if available or by Basin Research Archaeological firm's osteological staff and associates. Any associated grave regalia and artifacts will also be cleaned, photographed, measured, and described. Amah Mutsun Tribal Band Ohlone Tribe and/or Basin Research Archaeologist and the Osteologist will each be responsible for writing a stand-alone final report that meets the standards under CEQA.

These recommendations follow our Tribe's desire to learn as much as possible about our ancestral heritage that has been denied to us by the dominant society and by archaeologists working on our ancestral heritage sites within our

aboriginal and historic tribal territory. In this particular case, the ancestral person may indeed date back to what archaeologists have termed the Early Bay Period. Furthermore, given this recent discovery of our ancestral burial, I recommend bagging the skeletal elements, which has been done. We shall hand excavate within the immediate vicinity of the grave where these remains were found. After thorough investigation of the area, and confirmation that no more skeletal elements are present, mechanical excavation may proceed, slowly, with shallow passes of a flat blade 2-foot bucket. An Amah Mutsun Tribal Band Native American Monitor will be required to monitor this work. Amah Mutsun Tribal Band MLD Recommendations in the event that after further investigation by hand excavating a full burial has been discovered, only after the burial has been removed and thorough investigation of the area has been conducted and confirmation that no more human remains are found, mechanical excavation may proceed, slowly, with shallow passes of a flat blade 2-foot bucket. An Amah Mutsun Tribal Band Native American Monitor will be required to monitor this work. Given the context of the fact that our ancestral burial was recovered in a previously recorded mound site, and given the sensitive location of this site , I recommend that an Amah Mutsun Tribal Band Native American Monitor be required to monitor the rest of this project. Therefore, I recommend that all subsurface demolition, any and all excavations(i.e. for utilities, etc.), and tree/plant removal activities are monitored by an Amah Mutsun Tribal Band Native American Monitor. I am recommending that an Amah Mutsun Tribal Band Native American Monitor observe any and all subsurface excavation work, placing a Native American Monitor at each piece of any excavation equipment. I also recommend that the on-site Archaeologists plot the location and depth of each additional ancestral burial, grave/isolate locus, and/or other significant subsurface features by using GPS to pinpoint various aspects of the gravesite and other feature locations on the parcel and related maps. Given the possibility of discoveries of additional subsurface Archaeological Features at this site, if further excavations of features are investigated, I am requesting a weekly Status Report from the on site Archeological field personnel on any additional findings of our ancestral artifacts should a Amah Mutsun Tribal Band monitor not be present. Please be advised that Postings about these human remains through any and all forms of social media are unacceptable and therefore are prohibited. No photographs or video recording are allowed of our ancestral remains by the Construction Crew, anyone working at the site, or visiting the site, unless prior approval has been given by the MLD or Tribal Monitor. Lastly, I am requesting a response in writing on how work will proceed at the site, along with an updated treatment/mitigation plan. It is not our intention to hold up the progress of work at this site, we are available to begin burial recovery as soon as we are cleared to enter the site and with an approved budget.

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amtbinc21@gmail.com or amahmutsuntribal@gmail.com
650-851-7489

Amah Mutsun Tribal Band of Mission San Juan Bautista

We are available to begin Monitoring work as soon as a schedule is made available to us. Should the Client or Archaeologists have any questions, please feel free to contact me.

Sincerely,

Irenne Zwierlein

Tribal Chief of the Amah Mutsun Tribal Band of Mission San Juan Bautista

MLD

Tribal Chairwoman of the Amah Mutsun Tribal Band of Mission San Juan Bautista

3030 Soda Bay Road Lakeport, CA 95453
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Native American Heritage Commission

NATIVE AMERICAN HERITAGE COMMISSION

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NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

February 27, 2025

Matthew McCluney
The Board of Trustees of the California State University on behalf of CSUMB
100 Campus Center
Seaside CA 93955

Re: 2025021013 California State University Monterey Bay Stadium Expanded Use Project, Monterey County

Dear Mr. McCluney:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).

2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.

3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).

4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:

- **a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
- **b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:

- **a.** If part or all of the APE has been previously surveyed for cultural resources.
- **b.** If any known cultural resources have already been recorded on or adjacent to the APE.
- **c.** If the probability is low, moderate, or high that cultural resources are located in the APE.
- **d.** If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- **a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse

Salinan Tribe

-----Original Message-----
From: info@salinantribe.com <info@salinantribe.com>
Sent: Wednesday, March 19, 2025 1:51 PM
To: Erin Harwayne <eharwayne@ddaplanning.com>
Subject: Re: Notice of Preparation of an EIR and Notice of Public Scoping Meeting for the CSUMB Stadium Expanded Use Project

Greetings Erin, we defer our comments to the local Esleen Tribe.

Xayatspanikan,
Patti Dunton, Tribal Administrator

Individual – Joe Fletcher

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

Concerts at CSUMB

5 messages

joe fletcher <joefletch@mac.com> Wed, Mar 12, 2025 at 5:57 PM
To: mmccluney@csumb.edu

Hi Matthew,

Thank you for the presentation today. I would be excited to speak to you about bringing concerts and festivals to CSUMB and your soccer stadium.
I met with the soccer team when they first came to town and they were concerned about the playing field so asked me to check back once they sorted that out.

I have produced over 2,000 concerts on 4 continents including a sold out concert last week with Lyle Lovett at the Sunset Center in Carmel.

I began producing concerts in 1989 and have produced concerts and festivals around the world with top names in contemporary music including:
Eminem, Keith Urban, Pink, Elton John, Beyonce, Maroon5, Rihanna, 50 Cent, Motley Crue, Jay Z, Bob Dylan, Snoop Dogg, The Roots, Jackson Browne, Paul Simon Van Halen, Ray Charles, Alison Krauss, James Brown, Ringo Starr and many others.

Locally I have done concerts at Laguna Seca, Monterey Fairgrounds, the Golden State Theater and the Sunset Center with artists including: Jackson Browne, Vince Gill, Ziggy Marley, Lyle Lovett, Graham Nash, Rickie Lee Jones and many others.

Highlights of his career include:

-Producing the largest festival in Western Africa with Beyonce, Snoop Dogg, Jay Z, Ciara, Missy Elliott and Busta Rhymes
-Producing the Tobago Jazz Festival with Elton John, Diana Ross, Mary J Blige, Sean Paul and Al Green and Earth, Wind & Fire
-Working with President Obama from 2007 to 2016 producing campaign events, fundraisers and concerts to support his campaign
-White House appointment to the Entertainment Advisory Council for President Obama bringing surrogate artists including Jack Johnson, John Legend, Michael Franti, Chris Cornell, Sheila E., Los Lobos and others
-Selected by Mayor Mike Bloomberg to act as Regional Director for the Central Coast to run his 2020 presidential campaign
-Selected as Finance Director for Jimmy Panetta for Congress working to get Panetta elected and overseeing all campaign events and fundraisers
-Working for President Biden to produce fundraisers and bring in high level support for his campaign
-Producing events for Tom Steyer, Sheryl Sandberg, Larry Ellison, Mike Bloomberg, Gabby Giffords, President Obama, Vice President Kamala Harris and President Biden

Please let me know when a good time would be to meet to discuss bringing concerts to your facility.

Thank you,

Joe

Joe Fletcher
831 760-6270
joefletch@icloud.com
https://www.linkedin.com/in/joefletcher9/
https://rocktorecovery.org/joe-fletcher/

Individual – Leslie Asher

California State University
MONTEREY BAY

Matthew McCluney <mmccluney@csumb.edu>

CSUMB stadium expansion: traffic?

5 messages

Leslie Asher <LESLIEASHER@outlook.com> Thu, Mar 13, 2025 at 8:17 AM
To: "mmccluney@csumb.edu" <mmccluney@csumb.edu>
Cc: "councilmember_visscher@cityofmarina.org" <councilmember_visscher@cityofmarina.org>, "bdelgado62@gmail.com" <bdelgado62@gmail.com>

To: Matthew S. McCluney, AICP

Director of Campus Planning & Development

100 Campus Center

Seaside, CA 93955

mmccluney@csumb.edu

cc: Liesbeth Visscher

Council Member

City of Marina

councilmember_visscher@cityofmarina.org

cc: Bruce Delgado

Mayor

City of Marina

bdelgado62@gmail.com

Hello, Matthew McCluney:

Thanks for inviting comments from the community regarding the idea of expanding Cardinale Stadium on the campus of Cal State University, Monterey Bay.

As a resident of the adjacent Dunes neighborhood, my question relates to traffic. In your view, would expanding the sports stadium suggest that 2nd Avenue should be widened to accommodate more vehicles?

This avenue currently seems to have only one car lane in each direction between around the intersections of 10th Street and Inter-Garrison Road.

Yet 2nd Avenue also seems to serve as the main entry and exit for both the stadium as well as for the busy and growing Dunes neighborhood, both its residential and commercial areas.

Thanks for your consideration.

Sincerely,

(Mr.) Leslie Asher

[redacted]

[redacted]

LeslieAsher@Outlook.com

Screen image below is from KSBW television, 11 p.m. news, Wed., Mar. 12, 2025.

Matthew McCluney <mmccluney@csumb.edu> Thu, Mar 13, 2025 at 11:25 AM
To: Leslie Asher <LESLIEASHER@outlook.com>

Leslie Asher,
Thank you for your comment. It has been included in the record.

Regards,
Matt

Matthew S. McCluney, AICP
Facilities Management - Campus Planning & Development
Director of Campus Planning & Development
Phone: 831-582-4721
Email: mmccluney@csumb.edu
csumb.edu/facilities

Appendix B
Field Lighting Impacts Report

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Glendale, CA 91203
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California State University Monterey Bay Stadium Expanded Use Project

Field Lighting Impacts

Project Number
USS-25007599-00

Prepared By:

Michael Schrupp

Date Submitted
7 August, 2025
Date Revised
13 July, 2026

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NARRATIVE

1 INTRODUCTION

We (exp engineering) conducted a review of the lighting at night on the surrounding areas for the CSUMB Stadium Expanded Use Project.This report details the findings of the study and provides our conclusions and recommendations if any modifications are needed to be made to the design.

2 PROJECT LOCATION

Cardinale Stadium is a part of the greater Otter Sports Complex located at the southwest corner of the CSUMB campus off General Jim Moore Blvd between Lightfighter Drive and Divartiy Street in the city of Seaside in Monterey County, CA. The site is approximately 1/2 mile east of Highway 1 and 4 miles north east of the city center.
See Figure 1, Project Site Location

3 2022 LIGHTING RENOVATION

As part of the 2022 Cardinale stadium renovation, the field lighting was upgraded with new poles and luminaires.
The new layout consisted of four new 90’ tall high-mast poles, one at each corner of the stadium, each containing 46 LED flood lights aimed at the field surface below. The luminaires are all aimed at various positions on the playing field with the furthest and shallowest aiming angle being roughly 65° to the center of the field to the closest and steepest aiming angle being roughly 20°. *See Figure 3, Field Lighting Photometry*
The luminaires have glare shields on the front of the fixture to mitigate direct view of the LEDs.
Lower level, pedestrian-scale luminaires were added as a part of this renovation and temporary lighting was brought in to cove the parking lot areas during evening events.

4 2025 STADIUM EXPANDED USE PROJECT

The proposed expansion to the stadium facility consists of two new locker room and shower facilities (1,400 sf each), two new permanent restroom facilities (1,000 sf each), and a new storage and staging area (1.25 acre fenced-in area without permanent structures).
Only the new locker rooms and restrooms will have new lighting associated with them. No new lighting is being proposed for the stadium. Temporary “show” lighting may be brought in for specialty events that warrant the use of theatrical lights, such as evening concerts or festivals. These lights would be mounted

from temporary positions at the field level and would be obscured from public view by the stadium itself.

5 EXPANDED EVENING USE

The proposed facility expansion will allow for the addition of more hosted events throughout the year and would increase the number of evenings the stadium would be active.
The CCAA and NCAA would be able to host additional soccer events (12 events over 14 days), with evening tournaments occurring in the late fall (November), necessitating use of the lights.
The University plans to add an additional 32 non-athletic events to the stadium's calendar, with the quantity of those events happening in the evening to be determined.
The Monterey Bay Football Club (which consists of one team currently with plans to expand to as many as three more) practices and plays at the facility year-round, with the majority of matches played on Saturday evenings and the lighting system activated from 30 mins prior to sunset to roughly 1am (for post-game cleaning). Although rare, the occasional evening practice would also necessitate the field to be illuminated. Additionally, Monterey Bay Football Club would also host 21 non-athletic events over 88 days with several running into the evening, utilizing the lights.
This expanded use of the facility for evening events could also include the need for additional, supplemental lighting, including but not limited to, temporary parking lighting and theatrical show lighting for stage performances.

6 SITE CONSIDERATIONS

CSUMB is located on the site of the former military base Fort Ord with the Otter Sports Complex and Cardinale Stadium isolated in the southwest corner of the campus. Most of the former base structures have been demolished leaving wide swaths of land between the stadium and community structures.
The closest building to the site is the Veteran's Administration building, a medical office complex located on a small hill above the stadium, roughly 580' from the closest light tower. However, this office complex is no longer in operation.
The closest campus residences are approximately 1,800 feet northeast of the site, and the site is not visible from this location due to topography and vegetation. The closest off-campus residential communities are located roughly .51 miles south and .7 miles to the north. The closer, southern community is bordered by large, dense canopy trees obstructing the views to the north, while several homes in the community to the north (in the city of Marina) have a distant view of the stadium's light stations. It is worth noting that these homes were built after the 2022 stadium renovation.
<u>There are new residential communities near the stadium currently in development with phased construction</u>

to be completed by the end of 2027. The Dunes development is roughly .5 miles to the northwest of the stadium. The edge of the Main Gate development will be 1,300' directly to the west of the stadium, with the new courthouse complex 2,000 feet away, just above that. The closest point of the new Campus Town development will sit roughly 1,100 feet south of the stadium.

Any view from US Highway 1 to the sports complex and the stadium from highway traffic is obscured by groves of tall trees.

The stadium itself sits several feet below grade, with the new high-mast poles mounting at that lower field level making the top of those poles roughly the same height as the existing poles around the adjacent baseball field to the south and soccer fields to the southwest.

The stadium's proximity to the coastline does expose it to fog conditions, which results in extensive illumination fields created by the light towers. As the light passes through the moisture in the air, the light is reflected and refracted, creating a bright hemisphere of illumination.

7 CODES AND REGULATIONS

This section describes regulatory plans, policies, and ordinances related to lighting on the CSUMB campus or within the surrounding City of Seaside. As indicated in the following text, the California State University (CSU) does not have specific lighting policies or guidelines directing appropriate light levels (and spillover) from sports field or stadium lighting. As a result, although CSU as a state entity is not subject to local land use regulations, the City of Seaside's General Plan, the City's Municipal Zoning Code, and the guidelines in CSU Outdoor Lighting Design Guide were reviewed to provide parameters for the analysis of light impacts resulting from the proposed outdoor lighting.

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/ CALGreen).

Sports field lighting is not specifically addressed in this document.

California Title 24

The California Lighting Technology Center's 2022 Outdoor Lighting Guide for Title 24, Part 6, compliance is designed to help builders, lighting industry professionals, and others 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

uplight 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 (CALGreen)

The California Green Buildings Standards (2019), a subsection of California's Title 24 code (Part 11) includes regulations for backlight, uplight, and glare. If the nearest property line is less than or equal to two 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. These ratings are defined by Lighting Zones within the California Energy Code and California Administrative Code.

Seaside General Plan

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

<u>Implementation Plan UD-2.2.1 Restrict Light and Noise Impacts</u>

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.

<u>Implementation Plan COS-8.1.2 Design Guidelines for Exterior Light Sources.</u>

The City shall develop design guidelines that re-quire wherever possible that exterior light sources be controlled and/or shielded to the 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'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:

<u>Maximum height</u>. 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 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 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.

8 CODE ANALYSIS

The current stadium site, while isolated from the majority of public buildings, contributes to the urban nighttime lighting around the immediate area. Artificial light sources found on site and in the surrounding area include existing interior and exterior lighting at the Field House, high-mast sports lighting at the baseball and soccer fields and outdoor aquatic center adjacent to the site, parking lot lighting, light along the adjacent walkways and streets, and illuminated automobile headlights.

The stadium's four energy-efficient lighting poles, with a mounting height of 90 feet and 46 luminaries on each pole are the primary sources of light for the field, while other newly installed lighting (as part of the previous renovation), including pedestrian-scale decorative poles, support the surrounding vicinity. All lighting was implemented with Dark Sky-compliant LED fixtures with the sports lighting mounted at a fixed tilt based upon calculated aiming angles. The field poles are mounted at the perimeter corners of the facility to focus light directly on the field and away from neighboring receptors. These lights are turned on at full output at dusk when needed for practice or games and is switched off after the events with exact times being determined by the duration of the usage.

The new lighting being proposed for the expanded use, exclusive to the restrooms and locker rooms, will meet all Title 24 standards for energy efficiency and control. Temporary event lighting is exempt from state and local lighting codes.

The facility and upgraded lighting was designed to comply with the CSU *Outdoor Lighting Design Guide* to ensure a comfortable nighttime environment, maximize energy efficiency, reduce light pollution, reduce glare, and improve campus aesthetics. The guide contains CSU lighting design goals and strategies, lighting control strategies and methods throughout the campuses, and the mandated use of LED sources on new luminaires for energy efficiency and ease of maintenance. The guide includes goals pertaining to compliance with local codes, assurance of good nighttime visibility, low maintenance of lighting, energy efficiency, reduced light pollution, and integration into the overall campus aesthetic. As previously noted, sports field lighting is not specifically addressed in this document. Lighting design strategies are provided in the guide to aid in implementation of established lighting goals. Lighting design strategies are oriented toward creating vertical surface brightness, enhancing navigation, minimizing glare, maintaining lighting uniformity, and providing appropriate lighting levels (CSU 2018). The current lighting and operational schedule ensures that the field is illuminated as efficiently as possible and that campus uniformity is maintained in the project vicinity.

Although CSUMB is not subject to the City's ordinances or regulations, the facility is operated with consideration and compliance with several regulations and restrictions for outdoor lighting.

The City's Municipal Code (2021) states that 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. It further states that 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 by ensuring that the light source is not visible from off the site and confining glare and reflections within the site to the maximum extent feasible. The design of the field lighting considers all available methods for reducing lighting spillover and glare. The field lighting poles are arranged to focus the light directly on the field. The energy-efficient luminaires would be at a mounting height of 90 feet, mitigating the direct glare in the pedestrian views within the immediate vicinity. The luminaires in this system have a fixed downward angel to prohibit upward spill of the light and the fixtures faces are shielded with a 20" long shield making the system Dark-Sky compliant.

The City's Municipal Code (2021) also states that, to the extent applicable, outdoor lighting should be in compliance with the California Energy Code and Green Building Regulations (CALGreen0. CALGreen stipulates that all luminaires must meet the mandated BUG (Backlight/Uplight/Glare) ratings per their designated lighting zone unless otherwise exempt by Section 140.7 of the California Energy Code (Title 24) of which *Lighting for sports and athletic fields* is exemption number 4. However, despite being exempt, as shown

in *Figure 5, Sky Glow Study*, the calculations show that the installation does not produce any direct illumination at 120' or above the ground.

The City's Municipal Code (2021) states that all lighting shall direct, shield, and control light to keep it from falling onto surrounding properties, and no direct-beam illumination shall leave the premises. As shown in *Figure 2, Distance to Nearest Sensitive Receptors*, the closest campus residences are more than 1,800 feet (.34 miles) northeast of the site, while the closest private residential neighborhood is located approximately ½ mile south of the site. In addition, the proposed residential areas within the approved Campus Town Specific Plan Project, located south of Lightfighter Drive in the City of Seaside, are located over 950 feet from the nearest lighting pole. And as shown in Figure *4, Light Spill Summary,* at 250' from the stadium (pole locations), there would be little to no spillover light. Therefore, the gross majority of the light would be directed to the field and would be shielded from all surrounding sensitive receptors.

The stadium's lighting is one element among many others in the general area, and since the facility complies with applicable outdoor lighting guidelines and policies and produces minimal spillover, the current light and glare is not substantial for and public viewers at night.

9 Conclusion

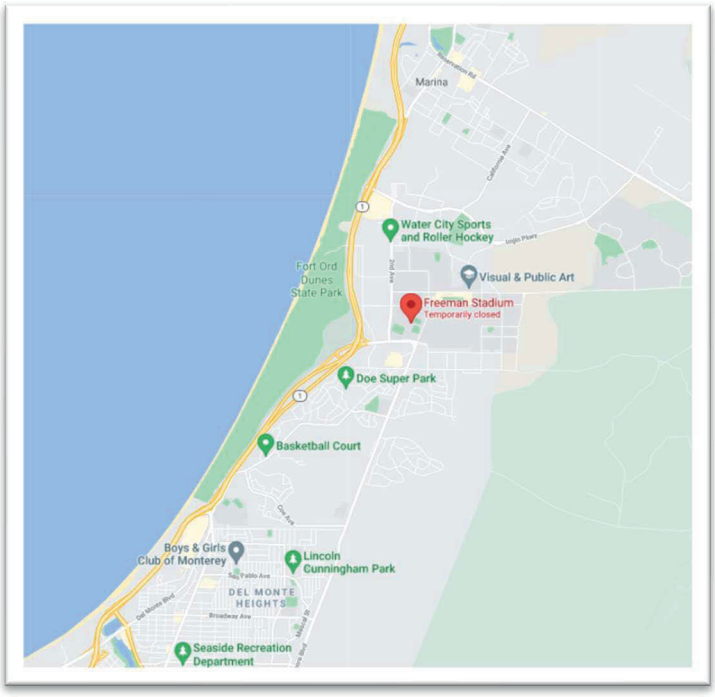
EXP has reviewed all the University, State, and local outdoor lighting codes, ordinances, and recommendations as they pertain to the proposed expansion of the Cardinale Stadium.
We find that none of the existing luminaires emit light beyond the immediate site, nor do they contribute to any upward light pollution.
This expansion, including the new lighting being added to for the new restroom and locker room facilities, will allow for more evening use and more hours that the light towers will be active. However, given <u>that the stadium itself sits several feet below grade, the high-mast poles are mounted at that lower field level making the top of those poles roughly the same height as the existing poles around the adjacent baseball field to the south and soccer fields to the southwest. These facilities are already illuminated nearly every evening, therefor we do not find the additional use of the stadium lighting to have any more impact to the current community, nor to the new residential developments listed in section 6, than it already does.</u> Nor will the addition of any temporary stage lighting added for special events be of consequence as this light is contained within the stadium and is not visible to those outside the venue.
Per the visibility of the light in fog conditions, we do not find this to be a considerable environmental concern as the adjacent residential units would also be engrossed in the same fog and too far from the field for the brighter hemisphere of light to be seen.

*This report, prepared by **exp** Services Inc., is intended for the exclusive use of the California State University Monterey Bay, Monterey FC, and Denise Duffy & Associates. Neither **exp** Services Inc the California State University Monterey Bay, Monterey FC, and Denise Duffy & Associates assume any liability for the use of this report, or for the use of any information disclosed in the report, or for damages resulting from the use of this report, by other parties.*

Appendix

Foot-candle Level Graphic Sheets

***Figure 1**, Project Site Location*



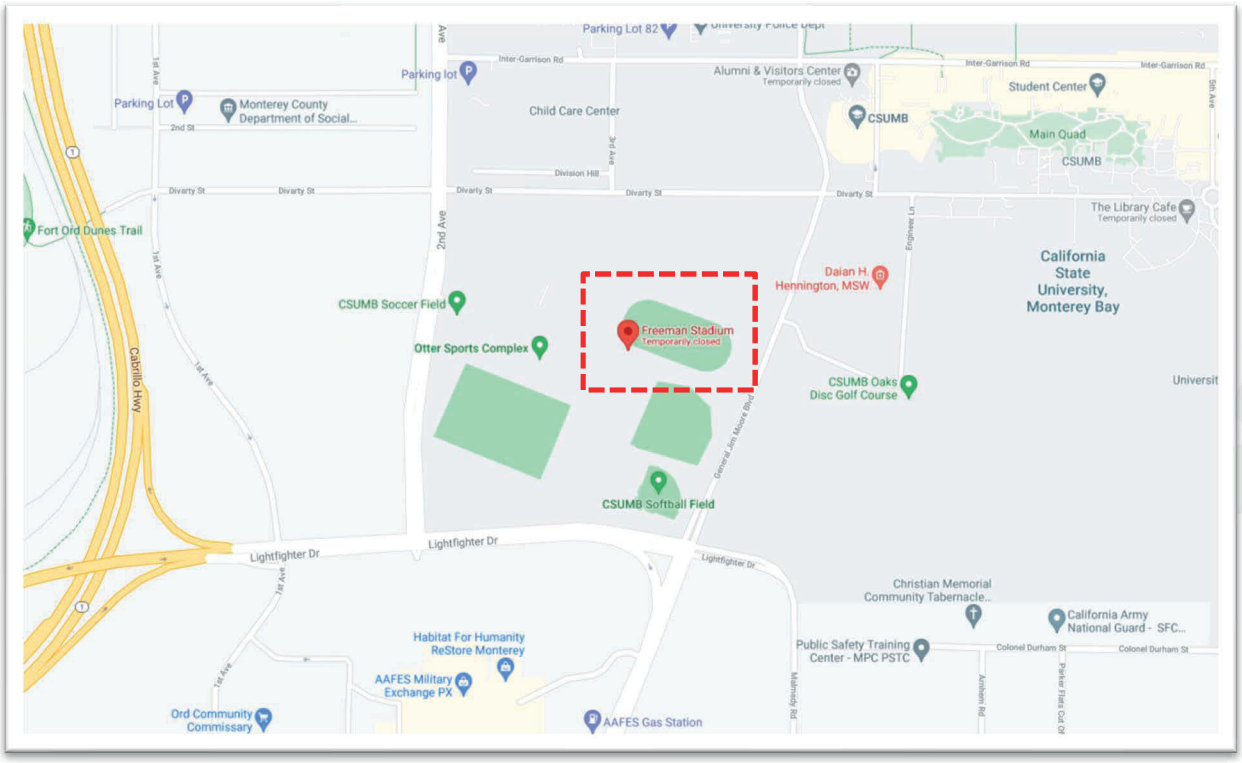


***Figure 2**, Distance to Nearest Sensitive Receptors*

***Figure 3**, Current Field Lighting*

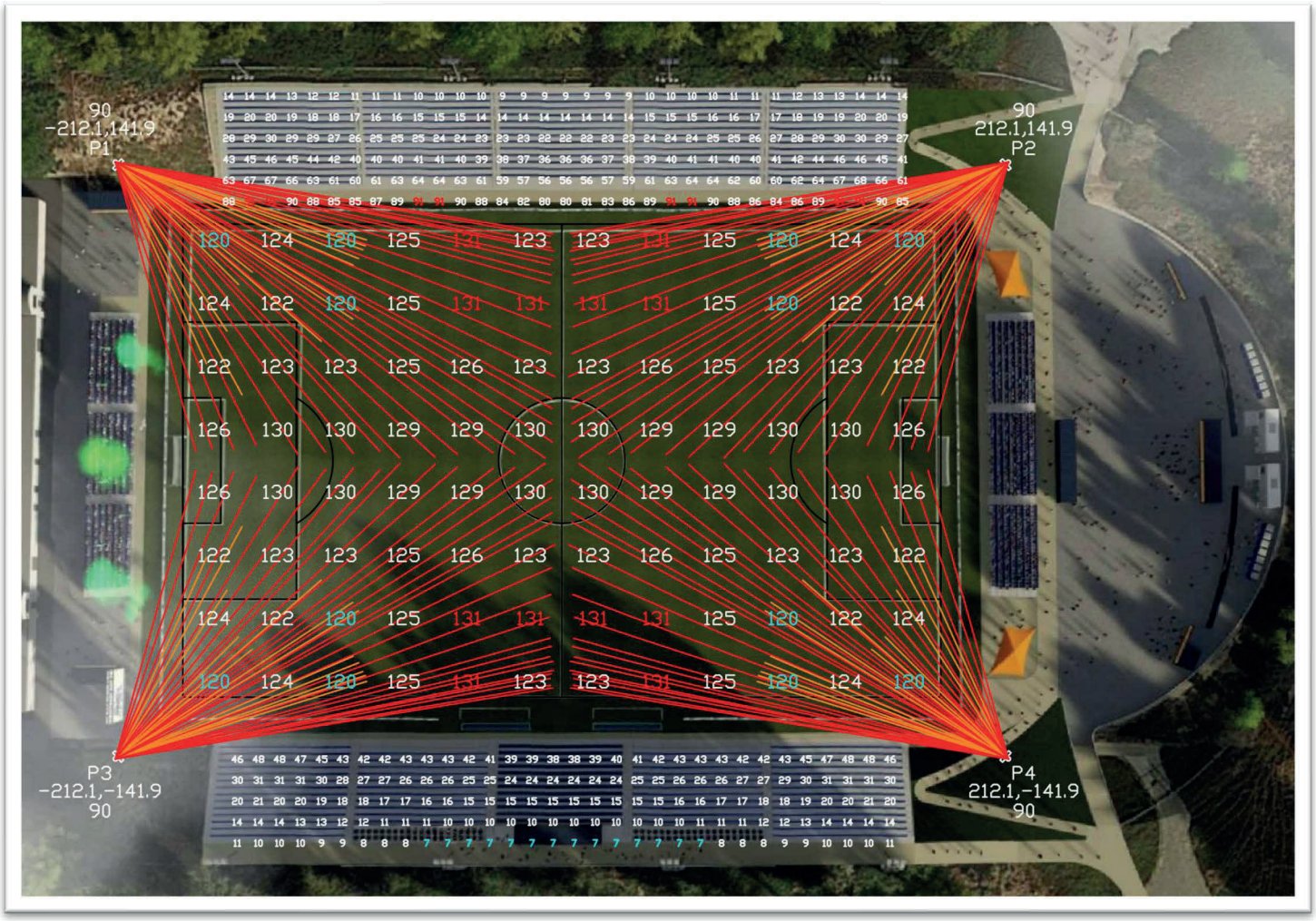
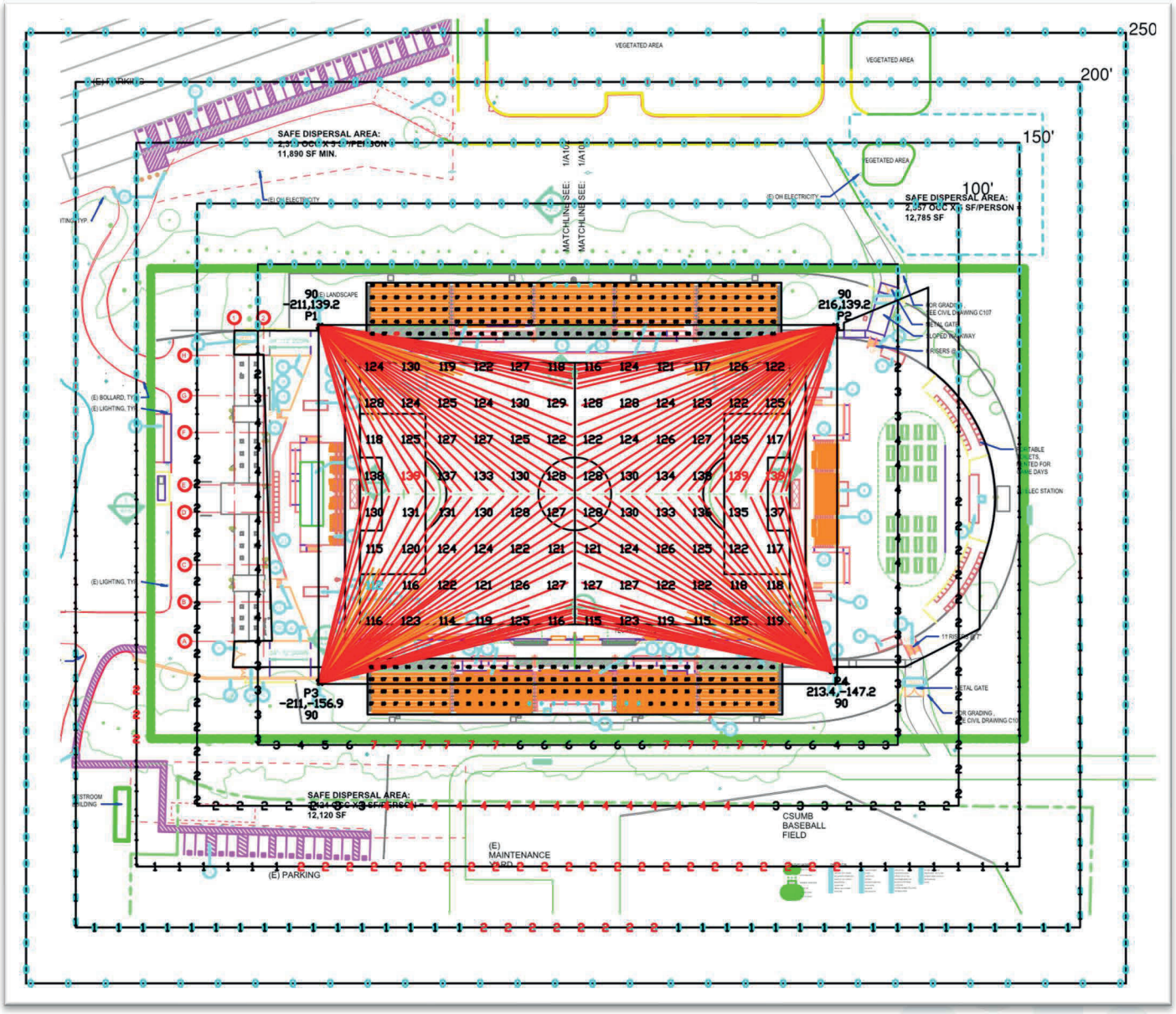


***Figure 4**, Light Spill Summary*



CACL @50'	
92 points	
VERTICAL FOOTCANDLES	
Average	3
Maximum	7
Minimum	0

CALC @100'	
112 points	
VERTICAL FOOTCANDLES	
Average	1
Maximum	4
Minimum	0

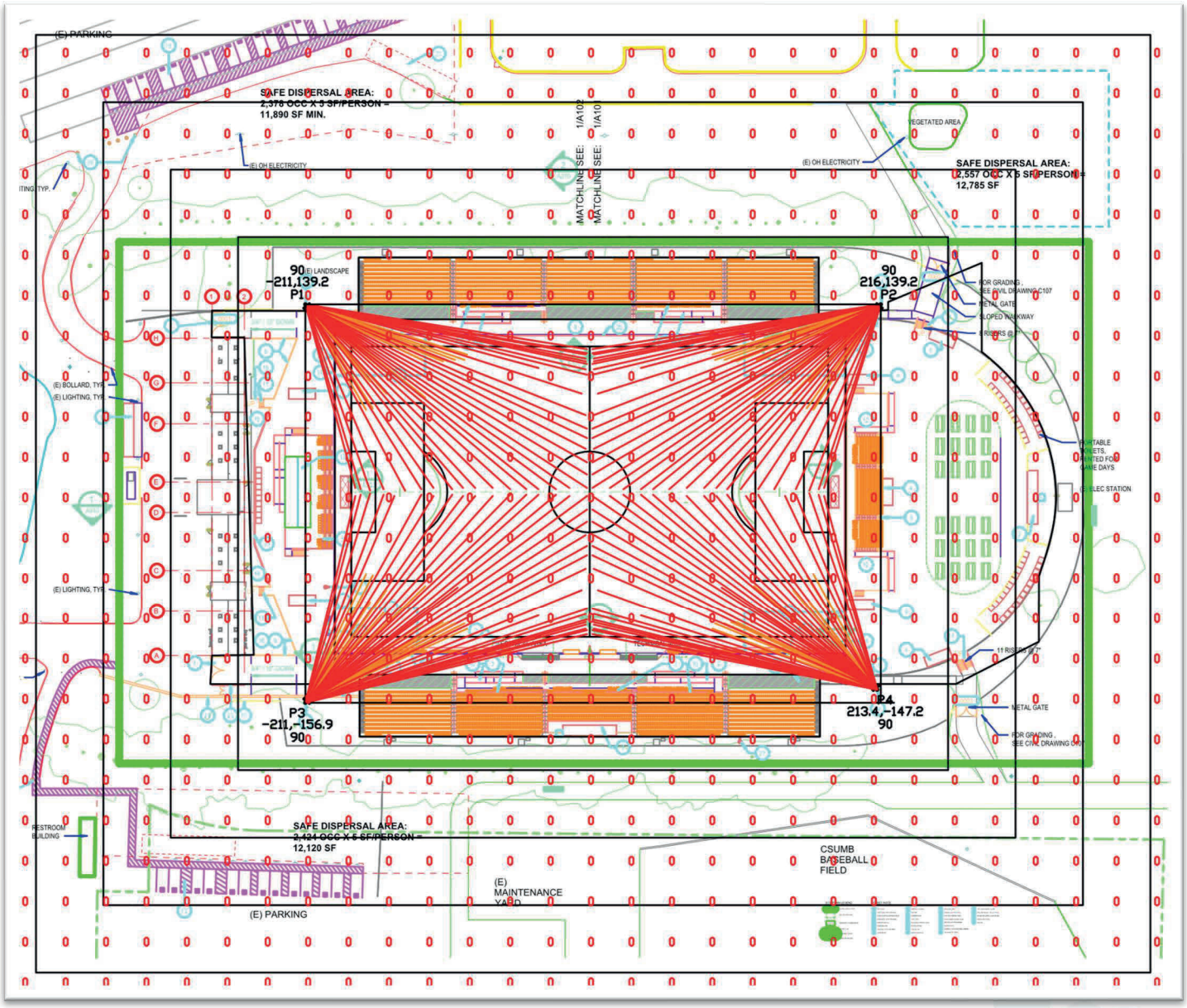
CALC @150'	
132 points	
VERTICAL FOOTCANDLES	
Average	1
Maximum	2
Minimum	0

CALC @200'
152 points

	A	B
Average	0	1
Maximum	1	2
Minimum	0	0

A HORIZONTAL FOOTCANDLES
B VERTICAL FOOTCANDLES.

***Figure 5**, Sky Glow Study*



SKY GLOW @120'
696 points at z=120, sp 30ft by 30ft
FOOTCANDLES perpendicular to surface

Average	0
Maximum	0
Minimum	0

***Figure 6**, Field Lighting Luminaire*

Appendix C
Air Quality and Greenhouse Gas Analysis

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75 Higuera Street, Suite 105
San Luis Obispo, CA 93401
805.226.2727
www.Ambient.Consulting

EMISSIONS MODELING REPORT

Date:	March 24, 2026
To:	Denise Duffy & Associates, Inc.
From:	Kurt Legleiter, Principal
Project:	California State University Monterey Bay Stadium Expanded Use Project
Subject:	Emissions Modeling Report

This memorandum provides a summary of the emissions modeling conducted for the proposed California State University Monterey Bay (CSUMB) Stadium Expanded Use Project (proposed project). This memorandum does not provide an analysis of air quality or greenhouse gas (GHG) impacts. Emissions modeling output files are included as an appendix to this memorandum.

Project Description

The proposed project consists of two (2) components: 1) an expansion of use of the CSUMB Stadium by the Monterey Bay Football Club (MBFC) and CSUMB; and 2) the construction and operation of two (2) new Locker Room facilities in the existing field house, two (2) new restroom buildings, and a gated event staging area just north of the Stadium. The project's regional and local location are depicted in Figures 1 and Figure 2, respectively. The project's site plan is depicted in Figure 3.

Expansion of Use

California State University, Monterey Bay

CSUMB's support of its academic mission, fostering of cultural enrichment, and enhancing of community engagement is intended to be implemented through proposed plans to host a diverse range of campus events at the Stadium. The proposed project would expand CSUMB's program of Stadium uses to include hosting 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 1). 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)-14 hours per day depending on their specific role.

Figure 1. Project Regional Location

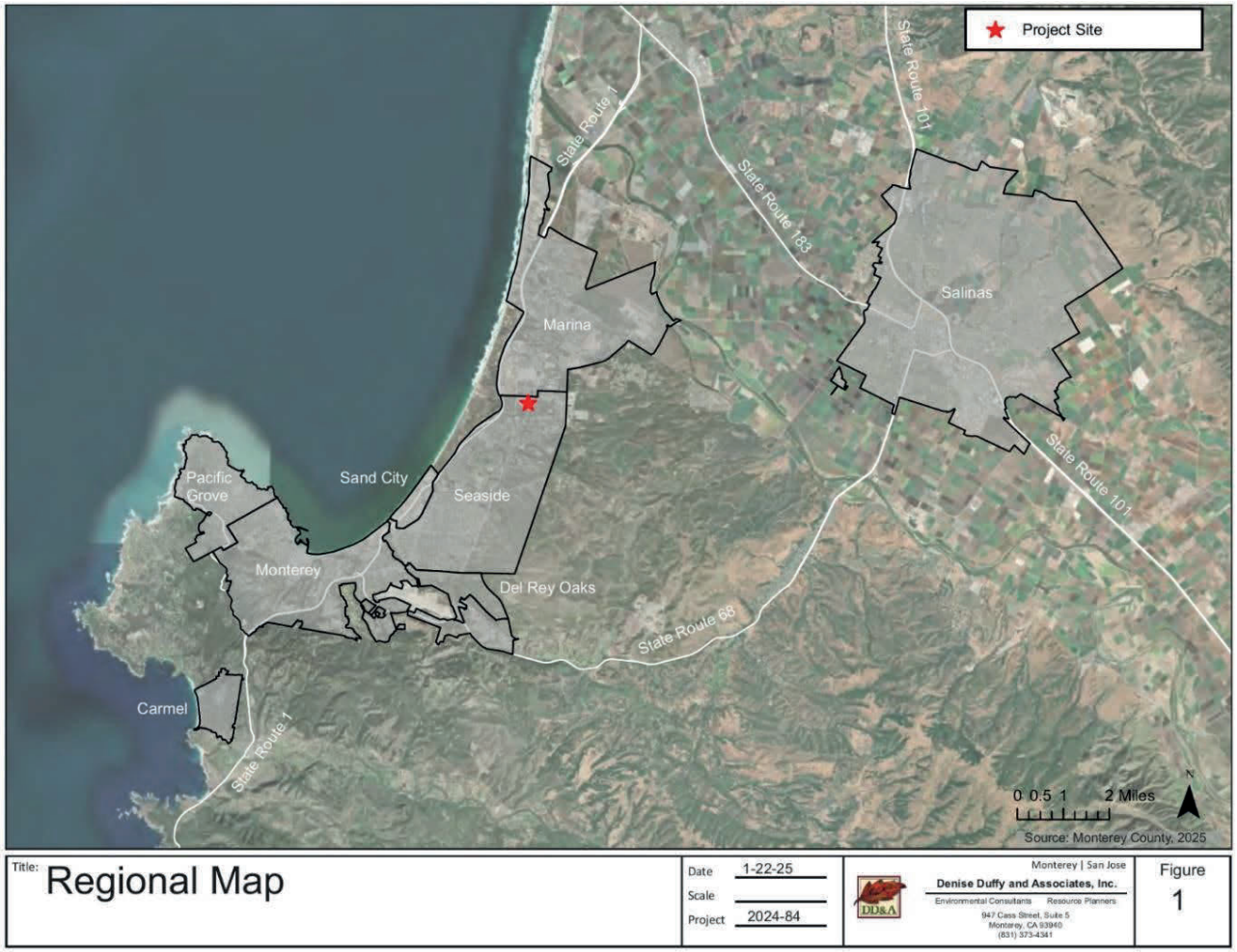

Figure 2. Project Location

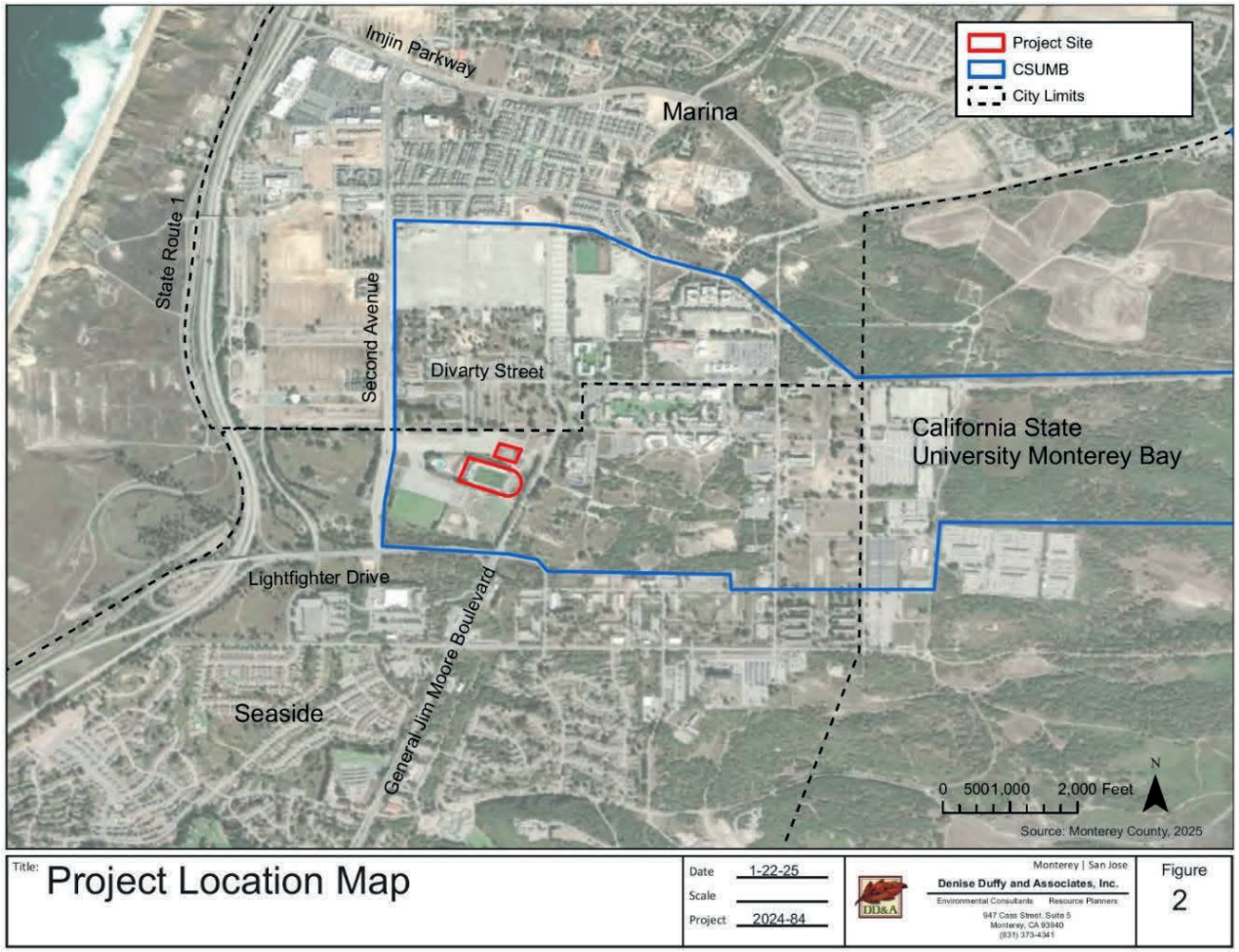

Figure 3. Project Site Plan

Table 1. CSUMB Athletic Events

Team	Matches	Attendance	Players	Staff[1]
Men's CCAA Championships	3 events, 2 days	300 spectators	120	36.0
Women's CCAA Championships	3 events, 2 days	300 spectators	120	36.0
Men's NCAA Division II National Championships	3 events, 5 days	400 spectators	120	40.0
Women's NCAA Division II National Championships	3 events, 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 events, new student fall Convocation, Otter Cross Cultural Center (OC3) affinity celebration, fall welcome concerts, a spring concert, and the Relay for Life. each of 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 2). Lastly, CSUMB would host up to 25 other university-related events, each assumed to have 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 each person's specific role and the event.

Table 2. CSUMB 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

[1]10.5 hours is the maximum number of hours event staff is expected to work. The majority of staff members would work approximately three (3) hours with approximately 10 staff members working 10.5 hours.

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). The addition of three (3) new teams would introduce 69 new players and 16 new coaching and training staff. 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. Monterey Bay Football Club Athletic Events

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

New Facilities

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

1. **Men's & Women's Locker Room and Shower Facilities.** Two permanent 1,400-sf locker room facilities will be constructed. One facility will replace the existing portable showers utilized by the men's team and will be built at the stadium entrance to the northwest of the field house. Another facility will be constructed to accommodate the women's teams and will be built to the southwest of the field house.
2. **Permanent Restroom Facilities.** Two permanent restroom buildings, each approximately 1,000 sf, will be constructed within the existing beer garden area to replace the 3,000-sf and approximately 36 portable facilities currently in use.
3. **Storage and Staging Area.** A new 1.25-acre dedicated storage and staging area will be established north of the stadium to support event operations, equipment storage, and logistical needs. No permanent construction of structures besides fencing is planned for this site. Shipping containers may be moved into the staging area 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. The only new exterior lighting would be associated with the new locker room and restroom facilities. However, temporary lighting may be necessary for non-athletic events, such as concerts. Temporary lighting may include, but are not limited to, LED stage lighting and portable light towers.

Access and Parking

There are two (2) existing parking lots at the Stadium: one 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. Perimeter fencing will be continued along the parking egress points to the stadium to improve access management.

Utilities

Potable Water

Currently, the CSUMB Stadium requires approximately 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.

Potable water would be supplied by connecting to or utilizing existing water supply infrastructure on campus, specifically that already in place to supply the field house. Construction of the locker rooms will require approximately 350 linear feet of new water and sanitary sewer pipelines. The proposed 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 approximately 0.47 AFY of wastewater. The proposed project would generate approximately 8.45 AFY[1] of wastewater. The proposed utilities would connect to existing wastewater pipelines.

Solid Waste

Currently, the CSUMB Stadium generates .25 tons per year of solid waste.[2] The proposed project would generate approximately 27 tons of solid waste per year.

Fire Suppression

Fire suppression systems are fed by the same water supply systems, and installation to new facilities would utilize the existing connections. The new restroom and locker room facilities will be built with fire sprinklers as required by the California Building Code. No new hydrants are proposed as part of the project.

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[1] Estimate based on Marina Coast Water District billing and metering practice of duplicating the potable volume to result in sewer volume.

[2] Solid waste generated by the existing stadium use is based on CalEEMod modeling prepared for the previous environmental analysis prepared for the 2021 Freeman Stadium Facilities Renovations Project (State Clearinghouse # 2021070153).

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)-14 hours per day depending on their specific role.

CSUMB would hold up to 31 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 will 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.

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 US 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 up to 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.

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 1.35 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 will be separated and hauled off site. Waste and recycling dumpster weight tags would be provided to CSUMB's construction project manager and compliant with the LEED Construction Waste Management Plan, and State waste and recycling requirements.

AIR QUALITY AND GREENHOUSE GAS QUANTIFICATION METHODOLOGY

Short-term Construction

Short-term construction emissions associated with the proposed project were calculated using the California Emission Estimator Model (CalEEMod), version 2022.1.1.37, computer program. Emissions were quantified for site preparation, building construction, paving, and architectural coating phases. Emissions modeling was conducted based on default construction phasing schedules, off-road equipment use, and equipment usage rates identified in CalEEMod. Construction was estimated to occur over an estimated 9-month period. Total acreage of disturbance was estimated to be 1.35 acres, including 0.1 acres for stadium renovations and 1.25 acres for the staging and storage area. Assuming an average thickness of four inches, existing asphalt to be removed would equate to roughly 60 cubic yards of material. Assuming an average haul truck capacity of 18 cubic yards per truck, the removal of the existing asphalt was assumed to require approximately eight one-way haul truck trips. All other construction vehicle trips (e.g., worker, vendor, and haul truck trips) and trip lengths were based on default CalEEMod assumptions for Monterey County. On-road mobile-source emissions derived from CalEEMod were adjusted to include EmFac2021 off-model adjustment factors for criteria pollutants and GHGs.[3] The off-model adjustment factors vary depending on various factors, including vehicle classification and fuel type. To be conservative, the highest off-model adjustment factors identified by applicable vehicle classifications and fuel types were applied. Construction modeling assumptions are summarized in Table 5. Emissions modeling files are included in Appendix A.

[3] California Air Resources Board. 2025. *EMFAC2021 Off-Model Adjustment Factors to Remove the Impact of Advanced Clean Trucks, Zero-Emission Airport Shuttle, Heavy-Duty Omnibus and Warranty Phase I Regulations*. Website url: https://ww2.arb.ca.gov/our-work/programs/msei/emfac2021-model-and-documentation.

Table 5. Summary of Construction Modeling Assumptions

Construction Start Date:	April 1, 2026
Construction End Date:	December 31, 2026
Total Project Area:	1.35 acres (.1 for the stadium renovations, 1.25 for the staging and storage area)
Total Asphalt Area :	0.1 acres
Off-Road Equipment	
Site Preparation & Grading:	1 Grader, 2 Tractor/Loader/Backhoe, 1 Dozer
Construction:	1 Crane, 1 Forklift, 1 Tractor/Loader/Backhoe, 1 Generator, 3 Welders
Paving:	1 Tractor/Loader/Backhoe, 1 Paver, Paving Equipment, 1 Roller, 1 Cement/Mortar Mixer
Architectural Coating:	1 Air Compressor
Daily Worker Trips	
Site Preparation & Grading:	10
Construction:	20
Paving:	12.5
Architectural Coating;	4
Haul Truck Trips	
Site Preparation & Grading:	8
Construction:	2
Off-road equipment use and construction vehicle trips based on CalEEMod defaults for Monterey County. Haul truck trips for site preparation and grading phase include estimated number of trips for removal of existing asphalt surface.	

Long-term Operations

Long-term operational emissions were calculated using the CalEEMod, version 2022.1.1.37, computer program, based on an initial operational year of 2027. Emissions modeling assumed the construction of 4,800 square feet of building area, to include the proposed locker rooms and restroom facilities. Energy-use requirements were based on model defaults. The project is not anticipated to result in increased landscape maintenance and, therefore, landscape maintenance was not included the modeling. Mobile-source emissions were calculated based on estimated daily and annual vehicle miles traveled, derived from the traffic analysis prepared for this project. Mobile-source emissions derived from CalEEMod were adjusted to include EmFac2021 off-model adjustment factors for criteria pollutants and GHGs.[3] As noted above, the off-model adjustment factors vary depending on various factors, including vehicle classification and fuel type. To be conservative, the highest off-model adjustment factors identified for all vehicle classifications and fuel types were applied. Emissions modeling files are included in Appendix A.

SUMMARY OF EMISSIONS MODELING RESULTS

Short-Term Construction

Criteria Air Pollutants

Construction generated emissions are summarized in Table 6. As noted in Table 6, the highest daily emissions would typically occur during the initial site preparation and grading phase. Emissions of ROG would be highest during the architectural coating phase. Assuming that all construction activities were to occur simultaneously on any given day, maximum daily emissions would total approximately 5.8 lbs/day of ROG, 27.9 lbs/day of NO_x, 33.9 lbs/day of CO, 0.1 lbs/day of SO_2, 8.7 lbs/day of PM_{10}, and 4.6 lbs/day of $PM_{2.5}$.

GHG Emissions

As shown in Table 7, the maximum annual construction-generated GHG emissions without emission-control measures would be approximately 204 $MTCO_2e$/year. As depicted, a majority of the emissions would be associated with the operation of on-site off-road construction equipment and on-road mobile sources.

Long-Term Operations

Criteria Air Pollutants

Daily operational emissions of criteria air pollutants for opening year conditions are summarized in Table 8. As shown in Table 8, the proposed project would result in maximum daily emissions of approximately 1.7 lbs/day of ROG, 6.5 lbs/day of NO_X, 37.3 lbs/day of CO, 0.1 lbs/day of SO_2, 11.6 lbs/day of PM_{10}, and 3.0 lbs/day of $PM_{2.5}$. A majority of the emissions would be associated with the operation of on-road mobile sources.

GHG Emissions

Annual GHG emissions for opening year conditions are summarized in Table 9. As shown in Table 9, operational-generated GHG emissions for the proposed project would total approximately 2,204.7 $MTCO_2e$/year. A majority of the emissions would be associated with the operation of on-road mobile sources.

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Table 6. Summary of Daily Construction Emissions

CONSTRUCTION PHASE	ROG	NOx	CO	SO_2	$PM_{10}E$	$PM_{10}D$	$PM_{10}T$	$PM_{2.5}E$	$PM_{2.5}D$	$PM_{2.5}T$
Site Preparation										
On-Site	1.4	12.9	14.0	0.0	0.6	7.1	7.7	0.5	3.4	4.0
Off-Site	0.1	0.8	0.7	0.0	0.0	0.2	0.2	0.0	0.1	0.1
Total	1.5	13.7	14.7	0.0	0.6	7.3	7.9	0.5	3.5	4.0
Construction										
On-Site	1.0	8.6	10.0	<0.1	0.3	0.0	0.3	0.3	0.0	0.3
Off-Site	0.1	0.3	0.9	0.0	0.0	0.2	0.2	0.0	0.0	0.0
Total	1.1	8.9	10.9	0.0	0.3	0.2	0.5	0.3	0.0	0.3
Paving										
On-Site	0.5	4.4	6.5	<0.1	0.2	0.0	0.2	0.2	0.0	0.2
Off-Site	0.1	0.0	0.5	0.0	0.0	0.1	0.1	0.0	0.0	0.0
Total	0.6	4.5	7.0	0.0	0.2	0.1	0.3	0.2	0.0	0.2
Architectural Coating										
On-Site	2.6	0.9	1.1	<0.1	<0.1	0.0	<0.1	<0.1	0.0	<0.1
Off-Site	<0.1	<0.1	0.2	0	0	<0.1	0.0	0	<0.1	0.0
Total	2.6	0.9	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TOTAL (All Phases)	**5.8**	**27.9**	**33.9**	**0.1**	**1.1**	**7.6**	**8.7**	**1.0**	**3.5**	**4.6**

ROG=Reactive Organic Compounds
NO_X=Oxides of Nitrogen
CO=Carbon Monoxide
SO_2=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
Totals may not sum due to rounding. Includes EmFac2001 off-model adjustment factors. To be conservative, the highest adjustment factors for applicable vehicle categories were applied. Estimated emissions do not include emissions-reduction measures. Daily emissions represent the highest emissions anticipated to occur during modeled winter or summer conditions, based on the default construction phasing identified in CalEEMod.

Table 7. Construction-Generated GHG Emissions

CONSTRUCTION PHASE	TONS/YEAR				
	CO_2T	CH_4	N_2O	REFRIGERANTS	$MTCO_2e$
Site Preparation					
On-Site	6.7	<0.1	<0.1	0	6.7
Off-Site	1.7	<0.1	<0.1	<0.1	1.8
Total	8.4	<0.1	<0.1	<0.1	8.5
Construction					
On-Site	160.9	<0.1	<0.1	0	161.5
Off-Site	26.0	<0.1	<0.1	<0.1	26.9
Total	186.9	<0.1	<0.1	<0.1	188.4
Paving					
On-Site	4.1	<0.1	<0.1	0	4.1
Off-Site	0.3	<0.1	<0.1	<0.1	0.4
Total	4.4	<0.1	<0.1	<0.1	4.5
Architectural Coating					
On-Site	2.3	<0.1	<0.1	0	2.3
Off-Site	0.5	<0.1	<0.1	<0.1	0.5
Total	2.8	<0.1	<0.1	<0.1	2.8
TOTAL (All Phases)	**202.5**	**<0.1**	**<0.1**	**<0.1**	**204.2**

GHG=Greenhouse Gas
CO_2=Carbon Dioxide
CH_4=Methane
N_2O=Nitrous Oxide
MT=Metric Tons
CO_2e=Carbon Dioxide Equivalent
Totals may not sum due to rounding. Includes EmFac2001 off-model adjustment factors. To be conservative, the highest adjustment factors for applicable vehicle categories were applied. Estimated emissions do not include emissions-reduction measures.CO_2e calculated based on global warming potential of individual GHG pollutants (e.g., CO_2=1; CH_4=25; N_2O=298)

Table 8. Summary of Daily Operational Emissions

SOURCE	DAILY EMISSIONS (LBS/DAY)									
	ROG	NOx	CO	SO_2	$PM_{10}E$	$PM_{10}D$	$PM_{10}T$	$PM_{2.5}E$	$PM_{2.5}D$	$PM_{2.5}T$
Summer										
Mobile	1.5	5.5	43.3	0.1	0.1	11.5	11.6	0.1	2.9	3.0
Area	0.1	0	0	0	0	0	0	0	0	0
Energy	<0.1	0.1	0.1	<0.1	<0.1	0	<0.1	<0.1	0	<0.1
Total	**1.6**	**5.6**	**43.4**	**0.1**	**0.1**	**11.5**	**11.6**	**0.1**	**2.9**	**3.0**
Winter										
Mobile	1.6	6.4	37.2	0.1	0.1	11.5	11.6	0.1	2.9	3.0
Area	0.1	0	0	0	0	0	0	0	0	0
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	0	<0.1	<0.1	0	<0.1
Total	**1.7**	**6.5**	**37.3**	**0.1**	**0.1**	**11.5**	**11.6**	**0.1**	**2.9**	**3.0**

ROG=Reactive Organic Compounds
NO_X=Oxides of Nitrogen
CO=Carbon Monoxide
SO_2=Sulfur Dioxide
$PM_{10}E/PM_{2.5}E$=Exhaust Particulate Matter/Fine Particulate Matter
$PM_{10}D/PM_{2.5}D$= Fugitive Dust Particulate Matter/Fine Particulate Matter
$PM_{10}T/PM_{2.5}T$= Total Particulate Matter/Fine Particulate Matter
Totals may not sum due to rounding. Includes EmFac2001 off-model adjustment factors. To be conservative, the highest adjustment factors for all vehicle categories and fuel types were applied.
Estimated emissions do not include emissions-reduction measures.

Table 9. Operational GHG Emissions

SOURCE	TONS/YEAR				
	CO_2	CH_4	N_2O	REFRIGERANTS	$MTCO_2e$
Mobile	2,114.6	0.1	0.1	3.3	2,143.8
Energy	15.2	<0.1	<0.1	0	15.3
Water	2.3	<0.1	<0.1	0	5.1
Waste	11.6	1.2	0	0	40.5
Refrigerants	0	0	0	<0.1	<0.1
Total	**2,143.6**	**1.3**	**0.1**	**3.3**	**2,204.7**

GHG=Greenhouse Gas
CO_2=Carbon Dioxide
CH_4=Methane
N_2O=Nitrous Oxide
MT=Metric Tons
CO_2e=Carbon Dioxide Equivalent
Totals may not sum due to rounding. Includes EmFac2001 off-model adjustment factors. To be conservative, the highest adjustment factors for all vehicle categories and fuel types were applied. Estimated emissions do not include emissions-reduction measures. CO_2e calculated based on global warming potential of individual GHG pollutants (e.g., CO_2=1; CH_4=25; N_2O=298)

APPENDIX A
Emissions Modeling

CSUMB Stadium Detailed Report

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6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

8.3. Land Use

8.4. Construction

8.4.1. Construction Phases

8.4.6. Trips and VMT

8.4.7. On-Road Fugitive Dust

8.5. Operations

8.5.1. Mobile Sources

8.5.1.4. Road Dust

8.5.2. Area Sources

8.5.2.2. Consumer Products

8.5.2.4. Landscape Equipment

8.5.4. Water and Waste Water

8.5.5. Solid Waste

8.6. Measure Input Overrides

8.6.1. Construction Measure Inputs

8.6.2. Operations Measure Inputs

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	CSUMB Stadium
Construction Start Date	4/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80000
Precipitation (days)	32.6000
Location	36.65119169683807, -121.80493732622415
County	Monterey
City	Seaside
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3262
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.39

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Health Club	4.80000	1000sqft	1.25000	4,800.00	0.00000	0.00000	—	—

Other Asphalt Surfaces	0.10000	Acre	0.10000	0.00000	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Water	W-4	Require Low-Flow Water Fixtures
Refrigerants	R-5	Reduce Service Leak Emissions
Area Sources	AS-2	Use Low-VOC Paints

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.30945	14.1483	19.1874	0.03158	0.50155	0.28440	0.78595	0.46166	0.06850	0.53015	3,340.00	0.14205	0.05938	1.32298	3,362.57
Mit.	3.06368	3.57233	15.9790	0.02353	0.08722	0.28440	0.37161	0.08371	0.06850	0.15220	2,717.58	0.11680	0.05433	1.32298	2,738.01
% Reduced	29%	75%	17%	25%	83%	—	53%	82%	—	71%	19%	18%	9%	—	19%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.48168	13.6377	14.6998	0.02637	0.58952	7.29429	7.88381	0.54321	3.48103	4.02423	3,082.71	0.13554	0.11336	0.03582	3,119.91
Mit.	0.29332	1.73243	11.3576	0.02165	0.05503	2.05317	2.10035	0.05248	0.94672	0.99390	2,571.69	0.11481	0.10922	0.03582	2,607.14
% Reduced	80%	87%	23%	18%	91%	72%	73%	90%	73%	75%	17%	15%	4%	—	16%

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.91037	5.19821	6.37465	0.01188	0.17614	0.21663	0.39277	0.16218	0.08085	0.24304	1,222.28	0.05300	0.02687	0.22024	1,231.83
Mit.	0.43190	0.99111	4.45049	0.00746	0.03146	0.13048	0.16193	0.03006	0.03919	0.06925	877.941	0.03903	0.02407	0.22024	886.311
% Reduced	53%	81%	30%	37%	82%	40%	59%	81%	52%	72%	28%	26%	10%	—	28%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.16614	0.94867	1.16337	0.00217	0.03215	0.03954	0.07168	0.02960	0.01476	0.04435	202.362	0.00877	0.00445	0.03646	203.944
Mit.	0.07882	0.18088	0.81221	0.00136	0.00574	0.02381	0.02955	0.00549	0.00715	0.01264	145.353	0.00646	0.00399	0.03646	146.739
% Reduced	53%	81%	30%	37%	82%	40%	59%	81%	52%	72%	28%	26%	10%	—	28%

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.30945	14.1483	19.1874	0.03158	0.50155	0.28440	0.78595	0.46166	0.06850	0.53015	3,340.00	0.14205	0.05938	1.32298	3,362.57
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.48168	13.6377	14.6998	0.02637	0.58952	7.29429	7.88381	0.54321	3.48103	4.02423	3,082.71	0.13554	0.11336	0.03582	3,119.91
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.91037	5.19821	6.37465	0.01188	0.17614	0.21663	0.39277	0.16218	0.08085	0.24304	1,222.28	0.05300	0.02687	0.22024	1,231.83
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	0.16614	0.94867	1.16337	0.00217	0.03215	0.03954	0.07168	0.02960	0.01476	0.04435	202.362	0.00877	0.00445	0.03646	203.944

2.2.2. Onsite Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.13943	13.8394	17.5690	0.03054	0.49870	0.00000	0.49870	0.45880	0.00000	0.45880	2,925.79	0.11868	0.02374	0.00000	2,935.83
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.42488	12.8567	14.0337	0.02266	0.57894	7.08259	7.66153	0.53263	3.42474	3.95736	2,455.05	0.09959	0.01992	0.00000	2,463.47
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.85674	5.03413	5.88192	0.01127	0.17442	0.11643	0.29085	0.16047	0.05630	0.21677	1,050.72	0.04262	0.00852	0.00000	1,054.33
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.15635	0.91873	1.07345	0.00206	0.03183	0.02125	0.05308	0.02929	0.01027	0.03956	173.959	0.00706	0.00141	0.00000	174.556

2.2.3. Offsite Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.17003	0.30892	1.61844	0.00103	0.00285	0.28440	0.28725	0.00285	0.06850	0.07135	414.218	0.02336	0.03564	1.32298	426.748
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.09295	0.78101	0.87859	0.00370	0.01058	0.21170	0.22228	0.01058	0.05629	0.06687	627.657	0.03595	0.09345	0.03582	656.439
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	0.05363	0.16408	0.49273	0.00062	0.00171	0.10021	0.10192	0.00171	0.02456	0.02627	171.555	0.01037	0.01834	0.22024	177.501
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.00979	0.02995	0.08992	0.00011	0.00031	0.01829	0.01860	0.00031	0.00448	0.00479	28.4030	0.00172	0.00304	0.03646	29.3873

2.2.4. Total Construction Emissions by Year, Mitigated

Includes both onsite and offsite emissions.

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.06368	3.57233	15.9790	0.02353	0.08722	0.28440	0.37161	0.08371	0.06850	0.15220	2,717.58	0.11680	0.05433	1.32298	2,738.01
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.29332	1.73243	11.3576	0.02165	0.05503	2.05317	2.10035	0.05248	0.94672	0.99390	2,571.69	0.11481	0.10922	0.03582	2,607.14
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.43190	0.99111	4.45049	0.00746	0.03146	0.13048	0.16193	0.03006	0.03919	0.06925	877.941	0.03903	0.02407	0.22024	886.311
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.07882	0.18088	0.81221	0.00136	0.00574	0.02381	0.02955	0.00549	0.00715	0.01264	145.353	0.00646	0.00399	0.03646	146.739

2.2.5. Onsite Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.89365	3.26341	14.3606	0.02250	0.08436	0.00000	0.08436	0.08085	0.00000	0.08085	2,303.36	0.09343	0.01869	0.00000	2,311.27
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	0.20037	1.31941	10.6915	0.01794	0.05217	1.84147	1.87807	0.04963	0.89043	0.92702	1,944.03	0.07886	0.01577	0.00000	1,950.70
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.37826	0.82702	3.95776	0.00685	0.02974	0.03027	0.06001	0.02834	0.01464	0.04298	706.386	0.02865	0.00573	0.00000	708.810
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.06903	0.15093	0.72229	0.00125	0.00543	0.00552	0.01095	0.00517	0.00267	0.00784	116.950	0.00474	0.00095	0.00000	117.352

2.2.6. Offsite Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.17003	0.30892	1.61844	0.00103	0.00285	0.28440	0.28725	0.00285	0.06850	0.07135	414.218	0.02336	0.03564	1.32298	426.748
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.09295	0.78101	0.87859	0.00370	0.01058	0.21170	0.22228	0.01058	0.05629	0.06687	627.657	0.03595	0.09345	0.03582	656.439
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05363	0.16408	0.49273	0.00062	0.00171	0.10021	0.10192	0.00171	0.02456	0.02627	171.555	0.01037	0.01834	0.22024	177.501
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.00979	0.02995	0.08992	0.00011	0.00031	0.01829	0.01860	0.00031	0.00448	0.00479	28.4030	0.00172	0.00304	0.03646	29.3873

2.3. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.56864	4.90929	43.3402	0.12846	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	13,216.6	7.81642	0.46636	46.6243	13,597.6

Mit.	1.56711	4.90929	43.3402	0.12846	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	—	—	—	46.6227	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.59461	5.75559	37.2817	0.12258	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	12,620.9	7.81054	0.50909	1.21620	12,969.1
Mit.	1.59309	5.75559	37.2817	0.12258	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	—	—	—	1.21463	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.57552	5.44112	37.2054	0.12312	0.09586	11.3038	11.3997	0.09033	2.86873	2.95906	12,675.9	7.81199	0.49293	20.1441	13,038.2
Mit.	1.57400	5.44112	37.2054	0.12312	0.09586	11.3038	11.3997	0.09033	2.86873	2.95906	—	—	—	20.1426	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.28753	0.99300	6.78999	0.02247	0.01749	2.06295	2.08045	0.01649	0.52354	0.54003	2,098.64	1.29336	0.08161	3.33509	2,158.63
Mit.	0.28725	0.99300	6.78999	0.02247	0.01749	2.06295	2.08045	0.01649	0.52354	0.54003	—	—	—	3.33483	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—

2.4. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.45514	4.85489	43.2945	0.12814	0.09169	11.5409	11.6326	0.08617	2.92798	3.01415	13,041.1	0.28303	0.45269	46.6168	13,229.7
Area	0.11051	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Energy	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	91.9650	0.01012	0.00065	—	92.4126
Water	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Waste	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750
Total	1.56864	4.90929	43.3402	0.12846	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	13,216.6	7.81642	0.46636	46.6243	13,597.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.48111	5.70119	37.2360	0.12225	0.09169	11.5409	11.6326	0.08617	2.92798	3.01415	12,445.5	0.27715	0.49542	1.20870	12,601.2
Area	0.11051	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	91.9650	0.01012	0.00065	—	92.4126
Water	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Waste	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750
Total	1.59461	5.75559	37.2817	0.12258	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	12,620.9	7.81054	0.50909	1.21620	12,969.1
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.46202	5.38672	37.1597	0.12279	0.09173	11.3038	11.3956	0.08620	2.86873	2.95493	12,500.5	0.27860	0.47926	20.1366	12,670.4
Area	0.11051	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	91.9650	0.01012	0.00065	—	92.4126
Water	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Waste	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750
Total	1.57552	5.44112	37.2054	0.12312	0.09586	11.3038	11.3997	0.09033	2.86873	2.95906	12,675.9	7.81199	0.49293	20.1441	13,038.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26682	0.98308	6.78165	0.02241	0.01674	2.06295	2.07969	0.01573	0.52354	0.53927	2,069.60	0.04612	0.07935	3.33385	2,097.73
Area	0.02017	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00055	0.00993	0.00834	0.00006	0.00075	—	0.00075	0.00075	—	0.00075	15.2259	0.00168	0.00011	—	15.3000
Water	—	—	—	—	—	—	—	—	—	—	2.25195	0.08979	0.00216	—	5.13907

Waste	—	—	—	—	—	—	—	—	—	—	11.5639	1.15577	0.00000	—	40.4581
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00124	0.00124
Total	0.28753	0.99300	6.78999	0.02247	0.01749	2.06295	2.08045	0.01649	0.52354	0.54003	2,098.64	1.29336	0.08161	3.33509	2,158.63

2.5. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.45514	4.85489	43.2945	0.12814	0.09169	11.5409	11.6326	0.08617	2.92798	3.01415	13,041.1	0.28303	0.45269	46.6168	13,229.7
Area	0.10898	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	91.9650	0.01012	0.00065	—	92.4126
Water	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Waste	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Total	1.56711	4.90929	43.3402	0.12846	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	NaN	NaN	NaN	46.6227	NaN
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.48111	5.70119	37.2360	0.12225	0.09169	11.5409	11.6326	0.08617	2.92798	3.01415	12,445.5	0.27715	0.49542	1.20870	12,601.2
Area	0.10898	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	91.9650	0.01012	0.00065	—	92.4126
Water	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Waste	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Total	1.59309	5.75559	37.2817	0.12258	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	NaN	NaN	NaN	1.21463	NaN
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.46202	5.38672	37.1597	0.12279	0.09173	11.3038	11.3956	0.08620	2.86873	2.95493	12,500.5	0.27860	0.47926	20.1366	12,670.4

Area	0.10898	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	91.9650	0.01012	0.00065	—	92.4126
Water	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Waste	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Total	1.57400	5.44112	37.2054	0.12312	0.09586	11.3038	11.3997	0.09033	2.86873	2.95906	NaN	NaN	NaN	20.1426	NaN
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26682	0.98308	6.78165	0.02241	0.01674	2.06295	2.07969	0.01573	0.52354	0.53927	2,069.60	0.04612	0.07935	3.33385	2,097.73
Area	0.01989	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00055	0.00993	0.00834	0.00006	0.00075	—	0.00075	0.00075	—	0.00075	15.2259	0.00168	0.00011	—	15.3000
Water	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Waste	—	—	—	—	—	—	—	—	—	—	11.5639	1.15577	0.00000	—	40.4581
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00098	0.00098
Total	0.28725	0.99300	6.78999	0.02247	0.01749	2.06295	2.08045	0.01649	0.52354	0.54003	NaN	NaN	NaN	3.33483	NaN

3. Construction Emissions Details

3.1. Site Prep & Grading (2026)

3.1.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.42488	12.8567	14.0337	0.02266	0.57894	—	0.57894	0.53263	—	0.53263	2,455.05	0.09959	0.01992	—	2,463.47

Dust From Material Movement	—	—	—	—	—	7.08259	7.08259	—	3.42474	3.42474	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02342	0.21134	0.23069	0.00037	0.00952	—	0.00952	0.00876	—	0.00876	40.3570	0.00164	0.00033	—	40.4955
Dust From Material Movement	—	—	—	—	—	0.11643	0.11643	—	0.05630	0.05630	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00427	0.03857	0.04210	0.00007	0.00174	—	0.00174	0.00160	—	0.00160	6.68156	0.00027	0.00005	—	6.70449
Dust From Material Movement	—	—	—	—	—	0.02125	0.02125	—	0.01027	0.01027	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.1.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04462	0.03849	0.40075	0.00000	0.00000	0.06691	0.06691	0.00000	0.01568	0.01568	66.8555	0.00473	0.00297	0.00717	67.8659
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Hauling	0.01217	0.74252	0.26544	0.00370	0.01058	0.14479	0.15537	0.01058	0.04061	0.05119	560.802	0.03122	0.09048	0.02865	588.573
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00072	0.00059	0.00629	0.00000	0.00000	0.00108	0.00108	0.00000	0.00025	0.00025	1.10412	0.00007	0.00005	0.00196	1.12248
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00021	0.01197	0.00433	0.00006	0.00017	0.00234	0.00252	0.00017	0.00066	0.00083	9.21613	0.00051	0.00148	0.00784	9.67914
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00013	0.00011	0.00115	0.00000	0.00000	0.00020	0.00020	0.00000	0.00005	0.00005	0.18280	0.00001	0.00001	0.00033	0.18584
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00218	0.00079	0.00001	0.00003	0.00043	0.00046	0.00003	0.00012	0.00015	1.52583	0.00008	0.00025	0.00130	1.60249

3.1.3. Onsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18297	0.95142	10.6915	0.01794	0.03659	—	0.03659	0.03659	—	0.03659	1,944.03	0.07886	0.01577	—	1,950.70
Dust From Material Movement	—	—	—	—	—	1.84147	1.84147	—	0.89043	0.89043	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00301	0.01564	0.17575	0.00029	0.00060	—	0.00060	0.00060	—	0.00060	31.9567	0.00130	0.00026	—	32.0664

Dust From Material Movement	—	—	—	—	—	0.03027	0.03027	—	0.01464	0.01464	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00055	0.00285	0.03207	0.00005	0.00011	—	0.00011	0.00011	—	0.00011	5.29079	0.00021	0.00004	—	5.30895
Dust From Material Movement	—	—	—	—	—	0.00552	0.00552	—	0.00267	0.00267	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.1.4. Offsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04462	0.03849	0.40075	0.00000	0.00000	0.06691	0.06691	0.00000	0.01568	0.01568	66.8555	0.00473	0.00297	0.00717	67.8659
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.01217	0.74252	0.26544	0.00370	0.01058	0.14479	0.15537	0.01058	0.04061	0.05119	560.802	0.03122	0.09048	0.02865	588.573
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00072	0.00059	0.00629	0.00000	0.00000	0.00108	0.00108	0.00000	0.00025	0.00025	1.10412	0.00007	0.00005	0.00196	1.12248
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00021	0.01197	0.00433	0.00006	0.00017	0.00234	0.00252	0.00017	0.00066	0.00083	9.21613	0.00051	0.00148	0.00784	9.67914
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00013	0.00011	0.00115	0.00000	0.00000	0.00020	0.00020	0.00000	0.00005	0.00005	0.18280	0.00001	0.00001	0.00033	0.18584

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00004	0.00218	0.00079	0.00001	0.00003	0.00043	0.00046	0.00003	0.00012	0.00015	1.52583	0.00008	0.00025	0.00130	1.60249

3.2. Building Construction (2026)

3.2.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.01475	8.56875	9.95599	0.01942	0.29272	—	0.29272	0.26930	—	0.26930	1,800.96	0.07305	0.01461	—	1,807.14
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.01475	8.56875	9.95599	0.01942	0.29272	—	0.29272	0.26930	—	0.26930	1,800.96	0.07305	0.01461	—	1,807.14
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.54769	4.62478	5.37351	0.01048	0.15799	—	0.15799	0.14535	—	0.14535	972.025	0.03943	0.00789	—	975.361
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09995	0.84402	0.98066	0.00191	0.02883	—	0.02883	0.02653	—	0.02653	160.930	0.00653	0.00131	—	161.482
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09101	0.06092	0.84513	0.00000	0.00000	0.13382	0.13382	0.00000	0.03137	0.03137	141.847	0.00814	0.00594	0.55352	144.374
Vendor	0.00071	0.02168	0.01047	0.00010	0.00021	0.00398	0.00419	0.00021	0.00110	0.00131	15.2144	0.00070	0.00223	0.03664	15.9331
Hauling	0.00322	0.17606	0.06561	0.00093	0.00265	0.03620	0.03884	0.00265	0.01015	0.01280	140.134	0.00780	0.02258	0.27617	147.333
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08925	0.07698	0.80149	0.00000	0.00000	0.13382	0.13382	0.00000	0.03137	0.03137	133.711	0.00947	0.00594	0.01433	135.732
Vendor	0.00066	0.02288	0.01074	0.00010	0.00021	0.00398	0.00419	0.00021	0.00110	0.00131	15.2292	0.00068	0.00223	0.00095	15.9119
Hauling	0.00304	0.18563	0.06636	0.00093	0.00265	0.03620	0.03884	0.00265	0.01015	0.01280	140.200	0.00780	0.02262	0.00716	147.143
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04746	0.03858	0.41306	0.00000	0.00000	0.07071	0.07071	0.00000	0.01655	0.01655	72.5039	0.00487	0.00321	0.12891	73.7098
Vendor	0.00038	0.01212	0.00574	0.00006	0.00011	0.00211	0.00222	0.00011	0.00058	0.00070	8.21494	0.00038	0.00120	0.00856	8.59164
Hauling	0.00169	0.09824	0.03558	0.00050	0.00143	0.01922	0.02065	0.00143	0.00540	0.00683	75.6490	0.00421	0.01218	0.06432	79.4496
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00866	0.00704	0.07538	0.00000	0.00000	0.01291	0.01291	0.00000	0.00302	0.00302	12.0038	0.00081	0.00053	0.02134	12.2035
Vendor	0.00007	0.00221	0.00105	0.00001	0.00002	0.00039	0.00041	0.00002	0.00011	0.00013	1.36008	0.00006	0.00020	0.00142	1.42244
Hauling	0.00031	0.01793	0.00649	0.00009	0.00026	0.00351	0.00377	0.00026	0.00099	0.00125	12.5246	0.00070	0.00202	0.01065	13.1538

3.2.3. Onsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20037	1.31941	6.50668	0.01138	0.05217	—	0.05217	0.04963	—	0.04963	1,178.54	0.04781	0.00956	—	1,182.58
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20037	1.31941	6.50668	0.01138	0.05217	—	0.05217	0.04963	—	0.04963	1,178.54	0.04781	0.00956	—	1,182.58
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10814	0.71212	3.51182	0.00614	0.02816	—	0.02816	0.02679	—	0.02679	636.086	0.02580	0.00516	—	638.269
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01974	0.12996	0.64091	0.00112	0.00514	—	0.00514	0.00489	—	0.00489	105.311	0.00427	0.00085	—	105.673
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2.4. Offsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09101	0.06092	0.84513	0.00000	0.00000	0.13382	0.13382	0.00000	0.03137	0.03137	141.847	0.00814	0.00594	0.55352	144.374
Vendor	0.00071	0.02168	0.01047	0.00010	0.00021	0.00398	0.00419	0.00021	0.00110	0.00131	15.2144	0.00070	0.00223	0.03664	15.9331

Hauling	0.00322	0.17606	0.06561	0.00093	0.00265	0.03620	0.03884	0.00265	0.01015	0.01280	140.134	0.00780	0.02258	0.27617	147.333
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08925	0.07698	0.80149	0.00000	0.00000	0.13382	0.13382	0.00000	0.03137	0.03137	133.711	0.00947	0.00594	0.01433	135.732
Vendor	0.00066	0.02288	0.01074	0.00010	0.00021	0.00398	0.00419	0.00021	0.00110	0.00131	15.2292	0.00068	0.00223	0.00095	15.9119
Hauling	0.00304	0.18563	0.06636	0.00093	0.00265	0.03620	0.03884	0.00265	0.01015	0.01280	140.200	0.00780	0.02262	0.00716	147.143
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04746	0.03858	0.41306	0.00000	0.00000	0.07071	0.07071	0.00000	0.01655	0.01655	72.5039	0.00487	0.00321	0.12891	73.7098
Vendor	0.00038	0.01212	0.00574	0.00006	0.00011	0.00211	0.00222	0.00011	0.00058	0.00070	8.21494	0.00038	0.00120	0.00856	8.59164
Hauling	0.00169	0.09824	0.03558	0.00050	0.00143	0.01922	0.02065	0.00143	0.00540	0.00683	75.6490	0.00421	0.01218	0.06432	79.4496
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00866	0.00704	0.07538	0.00000	0.00000	0.01291	0.01291	0.00000	0.00302	0.00302	12.0038	0.00081	0.00053	0.02134	12.2035
Vendor	0.00007	0.00221	0.00105	0.00001	0.00002	0.00039	0.00041	0.00002	0.00011	0.00013	1.36008	0.00006	0.00020	0.00142	1.42244
Hauling	0.00031	0.01793	0.00649	0.00009	0.00026	0.00351	0.00377	0.00026	0.00099	0.00125	12.5246	0.00070	0.00202	0.01065	13.1538

3.3. Paving (2026)

3.3.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.47034	4.41420	6.48016	0.00940	0.18282	—	0.18282	0.16820	—	0.16820	991.321	0.04021	0.00804	—	994.723
Paving	0.02911	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01160	0.10884	0.15978	0.00023	0.00451	—	0.00451	0.00415	—	0.00415	24.4435	0.00099	0.00020	—	24.5274
Paving	0.00072	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00212	0.01986	0.02916	0.00004	0.00082	—	0.00082	0.00076	—	0.00076	4.04690	0.00016	0.00003	—	4.06079
Paving	0.00013	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05688	0.03808	0.52821	0.00000	0.00000	0.08364	0.08364	0.00000	0.01960	0.01960	88.6541	0.00509	0.00371	0.34595	90.2335
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00136	0.00110	0.01179	0.00000	0.00000	0.00202	0.00202	0.00000	0.00047	0.00047	2.07023	0.00014	0.00009	0.00368	2.10466
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00025	0.00020	0.00215	0.00000	0.00000	0.00037	0.00037	0.00000	0.00009	0.00009	0.34275	0.00002	0.00002	0.00061	0.34845
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.3. Onsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13811	1.29796	6.89071	0.00940	0.02984	—	0.02984	0.02887	—	0.02887	991.321	0.04021	0.00804	—	994.723
Paving	0.02911	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00341	0.03200	0.16991	0.00023	0.00074	—	0.00074	0.00071	—	0.00071	24.4435	0.00099	0.00020	—	24.5274
Paving	0.00072	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00062	0.00584	0.03101	0.00004	0.00013	—	0.00013	0.00013	—	0.00013	4.04690	0.00016	0.00003	—	4.06079
Paving	0.00013	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.4. Offsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05688	0.03808	0.52821	0.00000	0.00000	0.08364	0.08364	0.00000	0.01960	0.01960	88.6541	0.00509	0.00371	0.34595	90.2335
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00136	0.00110	0.01179	0.00000	0.00000	0.00202	0.00202	0.00000	0.00047	0.00047	2.07023	0.00014	0.00009	0.00368	2.10466
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00025	0.00020	0.00215	0.00000	0.00000	0.00037	0.00037	0.00000	0.00009	0.00009	0.34275	0.00002	0.00002	0.00061	0.34845
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4. Architectural Coating (2026)

3.4.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12031	0.85645	1.13283	0.00173	0.02315	—	0.02315	0.02130	—	0.02130	133.504	0.00542	0.00108	—	133.963
Architectural Coatings	2.50492	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01253	0.08916	0.11794	0.00018	0.00241	—	0.00241	0.00222	—	0.00222	13.8991	0.00056	0.00011	—	13.9468
Architectural Coatings	0.26079	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00229	0.01627	0.02152	0.00003	0.00044	—	0.00044	0.00040	—	0.00040	2.30115	0.00009	0.00002	—	2.30905
Architectural Coatings	0.04759	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01820	0.01218	0.16903	0.00000	0.00000	0.02676	0.02676	0.00000	0.00627	0.00627	28.3693	0.00163	0.00119	0.11070	28.8747
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00183	0.00149	0.01594	0.00000	0.00000	0.00273	0.00273	0.00000	0.00064	0.00064	2.79710	0.00019	0.00012	0.00497	2.84363
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00033	0.00027	0.00291	0.00000	0.00000	0.00050	0.00050	0.00000	0.00012	0.00012	0.46309	0.00003	0.00002	0.00082	0.47080
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.3. Onsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02114	0.64604	0.96319	0.00173	0.00235	—	0.00235	0.00235	—	0.00235	133.504	0.00542	0.00108	—	133.963
Architectural Coatings	2.50492	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00220	0.06726	0.10028	0.00018	0.00024	—	0.00024	0.00024	—	0.00024	13.8991	0.00056	0.00011	—	13.9468
Architectural Coatings	0.26079	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00040	0.01227	0.01830	0.00003	0.00004	—	0.00004	0.00004	—	0.00004	2.30115	0.00009	0.00002	—	2.30905
Architectural Coatings	0.04759	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.4. Offsite - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01820	0.01218	0.16903	0.00000	0.00000	0.02676	0.02676	0.00000	0.00627	0.00627	28.3693	0.00163	0.00119	0.11070	28.8747
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00183	0.00149	0.01594	0.00000	0.00000	0.00273	0.00273	0.00000	0.00064	0.00064	2.79710	0.00019	0.00012	0.00497	2.84363
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00033	0.00027	0.00291	0.00000	0.00000	0.00050	0.00050	0.00000	0.00012	0.00012	0.46309	0.00003	0.00002	0.00082	0.47080
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.1.2. Mitigated

Mobile source emissions results are presented in Sections 2.5. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	4.47948	0.00072	0.00009	—	4.52377
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	4.47948	0.00072	0.00009	—	4.52377

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	27.0563	0.00438	0.00053	—	27.3238
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	4.47948	0.00072	0.00009	—	4.52377
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	4.47948	0.00072	0.00009	—	4.52377

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Other Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887

Other Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.00055	0.00993	0.00834	0.00006	0.00075	—	0.00075	0.00075	—	0.00075	10.7464	0.00095	0.00002	—	10.7762
Other Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00055	0.00993	0.00834	0.00006	0.00075	—	0.00075	0.00075	—	0.00075	10.7464	0.00095	0.00002	—	10.7762

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Other Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Other Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00299	0.05440	0.04570	0.00033	0.00413	—	0.00413	0.00413	—	0.00413	64.9087	0.00574	0.00012	—	65.0887
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Health Club	0.00055	0.00993	0.00834	0.00006	0.00075	—	0.00075	0.00075	—	0.00075	10.7464	0.00095	0.00002	—	10.7762
Other Asphalt Surfaces	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00055	0.00993	0.00834	0.00006	0.00075	—	0.00075	0.00075	—	0.00075	10.7464	0.00095	0.00002	—	10.7762

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.10272	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00779	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.11051	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.10272	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00779	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.11051	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.01875	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.00142	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.02017	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.10272	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00626	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.10898	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.10272	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00626	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.10898	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.01875	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00114	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.01989	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	13.6019	0.54236	0.01302	—	31.0403
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	2.25195	0.08979	0.00216	—	5.13907
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	2.25195	0.08979	0.00216	—	5.13907

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	NaN	NaN	NaN	—	NaN

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	11.5639	1.15577	0.00000	—	40.4581
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	11.5639	1.15577	0.00000	—	40.4581

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	69.8465	6.98090	0.00000	—	244.369
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	11.5639	1.15577	0.00000	—	40.4581
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	11.5639	1.15577	0.00000	—	40.4581

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00750	0.00750
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00124	0.00124
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00124	0.00124

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00593	0.00593
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00098	0.00098
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00098	0.00098

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequester	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Prep & Grading	Grading	3/24/2026	3/31/2026	5.00000	6.00000	—
Building Construction	Building Construction	4/1/2026	12/31/2026	5.00000	197.000	—
Paving	Paving	9/15/2026	9/26/2026	5.00000	9.00000	—
Architectural Coating	Architectural Coating	8/4/2026	9/24/2026	5.00000	38.0000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Prep & Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Site Prep & Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00000	7.00000	84.0000	0.37000
Site Prep & Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Building Construction	Cranes	Diesel	Average	1.000000	6.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	1.000000	6.00000	82.0000	0.20000
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.000000	6.00000	84.0000	0.37000

Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Welders	Diesel	Average	3.00000	8.00000	46.0000	0.45000
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Paving	Pavers	Diesel	Average	1.000000	6.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	1.000000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Average	1.000000	7.00000	36.0000	0.38000
Paving	Cement and Mortar Mixers	Diesel	Average	1.000000	6.00000	10.00000	0.56000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Prep & Grading	Graders	Diesel	Tier 4 Final	1.000000	8.00000	148.000	0.41000
Site Prep & Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.000000	8.00000	367.000	0.40000
Building Construction	Cranes	Diesel	Tier 4 Final	1.000000	6.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Tier 4 Final	1.000000	6.00000	82.0000	0.20000
Building Construction	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	1.000000	6.00000	84.0000	0.37000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Paving	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	1.000000	8.00000	84.0000	0.37000
Paving	Pavers	Diesel	Tier 4 Final	1.000000	6.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Tier 4 Final	1.000000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Tier 4 Final	1.000000	7.00000	36.0000	0.38000
Paving	Cement and Mortar Mixers	Diesel	Average	1.000000	6.00000	10.00000	0.56000
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.000000	6.00000	37.0000	0.48000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Prep & Grading	Worker	10.00000	9.47000	LDA,LDT1,LDT2
Site Prep & Grading	Vendor	—	6.03000	HHDT,MHDT
Site Prep & Grading	Hauling	8.00000	20.0000	HHDT
Site Prep & Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	20.0000	9.47000	LDA,LDT1,LDT2
Building Construction	Vendor	0.78672	6.03000	HHDT,MHDT
Building Construction	Hauling	2.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	12.5000	9.47000	LDA,LDT1,LDT2
Paving	Vendor	—	6.03000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	4.00000	9.47000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.03000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Prep & Grading	Worker	10.00000	9.47000	LDA,LDT1,LDT2
Site Prep & Grading	Vendor	—	6.03000	HHDT,MHDT
Site Prep & Grading	Hauling	8.00000	20.0000	HHDT
Site Prep & Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	20.0000	9.47000	LDA,LDT1,LDT2

Building Construction	Vendor	0.78672	6.03000	HHDT,MHDT
Building Construction	Hauling	2.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	12.5000	9.47000	LDA,LDT1,LDT2
Paving	Vendor	—	6.03000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	4.00000	9.47000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.03000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00000	0.00000	7,200.00	2,400.00	261.360

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Prep & Grading	—	—	6.00000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.10000

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Health Club	0.00000	0%
Paving	Other Asphalt Surfaces	0.10000	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00000	203.983	0.03300	0.00400

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	0.00000	0.00000	0.00000	0.00000	16,326.0	16,326.0	16,326.0	5,961,317

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	0.00000	0.00000	0.00000	0.00000	16,326.0	16,326.0	16,326.0	5,961,317

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)

Health Club	Wood Fireplaces	0	0
Health Club	Gas Fireplaces	0	0
Health Club	Propane Fireplaces	0	0
Health Club	Electric Fireplaces	0	0
Health Club	No Fireplaces	0	0
Health Club	Conventional Wood Stoves	0	0
Health Club	Catalytic Wood Stoves	0	0
Health Club	Non-Catalytic Wood Stoves	0	0
Health Club	Pellet Wood Stoves	0	0
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0
Other Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0.00000	0.00000	7,200.00	2,400.00	261.360

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	0.00000

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	0.00000

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Health Club	48,413.6	203.983	0.0330	0.0040	202,533
Other Asphalt Surfaces	0.00000	203.983	0.0330	0.0040	0.00000

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Health Club	48,413.6	203.983	0.0330	0.0040	202,533
Other Asphalt Surfaces	0.00000	203.983	0.0330	0.0040	0.00000

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Health Club	2,753,440	0.00000
Other Asphalt Surfaces	0.00000	0.00000

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Health Club	NaN	0.00000
Other Asphalt Surfaces	0.00000	0.00000

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Health Club	129.600	0.00000
Other Asphalt Surfaces	0.00000	0.00000

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Health Club	129.600	0.00000
Other Asphalt Surfaces	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Health Club	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	4.00000	18.0000

5.14.2. Mitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Health Club	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	2.00000	18.0000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.01000	annual days of extreme heat
Extreme Precipitation	1.90000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	31.4000	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	10.5663
AQ-PM	2.50156
AQ-DPM	70.1182
Drinking Water	49.1945
Lead Risk Housing	—
Pesticides	0.00000
Toxic Releases	5.73893
Traffic	3.48750
Effect Indicators	—
CleanUp Sites	68.9436
Groundwater	10.6425
Haz Waste Facilities/Generators	62.4752
Impaired Water Bodies	0.00000
Solid Waste	0.00000
Sensitive Population	—
Asthma	49.9003
Cardio-vascular	18.3948
Low Birth Weights	—

Socioeconomic Factor Indicators	—
Education	—
Housing	—
Linguistic	—
Poverty	—
Unemployment	99.9479

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	—
Employed	—
Median HI	—
Education	—
Bachelor's or higher	—
High school enrollment	—
Preschool enrollment	—
Transportation	—
Auto Access	—
Active commuting	—
Social	—
2-parent households	—
Voting	—
Neighborhood	—
Alcohol availability	—
Park access	—
Retail density	—

Supermarket access	—
Tree canopy	—
Housing	—
Homeownership	—
Housing habitability	—
Low-inc homeowner severe housing cost burden	—
Low-inc renter severe housing cost burden	—
Uncrowded housing	—
Health Outcomes	—
Insured adults	—
Arthritis	0.0
Asthma ER Admissions	76.7
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	0.0
Cognitively Disabled	98.0
Physically Disabled	98.4
Heart Attack ER Admissions	95.7
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	0.0
Physical Health Not Good	0.0
Stroke	0.0

Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	99.4
Elderly	99.8
English Speaking	0.0
Foreign-born	0.0
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	22.0
Traffic Density	0.0
Traffic Access	0.0
Other Indices	—
Hardship	0.0
Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	—
Healthy Places Index Score for Project Location (b)	—
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	1.35 Acres total disturbed
Construction: Construction Phases	Site prep/grading 6 days, Building const over an approx 9-month period. Arch coating over 4-month period, excluding initial construction period of ~5 months. Paving 9 days.
Construction: Trips and VMT	based on model defaults. Site Prep assume 4,800 sf of asphalt (60 cy) to be removed, 18-20 cy/truck, 8 one-way haul trucks, default trip distance. Bldg construction assumes 2 trucks/day for material deliveries.
Construction: On-Road Fugitive Dust	No on/off-site unpaved travel required.
Operations: Road Dust	No unpaved travel required
Operations: Consumer Products	No landscaping or parking maintenance required
Operations: Landscape Equipment	No landscape maintenance required.
Operations: Water and Waste Water	2753440 gals/yr potable water
Operations: Solid Waste	27 tons waste/yr
Operations: Refrigerants	includes ac and heat pumps

8.3. Land Use

Model Parameter	Units	Default Value	New Value

Lot Area	acre	0.11019	1.25000
Landscape Area	sq. ft	—	0.00000
Special Landscape Area	sq. ft	—	0.00000

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Grading	Site Prep & Grading	End Date	3/28/2026	3/31/2026
Grading	Site Prep & Grading	Work Days per Phase	4.00000	6.00000
Building Construction	Building Construction	Start Date	5/9/2026	4/1/2026
Building Construction	Building Construction	End Date	2/13/2027	12/31/2026
Building Construction	Building Construction	Work Days per Phase	200.000	197.000
Architectural Coating	Architectural Coating	Start Date	3/1/2027	8/4/2026
Architectural Coating	Architectural Coating	End Date	3/15/2027	9/24/2026
Architectural Coating	Architectural Coating	Work Days per Phase	10.00000	38.0000

8.4.6. Trips and VMT

Phase Name	Trip Type	Model Parameter	Default Value	New Value
Site Prep & Grading	Hauling	One-Way Trips per Day	0.00000	8.00000
Building Construction	Worker	One-Way Trips per Day	2.01600	20.0000
Building Construction	Hauling	One-Way Trips per Day	0.00000	2.00000
Architectural Coating	Worker	One-Way Trips per Day	0.40320	4.00000

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value
Site Prep & Grading	Worker Trip Paved	%	52.0000	100.0000

Site Prep & Grading	Vendor Trip Paved	%	52.0000	100.0000
Site Prep & Grading	Hauling Trip Paved	%	52.0000	100.0000
Building Construction	Worker Trip Paved	%	52.0000	100.0000
Building Construction	Vendor Trip Paved	%	52.0000	100.0000
Building Construction	Hauling Trip Paved	%	52.0000	100.0000
Paving	Worker Trip Paved	%	52.0000	100.0000
Paving	Vendor Trip Paved	%	52.0000	100.0000
Paving	Hauling Trip Paved	%	52.0000	100.0000
Architectural Coating	Worker Trip Paved	%	52.0000	100.0000
Architectural Coating	Vendor Trip Paved	%	52.0000	100.0000
Architectural Coating	Hauling Trip Paved	%	52.0000	100.0000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.4. Road Dust

Model Parameter	Units	Default Value	New Value
% Paved	%	52.0000	100.0000

8.5.2. Area Sources

8.5.2.2. Consumer Products

Model Parameter	Units	Default Value	New Value
City Park/Golf Course Pesticides/Fertilizers	lb/sqft/day	< 0.000005	0.00000
Parking Degreaser	lb/sqft/day	< 0.000005	0.00000

8.5.2.4. Landscape Equipment

Model Parameter	Units	Default Value	New Value
Summer Days	day/yr	250.000	0.00000

8.5.4. Water and Waste Water

Land Use	Model Parameter	Units	Default Value	New Value
Health Club	Indoor Water	gal/year	283,887	2,753,440

8.5.5. Solid Waste

Land Use	Model Parameter	Units	Default Value	New Value
Health Club	Solid Waste Generation Rate	ton/1000sqft/yr	5.70000	27.0000

8.6. Measure Input Overrides

8.6.1. Construction Measure Inputs

Measure Number and Input Name	Construction Phase	Equipment Type	Model Parameter	Default Value	New Value
C-5 - Use Advanced Engine Tiers	Site Prep & Grading	Tractors/Loaders/Backhoes	Number Mitigated	1.000000	2.00000
C-5 - Use Advanced Engine Tiers	Building Construction	Welders	Number Mitigated	1.000000	3.00000

8.6.2. Operations Measure Inputs

Sector	Measure Number	Land Use Subtype	Equipment Type	Model Parameter	Default Value	New Value
Water	W-4	Health Club	Clothes Washers	Percent Of Total Water Use	—	NaN

CSUMB Stadium Summary Report

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7.5. Evaluation Scorecard

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	CSUMB Stadium
Construction Start Date	4/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80000
Precipitation (days)	32.6000
Location	36.65119169683807, -121.80493732622415
County	Monterey
City	Seaside
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3262
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.39

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Health Club	4.80000	1000sqft	1.25000	4,800.00	0.00000	0.00000	—	—

Other Asphalt Surfaces	0.10000	Acre	0.10000	0.00000	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Water	W-4	Require Low-Flow Water Fixtures
Refrigerants	R-5	Reduce Service Leak Emissions
Area Sources	AS-2	Use Low-VOC Paints

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.30945	14.1483	19.1874	0.03158	0.50155	0.28440	0.78595	0.46166	0.06850	0.53015	3,340.00	0.14205	0.05938	1.32298	3,362.57
Mit.	3.06368	3.57233	15.9790	0.02353	0.08722	0.28440	0.37161	0.08371	0.06850	0.15220	2,717.58	0.11680	0.05433	1.32298	2,738.01
% Reduced	29%	75%	17%	25%	83%	—	53%	82%	—	71%	19%	18%	9%	—	19%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.48168	13.6377	14.6998	0.02637	0.58952	7.29429	7.88381	0.54321	3.48103	4.02423	3,082.71	0.13554	0.11336	0.03582	3,119.91
Mit.	0.29332	1.73243	11.3576	0.02165	0.05503	2.05317	2.10035	0.05248	0.94672	0.99390	2,571.69	0.11481	0.10922	0.03582	2,607.14
% Reduced	80%	87%	23%	18%	91%	72%	73%	90%	73%	75%	17%	15%	4%	—	16%

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.91037	5.19821	6.37465	0.01188	0.17614	0.21663	0.39277	0.16218	0.08085	0.24304	1,222.28	0.05300	0.02687	0.22024	1,231.83
Mit.	0.43190	0.99111	4.45049	0.00746	0.03146	0.13048	0.16193	0.03006	0.03919	0.06925	877.941	0.03903	0.02407	0.22024	886.311
% Reduced	53%	81%	30%	37%	82%	40%	59%	81%	52%	72%	28%	26%	10%	—	28%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.16614	0.94867	1.16337	0.00217	0.03215	0.03954	0.07168	0.02960	0.01476	0.04435	202.362	0.00877	0.00445	0.03646	203.944
Mit.	0.07882	0.18088	0.81221	0.00136	0.00574	0.02381	0.02955	0.00549	0.00715	0.01264	145.353	0.00646	0.00399	0.03646	146.739
% Reduced	53%	81%	30%	37%	82%	40%	59%	81%	52%	72%	28%	26%	10%	—	28%

2.3. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.56864	4.90929	43.3402	0.12846	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	13,216.6	7.81642	0.46636	46.6243	13,597.6
Mit.	1.56711	4.90929	43.3402	0.12846	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	—	—	—	46.6227	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.59461	5.75559	37.2817	0.12258	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	12,620.9	7.81054	0.50909	1.21620	12,969.1
Mit.	1.59309	5.75559	37.2817	0.12258	0.09582	11.5409	11.6367	0.09030	2.92798	3.01828	—	—	—	1.21463	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.57552	5.44112	37.2054	0.12312	0.09586	11.3038	11.3997	0.09033	2.86873	2.95906	12,675.9	7.81199	0.49293	20.1441	13,038.2
Mit.	1.57400	5.44112	37.2054	0.12312	0.09586	11.3038	11.3997	0.09033	2.86873	2.95906	—	—	—	20.1426	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.28753	0.99300	6.78999	0.02247	0.01749	2.06295	2.08045	0.01649	0.52354	0.54003	2,098.64	1.29336	0.08161	3.33509	2,158.63
Mit.	0.28725	0.99300	6.78999	0.02247	0.01749	2.06295	2.08045	0.01649	0.52354	0.54003	—	—	—	3.33483	—
% Reduced	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	< 0.5%	—

6. Climate Risk Detailed Report

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

7. Health and Equity Details

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	—
Healthy Places Index Score for Project Location (b)	—
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

Calendar Year	EMFAC2021 Vehicle Category	Fuel Type	Exhaust Nox	Total PM2.5 (exhaust, brake wear, and tire wear)	Total PM10 (exhaust, brake wear, and tire wear)	Total ROG (exhaust and evaporative)
2027	All Other Buses	DSL	1.01040467	1.00002031	1.00001236	1
2027	All Other Buses	NG	1	1	1	1
2027	LDA	DSL	1	1	1	1
2027	LDA	ELEC	1	1	1	1
2027	LDA	GAS	1	1	1	1
2027	LDA	PHE	1	1	1	1
2027	LDT1	DSL	1	1	1	1
2027	LDT1	ELEC	1	1	1	1
2027	LDT1	GAS	1	1	1	1
2027	LDT1	PHE	1	1	1	1
2027	LDT2	DSL	1	1	1	1
2027	LDT2	ELEC	1	1	1	1
2027	LDT2	GAS	1	1	1	1
2027	LDT2	PHE	1	1	1	1
2027	LHD1	DSL	1.00200997	1.0152093	1.02051899	1.0091555
2027	LHD1	ELEC	0	0	0	0
2027	LHD1	GAS	1.00809245	1.02950647	1.02970125	1.00387246
2027	LHD2	DSL	1.00324508	1.01820875	1.02293465	1.0127759
2027	LHD2	ELEC	0	0	0	0
2027	LHD2	GAS	1.00700723	1.02606482	1.02609647	1.00351705
2027	MCY	GAS	1	1	1	1
2027	MDV	DSL	1	1	1	1
2027	MDV	ELEC	1	1	1	1
2027	MDV	GAS	1	1	1	1
2027	MDV	PHE	1	1	1	1
2027	MH	DSL	1	1	1	1
2027	MH	GAS	1	1	1	1
2027	Motor Coach	DSL	1.0513294	1.00496754	1.00242068	1
2027	OBUS	ELEC	0	0	0	0
2027	OBUS	GAS	1.01828758	1.02737563	1.02723466	1.00478545
2027	PTO	DSL	1.04526631	1.02289995	1.02289995	1.01835134
2027	PTO	ELEC	0	0	0	0
2027	SBUS	DSL	1.00850296	1.00757111	1.01114516	1.00200661
2027	SBUS	ELEC	0	0	0	0
2027	SBUS	GAS	1.00734424	1.01172751	1.0115647	1.00800148
2027	SBUS	NG	1.00844789	1.0201133	1.0200095	1.01442883
2027	T6 CAIRP Class 4	DSL	1.06751314	1.03997019	1.04219846	1.02493403
2027	T6 CAIRP Class 4	ELEC	0	0	0	0
2027	T6 CAIRP Class 5	DSL	1.06134139	1.03779387	1.03917755	1.02790339
2027	T6 CAIRP Class 5	ELEC	0	0	0	0
2027	T6 CAIRP Class 6	DSL	1.10770257	1.05255216	1.05338563	1.03711147
2027	T6 CAIRP Class 6	ELEC	0	0	0	0
2027	T6 CAIRP Class 7	DSL	1.05696717	1.02987088	1.02986679	1.02214703
2027	T6 CAIRP Class 7	ELEC	0	0	0	0
2027	T6 CAIRP Class 7	NG	1.01285589	1.02545122	1.02520636	1.02763924
2027	T6 Instate Delivery Class 4	DSL	1.04582199	1.01904984	1.02425843	1.00679666
2027	T6 Instate Delivery Class 4	ELEC	0	0	0	0
2027	T6 Instate Delivery Class 4	NG	1.03666816	1.0491046	1.04876851	1.04646566
2027	T6 Instate Delivery Class 5	DSL	1.04987355	1.02152468	1.02459263	1.01049743
2027	T6 Instate Delivery Class 5	ELEC	0	0	0	0
2027	T6 Instate Delivery Class 5	NG	1.03708737	1.0487932	1.04854298	1.0458044
2027	T6 Instate Delivery Class 6	DSL	1.05068442	1.02162112	1.02480276	1.00998267
2027	T6 Instate Delivery Class 6	ELEC	0	0	0	0
2027	T6 Instate Delivery Class 6	NG	1.03643123	1.04937566	1.04902822	1.04633567
2027	T6 Instate Delivery Class 7	DSL	1.0161217	1.00855999	1.0090752	1.00534317
2027	T6 Instate Delivery Class 7	ELEC	0	0	0	0
2027	T6 Instate Delivery Class 7	NG	1.00502495	1.00828823	1.00811473	1.00843687
2027	T6 Instate Other Class 4	DSL	1.04871866	1.01994719	1.02578012	1.00715746
2027	T6 Instate Other Class 4	ELEC	0	0	0	0
2027	T6 Instate Other Class 4	NG	1.03970566	1.05196836	1.05160011	1.04975884
2027	T6 Instate Other Class 5	DSL	1.05708755	1.02508796	1.02685478	1.01613102
2027	T6 Instate Other Class 5	ELEC	0	0	0	0
2027	T6 Instate Other Class 5	NG	1.03548953	1.04695126	1.04663511	1.04455297
2027	T6 Instate Other Class 6	DSL	1.05310837	1.02201513	1.02593668	1.0095491
2027	T6 Instate Other Class 6	ELEC	0	0	0	0
2027	T6 Instate Other Class 6	NG	1.03419108	1.04458367	1.04429934	1.04240845
2027	T6 Instate Other Class 7	DSL	1.03057081	1.0217104	1.02358428	1.01069657
2027	T6 Instate Other Class 7	ELEC	0	0	0	0
2027	T6 Instate Other Class 7	NG	1.01162778	1.02284837	1.02256795	1.02004062
2027	T6 Instate Tractor Class 6	DSL	1.05212613	1.02457147	1.02966874	1.00927291
2027	T6 Instate Tractor Class 6	ELEC	0	0	0	0
2027	T6 Instate Tractor Class 6	NG	1.03321094	1.04938461	1.04908047	1.04582366
2027	T6 Instate Tractor Class 7	DSL	1.02446041	1.01309316	1.01396482	1.00696104
2027	T6 Instate Tractor Class 7	ELEC	0	0	0	0
2027	T6 Instate Tractor Class 7	NG	1.0080739	1.01475063	1.01457405	1.01385047
2027	T6 OOS Class 4	DSL	1	1	1	1
2027	T6 OOS Class 5	DSL	1	1	1	1
2027	T6 OOS Class 6	DSL	1	1	1	1
2027	T6 OOS Class 7	DSL	1	1	1	1
2027	T6 Public Class 4	DSL	1.01428829	1.01577071	1.02165228	1.00560836
2027	T6 Public Class 4	ELEC	0	0	0	0
2027	T6 Public Class 4	NG	1.03323708	1.04012768	1.03985492	1.03829572
2027	T6 Public Class 5	DSL	1.02161121	1.01840627	1.02221483	1.00733718
2027	T6 Public Class 5	ELEC	0	0	0	0
2027	T6 Public Class 5	NG	1.01930759	1.02688876	1.02655178	1.02441952
2027	T6 Public Class 6	DSL	1.01638867	1.01533007	1.02150971	1.00576478
2027	T6 Public Class 6	ELEC	0	0	0	0
2027	T6 Public Class 6	NG	1.03143645	1.03678846	1.03656823	1.03514883
2027	T6 Public Class 7	DSL	1.01492502	1.01742776	1.02458981	1.00560783
2027	T6 Public Class 7	ELEC	0	0	0	0

2027	T6 Public Class 7	NG	1.03247545	1.04283428	1.04275286	1.03942544
2027	T6 Utility Class 5	DSL	1.11027749	1.04840885	1.04936913	1.0390645
2027	T6 Utility Class 5	ELEC	0	0	0	0
2027	T6 Utility Class 5	NG	1.02965263	1.04646121	1.04595679	1.04432372
2027	T6 Utility Class 6	DSL	1.11610028	1.04985055	1.05030572	1.04128073
2027	T6 Utility Class 6	ELEC	0	0	0	0
2027	T6 Utility Class 6	NG	1.02107654	1.03608385	1.03552862	1.03466628
2027	T6 Utility Class 7	DSL	1.12249411	1.05698921	1.05726268	1.04737732
2027	T6 Utility Class 7	ELEC	0	0	0	0
2027	T6 Utility Class 7	NG	1.01892533	1.03812726	1.03757271	1.0354272
2027	T6TS	ELEC	0	0	0	0
2027	T6TS	GAS	1.03119696	1.03192418	1.03188495	1.007927
2027	T7 CAIRP Class 8	DSL	1.09921106	1.03011215	1.03244776	1.03153221
2027	T7 CAIRP Class 8	ELEC	0	0	0	0
2027	T7 CAIRP Class 8	NG	1.02601677	1.0304	1.03027372	1.02808742
2027	T7 NNOOS Class 8	DSL	1	1	1	1
2027	T7 NOOS Class 8	DSL	1	1	1	1
2027	T7 Other Port Class 8	DSL	1.03545939	1.01720204	1.01841822	1.01384761
2027	T7 Other Port Class 8	ELEC	0	0	0	0
2027	T7 POAK Class 8	DSL	1.03862681	1.01345907	1.01439897	1.01456219
2027	T7 POAK Class 8	ELEC	0	0	0	0
2027	T7 POAK Class 8	NG	1.0380548	1.03778818	1.03770312	1.03728122
2027	T7 POLA Class 8	DSL	1.01400906	1.00511314	1.00568009	1.00584511
2027	T7 POLA Class 8	ELEC	0	0	0	0
2027	T7 POLA Class 8	NG	1.01103432	1.017151	1.01692905	1.01621339
2027	T7 Public Class 8	DSL	1.01635805	1.01485942	1.01951785	1.00645337
2027	T7 Public Class 8	ELEC	0	0	0	0
2027	T7 Public Class 8	NG	1.02755053	1.04504096	1.04484608	1.03942383
2027	T7 Single Concrete/Transit Mix Class 8	DSL	1.11635709	1.0532675	1.05427173	1.04561449
2027	T7 Single Concrete/Transit Mix Class 8	ELEC	0	0	0	0
2027	T7 Single Concrete/Transit Mix Class 8	NG	1.04036483	1.05346765	1.05329969	1.04861776
2027	T7 Single Dump Class 8	DSL	1.04864574	1.02758622	1.02950798	1.01879329
2027	T7 Single Dump Class 8	ELEC	0	0	0	0
2027	T7 Single Dump Class 8	NG	1.01671032	1.03151822	1.03128703	1.02577034
2027	T7 Single Other Class 8	DSL	1.05689916	1.02971803	1.03077036	1.02212053
2027	T7 Single Other Class 8	ELEC	0	0	0	0
2027	T7 Single Other Class 8	NG	1.02058275	1.03244628	1.03228	1.02760617
2027	T7 SWCV Class 8	DSL	1.0020136	1.00687326	1.00616629	1.00684779
2027	T7 SWCV Class 8	ELEC	0	0	0	0
2027	T7 SWCV Class 8	NG	1.00151501	1.02286288	1.02305486	1.00052304
2027	T7 Tractor Class 8	DSL	1.04305897	1.01533682	1.01641565	1.0136211
2027	T7 Tractor Class 8	ELEC	0	0	0	0
2027	T7 Tractor Class 8	NG	1.00852357	1.01396497	1.01382973	1.01152453
2027	T7 Utility Class 8	DSL	1.04964111	1.02592926	1.02574002	1.0178427
2027	T7 Utility Class 8	ELEC	0	0	0	0
2027	T7IS	ELEC	0	0	0	0
2027	T7IS	GAS	1.03060997	1.02769033	1.02787155	1.00690254
2027	UBUS	DSL	1	1	1	1
2027	UBUS	ELEC	1	1	1	1
2027	UBUS	GAS	1	1	1	1
2027	UBUS	NG	1	1	1	1
			Exhaust Nox	**Total PM2.5 (exhaust, brake wear, and tire wear)**	**Total PM10 (exhaust, brake wear, and tire wear)**	**Total ROG (exhaust and evaporative)**
HIGHEST VALUE			**1.12249411**	**1.05698921**	**1.05726268**	**1.04975884**
2026	All Other Buses	DSL	1.00639258	1.00001324	1.00000815	1
2026	All Other Buses	NG	1	1	1	1
2026	LDA	DSL	1	1	1	1
2026	LDA	ELEC	1	1	1	1
2026	LDA	GAS	1	1	1	1
2026	LDA	PHE	1	1	1	1
2026	LDT1	DSL	1	1	1	1
2026	LDT1	ELEC	1	1	1	1
2026	LDT1	GAS	1	1	1	1
2026	LDT1	PHE	1	1	1	1
2026	LDT2	DSL	1	1	1	1
2026	LDT2	ELEC	1	1	1	1
2026	LDT2	GAS	1	1	1	1
2026	LDT2	PHE	1	1	1	1
2026	LHD1	DSL	1.00106854	1.00868955	1.01195634	1.0051073
2026	LHD1	ELEC	0	0	0	0
2026	LHD1	GAS	1.00452681	1.01754351	1.01767128	1.00216365
2026	LHD2	DSL	1.00176858	1.01062004	1.01358258	1.00728699
2026	LHD2	ELEC	0	0	0	0
2026	LHD2	GAS	1.00391816	1.01537935	1.01540584	1.00196236
2026	MCY	GAS	1	1	1	1
2026	MDV	DSL	1	1	1	1
2026	MDV	ELEC	1	1	1	1
2026	MDV	GAS	1	1	1	1
2026	MDV	PHE	1	1	1	1
2026	MH	DSL	1	1	1	1
2026	MH	GAS	1	1	1	1
2026	Motor Coach	DSL	1.03423613	1.00344218	1.00168584	1
2026	OBUS	ELEC	0	0	0	0
2026	OBUS	GAS	1.01127546	1.01645095	1.01635569	1.00293916
2026	PTO	DSL	1.02863098	1.01386424	1.01386424	1.01083811
2026	PTO	ELEC	0	0	0	0
2026	SBUS	DSL	1.00502072	1.00441258	1.00660204	1.00115761

2026	SBUS	ELEC	0	0	0	0
2026	SBUS	GAS	1.00470048	1.00732162	1.00722651	1.00495845
2026	SBUS	NG	1.00518636	1.01259369	1.01252403	1.00894522
2026	T6 CAIRP Class 4	DSL	1.03843934	1.02417269	1.02576599	1.01406746
2026	T6 CAIRP Class 4	ELEC	0	0	0	0
2026	T6 CAIRP Class 5	DSL	1.0347359	1.02271524	1.02366614	1.01612603
2026	T6 CAIRP Class 5	ELEC	0	0	0	0
2026	T6 CAIRP Class 6	DSL	1.06459311	1.03340302	1.03406941	1.02220598
2026	T6 CAIRP Class 6	ELEC	0	0	0	0
2026	T6 CAIRP Class 7	DSL	1.03361146	1.01826905	1.01818854	1.01305455
2026	T6 CAIRP Class 7	ELEC	0	0	0	0
2026	T6 CAIRP Class 7	NG	1.00698695	1.01497821	1.0148091	1.01652547
2026	T6 Instate Delivery Class 4	DSL	1.02648004	1.01067087	1.01413067	1.0034736
2026	T6 Instate Delivery Class 4	ELEC	0	0	0	0
2026	T6 Instate Delivery Class 4	NG	1.02293257	1.03173319	1.03147244	1.02994104
2026	T6 Instate Delivery Class 5	DSL	1.02925807	1.01226158	1.01434235	1.00551804
2026	T6 Instate Delivery Class 5	ELEC	0	0	0	0
2026	T6 Instate Delivery Class 5	NG	1.02287588	1.03102762	1.03083422	1.02900557
2026	T6 Instate Delivery Class 6	DSL	1.02968172	1.0122858	1.01444239	1.00520019
2026	T6 Instate Delivery Class 6	ELEC	0	0	0	0
2026	T6 Instate Delivery Class 6	NG	1.02234033	1.03136942	1.03110468	1.02930806
2026	T6 Instate Delivery Class 7	DSL	1.0103442	1.00517625	1.00548321	1.00317551
2026	T6 Instate Delivery Class 7	ELEC	0	0	0	0
2026	T6 Instate Delivery Class 7	NG	1.00303229	1.00498419	1.0048777	1.00510805
2026	T6 Instate Other Class 4	DSL	1.027586	1.01073626	1.01446741	1.00352463
2026	T6 Instate Other Class 4	ELEC	0	0	0	0
2026	T6 Instate Other Class 4	NG	1.0243861	1.03304538	1.03275739	1.03163711
2026	T6 Instate Other Class 5	DSL	1.03327539	1.01401724	1.01515777	1.00859741
2026	T6 Instate Other Class 5	ELEC	0	0	0	0
2026	T6 Instate Other Class 5	NG	1.02084072	1.02846355	1.0282294	1.02699297
2026	T6 Instate Other Class 6	DSL	1.03028947	1.01203662	1.01462102	1.00475832
2026	T6 Instate Other Class 6	ELEC	0	0	0	0
2026	T6 Instate Other Class 6	NG	1.02033252	1.02725748	1.0270461	1.02593292
2026	T6 Instate Other Class 7	DSL	1.01989129	1.01332981	1.01452956	1.00635957
2026	T6 Instate Other Class 7	ELEC	0	0	0	0
2026	T6 Instate Other Class 7	NG	1.00711765	1.01400092	1.01381835	1.0124198
2026	T6 Instate Tractor Class 6	DSL	1.02780195	1.01232543	1.01543189	1.00425285
2026	T6 Instate Tractor Class 6	ELEC	0	0	0	0
2026	T6 Instate Tractor Class 6	NG	1.01770635	1.02728818	1.0270558	1.0255344
2026	T6 Instate Tractor Class 7	DSL	1.01561216	1.00759194	1.00808523	1.00393814
2026	T6 Instate Tractor Class 7	ELEC	0	0	0	0
2026	T6 Instate Tractor Class 7	NG	1.00468383	1.00849776	1.00839021	1.00806759
2026	T6 OOS Class 4	DSL	1	1	1	1
2026	T6 OOS Class 5	DSL	1	1	1	1
2026	T6 OOS Class 6	DSL	1	1	1	1
2026	T6 OOS Class 7	DSL	1	1	1	1
2026	T6 Public Class 4	DSL	1.00902955	1.00982627	1.01377377	1.0033983
2026	T6 Public Class 4	ELEC	0	0	0	0
2026	T6 Public Class 4	NG	1.02245825	1.02739254	1.02717498	1.0262251
2026	T6 Public Class 5	DSL	1.01327397	1.01103109	1.01351203	1.00424353
2026	T6 Public Class 5	ELEC	0	0	0	0
2026	T6 Public Class 5	NG	1.01208052	1.01699354	1.01675951	1.01546676
2026	T6 Public Class 6	DSL	1.00988571	1.00909369	1.01318442	1.00328911
2026	T6 Public Class 6	ELEC	0	0	0	0
2026	T6 Public Class 6	NG	1.0209295	1.02468478	1.02451388	1.02361047
2026	T6 Public Class 7	DSL	1.00917679	1.01050497	1.01531333	1.00322694
2026	T6 Public Class 7	ELEC	0	0	0	0
2026	T6 Public Class 7	NG	1.02187497	1.02905633	1.02898008	1.02680379
2026	T6 Utility Class 5	DSL	1.0690842	1.02980045	1.03049836	1.0232168
2026	T6 Utility Class 5	ELEC	0	0	0	0
2026	T6 Utility Class 5	NG	1.01679551	1.02805437	1.02768226	1.02670171
2026	T6 Utility Class 6	DSL	1.07328008	1.0307756	1.03111712	1.02478993
2026	T6 Utility Class 6	ELEC	0	0	0	0
2026	T6 Utility Class 6	NG	1.01158512	1.02092419	1.02054945	1.02014842
2026	T6 Utility Class 7	DSL	1.07530665	1.03587435	1.03606462	1.02926089
2026	T6 Utility Class 7	ELEC	0	0	0	0
2026	T6 Utility Class 7	NG	1.01045433	1.02237172	1.02199982	1.02073344
2026	T6TS	ELEC	0	0	0	0
2026	T6TS	GAS	1.01864411	1.01969621	1.01967377	1.00469651
2026	T7 CAIRP Class 8	DSL	1.06381551	1.01881468	1.02020925	1.02003002
2026	T7 CAIRP Class 8	ELEC	0	0	0	0
2026	T7 CAIRP Class 8	NG	1.01569871	1.01844533	1.01834903	1.01723571
2026	T7 NNOOS Class 8	DSL	1	1	1	1
2026	T7 NOOS Class 8	DSL	1	1	1	1
2026	T7 Other Port Class 8	DSL	1.0202241	1.00945211	1.01013175	1.00773091
2026	T7 Other Port Class 8	ELEC	0	0	0	0
2026	T7 POAK Class 8	DSL	1.02346257	1.00787991	1.00842919	1.00871379
2026	T7 POAK Class 8	ELEC	0	0	0	0
2026	T7 POAK Class 8	NG	1.0288125	1.02803836	1.02798081	1.02811463
2026	T7 POLA Class 8	DSL	1.00864462	1.00301225	1.00332714	1.00351441
2026	T7 POLA Class 8	ELEC	0	0	0	0
2026	T7 POLA Class 8	NG	1.00665921	1.01069428	1.01054224	1.01023274
2026	T7 Public Class 8	DSL	1.01069201	1.00903409	1.01198518	1.00389766
2026	T7 Public Class 8	ELEC	0	0	0	0
2026	T7 Public Class 8	NG	1.01747026	1.02898237	1.02885952	1.02564361
2026	T7 Single Concrete/Transit Mix Class 8	DSL	1.07337448	1.03335527	1.03400962	1.02875429
2026	T7 Single Concrete/Transit Mix Class 8	ELEC	0	0	0	0
2026	T7 Single Concrete/Transit Mix Class 8	NG	1.02466312	1.03351001	1.03339949	1.03071454
2026	T7 Single Dump Class 8	DSL	1.02906387	1.01553408	1.01666734	1.01077007
2026	T7 Single Dump Class 8	ELEC	0	0	0	0
2026	T7 Single Dump Class 8	NG	1.00945673	1.0181634	1.01802148	1.01509701
2026	T7 Single Other Class 8	DSL	1.03660027	1.01864755	1.01928901	1.01401014
2026	T7 Single Other Class 8	ELEC	0	0	0	0

2026	T7 Single Other Class 8	NG	1.01277154	1.020426	1.02031447	1.01765351
2026	T7 SWCV Class 8	DSL	1.00125431	1.00420694	1.00373886	1.00416569
2026	T7 SWCV Class 8	ELEC	0	0	0	0
2026	T7 SWCV Class 8	NG	1.00088448	1.01474169	1.01488428	1.00030294
2026	T7 Tractor Class 8	DSL	1.02727768	1.00946312	1.01011405	1.0085619
2026	T7 Tractor Class 8	ELEC	0	0	0	0
2026	T7 Tractor Class 8	NG	1.00512673	1.00843906	1.00835002	1.00709901
2026	T7 Utility Class 8	DSL	1.03160957	1.01538089	1.01519252	1.01058054
2026	T7 Utility Class 8	ELEC	0	0	0	0
2026	T7IS	ELEC	0	0	0	0
2026	T7IS	GAS	1.01789032	1.01619837	1.0163609	1.00347821
2026	UBUS	DSL	1	1	1	1
2026	UBUS	ELEC	1	1	1	1
2026	UBUS	GAS	1	1	1	1
2026	UBUS	NG	1	1	1	1

	Exhaust Nox	Total PM2.5 (exhaust, brake wear, and tire wear)	Total PM10 (exhaust, brake wear, and tire wear)	Total ROG (exhaust and evaporative)
HIGHEST VALUE	**1.07530665**	**1.03587435**	**1.03606462**	**1.03163711**

CONSTRUCTION ADJ FACTORS	Calendar Year	Exhaust Nox	Total PM2.5 (exhaust, brake wear, and tire wear)	Total PM10 (exhaust, brake wear, and tire wear)	Total ROG (exhaust and evaporative)
LDA/T	2027	1	1	1	1
MDT/HDT	2027	1.11635709	1.05346765	1.05427173	1.04861776
LDA/T	2026	1	1	1	1
MDT/HDT	2026	1.07337448	1.03351001	1.03400962	1.03071454
OPERATIONAL ADJ FACTORS					
FLEET MAX	2027	1.12249411	1.05698921	1.05726268	1.04975884

Calendar Year	EMFAC2021 Vehicle Category	Fuel Type	Exhaust CO2	Exhaust CH4	Exhaust N2O
2026	LHD1	GAS	1.004803871	1.00526989	1.00775012
2026	LHD2	GAS	1.004192475	1.00459104	1.00654987
2026	T6TS	GAS	1.005560454	1.00960431	1.02570163
2026	T7IS	GAS	1.004710641	1.0060468	1.02165472
2026	LHD1	DSL	1.004683585	1.0051073	1.00468358
2026	LHD2	DSL	1.004811472	1.00728699	1.00481147
2026	T6 Public Class 4	DSL	1.005137672	1.0033983	1.00513767
2026	T6 Public Class 5	DSL	1.004530516	1.00424353	1.00453052
2026	T6 Public Class 6	DSL	1.005202604	1.00328911	1.0052026
2026	T6 Public Class 7	DSL	1.006209595	1.00322694	1.00620959
2026	T6 Utility Class 5	DSL	1.009579713	1.0232168	1.00957971
2026	T6 Utility Class 6	DSL	1.009770136	1.02478993	1.00977014
2026	T6 Utility Class 7	DSL	1.011299389	1.02926089	1.01129939
2026	T6 Instate Tractor Class 6	DSL	1.005782179	1.00425285	1.00578218
2026	T6 Instate Delivery Class 4	DSL	1.005164434	1.0034736	1.00516443
2026	T6 Instate Delivery Class 5	DSL	1.004737661	1.00551804	1.00473766
2026	T6 Instate Delivery Class 6	DSL	1.004836121	1.00520019	1.00483612
2026	T6 Instate Other Class 4	DSL	1.005559212	1.00352463	1.00555921
2026	T6 Instate Other Class 5	DSL	1.004872184	1.00859741	1.00487218
2026	T6 Instate Other Class 6	DSL	1.005095705	1.00475832	1.0050957
2026	T6 Instate Tractor Class 7	DSL	1.002698678	1.00393814	1.00269868
2026	T6 Instate Delivery Class 7	DSL	1.001750423	1.00317551	1.00175042
2026	T6 Instate Other Class 7	DSL	1.004856894	1.00635957	1.00485689
2026	T6 CAIRP Class 4	DSL	1.00788844	1.01406746	1.00788844
2026	T6 CAIRP Class 5	DSL	1.007116529	1.01612603	1.00711653
2026	T6 CAIRP Class 6	DSL	1.010285813	1.02220598	1.01028581
2026	T6 CAIRP Class 7	DSL	1.005073147	1.01305455	1.00507315
2026	T6 OOS Class 4	DSL	1	1	1
2026	T6 OOS Class 5	DSL	1	1	1
2026	T6 OOS Class 6	DSL	1	1	1
2026	T6 OOS Class 7	DSL	1	1	1
2026	T7 Public Class 8	DSL	1.004479722	1.00389766	1.00447972
2026	PTO	DSL	1.005867621	1.01083811	1.00586762
2026	T7 CAIRP Class 8	DSL	1.006265842	1.02003002	1.00626584
2026	T7 Utility Class 8	DSL	1.004396408	1.01058054	1.00439641
2026	T7 NNOOS Class 8	DSL	1	1	1
2026	T7 NOOS Class 8	DSL	1	1	1
2026	T7 Other Port Class 8	DSL	1.002886082	1.00773091	1.00288608
2026	T7 POAK Class 8	DSL	1.002356825	1.00871379	1.00235683
2026	T7 POLA Class 8	DSL	1.00094006	1.00351441	1.00094006
2026	T7 Single Concrete/Transit Mix Class 8	DSL	1.010084387	1.02875429	1.01008439
2026	T7 Single Dump Class 8	DSL	1.005307749	1.01077007	1.00530775
2026	T7 Single Other Class 8	DSL	1.00560861	1.01401014	1.00560861
2026	T7 Tractor Class 8	DSL	1.002775035	1.0085619	1.00277504
2026	T7 SWCV Class 8	DSL	1.000857867	1.00416569	1.00085787
2026	T6 Public Class 4	NG	1.005783533	1.0262251	1.00578353
2026	T6 Public Class 5	NG	1.003621726	1.01546676	1.00362173
2026	T6 Public Class 6	NG	1.005196821	1.02361047	1.00519682
2026	T6 Public Class 7	NG	1.004266198	1.02680379	1.0042662
2026	T6 Utility Class 5	NG	1.005951482	1.02670171	1.00595148
2026	T6 Utility Class 6	NG	1.004478008	1.02014842	1.00447801
2026	T6 Utility Class 7	NG	1.004739062	1.02073344	1.00473906
2026	T6 Instate Tractor Class 7	NG	1.001692133	1.00806759	1.00169213
2026	T6 Instate Delivery Class 7	NG	1.000767811	1.00510805	1.00076781
2026	T6 Instate Other Class 7	NG	1.002296835	1.0124198	1.00229684
2026	T7 Public Class 8	NG	1.005504055	1.02564361	1.00550406
2026	T7 POLA Class 8	NG	1.001701031	1.01023274	1.00170103
2026	T7 Single Concrete/Transit Mix Class 8	NG	1.006130363	1.03071454	1.00613036
2026	T7 Single Dump Class 8	NG	1.003554237	1.01509701	1.00355424
2026	T7 Single Other Class 8	NG	1.00348726	1.01765351	1.00348726
2026	T7 Tractor Class 8	NG	1.001293202	1.00709901	1.0012932
2026	T7 SWCV Class 8	NG	1.002403424	1.00058339	1.00240342
2026	UBUS	GAS	0.993827005	1	1
2026	SBUS	GAS	1.001994737	1.00627193	1.00734669
2026	OBUS	GAS	1.004459124	1.00662925	1.01728664

2026	UBUS	DSL	0.999954617	1	0.99995462
2026	SBUS	DSL	1.002596371	1.00115761	1.00259637
2026	Motor Coach	DSL	1	1	1
2026	All Other Buses	DSL	1	1	1
2026	UBUS	ELEC	1	1	1
2026	UBUS	NG	0.999943517	1	0.99994352
2026	SBUS	NG	1.002730361	1.00894522	1.00273036
2026	All Other Buses	NG	1	1	1
2026	MH	GAS	1	1	1
2026	MH	DSL	1	1	1
2026	T6 Instate Tractor Class 6	NG	1.006798561	1.0255344	1.00679856
2026	T6 Instate Delivery Class 4	NG	1.00682563	1.02994104	1.00682563
2026	T6 Instate Delivery Class 5	NG	1.006734949	1.02900557	1.00673495
2026	T6 Instate Delivery Class 6	NG	1.006885671	1.02930806	1.00688567
2026	T6 Instate Other Class 4	NG	1.007207819	1.03163711	1.00720782
2026	T6 Instate Other Class 5	NG	1.006523144	1.02699297	1.00652314
2026	T6 Instate Other Class 6	NG	1.006012245	1.02593292	1.00601225
2026	T7 CAIRP Class 8	NG	1.003541283	1.01723571	1.00354128
2026	T6 CAIRP Class 7	NG	1.001914788	1.01652547	1.00191479
2026	T7 POAK Class 8	NG	1.004939121	1.02811463	1.00493912
2026	MDV	GAS	1	1	1
2026	MDV	DSL	1	1	1
2026	MDV	ELEC	1	1	1
2026	MDV	PHE	1	1	1
2026	LDT2	GAS	1	1	1
2026	LDT2	DSL	1	1	1
2026	LDT2	ELEC	1	1	1
2026	LDT2	PHE	1	1	1
2026	LDT1	GAS	1	1	1
2026	LDT1	DSL	1	1	1
2026	LDT1	ELEC	1	1	1
2026	LDT1	PHE	1	1	1
2026	LDA	GAS	1	1	1
2026	LDA	DSL	1	1	1
2026	LDA	ELEC	1	1	1
2026	LDA	PHE	1	1	1
2026	MCY	GAS	1	1	1
2026	T6TS	ELEC	0	0	0
2026	T7IS	ELEC	0	0	0
2026	OBUS	ELEC	0	0	0
2026	LHD1	ELEC	0	0	0
2026	LHD2	ELEC	0	0	0
2026	T6 Public Class 4	ELEC	0	0	0
2026	T6 Public Class 5	ELEC	0	0	0
2026	T6 Public Class 6	ELEC	0	0	0
2026	T6 Public Class 7	ELEC	0	0	0
2026	T6 Utility Class 5	ELEC	0	0	0
2026	T6 Utility Class 6	ELEC	0	0	0
2026	T6 Utility Class 7	ELEC	0	0	0
2026	T6 Instate Tractor Class 6	ELEC	0	0	0
2026	T6 Instate Delivery Class 4	ELEC	0	0	0
2026	T6 Instate Delivery Class 5	ELEC	0	0	0
2026	T6 Instate Delivery Class 6	ELEC	0	0	0
2026	T6 Instate Other Class 4	ELEC	0	0	0
2026	T6 Instate Other Class 5	ELEC	0	0	0
2026	T6 Instate Other Class 6	ELEC	0	0	0
2026	T6 Instate Tractor Class 7	ELEC	0	0	0
2026	T6 Instate Delivery Class 7	ELEC	0	0	0
2026	T6 Instate Other Class 7	ELEC	0	0	0
2026	T6 CAIRP Class 4	ELEC	0	0	0
2026	T6 CAIRP Class 5	ELEC	0	0	0
2026	T6 CAIRP Class 6	ELEC	0	0	0
2026	T6 CAIRP Class 7	ELEC	0	0	0
2026	T6 OOS Class 4	ELEC	0	0	0
2026	T6 OOS Class 5	ELEC	0	0	0
2026	T6 OOS Class 6	ELEC	0	0	0

2026	T6 OOS Class 7	ELEC	0	0	0
2026	T7 Public Class 8	ELEC	0	0	0
2026	PTO	ELEC	0	0	0
2026	T7 CAIRP Class 8	ELEC	0	0	0
2026	T7 Utility Class 8	ELEC	0	0	0
2026	T7 NNOOS Class 8	ELEC	0	0	0
2026	T7 NOOS Class 8	ELEC	0	0	0
2026	T7 Other Port Class 8	ELEC	0	0	0
2026	T7 POAK Class 8	ELEC	0	0	0
2026	T7 POLA Class 8	ELEC	0	0	0
2026	T7 Single Concrete/Transit Mix Class 8	ELEC	0	0	0
2026	T7 Single Dump Class 8	ELEC	0	0	0
2026	T7 Single Other Class 8	ELEC	0	0	0
2026	T7 Tractor Class 8	ELEC	0	0	0
2026	T7 SWCV Class 8	ELEC	0	0	0
2026	UBUS	ELEC	0	0	0
2026	SBUS	ELEC	0	0	0
2026	Motor Coach	ELEC	0	0	0
2026	All Other Buses	ELEC	0	0	0
2026	MH	ELEC	0	0	0
Calendar Year	**EMFAC2021 Vehicle Category**	**Fuel Type**	**Exhaust CO2**	**Exhaust CH4**	**Exhaust N2O**
MAX VALUE			1.011299389	1.03163711	1.02570163
2027	LHD1	GAS	1.008404448	1.00946962	1.01362093
2027	LHD2	GAS	1.00734712	1.00827372	1.01152758
2027	T6TS	GAS	1.010786662	1.01624304	1.04179881
2027	T7IS	GAS	1.008853555	1.01161553	1.03601632
2027	LHD1	DSL	1.0081676	1.0091555	1.0081676
2027	LHD2	DSL	1.008336825	1.0127759	1.00833683
2027	T6 Public Class 4	DSL	1.009330643	1.00560836	1.00933064
2027	T6 Public Class 5	DSL	1.008716891	1.00733718	1.00871689
2027	T6 Public Class 7	DSL	1.011506273	1.00560783	1.01150627
2027	T6 Utility Class 5	DSL	1.018287949	1.0390645	1.01828795
2027	T6 Utility Class 6	DSL	1.018607716	1.04128073	1.01860772
2027	T6 Utility Class 7	DSL	1.021741589	1.04737732	1.02174159
2027	T6 Instate Other Class 4	DSL	1.011276436	1.00715746	1.01127644
2027	T7 Public Class 8	DSL	1.008148671	1.00645337	1.00814867
2027	T7 CAIRP Class 8	DSL	1.011654024	1.03153221	1.01165402
2027	T7 Utility Class 8	DSL	1.008465371	1.0178427	1.00846537
2027	T7 NNOOS Class 8	DSL	1	1	1
2027	T7 NOOS Class 8	DSL	1	1	1
2027	T7 Tractor Class 8	DSL	1.005239814	1.0136211	1.00523981
2027	T6 Instate Other Class 4	NG	1.014322934	1.04975884	1.01432293
2027	UBUS	GAS	0.98827564	1	1
2027	SBUS	GAS	1.00373767	1.01017838	1.01136193
2027	OBUS	GAS	1.008923213	1.01117632	1.02803424
2027	UBUS	DSL	0.999916731	1	0.99991673
2027	SBUS	DSL	1.005188535	1.00200661	1.00518853
2027	Motor Coach	DSL	1	1	1
2027	MH	GAS	1	1	1
2027	MH	DSL	1	1	1
2027	T6 Public Class 6	DSL	1.009815396	1.00576478	1.0098154
2027	T6 Instate Delivery Class 4	DSL	1.010273207	1.00679666	1.01027321
2027	T6 Instate Delivery Class 5	DSL	1.009577107	1.01049743	1.00957711
2027	T6 Instate Delivery Class 6	DSL	1.009788374	1.00998267	1.00978837
2027	T6 Instate Other Class 5	DSL	1.010143003	1.01613102	1.010143
2027	T6 Instate Other Class 6	DSL	1.010520222	1.0095491	1.01052022
2027	T6 Instate Tractor Class 7	DSL	1.005342077	1.00696104	1.00534208
2027	T6 Instate Delivery Class 7	DSL	1.003467518	1.00534317	1.00346752
2027	T6 Instate Other Class 7	DSL	1.009358381	1.01069657	1.00935838
2027	T6 CAIRP Class 4	DSL	1.015710623	1.02493403	1.01571062
2027	T6 CAIRP Class 5	DSL	1.014361508	1.02790339	1.01436151
2027	T6 CAIRP Class 6	DSL	1.019734712	1.03711147	1.01973471
2027	T6 CAIRP Class 7	DSL	1.01062243	1.02214703	1.01062243

2027	T6 OOS Class 4	DSL	1	1	1
2027	T6 OOS Class 5	DSL	1	1	1
2027	T6 OOS Class 6	DSL	1	1	1
2027	T6 OOS Class 7	DSL	1	1	1
2027	PTO	DSL	1.01110107	1.01835134	1.01110107
2027	T7 Single Dump Class 8	DSL	1.010543309	1.01879329	1.01054331
2027	T7 Single Other Class 8	DSL	1.010358596	1.02212053	1.0103586
2027	T7 SWCV Class 8	DSL	1.001641783	1.00684779	1.00164178
2027	T6 Instate Delivery Class 4	NG	1.013512371	1.04646566	1.01351237
2027	T6 Instate Delivery Class 5	NG	1.013568281	1.0458044	1.01356828
2027	T6 Instate Delivery Class 6	NG	1.013883267	1.04633567	1.01388327
2027	T6 Instate Other Class 5	NG	1.013413121	1.04455297	1.01341312
2027	T6 Instate Other Class 6	NG	1.012479809	1.04240845	1.01247981
2027	All Other Buses	DSL	1	1	1
2027	UBUS	ELEC	1	1	1
2027	UBUS	NG	0.999911011	1	0.99991101
2027	T7 Single Concrete/Transit Mix Class 8	DSL	1.018883472	1.04561449	1.01888347
2027	T6 Instate Tractor Class 6	DSL	1.0126719	1.00927291	1.0126719
2027	T7 Single Other Class 8	NG	1.00685446	1.02760617	1.00685446
2027	All Other Buses	NG	1	1	1
2027	T7 Public Class 8	NG	1.010251471	1.03942383	1.01025147
2027	T7 Single Dump Class 8	NG	1.007210109	1.02577034	1.00721011
2027	T7 Tractor Class 8	NG	1.002463985	1.01152453	1.00246398
2027	T7 POAK Class 8	DSL	1.004731044	1.01456219	1.00473104
2027	T6 Utility Class 5	NG	1.01241707	1.04432372	1.01241707
2027	T6 Utility Class 6	NG	1.00966332	1.03466628	1.00966332
2027	T6 Utility Class 7	NG	1.010539177	1.0354272	1.01053918
2027	T6 Instate Tractor Class 7	NG	1.003623263	1.01385047	1.00362326
2027	T6 Instate Delivery Class 7	NG	1.001791244	1.00843687	1.00179124
2027	T6 Instate Other Class 7	NG	1.005098285	1.02004062	1.00509828
2027	T7 Single Concrete/Transit Mix Class 8	NG	1.012396768	1.04861776	1.01239677
2027	T7 SWCV Class 8	NG	1.00460446	1.00098332	1.00460446
2027	T6 Public Class 4	NG	1.010516144	1.03829572	1.01051614
2027	T6 Public Class 5	NG	1.007168789	1.02441952	1.00716879
2027	T6 Public Class 6	NG	1.009871164	1.03514883	1.00987116
2027	T6 Public Class 7	NG	1.008801474	1.03942544	1.00880147
2027	SBUS	NG	1.005614716	1.01442883	1.00561472
2027	T7 Other Port Class 8	DSL	1.006114738	1.01384761	1.00611474
2027	T6 Instate Tractor Class 6	NG	1.01491213	1.04582366	1.01491213
2027	T7 CAIRP Class 8	NG	1.006848745	1.02808742	1.00684875
2027	T7 POLA Class 8	DSL	1.001903188	1.00584511	1.00190319
2027	T7 POAK Class 8	NG	1.007982362	1.03728122	1.00798236
2027	T7 POLA Class 8	NG	1.003387642	1.01621339	1.00338764
2027	T6 CAIRP Class 7	NG	1.005099777	1.02763924	1.00509978
2027	MDV	GAS	1	1	1
2027	MDV	DSL	1	1	1
2027	MDV	ELEC	1	1	1
2027	MDV	PHE	1	1	1
2027	LDT2	GAS	1	1	1
2027	LDT2	DSL	1	1	1
2027	LDT2	ELEC	1	1	1
2027	LDT2	PHE	1	1	1
2027	LDT1	GAS	1	1	1
2027	LDT1	DSL	1	1	1
2027	LDT1	ELEC	1	1	1
2027	LDT1	PHE	1	1	1
2027	LDA	GAS	1	1	1
2027	LDA	DSL	1	1	1
2027	LDA	ELEC	1	1	1
2027	LDA	PHE	1	1	1
2027	MCY	GAS	1	1	1
2027	T6TS	ELEC	0	0	0
2027	T7IS	ELEC	0	0	0
2027	OBUS	ELEC	0	0	0
2027	LHD1	ELEC	0	0	0
2027	LHD2	ELEC	0	0	0

2027	T6 Public Class 4	ELEC	0	0	0
2027	T6 Public Class 5	ELEC	0	0	0
2027	T6 Public Class 7	ELEC	0	0	0
2027	T6 Utility Class 5	ELEC	0	0	0
2027	T6 Utility Class 6	ELEC	0	0	0
2027	T6 Utility Class 7	ELEC	0	0	0
2027	T6 Instate Other Class 4	ELEC	0	0	0
2027	T7 Public Class 8	ELEC	0	0	0
2027	T7 CAIRP Class 8	ELEC	0	0	0
2027	T7 Utility Class 8	ELEC	0	0	0
2027	T7 NNOOS Class 8	ELEC	0	0	0
2027	T7 NOOS Class 8	ELEC	0	0	0
2027	T7 Tractor Class 8	ELEC	0	0	0
2027	UBUS	ELEC	0	0	0
2027	SBUS	ELEC	0	0	0
2027	Motor Coach	ELEC	0	0	0
2027	MH	ELEC	0	0	0
2027	T6 Public Class 6	ELEC	0	0	0
2027	T6 Instate Delivery Class 4	ELEC	0	0	0
2027	T6 Instate Delivery Class 5	ELEC	0	0	0
2027	T6 Instate Delivery Class 6	ELEC	0	0	0
2027	T6 Instate Other Class 5	ELEC	0	0	0
2027	T6 Instate Other Class 6	ELEC	0	0	0
2027	T6 Instate Tractor Class 7	ELEC	0	0	0
2027	T6 Instate Delivery Class 7	ELEC	0	0	0
2027	T6 Instate Other Class 7	ELEC	0	0	0
2027	T6 CAIRP Class 4	ELEC	0	0	0
2027	T6 CAIRP Class 5	ELEC	0	0	0
2027	T6 CAIRP Class 6	ELEC	0	0	0
2027	T6 CAIRP Class 7	ELEC	0	0	0
2027	T6 OOS Class 4	ELEC	0	0	0
2027	T6 OOS Class 5	ELEC	0	0	0
2027	T6 OOS Class 6	ELEC	0	0	0
2027	T6 OOS Class 7	ELEC	0	0	0
2027	PTO	ELEC	0	0	0
2027	T7 Single Dump Class 8	ELEC	0	0	0
2027	T7 Single Other Class 8	ELEC	0	0	0
2027	T7 SWCV Class 8	ELEC	0	0	0
2027	All Other Buses	ELEC	0	0	0
2027	T7 Single Concrete/Transit Mix Class 8	ELEC	0	0	0
2027	T6 Instate Tractor Class 6	ELEC	0	0	0
2027	T7 POAK Class 8	ELEC	0	0	0
2027	T7 Other Port Class 8	ELEC	0	0	0
2027	T7 POLA Class 8	ELEC	0	0	0
Calendar Year	**EMFAC2021 Vehicle Category**	**Fuel Type**	**Exhaust CO2**	**Exhaust CH4**	**Exhaust N2O**
MAX VALUE			1.021741589	1.04975884	1.04179881

CONSTRUCTION ADJ FACTORS	Calendar Year	Exhaust CO2	Exhaust CH4	Exhaust N2O
LDA/T	2027	1	1	1
HDT	2027	1.01888347	1.04861776	1.01888347
LDA/T	2026	1	1	1
HDT	2026	1.01008439	1.03071454	1.01008439
OPERATIONAL ADJ FACTORS				
FLEET MAX	2027	1.02174159	1.04975884	1.04179881

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Appendix D
Biological Resources Report

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Administrative Draft
CSUMB Stadium Expanded Use Project

Biological Resources Report

February 2026

Prepared by

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Prepared for

California State University Monterey Bay
100 Campus Center
Seaside, CA 93955

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1.0 PROJECT SUMMARY

The California State University Monterey Bay (CSUMB) contracted Denise Duffy & Associates, Inc. (DD&A) to provide environmental consulting services for the CSUMB Stadium Expanded Use Project (proposed project) located on the existing campus within the City of Seaside (City) (**Figures 1** and **2**). The proposed project would include improvements to the stadium currently utilized by CSUMB and the Monterey Bay Football Club (MBFC), consisting of new permanent restroom and locker room facilities to replace and expand on the temporary facilities, and a new 1.25-acre storage and staging area that would be installed within a disturbed vacant lot. The improvements would facilitate the proposed project's plans to expand the use of the stadium to include additional sporting events, community events, and increased visitor capacity.

1.1 Summary of Results

Botanical surveys in April and May 2025 identified Monterey spineflower (*Chorizanthe pungens* var. *pungens*), a federally endangered, Fort Ord Habitat Management Plan (Fort Ord HMP), and California Native Plant Society (CNPS) California Rare Plant Ranking (CRPR) 1B species, within the proposed storage and staging area on the proposed project site (**Figure 3**). Additionally, several trees would be removed as part of the proposed project. Nesting raptors and other protected avian species may be present in these trees and trees adjacent to the proposed project site. As a result, the proposed construction activities would result in potentially significant impacts to Monterey spineflower and nesting raptors and other protected avian species under the California Environmental Quality Act (CEQA). Any trees greater than four-inch (4-in) diameter-at-breast-height (dbh) proposed for removal would be required to comply with the CSUMB Tree Restoration Program. Avoidance and mitigation measures described within this report would reduce these potentially significant impacts to a less-than-significant level. No other special-status plants or wildlife species are present within the proposed project site. No environmentally sensitive habitats were observed within the proposed project site. Please refer to **Appendix A** for an analysis of each special-status species known to or with the potential occur within the proposed project vicinity.

Title: Project Location Map	Date: 1/14/2026 Scale: 1 IN = 1.5 MI 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 1

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 2

2.0 INTRODUCTION

California State University Monterey Bay (CSUMB) contracted Denise Duffy & Associates, Inc. (DD&A) to provide environmental consulting services for the CSUMB Stadium Expanded Use Project (proposed project) within campus of CSUMB located in the City of Seaside (City) (**Figures 1** and **2**). The proposed project would include improvements to the stadium currently utilized by CSUMB and the Monterey Bay Football Club (MBFC), consisting of new permanent restroom and locker room facilities, and a new 1.25-acre storage and staging area that would be installed within a disturbed vacant lot (**Figure 2**).

This report presents the findings of a biological resource assessment conducted by DD&A for the proposed project. The emphasis of this study is to describe the existing biological resources within and surrounding the proposed project site, identify any special-status species and sensitive habitats within and adjacent to the proposed project site, assess potential impacts that may occur to biological resources, and recommend appropriate avoidance, minimization, and mitigation measures necessary to reduce those impacts to a less-than-significant level in accordance with CEQA.

2.1 Project Description

The improvements to the stadium facilities would support the proposed project's plans for the expanded use of the facility, including increasing the attendance capacity for the stadium, additional sporting events, community partner events, and use by the CSUMB student body. This expanded use would not result in physical impacts to the proposed project site beyond the facility improvements described below.

These improvements include:

- **Permanent Men's & Women's Locker Room and Shower Facilities.** The proposed project would construct two (2) permanent 1,400-square-foot (sf) locker room and shower facilities. One (1) facility would replace the existing portable showers utilized by the MBFC 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, and the project would locate this facility to the southwest of the field house (**Figure 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 3,000-sf and approximately 36 portable facilities currently in use (**Figure 2**).

- **Storage and Staging Area.** The proposed project would establish a new 1.25-acre dedicated storage and staging area north of the stadium in the existing parking lot to support event operations, equipment storage, and logistical needs (**Figure 2**). The storage and staging area would not require permanent construction of structures besides fencing. The storage and staging area may accommodate shipping containers to protect equipment from the weather.

3.0 METHODS

3.1 Personnel and Survey Dates

DD&A Senior Environmental Scientist Jami Davis and Assistant Environmental Scientist Jordan DePedro conducted focused botanical surveys of the proposed project site on April 9 and May 13, 2025, to identify the 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 2**).

The surveys were conducted following the applicable guidelines outlined in the U.S. Fish and Wildlife Service (USFWS) *Guidelines for Conducting and Reporting Botanical Inventories for Federally listed, Proposed and Candidate Plants* (USFWS, 2000), the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018), and the CNPS *Botanical Survey Guidelines* (CNPS, 2001). Monterey spineflower was identified within the disturbed vacant lot where the new storage and staging area is proposed.

Data collected during the surveys were used to assess the environmental conditions of the proposed project site and its surroundings, evaluate environmental constraints at the site and within the local vicinity, and provide a basis for recommendations to minimize and avoid impacts to sensitive biological resources.

3.2 Special-Status Species

Special-status species are those plants and animals that have been formally listed or proposed for listing as endangered or threatened, are candidates for such listing under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). Listed species are afforded legal protection under the ESA and CESA. Species that meet the definition of rare or endangered under the CEQA Section 15380 are also considered special-status species. Animals on the California Department of Fish and Wildlife's (CDFW) list of "species of special concern" (most of which are species whose breeding populations in California may face extirpation if current population trends continue) meet this definition and are typically provided management consideration through the CEQA process, although they are not legally protected under the ESA or CESA. Additionally, the CDFW also includes some animal species that are not assigned any of the other status designations in the California Natural Diversity Database (CNDDB) "Special Animals" list (CNDDB, 2025); however, these species have no legal or protection status.

Plants listed as rare under the California Native Plant Protection Act (CNPPA) or included in CNPS 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* (CNPS, 2025) 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.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected in California under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy the nest or eggs of any such bird except otherwise provided by this code or any regulation adopted pursuant thereto." In addition, fully protected species under the Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians) are also considered special-status animal species. Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

Species with no formal special-status designation but thought by experts to be rare or in serious decline may also be considered special-status animal species in some cases, depending on project-specific analysis and relevant, localized conservation needs or precedence.

3.3 Sensitive Habitats

Sensitive habitats include riparian corridors, wetlands, habitats for legally protected species, areas of high biological diversity, areas supporting rare or special-status wildlife habitat, and unusual or regionally restricted vegetation types. Vegetation types considered sensitive include those listed on the CDFW's *California Natural Communities List* (i.e., those habitats that are rare or endangered within the borders of California) (CDFW, 2025a), or those that are occupied by species listed under ESA or are critical habitat in accordance with ESA, and those that are defined as environmentally sensitive habitat areas (ESHA) under the California Coastal Act (CCA). Specific habitats may also be identified as sensitive in city or county general plans or ordinances. Sensitive habitats are regulated under federal regulations (such as the Clean Water Act [CWA] and Executive Order [EO] 11990 – Protection of Wetlands), state regulations (such as CEQA, CCA, and the CDFW Streambed Alteration Program), or local ordinances or policies (such as city or county tree ordinances and general plan policies).

3.4 Data Sources

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

- Current agency status information from 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) Marina quadrangle and the following surrounding quadrangles: Monterey, Seaside, Salinas, Spreckels, Moss Landing, and Prunedale (CDFW, 2025b; **Appendix B**); and
    - USFWS IPaC Resource List (USFWS, 2025a; **Appendix C**).
- The CNPS *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2025)
- The USFWS National Wetlands Inventory Wetlands Mapper (USFWS, 2025b); and
- The National Hydrography Dataset (USGS, 2023).

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 A**). This list presents these species along with their legal status, habitat requirements, and a brief statement of the likelihood to occur.

3.4.1 Botany

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* (Baldwin et al., 2012) and *The Plants of Monterey County an Illustrated Field Key* (Matthews and Mitchell, 2015). Scientific nomenclature for plant species identified within this document follows Baldwin, et al., (2012), while common names follow Matthews and Mitchell (2015). The dominant species within each habitat were noted; dominant plant species are those which are more numerous than their competitors in an ecological community or make up more of the biomass (i.e. the species that are most abundant). Most ecological communities are defined by their dominant species. Vegetation types identified in *A Manual of California Vegetation* (Sawyer et.al., 2009) were utilized to determine if vegetation types identified as sensitive on CDFW's *California Natural Communities List* (CDFW, 2025a) are present within the proposed project site. Information regarding the distribution and habitats of local and state vascular plants was also reviewed (Howitt and Howell, 1964 and 1973; Munz and Keck, 1973; Baldwin et al., 2012; Matthews and Mitchell, 2015; Jepson Flora Project, 2025).

The California Invasive Plant Council (Cal-IPC) Inventory (Cal-IPC, 2025) was reviewed to determine if invasive plant species are present within the evaluation area.

3.4.2 Wildlife

The following literature and data sources were reviewed: CDFW reports on special-status wildlife (Remsen, 1978; Williams, 1986; Thelander, 1994); California Wildlife Habitat Relationships Program species-habitat models (Zeiner et al., 1988 and 1990); and general wildlife references (Stebbins, 1972, 1985, and 2003).

3.5 Level of Analysis and Survey Limitations

The entirety of the proposed project site was assessed during the biological surveys.

3.6 Regulatory Setting

The following regulatory discussion describes the major laws that may be applicable to the proposed project.

3.6.1 Federal Regulations

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 ESA is administered by the USFWS or National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS). In general, the 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 countries for the protection of migratory birds – Canada, Mexico, Japan, and Russia. USFWS maintains a list of migratory bird species that are protected under the MBTA, which was updated in 2023.

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, USFWS issued a 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 (USFWS, 1993, updated to USFWS, 2017, "2017 Programmatic BO"). 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 (Army Corps of Engineers [ACOE], 1997).

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 (USFWS, 2017 and ACOE, 1997). In addition, the Fort Ord HMP requires that land recipients prepare and implement Resource Management Plans (RMP) and Borderland Management Plans (BMP) for specified parcels within their respective jurisdictions.

3.6.2 State Regulations

California Endangered Species Act

The CESA was enacted in 1984. The California Code of Regulations (Title 14, §670.5) lists animal species that are 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 (ITP) from the CDFW may be obtained to authorize “take” of any state listed species.

California Fish and Game Code

Birds. 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 MBTA. Section 3800 prohibits take of nongame birds.

Fully Protected Species. The classification of fully protected was the state's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish (§5515), mammals (§4700), amphibians and reptiles (§5050), and birds (§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.

Species of Special Concern. As noted above, the CDFW also maintains a list of animal “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.

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 (§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.

CSUMB Master Plan

CSUMB prepared and adopted an Environmental Impact Report (EIR) for the CSUMB Master Plan (Master Plan EIR) in 2022 (State Clearinghouse No. 2017051042). The 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 Mitigation Monitoring and Reporting Program (MMRP) for

the Master Plan EIR, and implementation of the adopted mitigation measures are required for any projects on the campus.

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 4-in dbh removed, two coast live oak trees would be replanted, and assumed to survive, in the identified restoration area on campus. In some cases, more than two 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-in dbh or greater.

3.6.3 Local Regulations

As a state entity, CSUMB is not subject to local government planning or ordinances, such as the general plans and ordinances for the city of Seaside and the County of Monterey. Accordingly, because neither local general plans nor any other local land use plans or ordinances are applicable to CSUMB, such local plans and ordinances are not summarized here or further analyzed in this section.

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.

4.0 RESULTS

The proposed project site consists of one vegetation type: ruderal/disturbed (approximately 1.25 acre). The remainder of the proposed project site, approximately 6,000 sq ft, is developed (i.e., consists of gravel, pavement, or buildings), and, therefore, contains no vegetation or limited landscape/horticulture species that provide little to no habitat for wildlife species. Habitat surrounding the proposed project site consists of ruderal and developed areas.

4.1 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. The majority of the ruderal habitat is located within the proposed location for the new staging and storage area and consists of compact fill dirt covered with non-native grasses, iceplant (*Carpobrotus edulis*), and scattered trees and shrubs. Trees with a 4-in or greater dbh within the ruderal habitat include four bishop pines (*Pinus muricata*.), four eucalyptus (*Eucalyptus* sp.), and eight 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 (Cal-IPC, 2025). One population of Monterey spineflower was identified on the western side of the area (**Figure 3**).

Ruderal/disturbed habitat is considered to have 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.

4.2 Sensitive Habitats

No sensitive habitats were identified within the proposed project site. Additionally, no wetland or drainage features were identified from the National Wetland Inventory or USGS Hydrography dataset (USFWS, 2025b; USGS, 2025). No ESHA occurs within the proposed project site as the site is not located in the Coastal Zone. Therefore, no sensitive habitats occur within the proposed project site.

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 3

4.3 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 (please refer to *Section 3.0, Methods* and **Appendix A**). 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 removal within the storage and staging area. These species are discussed further below.

One 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 storage and staging area (**Figure 3**). 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 A** and, therefore, are unlikely to be impacted by the proposed project and not discussed further in this analysis.

4.3.1 Monterey Spineflower

Monterey spineflower (*Chorizanthe pungens* var. *pungens*) is a federally threatened, CNPS CRPR 1B species, and Fort Ord HMP species. It 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 3 - 450 meters (50 – 1,500 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.

4.3.2 CSUMB Trees

All trees, native and non-native, are under the jurisdiction of the CSUMB Tree Restoration Program. A total of 16 trees with a 4-in or greater dbh, including eight coast live oaks, are located within the ruderal/disturbed lot within the proposed project site.

4.3.3 Raptors and Other Protected Avian Species

Raptors and their nests are protected under the 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 protected avian species have a potential to nest within any of the trees present within and adjacent to the survey area.

5.0 IMPACTS AND MITIGATION MEASURES

The following section describes potential impacts to sensitive biological resources that may result from the proposed project. In accordance with Appendix G of CEQA Guidelines, an impact is considered to be significant and require mitigation if it would result in any of the following:

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 CDFW or USFWS;

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS;

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 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.

5.1 Areas of No Impact

The proposed project site does not contain and is not adjacent to any state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), riparian or other sensitive habitat identified by local regulations, CDFW, or USFWS and, therefore, no impacts to these resources would occur. Therefore, criterion b and c are not evaluated in this analysis.

5.2 Impacts and Mitigation Measures

Impact BIO-1*: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.*

Monterey spineflower, a federally endangered, Fort Ord HMP and CRPR 1B plant species, is present within the proposed project site (**Figure 3**). A population covering approximately 1,198-sf with approximately 5

percent ground cover was identified during a focused botanical survey during its blooming period. The proposed project includes grading and installing gravel in the area where Monterey spineflower was observed. These activities would 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 be required to reduce this potentially significant impact to a less-than-significant level.

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.

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. This would be a potentially significant impact that would be reduced to a less-than-significant level with the implementation of **Mitigation Measures BIO-2** and **3**.

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 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 pre-construction survey for nesting raptors or other protected avian species within 300 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 feet in all directions for raptors; other avian

species may have species-specific requirements) until the young of the year have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.

Impact BIO-2: *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites.*

The majority of the proposed project site is currently developed and actively used as a sports stadium and associated facilities. The proposed project site provides minimal foraging resources for migratory wildlife and is not within an established wildlife corridor or nursery. Therefore, the implementation of the proposed project would not result in substantial interference with the movement of wildlife through the site or impede the use of a native nursery site. Therefore, the proposed project would have a less-than-significant impact on wildlife movement and native nursery sites.

Impact BIO-3: *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

Implementation of the project would result in impacts to trees within CSUMB campus boundaries. 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 trees with a four-inch dbh or greater removed, a minimum of two coast live oak trees would be replanted in the identified restoration area on campus. The implementation of this program is required for all projects that would result in impacts to trees. Therefore, as a feature of the project design, two coast live oak trees would be replanted for every tree with a greater than four-inch dbh removed. The replanting specifications would be required in final project plans. Trees within and adjacent to the project sites not planned for removal will be protected prior to and during construction through the implementation of exclusionary fencing as required in **Mitigation Measure BIO-2**. This would be a less-than-significant impact.

Impact BIO-4: *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

As described in *Section 2.4, Regulatory Setting*, the proposed project site is not located within an approved Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) area. However, the proposed project site is located within the former Fort Ord and the plan area of the HMP. As described in Section 3.6.1, Federal Regulations, the proposed project activities are consistent with the approved HMP as it is located within parcels designated for “development” and the parcels do not have any restrictions for use. In addition, the proposed project will comply with the requirements of the HMP, as applicable. Therefore, implementation of the proposed project would not conflict with the approved HMP. This impact would be less than significant, and no mitigation is required.

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APPENDIX A

Special-Status Species Table

Special-Status Species Table

Marina, Monterey, Seaside, Spreckels, Salinas, Moss Landing, and Prunedale

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
MAMMALS			
Corynorhinus townsendii Townsend's big-eared bat	— / CSC / —	Found primarily in rural settings from inland deserts to coastal redwoods, oak woodland of the inner Coast Ranges and Sierra foothills, and low to mid-elevation mixed coniferous-deciduous forests. Typically roost during the day in limestone caves, lava tubes, and mines, but can roost in buildings that offer suitable conditions. Night roosts are in more open settings and include bridges, rock crevices, and trees.	**Low** Marginal night roost habitat may be present within trees adjacent to the project site; however, the frequent human activity and noise and light disturbances in the area make the potential for bats to roost in the project site is low.
Neotoma macrotis luciana Monterey dusky-footed woodrat	— / CSC / —	Forest and oak woodland habitats of moderate canopy with moderate to dense understory. Also occurs in chaparral habitats.	**Not Present** No suitable habitat is present within the project site. No nests were observed during the field survey.
Sorex ornatus salaries **Monterey ornate shrew**	— / CSC / —	Mostly moist or riparian woodland habitats and within chaparral, grassland, and emergent wetland habitats where there is a thick duff or downed logs.	**Not Present** No suitable habitat is present within project site.
Taxidea taxus American badger	— / CSC / —	Dry, open grasslands, fields, pastures savannas, and mountain meadows near timberline are preferred. The principal requirements seem to be sufficient food, friable soils, and relatively open, uncultivated grounds.	**Not Present** No suitable habitat is present within project site.
BIRDS			
Agelaius tricolor Tricolored blackbird (nesting colony)	— / ST & CSC / —	Nest in colonies in dense riparian vegetation, along rivers, lagoons, lakes, and ponds. Forages over grassland or aquatic habitats.	**Not Present** No suitable habitat is present within project site.
Anarhychus nivosus nivosus Western snowy plover	FT / CSC / —	Sandy beaches on marine and estuarine shores, also salt pond levees and the shores of large alkali lakes. Requires sandy, gravelly or friable soil substrate for nesting.	**Not Present** No suitable habitat is present within project site.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Asio flammeus Short-eared owl (nesting)	— / CSC / —	Usually found in open areas with few trees, such as annual and perennial grasslands, prairies, meadows, dunes, irrigated lands, and saline and freshwater emergent marshes. Dense vegetation is required for roosting and nesting cover. This includes tall grasses, brush, ditches, and wetlands. Open, treeless areas containing elevated sites for perching, such as fence posts or small mounds, are also needed. Some individuals breed in northern California.	**Unlikely** No suitable habitat is present within project site.
Athene cunicularia Burrowing owl (burrow sites and some wintering sites)	— / SC & CSC / —	Year-round resident of open, dry grassland and desert habitats, and in grass, forb and open shrub stages of pinyon-juniper and ponderosa pine habitats. Frequent open grasslands and shrublands with perches and burrows. Use rodent burrows (often California ground squirrel) for roosting and nesting cover. Pipes, culverts, and nest boxes may be substituted for burrows in areas where burrows are not available.	**Not Present** No suitable habitat is present within project site.
Brachyramphus marmoratus Marbled murrelet	FT / SE / —	Occur year-round in marine subtidal and pelagic habitats from the Oregon border to Point Sal. Partial to coastlines with stands of mature redwood and Douglas-fir. Requires dense mature forests of redwood and/or Douglas-fir for breeding and nesting.	**Not Present** No suitable habitat is present within project site.
Coccyzus americanus occidentalis Western yellow-billed cuckoo	FT / SE / --	Inhabits extensive deciduous riparian thickets or forests with dense, low-level or understory foliage, slow-moving watercourses, backwaters, or seeps. Willow almost always a dominant component of the vegetation.	**Not Present** No suitable habitat is present within project site.
Coturnicops noveboracensis Yellow rail	— / CSC / —	Wet meadows and coastal tidal marshes. Occurs year round in California, but in two primary seasonal roles: as a very local breeder in the northeastern interior and as a winter visitor (early Oct to mid-Apr) on the coast and in the Suisun Marsh region	**Not Present** Project site lacks obligate habitat features and is located outside of the known nesting range of this species.
Cypseloides niger Black swift	— / CSC / —	Regularly nests in moist crevice or cave on sea cliffs above the surf, or on cliffs behind, or adjacent to, waterfalls in deep canyons. Forages widely over many habitats.	**Unlikely** No suitable nesting habitat is present within project site.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Elanus leucurus White-tailed kite (nesting)	-- / CFP / --	Open groves, river valleys, marshes, and grasslands. Prefer such area with low roosts (fences etc.). Nest in shrubs and trees adjacent to grasslands.	**Low** Suitable nesting habitat may be present within the trees within the survey area; however, only marginal foraging habitat is present and the CNDDB reports only one occurrence of the species within the reviewed quadrangles, located approximately 14 miles from the project site.
Empidonax traillii extimus Southwestern willow flycatcher	FE / SE / —	Breeds in riparian habitat in areas ranging in elevation from sea level to over 2,600 meters. Builds nest in trees in densely vegetated areas. This species establishes nesting territories and builds, and forages in mosaics of relatively dense and expansive areas of trees and shrubs, near or adjacent to surface water or underlain by saturated soils. Not typically found nesting in areas without willows (*Salix sp*.), tamarisk (*Tamarix ramosissima*), or both.	**Unlikely** No suitable habitat is present within project site.
Falco peregrinus anatum American peregrine falcon (nesting)	— / CFP / —	Forages for other birds over a variety of habitats. Breeds primarily on rocky cliffs.	**Unlikely** No suitable habitat is present within project site.
Gymnogyps californianus California condor	FE / SE /—	Roosting sites in isolated rocky cliffs, rugged chaparral, and pine covered mountains 2000-6000 feet above sea level. Foraging area removed from nesting/roosting site (includes rangeland and coastal area - up to 19 mile commute one way). Nest sites in cliffs, crevices, potholes.	**Unlikely** No suitable habitat is present within project site.
Hydrobates homochroa Ashy storm-petrel (nesting colony)	-- / CSC / --	Tied to land only to nest, otherwise remains over open sea. Nests in natural cavities, sea caves, or rock crevices on offshore islands and prominent peninsulas of the mainland.	**Not Present** No suitable habitat is present within project site.
Laterallus jamaicensis coturniculus California black rail	— / ST & CFP / —	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that does not fluctuate during the year and dense vegetation for nesting habitat.	**Not Present** No suitable habitat is present within project site.
Rallus obsoletus obsoletus California Ridgway's rail	FE / SE&CFP / --	Salt and brackish marshes.	**Not Present** No suitable habitat is present within project site.
Riparia riparia Bank swallow (nesting)	— / ST / —	Nest colonially in sand banks. Found near water; fields, marshes, streams, and lakes.	**Unlikely** No suitable nesting habitat is present within project site.
Sterna antillarum browni California least tern	FE / SE / —	Prefers undisturbed nest sites on open, sandy/gravelly shores near shallow-water feeding areas in estuaries. Sea beaches, bays, large rivers, bars.	**Unlikely** No suitable habitat is present within project site.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Vireo bellii pusillus Least Bell's Vireo	FE / SE / —	Riparian areas and drainages. Breed in willow riparian forest supporting a dense, shrubby understory. Oak woodland with a willow riparian understory is also used in some areas, and individuals sometimes enter adjacent chaparral, coastal sage scrub, or desert scrub habitats to forage.	**Unlikely** No suitable habitat is present within project site.
REPTILES AND AMPHIBIANS			
Actinemys marmorata Northwestern pond turtle	FC / CSC / --	Associated with permanent or nearly permanent water in a wide variety of habitats including streams, lakes, ponds, irrigation ditches, etc. Require basking sites such as partially submerged logs, rocks, mats of vegetation, or open banks. During spring and early summer females move overland for up to 100 meters to lay eggs, typically in compact, dry soils in areas with sparse vegetation. The range for this species is from Washington south to approximately Castroville, the foothills of the Salinas Valley from Salinas to Soledad, and into the central valley and eastern foothills to Lancaster, California.	**Not Present** No suitable habitat is present within project site.
Actinemys pallida Southwestern pond turtle	FC / CSC / —	Associated with permanent or nearly permanent water in a wide variety of habitats including streams, lakes, ponds, irrigation ditches, etc. Require basking sites such as partially submerged logs, rocks, mats of vegetation, or open banks.	**Not Present** No suitable habitat is present within project site.
Ambystoma californiense **California tiger salamander**	FT / ST /—	Annual grassland and grassy understory of valley-foothill hardwood habitats in central and northern California. Need underground refuges and vernal pools or other seasonal water sources.	**Unlikely** No suitable habitat is present within project site. The project site is outside the dispersal range of any known or potential breeding ponds.
Ambystoma macrodactylum croceum Santa Cruz long-toed salamander	FE / SE&CFP / --	Preferred habitats include ponderosa pine, montane hardwood-conifer, mixed conifer, montane riparian, red fir and wet meadows. Occurs in a small number of localities in Santa Cruz and Monterey Counties. Adults spend the majority of the time in underground burrows and beneath objects. Larvae prefer shallow water with clumps of vegetation.	**Unlikely** No suitable habitat is present within project site. The project site is outside the dispersal range of any known or potential breeding resources.
Anniella pulchra **Northern California legless lizard**	— / CSC / —	Requires moist, warm habitats with loose soil for burrowing and prostrate plant cover, often forages in leaf litter at plant bases; may be found on beaches, sandy washes, and in woodland, chaparral, and riparian areas.	**Low** No suitable habitat is present within project site.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Phrynosoma blainvillii Coast horned lizard	— / CSC / —	Associated with open patches of sandy soils in washes, chaparral, scrub, and grasslands.	**Low** No suitable habitat is present within project site.
Rana boylii Foothill yellow-legged frog	FE / SE / —	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats, including hardwood, pine, and riparian forests, scrub, chaparral, and wet meadows. Rarely encountered far from permanent water.	**Not Present** No suitable habitat is present within project site.
Rana draytonii **California red-legged frog**	FT / CSC / —	Lowlands and foothills in or near permanent or late-season sources of deep water with dense, shrubby, or emergent riparian vegetation. During late summer or fall adults are known to utilize a variety of upland habitats with leaf litter or mammal burrows.	**Unlikely** No suitable habitat is present within project site. The project site is outside the dispersal range of any known or potential breeding sites.
Spea hammondii Western spadefoot	FC / CSC / —	Grasslands with shallow temporary pools are optimal habitats for the western spadefoot. Occur primarily in grassland habitats, but can be found in valley and foothill woodlands. Vernal pools are essential for breeding and egg laying.	**Unlikely** No suitable habitat is present within project site. The project site is outside the dispersal range of any known or potential breeding sites.
Taricha torosa Coast Range newt	— / CSC / —	Occurs mainly in valley-foothill hardwood, valley-foothill hardwood-conifer, coastal scrub, and mixed chaparral but is known to occur in grasslands and mixed conifer types. Seek cover under rocks and logs, in mammal burrows, rock fissures, or man-made structures such as wells. Breed in intermittent ponds, streams, lakes, and reservoirs.	**Unlikely** No suitable habitat is present within project site. The project site is outside the dispersal range of any known or potential breeding sites.
Thamnophis hammondii Two-striped garter snake	— / CSC / —	Associated with permanent or semi-permanent bodies of water bordered by dense vegetation in a variety of habitats from sea level to 2400m elevation.	**Not Present** No suitable habitat is present within project site.
FISH			
Eucyclogobius newberryi Tidewater goby	FE / CSC / —	Brackish water habitats, found in shallow lagoons and lower stream reaches. Tidewater gobies appear to be naturally absent (now and historically) from three large stretches of coastline where lagoons or estuaries are absent and steep topography or swift currents may prevent tidewater gobies from dispersing between adjacent localities. The southernmost large, natural gap occurs between the Salinas River in Monterey County and Arroyo del Oso in San Luis Obispo County.	**Not Present** No suitable habitat is present within project site.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Lavinia exilicauda harengus Monterey hitch (Pajaro/Salinas hitch)	-- / CSC / --	Found only within the Pajaro and Salinas River systems. Can occupy a wide variety of habitats, however, they are most abundant in lowland areas with large pools or small reservoirs that mimic such conditions. May be found in brackish water conditions within the Salinas River lagoon during the early summer months when the sandbar forms at the mouth of the river.	**Not Present** No suitable habitat is present within project site.
Oncorhynchus mykiss irideus Steelhead (south-central California coast DPS)	FT / CSC / —	Cold headwaters, creeks, and small to large rivers and lakes; anadromous in coastal streams.	**Not Present** No suitable habitat is present within project site.
Spirinchus thaleichthys Longfin smelt	-- / ST / --	Euryhaline, nektonic & anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefers salinities of 15-30 PPT, but can be found in completely freshwater to almost pure seawater. Found in coastal estuaries north of the Russian River (primarily in Humbolt Bay) and south of Pillar Point in Half Moon Bay.	**Not Present** No suitable habitat is present within project site.
INVERTEBRATES			
Bombus crotchii Crotch bumble bee	-- / SC / --	Occurs in open grassland and scrub at relatively warm and dry sites. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late October. Generally nests underground, often in abandoned mammal burrows. Within California this species is known to occur in the Mediterranean, Pacific Coast, Western Desert, as well as Great Valley and adjacent foothill regions.	**Unlikely** Marginal habitat is present within the project site. However, the project site does not provide adequate sources of nectar for the entire life cycle of this species.
Bombus occidentalis Western bumble bee	— / SC / —	Found in a range of habitats, including mixed woodlands, farmlands, urban parks and gardens, montane meadows, and prairie grasslands. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late November. Generally nests underground, often in abandoned mammal burrows. Populations are currently largely restricted to high elevation sites in the Sierra Nevada; however, the historic range includes the northern California coast.	**Unlikely** Marginal habitat is present within the project site. However, the project site does not provide adequate sources of nectar for the entire life cycle of this species and the site is outside the current range of this species.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Branchinecta lynchi Vernal pool fairy shrimp	FT / — / —	Require ephemeral pools with no flow. Associated with vernal pool/grasslands from near Red Bluff (Shasta County), through the central valley, and into the South Coast Mountains Region. Require ephemeral pools with no flow.	**Not Present** No suitable habitat is present within project site.
Danaus plexippus Monarch butterfly	FC / — / —	Overwinters in coastal California using colonial roosts generally found in Eucalyptus, pine and acacia trees. Overwintering habitat for this species within the Coastal Zone represents ESHA. Local ordinances often protect this species as well.	**Unlikely** No suitable habitat is present within the project site. No overwintering occurrences are known within the project site.
Euphilotes enoptes smithi **Smith's blue butterfly**	FE / — / —	Most commonly associated with coastal dunes and coastal sage scrub plant communities in Monterey and Santa Cruz Counties. Plant hosts are *Eriogonum latifolium* and *E. parvifolium*.	**Not Present** Obligate host plants were not identified in the 2025 survey.
Linderiella occidentalis **California linderiella (fairy shrimp)**	— / — / —	Ephemeral ponds with no flow. Generally associated with hardpans.	**Not Present** No suitable habitat is present within project site.
PLANTS			
Agrostis lacuna-vernalis Vernal pool bent grass	— / — / 1B	Vernal pool Mima mounds at elevations of 115-145 meters. Annual herb in the Poaceae family; blooms April-May. Known only from Butterfly Valley and Machine Gun Flats of Ft. Ord National Monument.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Allium hickmanii Hickman's onion	— / — / 1B	Mesic areas of closed-cone coniferous forests, maritime chaparral, coastal prairie, coastal scrub, and valley and foothill grasslands at elevations of 5-200 meters. Bulbiferous perennial herb in the Alliaceae family; blooms March-May.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Aphyllon robbinsii Robbins' broomrape	— / — / 1B	Coastal bluff scrub and possibly coastal dunes at elevations of 0-100 meters. Achlorophyllous annual herb in the Orobanchaceae family; blooms April-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Arctostaphylos hookeri* ssp. *hookeri **Hooker's manzanita**	— / — / 1B	Closed-cone coniferous forest, chaparral, cismontane woodland, and coastal scrub on sandy soils at elevations of 85-536 meters. Evergreen shrub in the Ericaceae family; blooms January-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Arctostaphylos montereyensis **Toro manzanita**	— / — / 1B	Maritime chaparral, cismontane woodland, and coastal scrub on sandy soils at elevations of 30-730 meters. Evergreen shrub in the Ericaceae family; blooms February-March.	**Not Present** Not observed in project site during 2025 focused botanical survey.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Arctostaphylos pajaroensis Pajaro manzanita	— / — / 1B	Chaparral on sandy soils at elevations of 30-760 meters. Evergreen shrub in the Ericaceae family; blooms December-March.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Arctostaphylos pumila **Sandmat manzanita**	— / — / 1B	Openings of closed-cone coniferous forests, maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub on sandy soils at elevations of 3-205 meters. Evergreen shrub in the Ericaceae family; blooms February-May.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Arenaria paludicola Marsh sandwort	FE / SE / 1B	Known from only two natural occurrences in Black Lake Canyon and at Oso Flaco Lake. Sandy openings of freshwater of brackish marshes and swamps at elevations of 3-170 meters. Stoloniferous perennial herb in the Caryophyllaceae family; blooms May-August.	**Not Present** Not observed during 2025 focused botanical survey.
Astragalus tener var. *tener* Alkali milk-vetch	— / — / 1B	Playas, valley and foothill grassland on adobe clay, and vernal pools on alkaline soils at elevations of 1-60 meters. Annual herb in the Fabaceae family; blooms March-June.	**Not Present** Not observed during the 2025 survey.
Astragalus tener var. *titi* Coastal dunes milk-vetch	FE / SE / 1B	Sandy soils in coastal bluff scrub, coastal dunes, coastal prairie (mesic); elevation 3-164 feet. Annual herb in the Fabaceae family; blooms March-May.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Bryoria spiralifera Twisted horsehair lichen	— / — / 1B	California North Coast coniferous forest at elevations of 0–30 meters. Often found on conifers, including *Picea sitchensis*, *Pinus contorta* var. *contorta*, *Pseudotsuga menziesii*, *Abies grandis*, and *Tsuga heterophylla*. Fruticose lichen in the Parmeliaceae family.	**Not Present** No suitable habitat in project site. The project site is outside the known elevation range of this species. Not observed during 2025 focused botanical survey.
Castilleja ambigua var. insalutata Pink Johnny-nip	— / — / 1B	Coastal prairie and coastal scrub at elevations of 0-100 meters. Annual herb in the Orobanchaceae family; blooms May-August.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Ceanothus rigidus **Monterey ceanothus**	— / — / —	Closed cone coniferous forest, chaparral, and coastal scrub on sandy soils at elevations of 3-550 meters. Evergreen shrub in the Rhamnaceae family, blooms February-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Centromadia parryi ssp. *congdonii* Congdon's tarplant	— / — / 1B	Valley and foothill grassland on heavy clay, saline, or alkaline soils at elevations of 0-230 meters. Annual herb in the Asteraceae family; blooms May-November.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Chorizanthe minutiflora Fort Ord spineflower	— / — / 1B	Sandy openings of maritime chaparral and coastal scrub at elevations of 55-150 meters. Only known occurrences on Fort Ord National Monument. Annual herb in the Polygonaceae family; blooms April-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Chorizanthe pungens* var. *pungens **Monterey spineflower**	FT / — / 1B	Maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland on sandy soils at elevations of 3-450 meters. Annual herb in the Polygonaceae family; blooms April-July.	**Present** One polygon of this species was observed within the project site during the May 2025 focused botanical survey.
Chorizanthe robusta var. *robusta* Robust spineflower	FE / -- / 1B	Openings in cismontane woodland, coastal dunes, maritime chaparral, and coastal scrub on sandy or gravelly soils at elevations of 3-300 meters. Annual herb in the Polygonaceae family; blooms April-September.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Clarkia jolonensis Jolon clarkia	— / — / 1B	Cismontane woodland, chaparral, riparian woodland, and coastal scrub at elevations of 20-660 meters. Annual herb in the Onagraceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Collinsia multicolor San Francisco collinsia	— / — / 1B	Closed-cone coniferous forest and coastal scrub, sometimes on serpentinite soils, at elevations of 30-250 meters. Annual herb in the Plantaginaceae family; blooms March-May.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Cordylanthus rigidus* ssp. *littoralis **Seaside bird's-beak**	— / SE / 1B	Closed-cone coniferous forests, maritime chaparral, cismontane woodlands, coastal dunes, and coastal scrub on sandy soils, often on disturbed sites, at elevations of 0-425 meters. Annual hemi-parasitic herb in the Orobanchaceae family; blooms April-October.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Delphinium californicum ssp. *interius* Hospital Canyon larkspur	— / — / 1B	Openings in chaparral, coastal scrub, and mesic areas of cismontane woodland at elevations of 230-1095 meters. Perennial herb in the Ranunculaceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Delphinium hutchinsoniae Hutchinson's larkspur	— / — / 1B	Broadleaved upland forest, chaparral, coastal scrub, and coastal prairie at elevations of 0-427 meters. Perennial herb in the Ranunculaceae family; blooms March-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Delphinium umbraculorum Umbrella larkspur	— / — / 1B	Cismontane woodland at elevations of 400-1600 meters. Perennial herb in the Ranunculaceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Ericameria fasciculata **Eastwood's goldenbush**	— / — / 1B	Openings in closed-cone coniferous forest, maritime chaparral, coastal dunes, and coastal scrub on sandy soils at elevations of 30-275 meters. Evergreen shrub in the Asteraceae family; blooms July-October.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Eriogonum nortonii Pinnacles buckwheat	— / — / 1B	Chaparral and valley and foothill grassland on sandy soils, often on recent burns, at elevations of 300-975 meters. Annual herb in the Polygonaceae family; blooms May-September.	**Not Present** Not observed in project site during 2025 focused botanical survey.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Eryngium montereyense Fort Ord button-celery	— / — / 1B	Vernal pools, seasonally wet swales at 140 meters. Annual herb in the Apiaceae family; blooms May-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Erysimum ammophilum **Sand-loving wallflower**	— / — / 1B	Openings in maritime chaparral, coastal dunes, and coastal scrub on sandy soils at elevations of 0-60 meters. Perennial herb in the Brassicaceae family; blooms February-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Erysimum menziesii Menzies' wallflower	FE / SE / 1B	Coastal dunes at elevations of 0-35 meters. Perennial herb in the Brassicaceae family; blooms March-September.	**Not Present** Not observed in project site during 2025 survey.
Fritillaria liliacea Fragrant fritillary	— / — / 1B	Cismontane woodland, coastal prairie, coastal scrub, and valley and foothill grassland, often serpentinite, at elevations of 3-410 meters. Bulbiferous perennial herb in the Liliaceae family; blooms February-April.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Gilia tenuiflora* ssp. *arenaria **Monterey gilia**	FE / ST / 1B	Openings in maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub on sandy soils at elevations of 0-45 meters. Annual herb in the Polemoniaceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Hesperocyparis goveniana Gowen cypress	FT / — / 1B	Closed-cone coniferous forest and maritime chaparral at elevations of 30-300 meters. Evergreen tree in the Cupressaceae family. Natively occurring only at Point Lobos near Gibson Creek and the Huckleberry Hill Nature Preserve near Highway 68.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Hesperocyparis macrocarpa Monterey cypress	— / — / 1B	Closed-cone coniferous forest at elevations of 10-30 meters. Evergreen tree in the Cupressaceae family. Natively occurring only at Cypress Point in Pebble Beach and Point Lobos State Park; widely planted and naturalized elsewhere.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Holocarpha macradenia Santa Cruz tarplant	FT / SE / 1B	Coastal prairies and valley foothill grasslands, often clay or sandy soils, at elevations of 10-220 meters. Annual herb in the Asteraceae family; blooms June-October.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Horkelia cuneata ssp. *sericea* Kellogg's horkelia	— / — / 1B	Openings of closed-cone coniferous forests, maritime chaparral, coastal dunes, and coastal scrub on sandy or gravelly soils at elevations of 10-200 meters. Perennial herb in the Rosaceae family; blooms April-September.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Horkelia marinensis Point Reyes horkelia	— / — / 1B	Coastal dunes, coastal prairie, and coastal scrub on sandy soils at elevations of 5-350 meters. Perennial herb in the Rosaceae family; blooms May-September.	**Not Present** Not observed in project site during 2025 focused botanical survey.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Lasthenia conjugens Contra Costa goldfields	FE / — / 1B	Mesic areas of valley and foothill grassland, alkaline playas, cismontane woodland, and vernal pools at elevations of 0-470 meters. Annual herb in the Asteraceae family; blooms March-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Layia carnosa Beach layia	FE / SE / 1B	Coastal dunes and coastal scrub on sandy soils at elevations of 0-60 meters. Annual herb in the Asteraceae family; blooms March-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Legenere limosa Legenere	— / — / 1B	Vernal pools and wetlands at elevations of 1-880 meters. Annual herb in the Campanulaceae family; blooms April- June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Lupinus tidestromii Tidestrom's lupine	FE / SE / 1B	Coastal dunes at elevations of 0-100 meters. Perennial rhizomatous herb in the Fabaceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Malacothamnus involucratus Carmel Valley bush-mallow	— / — / 1B	Chaparral, cismontane woodland, and coastal scrub at elevations of 30-1100 meters. Perennial deciduous shrub in the Malvaceae family; blooms May-October.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Malacothrix saxatilis var. *arachnoidea* Carmel Valley malacothrix	— / — / 1B	Chaparral and coastal scrub on rocky soils at elevations of 25-1036 meters. Perennial rhizomatous herb in the Asteraceae family; blooms June-December.	**Unlikely** No suitable habitat is present within project site.
Meconella oregana Oregon meconella	— / — / 1B	Coastal prairie and coastal scrub at elevations of 250-620 meters. Annual herb in the Papaveraceae Family; blooms March-April.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Microseris paludosa Marsh microseris	— / — / 1B	Mesic areas of closed-cone coniferous forest, cismontane woodland, coastal scrub, and valley and foothill grassland at elevations of 5-300 meters. Perennial herb in the Asteraceae family; blooms April-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Monardella sinuata ssp. *nigrescens* Northern curly-leaved monardella	— / — / 1B	Chaparral, coastal dunes, coastal scrub, and lower montane coniferous forest (ponderosa pine sandhills) on sandy soils at elevations of 0-300 meters. Annual herb in the Lamiaceae family; blooms April-September.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Monolopia gracilens Woodland woollythreads	— / — / 1B	Openings of broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland on serpentinite soils at elevations of 100-1200 meters. Annual herb in the Asteraceae family; blooms February-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Pinus radiata Monterey pine	— / — / 1B	Closed-cone coniferous forest and cismontane woodland at elevations of 25-185 meters. Evergreen tree in the Pinaceae family. Only three native stands in CA at Ano Nuevo, Cambria, and the Monterey Peninsula; introduced in many areas.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Piperia yadonii **Yadon's rein orchid**	FE / — / 1B	Sandy soils in coastal bluff scrub, closed-cone coniferous forest, and maritime chaparral at elevations of 10-510 meters. Annual herb in the Orchidaceae family; blooms February-August.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Plagiobothrys chorisianus var. *chorisianus* Choris's popcorn-flower	— / — / 1B	Mesic areas of chaparral, coastal prairie, and coastal scrub at elevations of 15-160 meters. Annual herb in the Boraginaceae family; blooms March-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Potentilla hickmanii Hickman's cinquefoil	FE / SE / 1B	Coastal bluff scrub, closed-cone coniferous forests, vernally mesic meadows and seeps, and freshwater marshes and swamps at elevations of 10-149 meters. Perennial herb in the Rosaceae family; blooms April-August.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Ramalina thrausta Angel's hair lichen	— / — / 2B	North coast coniferous forest on dead twigs and other lichens. Epiphytic fructose lichen in the Ramalinaceae family. In northern CA it is usually found on dead twigs, and has been found on *Alnus rubra*, *Calocedrus decurrens*, *Pseudotsuga menziesii*, *Quercus garryana*, and *Rubus spectabilis*. In Sonoma County it grows on and among dangling mats of *R. menziesii* and *Usnea* spp.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Rosa pinetorum Pine rose	— / — / 1B	Closed-cone coniferous forest at elevations of 2-300 meters. Perennial shrub in the Rosaceae family; blooms May-July. Possible hybrid of *R. spithamea*, *R. gymnocarpa*, or others; further study needed.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Stebbinsoseris decipiens Santa Cruz microseris	— / — / 1B	Broadleaved upland forest, closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, and openings in valley and foothill grassland, sometimes on serpentinite, at elevations of 10-500 meters. Annual herb in the Asteraceae family; blooms April-May.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Sulcaria spiralifera Twisted horsehair lichen	-- / -- / 1B	California North Coast coniferous forest at elevations of 0–30 meters. Often found on conifers, including *Picea sitchensis*, *Pinus contorta* var. *contorta*, *Pseudotsuga menziesii*, *Abies grandis*, and *Tsuga heterophylla*. Fruticose lichen in the Parmeliaceae family.	**Not Present** Not observed in project site during 2025 focused botanical survey.

Species	Status (USFWS/CDFW/CNPS)	General Habitat	Potential Occurrence
Trifolium buckwestiorum Santa Cruz clover	— / — / 1B	Gravelly margins of broadleaved upland forest, cismontane woodland, and coastal prairie at elevations of 105-610 meters. Annual herb in the Fabaceae family; blooms April-October.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Trifolium hydrophilum Saline clover	— / — / 1B	Marshes and swamps, mesic and alkaline valley and foothill grassland, and vernal pools at elevations of 0-300 meters. Annual herb in the Fabaceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Trifolium polyodon Pacific Grove clover	— / SR / 1B	Mesic areas of closed-cone coniferous forest, coastal prairie, meadows and seeps, and valley and foothill grassland at elevations of 5-120 meters. Annual herb in the Fabaceae family; blooms April-July.	**Not Present** Not observed in project site during 2025 focused botanical survey.
Trifolium trichocalyx Monterey clover	FE / SE / 1B	Sandy openings and burned areas of closed-cone coniferous forest at elevations of 30-240 meters. Annual herb in the Fabaceae family; blooms April-June.	**Not Present** Not observed in project site during 2025 focused botanical survey.

STATUS DEFINITIONS

Federal

FE = listed as Endangered under the federal Endangered Species Act
FT = listed as Threatened under the federal Endangered Species Act
FC = Candidate for listing under the federal Endangered Species Act
— = no listing

State

SE = listed as Endangered under the California Endangered Species Act
ST = listed as Threatened under the California Endangered Species Act
SC = Candidate for listing under California Endangered Species Act
SR = listed as Rare under the California Native Plant Protection Act
CFP = California Fully Protected Species
CSC = CDFW Species of Concern
— = no listing

California Native Plant Society

1B = California Rare Plant Rank 1B species; plants rare, threatened, or endangered in California and elsewhere
2B = California Rare Plant Rank 2B species; rare, threatened, or endangered in California, but more common elsewhere
-- = no listing

Former Fort Ord Habitat Management Plan (HMP)

Bold = Former Fort Ord HMP Species

POTENTIAL TO OCCUR

Present = known occurrence of species within the site; presence of suitable habitat conditions; or observed during field surveys
High = known occurrence of species in the vicinity from the CNDDB or other documentation; presence of suitable habitat conditions
Moderate = known occurrence of species in the vicinity from the CNDDB or other documentation; presence of marginal habitat conditions within the site
Low = species known to occur in the vicinity from the CNDDB or other documentation; lack of suitable habitat or poor quality
Unlikely = species not known to occur in the vicinity from the CNDDB or other documentation, no suitable habitat is present within the site
Not Present = species was not observed during surveys

APPENDIX B

California Natural Diversity Database Report
(USGS quadrangles: Seaside, Marina, Monterey, Salinas, Spreckels, Moss Landing and Prunedale)

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Marina (3612167) OR Monterey (3612158) OR Seaside (3612157) OR Spreckels (3612156) OR Salinas (3612166) OR Moss Landing (3612177) OR Prunedale (3612176))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Actinemys marmorata northwestern pond turtle	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
Actinemys pallida southwestern pond turtle	ARAAD02032	Proposed Threatened	None	G2	SNR	SSC
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
Agrostis lacuna-vernalis vernal pool bent grass	PMPOA041N0	None	None	G1	S1	1B.1
Allium hickmanii Hickman's onion	PMLIL02140	None	None	G2	S2	1B.2
Ambystoma californiense pop. 1 California tiger salamander - central California DPS	AAAAA01181	Threatened	Threatened	G3T3	S3	WL
Ambystoma macrodactylum croceum Santa Cruz long-toed salamander	AAAAA01082	Endangered	Endangered	G5T1T2	S2	FP
Anarhynchus nivosus nivosus western snowy plover	ABNNB03031	Threatened	None	G3T3	S3	SSC
Anniella pulchra Northern California legless lizard	ARACC01020	None	None	G3	S2S3	SSC
Aphyllon robbinsii Robbins' broomrape	PDORO040Q0	None	None	G1	S1	1B.1
Arctostaphylos hookeri ssp. hookeri Hooker's manzanita	PDERI040J1	None	None	G3T2	S2	1B.2
Arctostaphylos montereyensis Toro manzanita	PDERI040R0	None	None	G2?	S2?	1B.2
Arctostaphylos pajaroensis Pajaro manzanita	PDERI04100	None	None	G1	S1	1B.1
Arctostaphylos pumila sandmat manzanita	PDERI04180	None	None	G1	S1	1B.2
Asio flammeus short-eared owl	ABNSB13040	None	None	G5	S2	SSC
Astragalus tener var. tener alkali milk-vetch	PDFAB0F8R1	None	None	G2T1	S1	1B.2
Astragalus tener var. titi coastal dunes milk-vetch	PDFAB0F8R2	Endangered	Endangered	G2T1	S1	1B.1
Athene cunicularia burrowing owl	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
Bombus caliginosus obscure bumble bee	IIHYM24380	None	None	G2G3	S1S2	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Bombus crotchii Crotch's bumble bee	IIHYM24480	None	Candidate Endangered	G2	S2	
Bombus occidentalis western bumble bee	IIHYM24252	None	Candidate Endangered	G3	S1	
Buteo regalis ferruginous hawk	ABNKC19120	None	None	G4	S3S4	WL
Castilleja ambigua var. insalutata pink Johnny-nip	PDSCR0D403	None	None	G5T2	S2	1B.1
Central Dune Scrub Central Dune Scrub	CTT21320CA	None	None	G2	S2.2	
Central Maritime Chaparral Central Maritime Chaparral	CTT37C20CA	None	None	G2	S2.2	
Centromadia parryi ssp. congdonii Congdon's tarplant	PDAST4R0P1	None	None	G3T2	S2	1B.1
Chorizanthe minutiflora Fort Ord spineflower	PDPGN04100	None	None	G1	S1	1B.2
Chorizanthe pungens var. pungens Monterey spineflower	PDPGN040M2	Threatened	None	G2T2	S2	1B.2
Chorizanthe robusta var. robusta robust spineflower	PDPGN040Q2	Endangered	None	G2T1	S1	1B.1
Clarkia jolonensis Jolon clarkia	PDONA050L0	None	None	G2	S2	1B.2
Coastal and Valley Freshwater Marsh Coastal and Valley Freshwater Marsh	CTT52410CA	None	None	G3	S2.1	
Coastal Brackish Marsh Coastal Brackish Marsh	CTT52200CA	None	None	G2	S2.1	
Coelus globosus globose dune beetle	IICOL4A010	None	None	G1G2	S1S2	
Collinsia multicolor San Francisco collinsia	PDSCR0H0B0	None	None	G2	S2	1B.2
Cordylanthus rigidus ssp. littoralis seaside bird's-beak	PDSCR0J0P2	None	Endangered	G5T2	S2	1B.1
Corynorhinus townsendii Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
Coturnicops noveboracensis yellow rail	ABNME01010	None	None	G4	S2	SSC
Cypseloides niger black swift	ABNUA01010	None	None	G4	S3	SSC
Danaus plexippus plexippus pop. 1 monarch - California overwintering population	IILEPP2012	Proposed Threatened	None	G4T1T2Q	S2	
Delphinium californicum ssp. interius Hospital Canyon larkspur	PDRAN0B0A2	None	None	G3T3	S3	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Delphinium hutchinsoniae Hutchinson's larkspur	PDRAN0B0V0	None	None	G2	S2	1B.2
Delphinium umbraculorum umbrella larkspur	PDRAN0B1W0	None	None	G3	S3	1B.3
Dipodomys heermanni goldmani Salinas kangaroo rat	AMAFD03065	None	None	G4T2T3	S2S3	
Dipodomys venustus sanctiluciae Santa Lucia Mountain kangaroo rat	AMAFD03043	None	None	G2T3	S3	
Elanus leucurus white-tailed kite	ABNKC06010	None	None	G5	S3S4	FP
Eremophila alpestris actia California horned lark	ABPAT02011	None	None	G5T4Q	S4	WL
Ericameria fasciculata Eastwood's goldenbush	PDAST3L080	None	None	G2	S2	1B.1
Eriogonum nortonii Pinnacles buckwheat	PDPGN08470	None	None	G2	S2	1B.3
Eryngium montereyense Fort Ord button-celery	PDAPI0Z150	None	None	G1	S1	1B.1
Erysimum ammophilum sand-loving wallflower	PDBRA16010	None	None	G2	S2	1B.2
Erysimum menziesii Menzies' wallflower	PDBRA160R0	Endangered	Endangered	G1	S1	1B.1
Eucyclogobius newberryi tidewater goby	AFCQN04010	Endangered	None	G3	S3	SSC
Eumetopias jubatus Steller sea lion	AMAJC03010	Delisted	None	G3	S2	
Euphilotes enoptes smithi Smith's blue butterfly	IILEPG2026	Endangered	None	G5T2	S2	
Falco mexicanus prairie falcon	ABNKD06090	None	None	G5	S4	WL
Falco peregrinus anatum American peregrine falcon	ABNKD06071	Delisted	Delisted	G4T4	S3S4	
Fritillaria liliacea fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
Gilia tenuiflora ssp. arenaria Monterey gilia	PDPLM041P2	Endangered	Threatened	G3G4T2	S2	1B.2
Hesperocyparis goveniana Gowen cypress	PGCUP04031	Threatened	None	G1	S1	1B.2
Hesperocyparis macrocarpa Monterey cypress	PGCUP04060	None	None	G1	S1	1B.2
Holocarpha macradenia Santa Cruz tarplant	PDAST4X020	Threatened	Endangered	G1	S1	1B.1

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Horkelia cuneata var. sericea Kellogg's horkelia	PDROS0W043	None	None	G4T1?	S1?	1B.1
Horkelia marinensis Point Reyes horkelia	PDROS0W0B0	None	None	G2	S2	1B.2
Lasiurus cinereus hoary bat	AMACC05032	None	None	G3G4	S4	
Lasthenia conjugens Contra Costa goldfields	PDAST5L040	Endangered	None	G1	S1	1B.1
Laterallus jamaicensis coturniculus California black rail	ABNME03041	None	Threatened	G3T1	S2	FP
Lavinia exilicauda harengus Monterey hitch	AFCJB19013	None	None	G4T3	S3	SSC
Layia carnosa beach layia	PDAST5N010	Threatened	Endangered	G2	S2	1B.1
Legenere limosa legenere	PDCAM0C010	None	None	G2	S2	1B.1
Linderiella occidentalis California linderiella	ICBRA06010	None	None	G2G3	S2S3	
Lupinus tidestromii Tidestrom's lupine	PDFAB2B3Y0	Endangered	Endangered	G1	S1	1B.1
Malacothamnus involucratus Carmel Valley bushmallow	PDMAL0Q0B1	None	None	G2Q	S2	1B.2
Malacothrix saxatilis var. arachnoidea Carmel Valley malacothrix	PDAST660C2	None	None	G5T2	S2	1B.2
Meconella oregana Oregon meconella	PDPAP0G030	None	None	G2	S2	1B.1
Microseris paludosa marsh microseris	PDAST6E0D0	None	None	G2	S2	1B.2
Microtus californicus halophilus Monterey vole	AMAFF11036	None	None	G5T1	S2	
Monardella sinuata ssp. nigrescens northern curly-leaved monardella	PDLAM18162	None	None	G3T2	S2	1B.2
Monolopia gracilens woodland woollythreads	PDAST6G010	None	None	G3	S3	1B.2
Monterey Cypress Forest Monterey Cypress Forest	CTT83150CA	None	None	G1	S1.2	
Monterey Pine Forest Monterey Pine Forest	CTT83130CA	None	None	G1	S1.1	
Monterey Pygmy Cypress Forest Monterey Pygmy Cypress Forest	CTT83162CA	None	None	G1	S1.1	
Neotoma macrotis luciana Monterey dusky-footed woodrat	AMAFF08083	None	None	G5T3	S3	SSC

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Northern Bishop Pine Forest Northern Bishop Pine Forest	CTT83121CA	None	None	G2	S2.2	
Northern Coastal Salt Marsh Northern Coastal Salt Marsh	CTT52110CA	None	None	G3	S3.2	
Oncorhynchus mykiss irideus pop. 9 steelhead - south-central California coast DPS	AFCHA0209H	Threatened	None	G5T2Q	S2	SSC
Pelecanus occidentalis californicus California brown pelican	ABNFC01021	Delisted	Delisted	G4T3T4	S3	
Phrynosoma blainvillii coast horned lizard	ARACF12100	None	None	G4	S4	SSC
Pinus radiata Monterey pine	PGPIN040V0	None	None	G1	S1	1B.1
Piperia yadonii Yadon's rein orchid	PMORC1X070	Endangered	None	G1	S1	1B.1
Plagiobothrys chorisianus var. chorisianus Choris' popcornflower	PDBOR0V061	None	None	G3T1Q	S1	1B.2
Potentilla hickmanii Hickman's cinquefoil	PDROS1B370	Endangered	Endangered	G1	S1	1B.1
Rallus obsoletus obsoletus California Ridgway's rail	ABNME05011	Endangered	Endangered	G3T1	S2	FP
Ramalina thrausta angel's hair lichen	NLLEC3S340	None	None	G5?	S2S3	2B.1
Rana boylii pop. 6 foothill yellow-legged frog - south coast DPS	AAABH01056	Endangered	Endangered	G3T1	S1	
Rana draytonii California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
Reithrodontomys megalotis distichlis Salinas harvest mouse	AMAFF02032	None	None	G5T1	S2	
Riparia riparia bank swallow	ABPAU08010	None	Threatened	G5	S3	
Rosa pinetorum pine rose	PDROS1J0W0	None	None	G1Q	S1	1B.2
Sidalcea malachroides maple-leaved checkerbloom	PDMAL110E0	None	None	G3	S3	4.2
Sorex ornatus salarius Monterey shrew	AMABA01105	None	None	G5T1T2	S1S2	SSC
Sorex vagrans paludivagus Monterey vagrant shrew	AMABA01072	None	None	G5T1	S2	
Spea hammondii western spadefoot	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC
Spirinchus thaleichthys longfin smelt	AFCHB03010	None	Threatened	G5	S1	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Stebbinsoseris decipiens Santa Cruz microseris	PDAST6E050	None	None	G2	S2	1B.2
Sulcaria spiralifera twisted horsehair lichen	NLT0042560	None	None	G3G4	S2	1B.2
Taricha torosa Coast Range newt	AAAAF02032	None	None	G4	S4	SSC
Taxidea taxus American badger	AMAJF04010	None	None	G5	S3	SSC
Thamnophis hammondii two-striped gartersnake	ARADB36160	None	None	G4	S3S4	SSC
Trifolium buckwestiorum Santa Cruz clover	PDFAB402W0	None	None	G2	S2	1B.1
Trifolium hydrophilum saline clover	PDFAB400R5	None	None	G2	S2	1B.2
Trifolium polyodon Pacific Grove clover	PDFAB402H0	None	Rare	G1	S1	1B.1
Trifolium trichocalyx Monterey clover	PDFAB402J0	Endangered	Endangered	G1	S1	1B.1
Tryonia imitator mimic tryonia (=California brackishwater snail)	IMGASJ7040	None	None	G2	S2	
Valley Needlegrass Grassland Valley Needlegrass Grassland	CTT42110CA	None	None	G3	S3.1	

Record Count: 114

APPENDIX C

IPaC Resource List

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

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Location

Monterey County, California

Local office

Ventura Fish And Wildlife Office

- (805) 644-1766
- (805) 644-3958
- FW8VenturaSection7@FWS.Gov

2493 Portola Road, Suite B
Ventura, CA 93003-7726

https://www.fws.gov/Ventura

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

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The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Condor Gymnogyps californianus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8193	Endangered
California Least Tern Sternula antillarum browni Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8104	Endangered
Least Bell's Vireo Vireo bellii pusillus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Western Snowy Plover Charadrius nivosus nivosus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8035	Threatened
Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	Threatened

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Reptiles

NAME	STATUS
Southwestern Pond Turtle Actinemys pallida Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4768	Proposed Threatened

Amphibians

NAME	STATUS

California Red-legged Frog Rana draytonii — Threatened

Wherever found

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.

https://ecos.fws.gov/ecp/species/2891

California Tiger Salamander Ambystoma californiense — Threatened

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.

https://ecos.fws.gov/ecp/species/2076

Western Spadefoot Spea hammondii — Proposed Threatened

No critical habitat has been designated for this species.

Fishes

NAME	STATUS
Tidewater Goby Eucyclogobius newberryi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/57	Endangered

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Smith's Blue Butterfly Euphilotes enoptes smithi Wherever found There is **proposed** critical habitat for this species. https://ecos.fws.gov/ecp/species/4418	Endangered

Crustaceans

NAME	STATUS

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Vernal Pool Fairy Shrimp Branchinecta lynchi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/498	Threatened

Flowering Plants

NAME	STATUS
Contra Costa Goldfields Lasthenia conjugens Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/7058	Endangered
Monterey Gilia Gilia tenuiflora ssp. arenaria Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/856	Endangered
Monterey Spineflower Chorizanthe pungens var. pungens Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/396	Threatened
Yadon's Piperia Piperia yadonii Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/4205	Endangered

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Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

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Bald and Golden Eagle information is not available at this time

Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

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Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Migratory birds

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (FWS).

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Migratory bird information is not available at this time

Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the

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levels of concern for migratory birds?" for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and

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3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs
Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

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To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

This location did not intersect any wetlands mapped by NWI.

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

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Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate

Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

Appendix E
California Department of Parks and Recreation Form 523A

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Appendix C

Freeman Stadium: State of California, Department of Parks and Recreation Form 523

(Buildings, Structure, and Object Record)

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State of California ◆ The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code Reviewer Date

Page 1 **of** 14 ***Resource Name or #:** (Assigned by recorder) Freeman Stadium
P1. Other Identifier:

***P2. Location:** ☐ **Not for Publication** ■ **Unrestricted**

***a. County** Monterey County **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad** Marina, CA **Date** 1947 (1983 ed.) **T** 15S; **R** 1E; SW ¼ ■ **of** SE ¼ ■ **of Sec** 1 ; Mount Diablo **B.M.**

c. Address 4111 2nd Ave Seaside Zip 93955

d. UTM: (Give more than one for large and/or linear resources) Zone 10S , 606835 mE/ 4056788 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)
Freeman Stadium sits south of Divarty Street, between 2nd Avenue and General Jim Moore Boulevard. APN: 031101044000

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
Freeman Stadium sits south of Divarty Street, between 2nd Avenue and General Jim Moore Boulevard. The stadium is clustered with other outdoor athletic facilities northeast of the Otter Sports Complex on the California State University, Monterey Bay (CSUMB) campus. The campus Aquatic Center is located to the west and the Baseball Field, Softball Field, and Soccer Field to the south and southeast. **See Continuation Sheet.**

***P3b. Resource Attributes:** (List attributes and codes) HP42. Stadium/Sports Field

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)

***P4. Resources Present:** ■ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) East elevation, view looking west, Dudek

***P6. Date Constructed/Age and Source:** ■ Historic ☐ Prehistoric ☐ Both
Circa 1952 (The Californian 1951)

***P7. Owner and Address:**
California State University Monterey Bay, 100 Campus Center, Seaside, CA. 93955

***P8. Recorded by:** (Name, affiliation, and address) Sarah Corder, Dudek, 38 N Marengo Ave., Pasadena, CA 91101

***P9. Date Recorded:** 6/14/2021

***P10. Survey Type:** (Describe)
Intensive level

***P11. Report Citation:** (Cite survey report and other sources or enter none)
"Dudek 2021. Built Environment Inventory and Evaluation Report for California State" University, Monterey Bay.

***Attachments:** ☐NONE ■Location Map ■Continuation Sheet ■Building, Structure, and Object Record
☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐ Other (List):

State of California ◆ Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI#
Trinomial

Page 2 **of** 14 ***Resource Name or #** (Assigned by recorder) Freeman Stadium
Map Name: Marina Quadrangle ***Scale:** USGS 7.5-minute Series ***Date of map:** 1995

BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** (Assigned by recorder) Freeman Stadium ***NRHP Status Code** 6Z

B1. Historic Name: Warriors Stadium

B2. Common Name: Freeman Stadium

B3. Original Use: Stadium/Sports Field 4. Present Use: Outdoor Field/Athletic Complex

***B5. Architectural Style:** Altered Beyond Recognition

***B6. Construction History:** (Construction date, alterations, and date of alterations)

Designed in 1949 and completed in 1951, Freeman Stadium has been altered beyond recognition since its construction. Renovation and as-built drawings show alterations to the subject property took place in 1953, 1974, 1982, 1987, 1998, and 2006. Minor changes and upgrades were completed in 1953, 1974, 1982, 1987, and 1998. Major renovations were completed to the Field House in 2006, including the addition of three, barrel roof, two-story additions to the south, center, and north portions of the building, removal of original doors, windows, and substantial changes to fenestration (CSUMB Facilities 1953, 1974, 1982, 1987, 1998, and 2006). The field was paved in 2018 (Google Earth 2021)

***B7. Moved?** ■No ☐Yes ☐Unknown **Date:** ___ **Original Location:**_____ ***B8. Related Features:**

B9a. Architect: Fort Ord Engineering Office b. Builder: F. V. Hampshire Contracting Company

***B10. Significance: Theme** N/A **Area** N/A

Period of Significance N/A **Property Type** N/A **Applicable Criteria** N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

See Continuation Sheet.

B11. Additional Resource Attributes: (List attributes and codes)

***B12. References:** **See Continuation Sheet.**

B13. Remarks:

***B14. Evaluator:** Adrienne Donovan-Boyd, MSHP

***Date of Evaluation:** June 25, 2021

(This space reserved for official comments.)

(Sketch Map with north arrow required.)

***P3a. Description (continued):**

Freeman Stadium is located at a low grade, with the bleachers following the slope of the hillside. A chain-link fence encloses the field, track, and bleachers, with gates on the west, near the Field House (Figure 1), and on the east side of the field for ADA accessibility. Deciduous and evergreen trees and shrubs are planted around the perimeter of the chain-link fence.

Figure 1. Main (west) elevation, looking northeast (IMG_0431)

Freeman Stadium is made up of the following components: the field, track, bleachers, electrical building, and Field House. Freeman Stadium field is oval, paved, and has a white coating (Figure 2). A paved track encircles the field, but track markings are no longer delineated on the pavement. Concrete, stepped bleachers are located on the north and south side of the track and field. They each measure approximately 342 feet by 48 feet and contain fifteen, board-formed, concrete bleachers with concrete stairs on both the north and south ends and four sets of stairs evenly spaced throughout the bleachers creating distinct aisleways. Additional concrete stairs lead from track on the east and west sides of bleachers. A welded 1½ inch metal railing is located along the perimeter of each section of bleachers with openings at each stairwell (Figure 4). The electrical building is located on a berm west of the track. The small, windowless building is constructed of CMU and sits on a concrete foundation. The building has a low-pitched cement shed roof with small eave overhangs (Figure 5).

The two-story, Field House building sits at the west end of the field and track (Figure 1 and 2). The building is rectangular in plan with a side-gable roof sheathed in standing seam metal. The roof has round skylights evenly spaced throughout and small eave overhangs. Three, two-story, barrel roofed sections are evenly spaced on the façade, one of which, is a larger central section. Two, smaller, two-story barrel roof sections are located on the north and the south portions of the building. The concession area is in the central two-story section. This section has square pillars supporting an overhanging barrel roof. The pillars are primarily clad in stucco fiber cement siding panels, with the lower portion clad in manufactured stone veneer. The west façade has windows located at irregular intervals, all of which appear to be the side-sliding vinyl variety, with the exception of the windows in the barrel roof gable ends, which appear to be fixed, multi-lite windows with prominent metal frames.

Clerestory windows are located on the north and south façade of the barrel roof additions. The building is clad in stucco fiber cement siding and sits on a concrete foundation.

Figure 2. East elevation, looking west (IMG_0477)

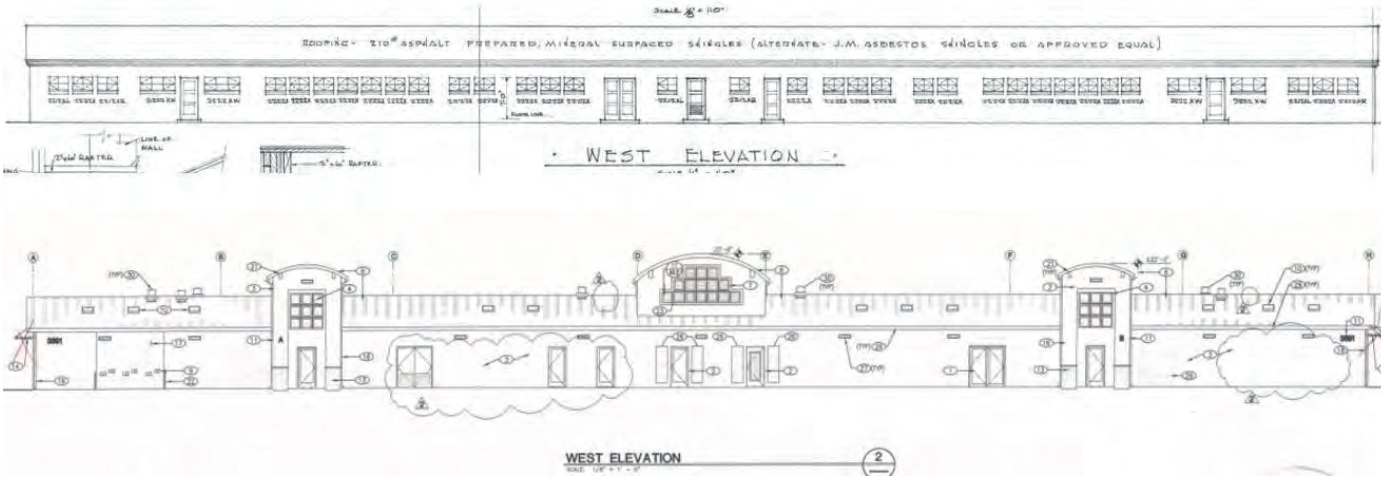

Figure 3. 1949 As-Built Drawing (top) 2006 Renovation Drawing (bottom) (DPR Elevations)

Figure 4. South bleachers, looking southeast (IMG_0434)

Figure 5. Electrical building, looking east (IMG_0452)

Figure 6. Track detail, looking northwest, Field House in background (IMG_0437)

***B10. Significance (continued):**

Historical Overview of Fort Ord

Fort Ord, located on the Monterey Peninsula, was established in 1917 under the name "Fort Gigling." It was formed for training of field artillery and calvary troops stationed at the Presidio of Monterey located about 8 miles southwest of the Fort (Military Museum, n.d.). No formal buildings were erected until the late 1930s when "administrative buildings, barracks, mess halls, tent pads, and sewage treatment plant were constructed" (Military Museum, n.d.). In 1939, the fort was renamed Camp Ord and then in 1940 the name was formally changed to Fort Ord (The Californian 1940: 1). Fort Ord was placed under the command of General Joseph "Vinegar Joe" Stilwell. The original camp encompassed 3,777 acres (Castle 1990: 4). In 1940, the *Salinas Morning Post* announced contracts awarded to the Ford J. Twait company and Morrison-Knudsen, Inc., Los Angeles based companies, for a total of $2.7 million to construct 564 structures on site. Barret and Hilp company of San Francisco was awarded "$35,000 to lay down two spur tracks from Southern Pacific lines into the army reservations" (Salinas Morning Post, 1940: 1). The War Progress Administration (WPA) had an additional $1.4 million budget for construction of buildings at Fort Ord (Salinas Morning Post, 1940:1).

By 1941, the camp had over 28,514 acres of land, 27,000 men and $12 million dollars invested in a training base and staging area for the U.S. Army (Cavanaugh 2000: 9). The WPA and private contractors were busy constructing wood framed buildings to accommodate the growing population. The Main Garrison was constructed between 1940 and 1960s "starting in the northwest corner of the base and expanding southward and eastward." (Military Museum n.d.) At this time, the army was changing training tactics and was actively transferring over from horse in calvary to tanks and trucks (Castle 1990: 4).

Fort Ord trained soldiers in preparation for war during World War I, World War II, the Korean War, and the Vietnam War. During World War II, Fort Ord began training for

amphibious warfare as it was becoming clear that it was advantageous during combat in the Pacific. With access to the beaches in Monterey Bay, Fort Ord became home to the amphibious training unit 18th Armored Group (Panorama, n.d.).

In 1957, Fort Ord was designated as a U.S. Army Training Center for infantry (Castle 1990: 4). The 7th Infantry Division made its home at Fort Ord in 1975. In 1983, the 7th Infantry became a light infantry division operating without heavy tanks, armor, or artillery (Military Museum, n.d.) The unit could deploy anywhere within 48 hours (Cavanaugh 2000: 9).

Recreation Opportunities at Fort Ord

Initially, the U.S. Armed Forces focused solely on training programs that led to the production and establishment of a robust fighting force. Recreation for enlisted soldiers was often provided by civilian groups, not through formal programs run through any branch of the military. This began to change after World War I. The 1940 plan for the development of Fort Ord called for all the buildings necessary to train, house, and care for the infantry, but also called for the construction of recreation buildings such as post exchanges, regimental recreational buildings, moving picture tents, and service clubs (Quartermaster Review 1940:37). During World War II, the military vastly expanded recreational offerings for military personnel to boost morale and to better align with more modern concepts of free-time and leisure (Gates 1957:99). Morale, it was said was "just as important as ammunition" and newer, more modern thinking, saw recreation as a "vital force in self-development and the art of living" (Gates 1957: 100).

Early recreation activities at the fort included band concerts, live theater, orchestra shows, and choir performances often organized by enlisted men (Park 2015: 25). Track and field meets were organized with field days happening throughout World War II. Boxing was also noted as a popular spectator sport at the base in its early years (Park 2015:25). Fort Ord's first football team, the Presidio Dons, was organized in October of 1940. The team initially practiced and played at nearby Del Monte Polo Field.

During World War II the Fort Ord Athletic and Recreation Officer set out to design a plan to keep soldiers "fit to fight" by developing a more extensive plan for football, baseball, softball, boxing and other recreational activities. Soon after games and tournaments were arranged between Fort Ord teams and nearby military bases and other organized teams (Gates 1957: 100). After the war ended in 1945, Fort Ord introduced an athletic program which gave service members, now back from the war, "an opportunity to take part in any recreational activity they wish" (Park 2015:33). In 1951, a report completed by the Committee on Religion and Welfare in the Armed Forces found that the availability of "wholesome free time activities" were essential for shaping character, increasing job performance, and for the national support of the Armed Forces" (Gates 1957: 100).

The recreation opportunities available at Fort Ord continued to expand, with the stadium and other outdoor athletic fields being constructed in the 1950s and 1960s. By 1977, the main garrison area included a wide variety of recreation facilities, including a snack bar, bowling center, softball field, baseball field, service club and library, hand ball courts, tennis courts, a commissary, the theater, parade grounds, as well as a football stadium and track (U. S. Army 1977). It was believed that these recreation opportunities would create better leaders and they would better prepare soldiers for successful civilian lives (Gates 1957:104).

Fort Ord Football: The Warriors

The first football team at Fort Ord were named the Presidio Dons was organized in

1940. The team held practices at nearby fields and appeared to play other branches of the military. After the new stadium was constructed in 1951, the team's name changed to the Warriors and games were being played regularly between military units, but also against other college teams. By November of 1953 the Fort Ord's semi-professional football team made up of service members stationed at Fort Ord, were playing games in the newly completed "Warriors Stadium" (Sacramento Bee 1953:33). During the 1953 season, the Warriors played both the Los Angeles Rams and the San Francisco Forty Niners. The team was so well respected that in the 1950s, coaches from various colleges would visit Fort Ord at the end of the season in an effort to recruit players for college football (Hollaway 2021). The Warriors were the top-ranked service team in the country in the mid-1950s (Sports Press 2012). In 1953, Don Heinrich, who twice earned the All-American rating while quarterbacking for the Washington Huskies, and Ollie Matson, who played for the Chicago Cardinals and went on to play for the Los Angeles Rams were both playing for the Warriors during their tour of duty (Seattle Times 1953:73). The Fort Ord Warriors continued to have All Star and professional bound players through the 1950s and 1960s keeping them in the top of the ratings and making football one of Fort Ord's most prominent sports.

Freeman Stadium, 1951

In January of 1949, the Army prepared plans and specifications for a new Football and Track Stadium (Fresno Bee 1951b:27). The plans were finalized in December of 1949, by the Fort Ord Engineer Office (CSUMB Facilities 1949). They called for the development of the new stadium at the site of the base's existing amphitheater, just north of the parade grounds. In January of 1951, the Army put out a call for bids for the $200,000, 6,000-seat, concrete football and track stadium at Fort Ord. The design called for the stadium seating to be reinforced concrete, set into the existing dirt embarkment of the base's amphitheater (Fresno Bee 1951a:13).

The plan to develop a stadium at Fort Ord was immediately met with criticism, as President Truman had previously ordered a federal freeze on new government construction to aid the Korean War effort. The Army argued that the stadium was planned "long before the present emergency" and would be constructed of non-critical materials. The planned stadium seating was designed to be constructed of "concrete steel blocks" and concrete slab flooring. They announced in February of 1951, in an effort to preserve copper, the stadium would use steel water pipes and cast-iron conduits for construction (Fresno Bee 1951b:27). Ultimately, the ban on unnecessary building was ignored, citing the need for recreational facilities to boost morale, and because the growth of Fort Ord was placing a "severe strain on the recreational facilities in the Monterey-Salinas area" (San Francisco Examiner 1951:4). The stadium was considered a necessary facility to "keep pace with the growth of the tent-soldier population" and the athletics field would help to reinforce the Army's rigorous training program (San Francisco Examiner 1951:4).

The contract was awarded to construct the stadium and Field House in March of 1951 to F. V. Hampshire Contracting Company of Salinas. They bid $146,346 for the project. Construction was set to begin soon after the contract was awarded and was planned to be completed by September of 1951 (The Californian 1951:1).

Fort Ord Closure and Establishment of California State University at Monterey Bay

As the Cold War came to an end, the United States sought to increase the efficiency of the Department of Defense. In doing so, Vice President Richard Cheney "announced [in 1990] proposals for defense installation realignment and closures, including the downsizing of Fort Ord" (Cavanaugh 2000: 9). The Base Realignment and Closure (BRAC) was a process used by the United States to determine which military installations would close and set up the framework for the transfer of ownership. Despite reports by

the community that the closure of Fort Ord was not in the best interest of the community, the Secretary of Defense announced the closure of Fort Ord in April 1991 (Cavanaugh 2000: 9). The Fort was divided, a portion was retained by the Army, another was kept as a nature preserve, and another was set aside to establish California State University, Monterey Bay (CSUMB).

The newest installation of the California State University system opened on September 4, 1996 (Cavanaugh 2000: 29). President Bill Clinton was present for the dedication of the campus (Cavanaugh 2000: 28). After Fort Ord closed, the stadium became part of the newly established CSUMB campus. It appears the track and field were used for some athletic activities after the transition, but eventually the field was paved, and the site has been in use as an occasional outdoor auditorium.

NRHP/CRHR Designation Criteria

In consideration of the project site's history and requisite integrity, Dudek recommends the property not eligible for listing in the NRHP and CRHR based on the following significance evaluation and in consideration of national and state eligibility criteria:

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.
Built in 1951, Freeman Stadium and associated buildings, were constructed for use by the fort's football team, the Warriors. The stadium was constructed after the core construction period of the base during a period when the military was working to increase recreational facilities and opportunities for service members. The initial base plan did not call for a stadium, with early practices and scrimmages taking place at nearby facilities. Both the increasing popularity of football and the desire to provide more avenues for athletic recreation, created a need for an on-site stadium at Fort Ord. This nationwide interest in sports and recreation resulted in numerous improvements to recreation facilities on army bases across America. While Freeman Stadium does reflect the post-war investment in recreation, that investment and subsequent infrastructure was not limited to or unique to Fort Ord. Utilitarian stadiums, such as these, were not uncommon. Therefore, due to a lack of identified significant associations with events important to history, the subject property does not appear eligible under NRHP/CRHR Criterion A/1.

Criterion B/2: That are associated with the lives of persons significant in our past.
To be found eligible under B/2 the property must be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research indicated that Freeman Stadium, originally called the Warriors Stadium, was originally named after Fort Ord's football team, the Warriors. No single person was shown to be influential or directly associated with the stadium. As such this property is not known to have any historical associations with people important to the nation's or state's past. Due to a lack of identified significant associations with important persons in history, the subject property does not appear eligible under NRHP/CRHR Criterion B/2.

Criterion C/3: That embody 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.
Freeman Stadium was added to the Fort Ord in 1951. By 1952 the stadium included the track, football field, bleachers, electrical building, and the Field House. Research

indicates that the stadium was designed using the amphitheater on the site and was designed by the Fort Ord Post Engineer Office.

The original design for the stadium, bleachers, and Field House were completed by architects and/or engineers who were employed by the Fort Ord Engineering Office. The building drawings identify "ROWE" as the individual who drew the plans and shows the plans were checked by an individual with the initials "M.O.R". No further information on these individuals was identified during archival research. The drawings were approved by Lt. Col. Post Engineer Menon W. Whitsitt. No further information was uncovered during archival research about Whitsitt, or the other's listed on the plan. None of the research identified a significant architect for Freeman Stadium, as such, no master architect is found to be associated with the design.

Lastly, stadiums are a ubiquitous type of recreational facility. Archival research did not identify Freeman Stadium as being distinctive in its type, period, and method of construction. There is no artistic value to the present paved track or paved field. The concrete stadium bleachers are a simple, utilitarian design. The field and track have 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. Additionally, the Field House, has undergone numerous, extensive alterations, including substantial changes to the plan, exterior cladding, and fenestration. Due to a lack of high artistic value, a lack of evidence suggesting Freeman Stadium is associated with a master architect, and substantial alterations, Freeman Stadium is recommended not eligible under NRHP/CRHR Criterion C/3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.
There is no evidence to suggest that this property has the potential to yield information important to state or local history. Therefore, the property is recommended not eligible under NRHP/CRHR Criterion D/4.

California Historic Landmark Statement of Significance
In consideration of the subject property's history and requisite integrity, Dudek recommends the property not eligible for designation as a California Historic Landmark based on the following significance evaluation and in consideration of state eligibility criteria:

The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
Freeman Stadium was designed in 1949 and constructed in 1951. The stadium and associated buildings were constructed after the initial, core development period of Fort Ord in the 1940s. The stadium was conceptualized by architects employed through the Fort Ord Engineering office and is a ubiquitous building type that lacks high style components to set it apart from other stadiums constructed throughout the State of California in the 1950s. Therefore, the subject property is recommended not eligible for listing as a CHL under this criterion.

Associated with an individual or group having a profound influence on the history of California.
Archival research failed to indicate any significant associations between the subject property and individuals or groups that profoundly influenced the history of California. Freeman Stadium was developed by the military, and no single individual was found to have influenced design, construction, or use of the building. Therefore, the subject property is recommended not eligible for listing as a CHL under this

criterion.

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.
Freeman Stadium is neither a prototype or an outstanding example of a period, style, or architectural movement. The stadium has been altered beyond recognition and it fails to convey either its style or its temporal period. It is a typical example of a sports arena, designed to serve a utilitarian purpose. There are no remaining identifying features on the Field House that would establish the building as a notable work of a master architect, or a notable designer or builder working within the military, or in the State of California. Therefore, the subject property is recommended not eligible for listing as a CHL under this criterion.

Local Designation Statement of Significance

As discussed above, Freeman Stadium does not rise to the level of significance required for state or national designation. For the same reasons presented above, the property also does not rise to the level of significance required for local designation on an individual level or as a component of a historic district.

Integrity Discussion

Freeman Stadium retains its integrity of location. Replacement materials have been added throughout the stadium since its completion in 1951, including new track materials, the paving of the field, and extensive alterations and material changes to the Field House. These alterations have diminished the resource's integrity of design, materials, and workmanship. The stadium is no longer used as a football stadium and the site, once a bustling army base, is now home to a California State University campus. These changes to the surrounding area and the change of use, from a sports arena to an outdoor auditorium, have diminished the integrity of setting, feeling, and association. The changes to original materials and the change in original use prohibit the stadium from conveying its temporal period.

Summary of Evaluation Findings

Freeman Stadium retains little to no historic integrity and lacks historical and architectural significance. Based on the significance evaluations presented above, Freeman Stadium does not appear to meet the NRHP, CRHR, CHL or local designation criteria. Therefore, Freeman Stadium is not considered a historical resource for purposes of CEQA.

***B12. References (continued):**

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Appendix F
Noise and Groundborne Vibration Impact Analysis

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NOISE & GROUNDBORNE VIBRATION IMPACT ANALYSIS

FOR

CSUMB STADIUM EXPANDED USE PROJECT

SEASIDE, CA

MARCH 2026

REVISED JULY 2026

PREPARED FOR:

DENISE DUFFY & ASSOCIATES, INC.
947 CASS STREET, SUITE 5
MONTEREY, CA 93940

PREPARED BY:

AMBIENT
AIR QUALITY & NOISE CONSULTING
75 Higuera Street, Suite 105
San Luis Obispo, CA 93401

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APPENDICES

A. Noise Modeling & Measurement Data

LIST OF COMMON TERMS AND ACRONYMS

ANSI	Acoustical National Standards Institute
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
dB	Decibels
dBA	A-Weighted Decibels
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
Hz	Hertz
in/sec	Inches per Second
L_{dn}	Day-Night Level
L_{eq}	Equivalent Sound Level
L_{max}	Maximum Sound Level
PPV	Peak Particle Velocity
U.S. EPA	United States Environmental Protection Agency
mph	Miles per Hour

INTRODUCTION

This report discusses the existing setting, identifies potential noise and groundborne vibration impacts associated with the implementation of the proposed California State University Monterey Bay (CSUMB) Stadium Improvement Project (project). Noise mitigation measures are recommended where the predicted noise and groundborne vibration levels would exceed applicable thresholds of significance.

PROJECT DESCRIPTION

The proposed project consists of two (2) components: 1) an expansion of use of the CSUMB Stadium by MBFC and CSUMB; and 2) the construction and operation of two (2) new Locker Room facilities, two (2) new restroom buildings, and a gated event staging area just north of the Stadium. The project's regional and local location are depicted in Figures 1 and Figure 2, respectively. The project's site plan is depicted in Figure 3.

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'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 1). 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)-14 hours per day depending on their specific role.

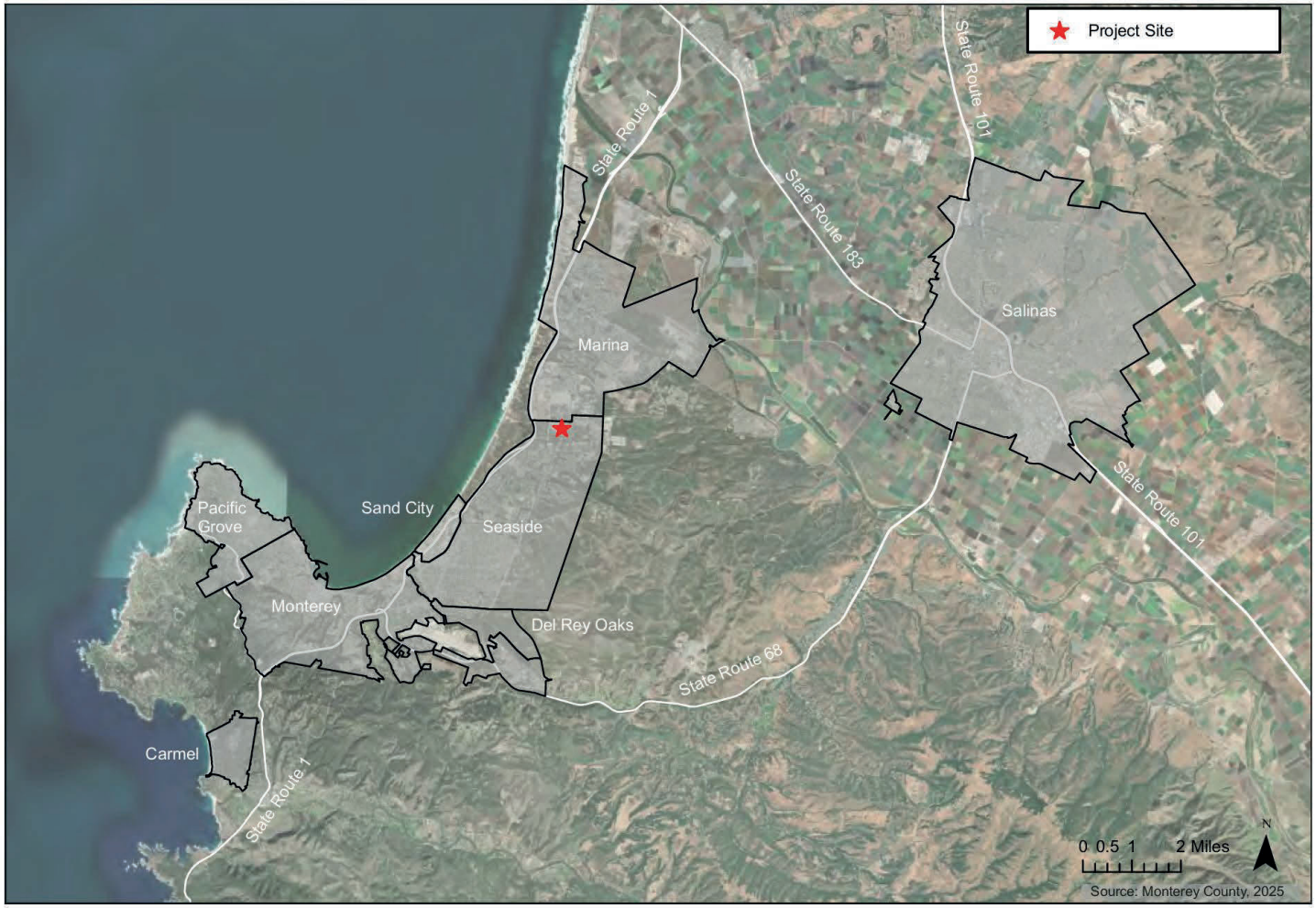
Table 1. CSUMB Athletic Events

Team	Matches	Attendance	Players	Staff[1]
Men's CCAA Championships	3 events, 2 days	300 spectators	120	36.0
Women's CCAA Championships	3 events, 2 days	300 spectators	120	36.0
Men's NCAA Division II National Championships	3 events, 5 days	400 spectators	120	40.0
Women's NCAA Division II National Championships	3 events, 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 concerts, a spring concert, and the Relay for Life. These events would occur once annually and last for one (1) day only. Except for Relay for Life, which would host approximately 6,000 attendees, events would host between 600 and 2,500 attendees (Table 2). 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 each person's specific role and the event.

Figure 1. Project Regional Location



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 1

Figure 2. Project Location

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 Monterey, CA 93940 (831) 373-4341	Figure 2

Figure 3. Project Site Plan

Title:			
Proposed Site Plan	Date 2-19-2025 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

Table 2. CSUMB 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

[1]10.5 hours is the maximum number of hours event staff is expected to work. The majority of staff members would work approximately three (3) hours with approximately 10 staff members working 10.5 hours.

Table 3. Monterey Bay Football Club Athletic Events

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

New Facilities

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

1. **Men's & Women's Locker Room and Shower Facilities.** Two permanent 1,400-sf locker room facilities will be constructed. One facility will replace the existing portable showers utilized by the men's team, and will be built at the stadium entrance to the northwest of the field house. Another facility will be constructed to accommodate the women's teams and will be built to the southwest of the field house.
2. **Permanent Restroom Facilities.** Two permanent restroom buildings, each approximately 1,000 sf, will be constructed within the existing beer garden area to replace the 3,000-sf and approximately 36 portable facilities currently in use.
3. **Storage and Staging Area.** A new 1.25-acre dedicated storage and staging area will be established north of the stadium to support event operations, equipment storage, and logistical needs. No permanent construction of structures besides fencing is planned for this site. Shipping containers may be moved into the staging area 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. The only new lighting would be associated with the new locker room and restroom facilities. However, temporary lighting may be necessary for non-athletic events, such as concerts. Temporary lighting may include, but are not limited to, LED stage lighting and portable light towers.

Access and Parking

There are two (2) existing parking lots at the Stadium: one 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. Perimeter fencing will be continued along the parking egress points to the stadium to improve access management.

Utilities

Potable Water
Currently, the CSUMB Stadium requires approximately 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.

Potable water would be supplied by connecting to or utilizing existing water supply infrastructure on campus, specifically that already in place to supply the field house. Construction of the locker rooms will require approximately 350 linear feet of new water and sanitary sewer pipelines. The proposed 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 approximately 0.47 AFY of wastewater. The proposed project would generate approximately 8.45 AFY[1] of wastewater and 115 tons of solid waste per year. The proposed utilities would connect to existing wastewater pipelines.

Solid Waste
Currently, the CSUMB Stadium generates .25 tons per year of solid waste.[2] The proposed project would generate approximately 27 tons of solid waste per year.

Fire Suppression
Fire suppression systems are fed by the same water supply systems, and installation to new facilities would utilize the existing connections. The new restroom and locker room facilities will be built with fire sprinklers as required by the California Building Code. No new hydrants are proposed as part of the project.

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[1] ***Estimate based on Marina Coast Water District billing and metering practice of duplicating the potable volume to result in sewer volume.***

[2] *Solid waste generated by the existing stadium use is based on CalEEMod modeling prepared for the previous environmental analysis prepared for the 2021 Freeman Stadium Facilities Renovations Project (State Clearinghouse # 2021070153).*

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)-14 hours per day depending on their specific role.

CSUMB would hold up to 31 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 will 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.

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 US 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.

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 1.35 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 will be separated and hauled offsite. Waste and recycling dumpster weight tags would be provided to CSUMB's construction project manager and compliant with the LEED Construction Waste Management Plan, and State waste and recycling requirements.

PROJECT GOAL AND OBJECTIVES

The primary purpose of the proposed project is to enhance and expand the existing stadium facilities to support the educational mission of California State University, Monterey Bay (CSUMB) while aligning with the requirements of the United Soccer League (USL) and the National Collegiate Athletic Association (NCAA). The project aims to strengthen CSUMB's role as a hub for athletics, academic growth, and community engagement.

The renovated stadium will serve as a versatile space that promotes CSUMB's academic and athletic programs, including expanded opportunities for student research, particularly in the College of Health Sciences and Human Services, and enhanced support for the development of CSUMB's student-athletes. Furthermore, the project emphasizes building stronger connections with the broader Central Coast community by offering accessible soccer programs and events.

The project's key objectives are as follows:

- Enhancing the usability and functionality of existing facilities to benefit the campus community.
- Improving the stadium space to foster relationships between CSUMB and the surrounding communities through events
- Increasing the visibility of CSUMB athletics in the Monterey region.
- To create an event space that can drive economic growth and opportunity.

EXISTING SETTING

CONCEPTS AND TERMINOLOGY

ACOUSTIC FUNDAMENTALS

Noise is generally defined as sound that is loud, disagreeable, or unexpected. Sound 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 defined as 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 sound source of 65 dB, 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 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 3 dB change in amplitude as the minimum audible difference perceptible to the average person.

Frequency

The frequency of a sound is defined as the number of fluctuations of the pressure wave per second. The unit of frequency is the Hertz (Hz). One Hz equals one cycle per second. The human ear is not equally sensitive to the sound of different frequencies. For instance, the human ear is more sensitive to sound in the

higher portion of this range than in the lower and sound waves below 16 Hz or above 20,000 Hz cannot be heard at all. To approximate the sensitivity of the human ear to changes in frequency, environmental sound is usually measured in what is referred to as "A-weighted decibels" (dBA). On this scale, the normal range of human hearing extends from about 10 dBA to about 140 dBA (U.S. EPA 1971). Common community noise sources and associated noise levels, in dBA, are depicted in Figure 4.

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 3-dB increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one automobile produces a sound level of 70 dB when it passes an observer, two cars passing simultaneously would not produce 140 dB; rather, they would combine to produce 73 dB. Under the decibel scale, three sources of equal loudness together would produce an increase of 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 6 decibels for each doubling of distance from a point source. Highways consist of several localized noise sources on 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 3 decibels 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 the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an excess ground-attenuation value of 1.5 decibels 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 decibels per doubling of distance from the source.

Atmospheric Effects

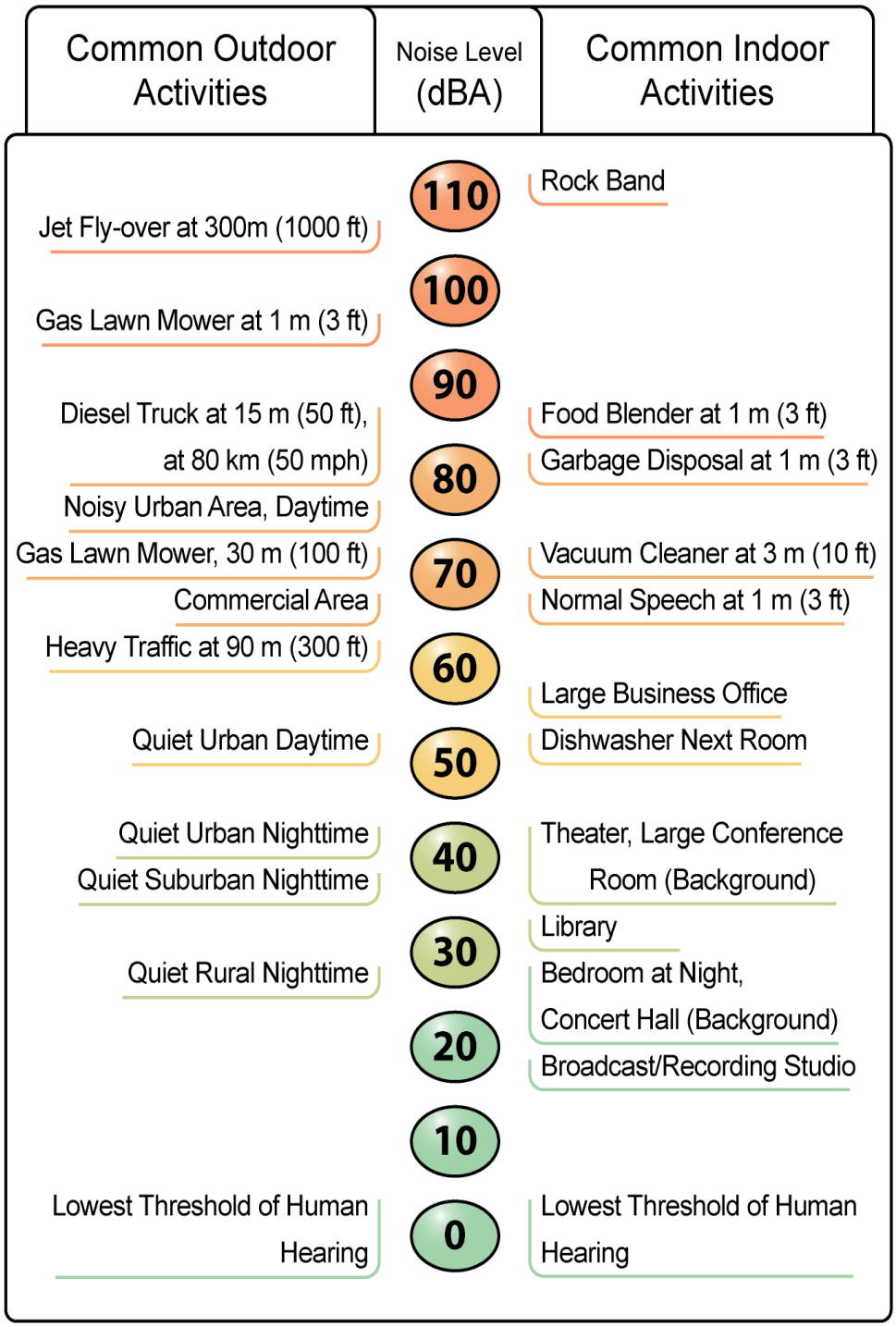
Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) from the highway due to atmospheric temperature inversion (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 a minimum of 5 dB 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.

Figure 4. Common Noise Levels



Source: Caltrans 2025

NOISE DESCRIPTORS

The decibel 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 a 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 with 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-scale sound levels of those sounds. 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 p.m. to 7 a.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 5-dBA penalty for evening noise (7 p.m. to 10 p.m.) Another descriptor that is commonly discussed is the sound-exposure level, expressed as SEL. The SEL 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. Common noise level descriptors are summarized in Table 5.

Table 5. Common Acoustical Descriptors

Descriptor	Definition
Energy Equivalent Noise Level (L_{eq})	The mean (average) energy 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 DNL was first recommended by the U.S. EPA in 1974 as a "simple, uniform and appropriate way" of measuring long term environmental noise. DNL takes into account both the frequency of occurrence and duration of all noise events during a 24-hour period with a 10 dBA "penalty" for noise events that occur between the more noise-sensitive hours of 10:00 p.m. and 7:00 a.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 5 dBA "penalty" added to noise events that occur between the hours of 7:00 p.m. to 10:00 p.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 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 1 dB cannot be perceived by humans;
- Outside of the laboratory, a change of 3 dB is considered a just-perceivable difference;
- A change in sound level of at least 5 dB is required before any noticeable change in community response would be expected. An increase of 5 dB is typically considered substantial;
- A change of 10 dB 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 greatly 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 often evaluated in terms of the potential for noise events to result in increased levels of annoyance, sleep disruption, or interference with speech communication, activities, and learning. Noise-related effects on human activities are discussed in more detail, as follows:

Speech Communication

For most noise-sensitive land uses, an interior noise level of 45 dB L_{eq} is typically identified for the protection of speech communication in order 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 L_{eq} allows normal conversation at distances up to 2 meters with 95 percent sentence intelligibility (U.S. EPA 1974.) Based on this information, speech interference begins to become a problem when steady noise levels reach approximately 60 to 65 dBA.

Annoyance & Sleep Disruption

With regard to 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}). Perhaps the most comprehensive and widely accepted evaluation of the relationship

between noise exposure and the extent of annoyance was originally developed by Theodore J. Schultz in 1978. In 1978 the research findings of Theodore J. Schultz provided support for L_{dn} as the descriptor for environmental noise. Research conducted by Schultz identified a correlation between the cumulative noise exposure metric and individuals who were highly annoyed by transportation noise. The Schultz curve, expressing this correlation, became a basis for noise standards. When expressed graphically, this relationship is typically referred to as the Schultz curve. The Schultz curve indicates that approximately 13 percent of the population is highly annoyed at a noise level of 65 dBA L_{dn}. It 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.

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 (FAA) 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 in excess of 65 dBA CNEL/L_{dn} are typically considered to result in 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 generally 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 (U.S. EPA 1974.)

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.

AFFECTED ENVIRONMENT

EXISTING NOISE-SENSITIVE LAND USES

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are also considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest on-campus noise-sensitive land uses consist predominantly of on-campus student residence halls. The nearest student residence hall is Sanderling Hall located approximately 920 feet northeast of the project site, along Divarty Street. In addition, the EDS CSUMB Child Development Center is located approximately 830 feet north of the project site, along 3rd Avenue. The nearest existing off-campus sensitive land uses are residential land uses located in excess of 2,300 feet from the project site, south of Gigling Road. The nearest existing noise-sensitive land uses are depicted in Figure 5.

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 be in compliance with ANSI specifications. Measured ambient daytime noise levels are summarized in Table 6. Noise measurement locations are depicted in Figure 5.

Table 6. Summary of Measured Ambient Noise Levels

Location	Monitoring Period	Measured Daytime Noise Levels (dBA)	
		L_{eq}	L_{max}
1. West of the Project Site. Near 2nd Avenue. Approximately 70 feet from roadway edge.	1410-1420	57.3	77.8
2. Northwest of the Project Site. Near Divarty Street on Division Hill. Approximately 55 feet from Divarty Street.	1435-1445	52.2	71.5
3. Northeast of the Project Site. Approximately 15 feet from Divarty Street. Approximately 225 feet east of General Jim Moore Boulevard.	1505-1515	53.5	74.9
4. Approximately 352 feet east of General Jim Moore Boulevard.	1535-1545	54.1	69.4

Ambient noise measurements were conducted on January 14, 2026, using a Larson Davis Laboratories, Type I, Model LxT integrating sound level meter placed at a height of 5 feet. Noise-monitoring locations are depicted in Figure 5.

Figure 5. Nearby Existing Noise-Sensitive Land Uses & Noise Measurement Locations

Refer to Table 6 for noise-measurement data.

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. Ambient noise levels during the evening and nighttime hours are generally 5-10 dB lower than daytime noise levels.

REGULATORY FRAMEWORK

NOISE

City of Seaside 2040 General Plan

The City of Seaside has established policies in the Noise Element of the General Plan to guide the development of new land uses with respect to noise exposure. Table 7 summarizes the City's noise standards for various types of land uses. These noise standards represent the maximum acceptable average-daily noise level, which are used to determine noise impacts for land uses (City of Seaside 2024).

Table 7. City of Seaside Interior and Exterior Noise Standards

Land Use	Noise Standards (dBA CNEL)	
	Exterior	Interior
Residential	65	45
Mixed-Use Residential	70	45
Commercial	70	-
Office	70	50
Industrial	75	55
Public Facilities	70	50
Schools	50	50
Source: City of Seaside 2024		

City of 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. (City of Seaside 2025).

GROUNDBORNE VIBRATION

Vibration is like noise in that it involves a source, a transmission path, and a receiver. While vibration is related to noise, it differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually 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 can 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).

There are no federal, state, or local regulatory standards for groundborne vibration. However, Caltrans has developed vibration criteria based on potential structural damage risks and human annoyance. Caltrans-recommended criteria for the evaluation of groundborne vibration levels, with regard to structural damage and human annoyance, are summarized in Table 8. The criteria apply to continuous vibration sources, which include vehicle traffic and most construction activities. All damage criteria for buildings are in terms of ground motion at the buildings' foundations. No allowance is included for the amplifying effects of structural components (Caltrans 2020).

Table 8. Summary of Groundborne Vibration Levels and Potential Effects

Vibration Level (in/sec ppv)	Human Reaction	Effect on Buildings
0.006 - 0.019	Threshold of perception; possibility of intrusion.	Vibrations unlikely to cause damage of any type.
0.08	Vibrations readily perceptible.	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected.
0.10	Level at which continuous vibrations begin to annoy people.	Virtually no risk of "architectural" damage to normal buildings.
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).	Threshold at which there is a risk of "architectural" damage to fragile buildings.
0.3 - 0.6	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.	Potential risk of "architectural" damage may occur at levels above 0.3 in/sec ppv for older residential structures and above 0.5 in/sec ppv for newer structures.

The vibration levels are based on peak particle velocity in the vertical direction for continuous vibration sources, which includes most construction activities.
Source: Caltrans 2020

As indicated in Table 8, the threshold at which there is a risk to normal structures from continuous events is 0.3 in/sec PPV for older residential structures and 0.5 in/sec PPV for newer building construction. With regard to human reaction (Table 8), vibration levels would begin to become potentially annoying for people in buildings at levels of 0.2 in/sec PPV.

PROJECT IMPACTS

THRESHOLDS OF SIGNIFICANCE

Criteria for determining the significance of air quality impacts were developed based on information contained in the California Environmental Quality Act Guidelines (CEQA Guidelines, Appendix G). According to those guidelines, a project may have a significant effect on the environment if it would result in the following conditions:

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Generation of excessive groundborne vibration or groundborne noise levels.
3. 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 miles of a public airport or private-use airport, would the project expose people residing or working in the project area to excessive noise levels?

Short-Term Construction

The City has not adopted noise standards that apply to short-term construction activities. However, based on screening noise criteria commonly recommended by federal agencies, construction activities would generally be considered to have a potentially significant impact if average-hourly daytime noise levels would exceed 80 dBA L_{eq} at noise-sensitive land uses, such as residential land uses. Likewise, construction activities would be considered to have a potentially significant impact if average-hourly nighttime noise

levels would exceed 70 dBA L_{eq} at noise-sensitive land uses (FTA 2018). 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 L_{eq} and 70 dBA L_{eq}, respectively) would be considered to have a ***potentially significant impact***. For purposes of this analysis, substantial increases in ambient noise levels would be defined as an increase of 5 dBA, or more.

Long-term Operation

Predicted noise levels were compared to applicable City noise standards for determination of impact significance. The City's applicable noise standards are summarized in Table 7. Substantial increases in ambient noise levels that would exceed applicable City noise standards would be considered to have a potentially significant impact. For purposes of this analysis, substantial increases in ambient noise levels would be defined as an increase of 5 dBA, or more.

Groundborne Vibration

The *CEQA Guidelines* do not define the levels at which groundborne vibration levels would be considered excessive. For this reason, Caltrans' recommended groundborne vibration thresholds were used for the evaluation of impacts based on increased potential for structural damage and human annoyance, as identified in Table 8. For purposes of this analysis, risks of architectural damage (i.e., minor cracking of plaster walls and ceilings) would be considered potentially significant if construction-generated ground vibration levels at nearby structures would exceed 0.5 in/sec PPV. Ground vibration in excess of 0.2 in/sec PPV would be expected to result in a potential for significant short-term increases in levels of annoyance for occupants of nearby buildings.

METHODOLOGY

Short-Term Construction

Short-term noise impacts associated with construction activities were analyzed based on typical construction equipment noise levels and distances to the nearest noise-sensitive land usage. Noise levels were predicted based on representative off-road equipment noise levels derived from the Federal Highway Administration's (FHWA) *Road Construction Noise Model* based on average equipment usage rates identified in the model. Predicted construction noise levels at nearby land uses were calculated assuming the simultaneous operation of the two noisiest pieces of off-road construction equipment, based on estimated equipment to be required derived from the CalEEMod emissions modeling conducted for this project (FTA 2018).

Long-term Operation

Predicted noise levels for on-site events were calculated using the SoundPlan computer model. To be conservative, predicted noise levels were based on the highest estimated hourly noise levels associated with the use of an amplified sound system. The highest hourly noise levels associated with the use of an amplified sound system would be associated with concert events, which would generate hourly noise levels of approximately 87 dBA L_{eq} at 100 feet in front of the stage. To account for major events that could occur over multiple hours during the day, such as major festivals, predicted noise levels were conservatively estimated assuming that events could occur between the hours of 7:00 a.m. and 10:00 p.m., consistent with the hourly limitation noted in the City's municipal code for amplified sound events. The analysis of predicted operational noise levels included nearby existing noise-sensitive land uses, as well as, nearby noise-sensitive land uses planned for future development. Predicted increases in traffic noise levels were qualitatively discussed based on information derived from the traffic analysis prepared for this project (Fehr&Peers 2026).

Groundborne vibration levels associated with project construction were quantitatively assessed based on estimated equipment usage and associated groundborne vibration levels derived from Caltrans' recommended groundborne vibration guidance (Caltrans 2020). Groundborne vibration levels associated with project operations were qualitatively assessed.

IMPACT 1: ***Would the project result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Long-term Operational Noise Levels

The proposed project consists of two (2) components: 1) an expansion of use of the CSUMB Stadium by MBFC and CSUMB; and 2) the construction and operation of two (2) new Locker Room facilities, two (2) new restroom buildings, and a gated event staging area just north of the Stadium. As noted earlier in this report, the proposed expansion of use of the CSUMB Stadium would include additional athletic events (e.g., soccer practices, championships), as well as non-athletic events (e.g., ceremonies, concerts, and festivals). Noise sources commonly associated with these events would include spectator noise, and the use of amplified public address and amplified sound systems. In addition, increases in vehicle traffic on area roadways would also be associated with an expansion of use of the CSUMB Stadium. Noise sources commonly associated with the new locker rooms and restroom buildings would be primarily associated with the operation of building mechanical equipment, such as air conditioning (AC) units and fans. Predicted increases in ambient noise levels associated with these noise sources are discussed in greater detail, as follows:

On-site Events

As noted above, noise sources commonly associated with on-site events would include spectator noise, and the use of amplified sound systems. Noise levels associated with events are generally 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 associated with 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 (CSUMB 2021). 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 (City of Merced 2012).

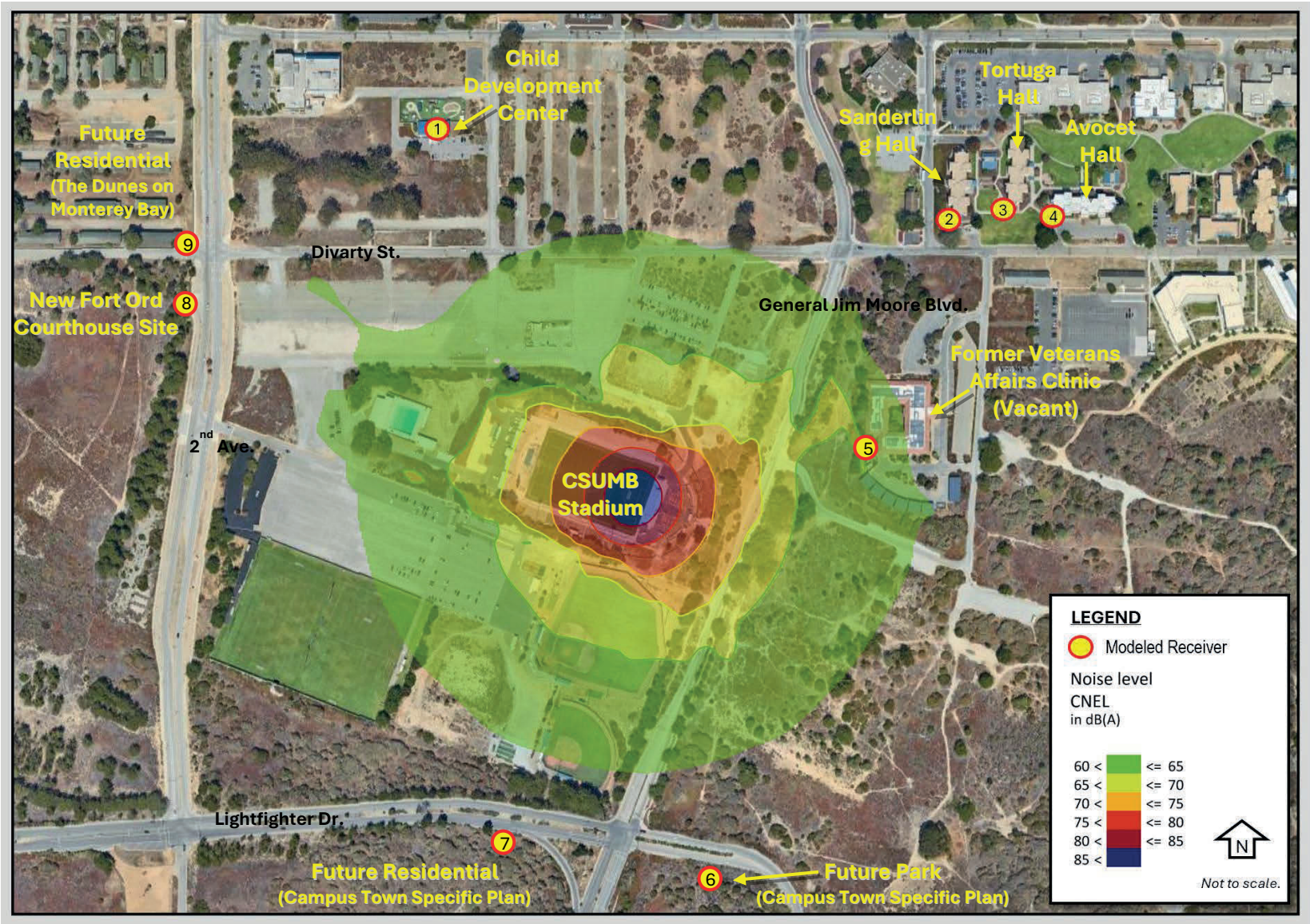
As noted above, the highest on-site event noise levels would be associated with proposed concerts. Concert-related noise levels were modeled based on an average noise level of 87 dBA L_{eq} at approximately 100 feet. Two scenarios were modeled, including an individual concert occurring during the evening hours of 7:00 p.m. to 10:00 p.m., and 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's municipal code for the use of amplified sound systems (City of Seaside 2024). To ensure a conservative analysis, concert events were assumed to occur continuously during the time periods noted. Predicted noise levels for the evening concert and all-day music festival at nearby noise-sensitive land uses are summarized in Table 9. Predicted noise contours for the evening concert and all-day music festival are depicted in Figures 6 and 7, respectively. 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 9, predicted noise levels for the evening concert and all-day music festival would not exceed the City'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. Implementation of the proposed project would not result in a substantial increase in ambient noise levels that would exceed the City's noise standards at nearby existing or future planned noise-sensitive land uses. This impact would be considered ***less than significant***.

Table 9. Predicted Operational Noise Levels at Nearby Land Uses

Event	Predicted Noise Levels (dBA CNEL) at Modeled Receivers[1]								
	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
Land Use:	Child Development Center	Student Residence Hall	Student Residence Hall	Student Residence Hall	Vacant[4]	Future Park[5]	Future Residential[5]	~~Future Hotel~~ New Fort Ord Court-house[5]	Future Residential[5]
City's Noise Standards[6]	65	65	65	65	70	70	65	65	65
Exceeds Noise Standard?	No	No	No	No	No	No	No	No	No

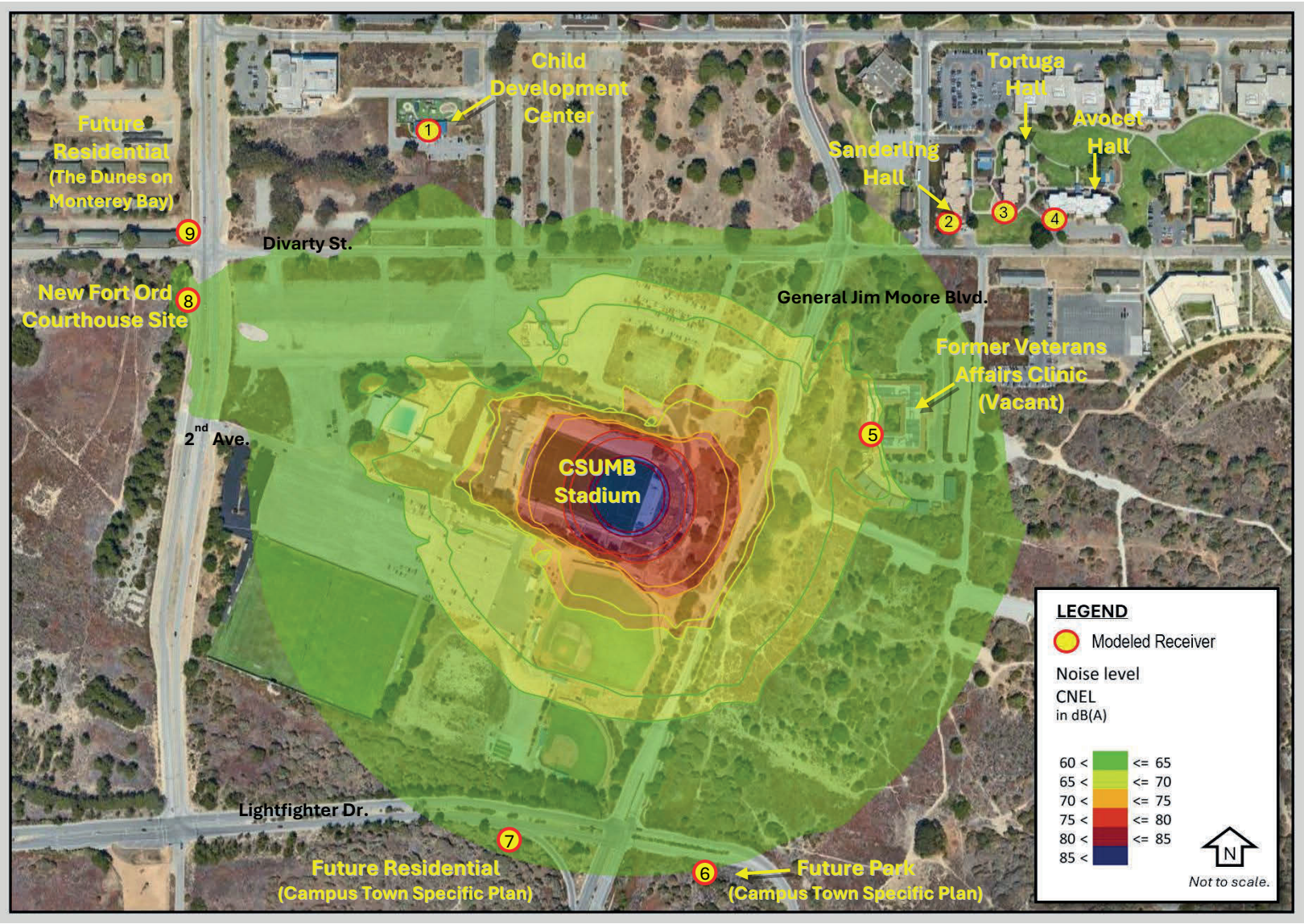
1. *Noise levels were calculated assuming continuous hourly operations for the scenario periods modeled. Based on an average-hourly noise level of 87 dBA at 100 feet from the stage. To be conservative, noise source directionality was not applied. Modeled receiver locations, land uses, and predicted noise contours for evening concert and all-day festival events are depicted in Figures 6 and 7, respectively. 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 (Monterey Herald 2019).*
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 (Refer to Table 7). To be conservative, student residence halls, child development center, and ~~future hotel~~ New Fort Ord Courthouse (Receivers 1 through 4, 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.*

Figure 6. Predicted Operational Noise Levels – Evening Concert



Depicts predicted noise contours for an evening amplified musical concert event (7:00 p.m. – 10:00 p.m.)

Figure 7. Predicted Operational Noise Levels – All-Day Festival



Depicts predicted noise contours for an all-day festival event with multiple amplified musical concerts (7:00 a.m. – 10:00 p.m.)

Building Mechanical Equipment

As noted above, noise sources associated with the new locker rooms and restroom buildings would be primarily associated with the operation of building 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 operational noise levels of approximately 60 dBA L_{eq} at 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 levels would not result in a substantial increase in ambient noise levels that would exceed the City's noise standards at nearby existing or future planned noise-sensitive land uses and would be largely masked by event noise occurring within the stadium. This impact would be considered ***less than significant***.

Vehicular Roadway Traffic

As noted above, on-site events would result in additional 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. Increases in traffic noise levels could exceed the City's noise standards at nearby existing or future planned noise-sensitive land uses located along nearby major roadways. As a result, this impact would be considered ***potentially significant***.

Mitigation Measure

MBFC and CSUMB shall continue to implement the *CSUMB Stadium Renovation Transportation Management Plan* (August 2022)

Significance after Mitigation

The purpose of the *CSUMB Stadium Renovation Transportation Management Plan* (August 2022) is 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 newly renovated Stadium. MBFC and CSUMB would continue implementation of the TMP's transportation demand management measures which include pedestrian facility improvements, transit facility and service improvements, bicycle and e-scooter facility and service improvements, traffic management, and wayfinding. However, as activities grow, some increase in vehicle trips would still be anticipated to occur (Fehr&Peers 2025). There are no additional feasible mitigation strategies available to CSUMB to reduce this impact to a less-than-significant level. Therefore, this impact would be considered ***significant and unavoidable.***

Short-term Temporary Construction Noise Levels

Construction of the proposed improvements would be primarily associated with the installation of the locker and dressing room buildings. Site clearing and grading would also be required for the storage and staging area. Noise levels commonly associated with off-road equipment anticipated to be used during project construction are summarized in Table 10.

As noted in Table 10, instantaneous noise levels generated by individual pieces of off-road equipment typically range from approximately 78 to 85 dBA L_{max} at 50 feet (FHWA 2008). Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Based on typical off-road equipment usage rates, average-hourly noise levels for individual equipment would be approximately 83 dBA L_{eq}, or less, at 50 feet.

Table 10. 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
Grader	85	81
Loader	79	71
Forklift/Gradall	79	83
Plate Compactor	83	76
Roller Compactor	80	73
Source: Based on measured data obtained from the FHWA Roadway Construction Noise Model (FHWA 2008)		

The nearest existing noise-sensitive land uses include a child development center, located approximately 830 feet northwest of the project site, and student residence hall located approximately 920 feet northeast of the project site. In addition, noise-sensitive land uses, including residential uses, are planned for future development in excess of approximately 1,000 feet west of the project site, across 2nd Avenue, and to the south, across Lightfighter Drive.

Based on the individual equipment noise levels noted in Table 10 and assuming that all equipment were to operate simultaneously over a one-hour period, predicted average-hourly construction noise levels at the nearby existing child development center would be approximately 59 dBA L_{eq}. Predicted construction noise levels at the nearest on-campus student residence hall (Sanderling Hall) would be approximately 58 dBA L_{eq}. Predicted construction noise levels at the future land uses to be developed west of 2nd Avenue and south of Lightfighter Drive would be approximately 57 dBA L_{eq}, or less. 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.

With regard to residential land uses, noise-generating activities occurring during the more noise-sensitive nighttime hours are of increased concern. Ambient noise levels typically decline during the evening and nighttime hours due to primarily to decreased vehicular activity on area roadways. Project-generated noise levels occurring during these periods of the day may be more noticeable and, therefore, would have an increased potential for annoyance and sleep interference. Although construction noise levels would not be projected to exceed the nighttime noise standard of 70 dBA L_{eq}, substantial increases in ambient noise levels during the evening and nighttime hours could result in sleep disruption to occupants of the nearby existing student residence halls, as well as, nearby residential ~~and hotel~~ uses planned for future development to the west and south of the project site. This impact would be considered ***potentially significant***.

Mitigation Measure

MM Noise-1. Construction activities shall be limited to between the daytime hours of 7:00 a.m. and 7:00 p.m. on weekdays and between 9:00 a.m. and after 7:00 p.m. on Saturdays, Sundays and holidays.

Significant After Mitigation

MM Noise-1 would limit construction activities to the daytime hours. With mitigation, this impact would be considered ***less than significant***.

IMPACT 2:	***Would the project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?***

Increases in groundborne vibration levels attributable to the project would be primarily associated with short-term construction activities. Groundborne vibration levels associated with representative construction equipment are estimated to range from approximately 0.003 to 0.089 in/sec PPV at 25 feet (Caltrans 2020). The nearest existing structure is an aquatics center located approximately 230 feet from the project site. Based on this distance and assuming a maximum groundborne vibration level of 0.089 in/sec PPV at 25 feet, predicted groundborne vibration levels at this nearest structure would be approximately 0.008 in/sec, or less. Predicted groundborne vibration levels at this nearest structure would not exceed commonly applied threshold of 0.5 in/sec ppv for potential structural damage.

The nearest existing sensitive receptor is a child development center located approximately 830 feet from the project site. Based on this distance and assuming a maximum groundborne vibration level of 0.089 in/sec PPV at 25 feet, predicted groundborne vibration levels at this nearest sensitive receptor would be approximately 0.002 in/sec, or less. Predicted groundborne vibration levels at other nearby existing and future sensitive land uses, which are located at greater distance from the project site, would be less. Predicted groundborne vibration levels at nearby sensitive land uses would not exceed commonly applied thresholds for potential structural damage or human annoyance (i.e., 0.5 and 0.2 in/sec ppv, respectively). As a result, this impact would be considered ***less than significant***.

IMPACT 3:	***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? and For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?***

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. As a result, the project would not subject on-site individuals to potentially hazardous noise conditions associated with aircraft operations nor would implementation of the project affect airport operations. ***No impact***.

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APPENDIX A
Noise Modeling & Measurement Data

Construction Noise Modeling

Assumptions:

Two Noisiest Equipment Operating Simultaneously

Distance to nearest noise-sensitive receptor: 830 feet

Input Data

Case Description: CSUMB Stadium Project

Receptor

	Description	Land Use	Daytime Baseline (dBA)	Evening Baseline (dBA)	Nighttime Baseline (dBA)
1	R1	Residential	5.0	5.0	5.0
2					
3					
4					

Noise Metric: Leq

Noise Limit Criteria

Receptor #1

Noise Limits

Equipment Receptor #1: R1

	Active	Description	Impact Device	Usage(%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Distance to Receptor (feet)	Estimated Shielding (dBA)
1	☐	Dozer	☐	40%	85.0	81.7	50.0	0.0
2	☑	Grader	☐	40%	85.0	N/A	50.0	0.0
3	☑	Gradall	☐	40%	85.0	83.4	50.0	0.0
4	☐	Roller	☐	20%	85.0	80.0	50.0	0.0
5	☐	Backhoe	☐	40%	80.0	77.6	50.0	0.0
6	☐	Front End Loader	☐	40%	80.0	79.1	50.0	0.0

Results

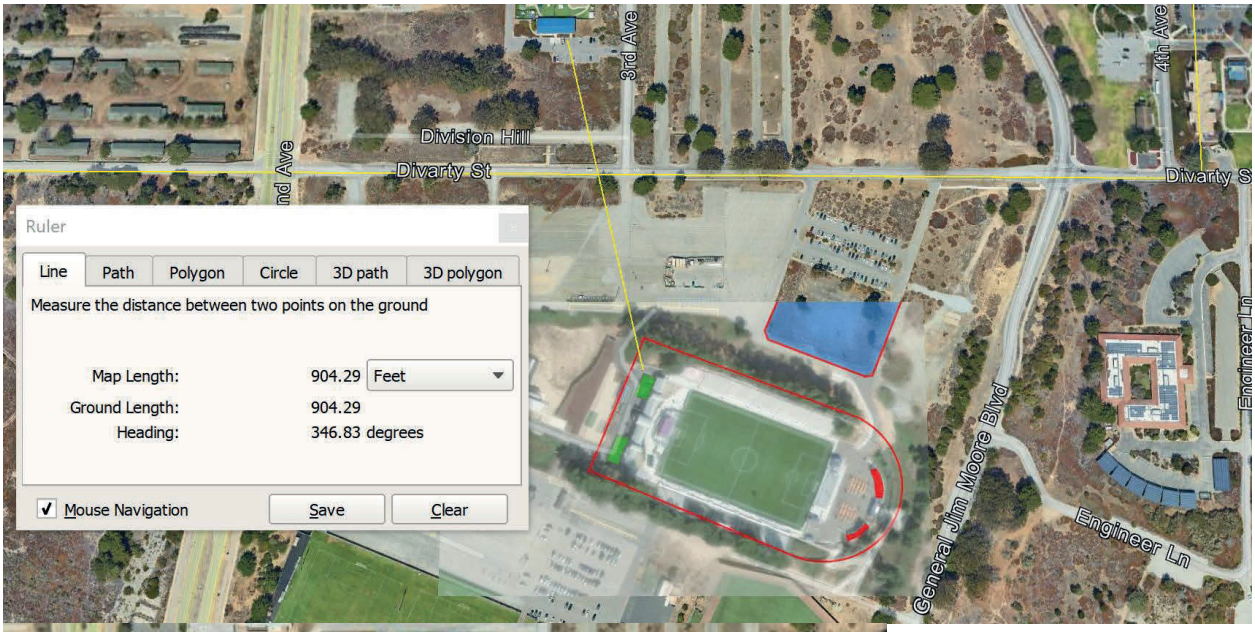
Receptor #1: R1

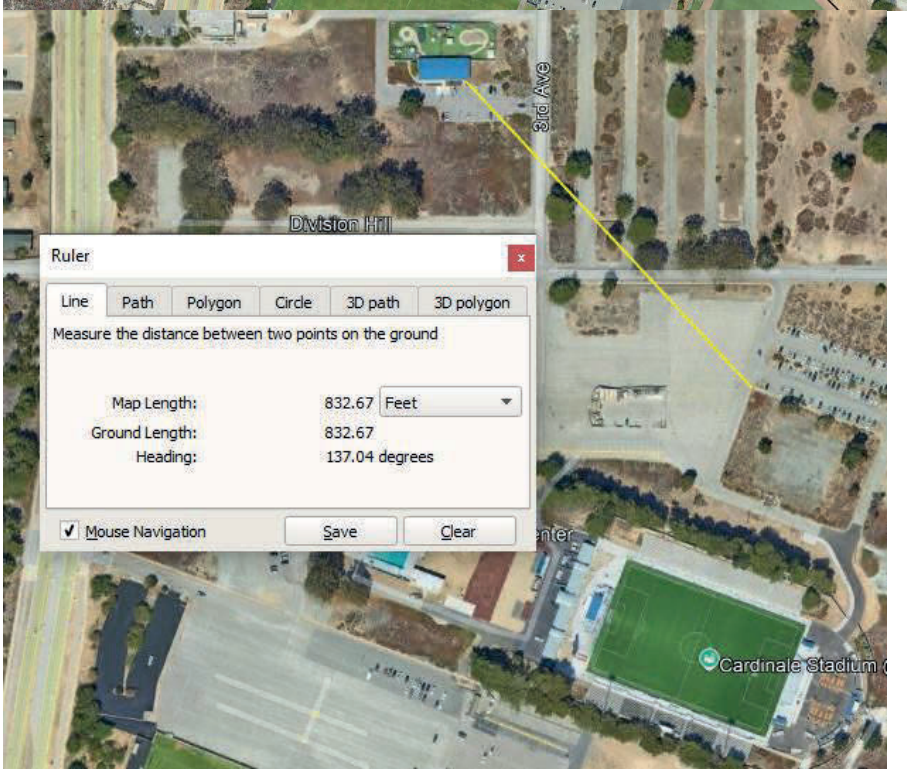
		Calculated (dBA)		Noise Limits (dBA)						Noise Limit Exceedance (dBA)					
				Day		Evening		Night		Day		Evening		Night	
	Equipment	Lmax*	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
	Total	85.0	83.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1	Grader	85.0	81.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Gradall	83.4	79.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3															
4															
5															

*Total Lmax is the value for the loudest piece of equipment.

NOISE PREDICTION CALCULATION

Distance from Source Center (feet)	(dB)			
50	83	Reference Distance and Noise Level (Two Noisiest Equipment)		
	(dB)	Shielding	(dB)	Land Use
50	83	0	83	
830	59	0	59	CHILD DEV CENTER
920	58	0	58	STUDENT HOUSING
1000	57	0	57	FUTURE DEV


Division Hill
Divarty St
3rd Ave
4th Ave
General Jim Moore Blvd
Engineer Ln
Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
Measure the distance between two points on the ground
Map Length: 904.29 Feet
Ground Length: 904.29
Heading: 346.83 degrees
Mouse Navigation
Save
Clear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Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
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Ground Length: 832.67
Heading: 137.04 degrees
Mouse Navigation
Save
Clear
Cardinale Stadium

Division Hill
Divarty St
Divarty St
Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
Measure the distance between two points on the ground
Map Length:
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Feet
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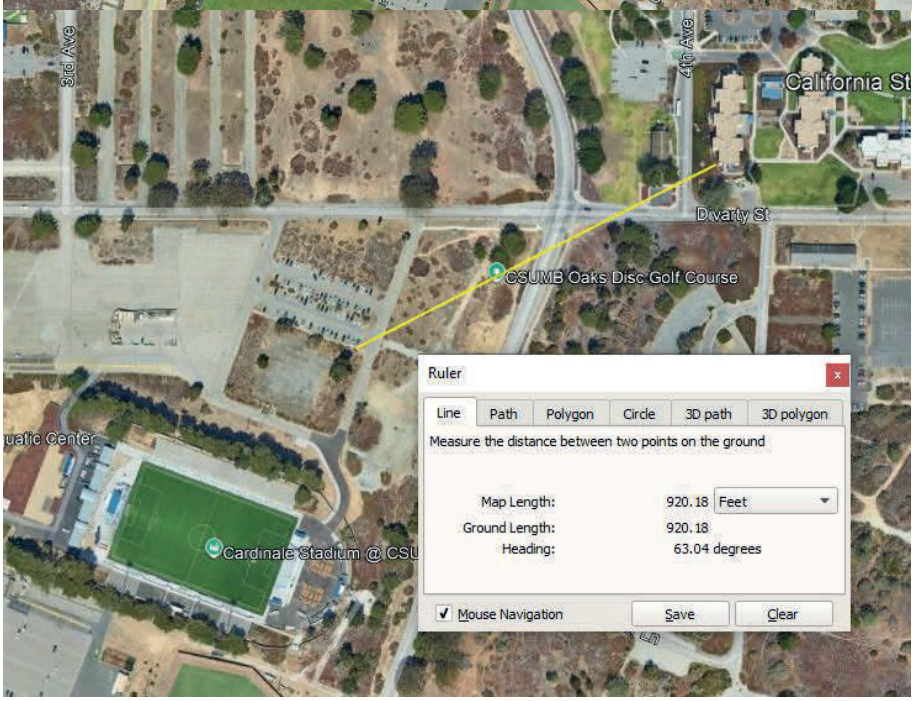
General Jim Moore Blvd
Engineer Ln
Engineer Ln


3rd Ave
4th Ave
California St
Divarty St
CSUMB Oaks Disc Golf Course
Cardinale Stadium @ CSU
Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
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Feet
Ground Length:
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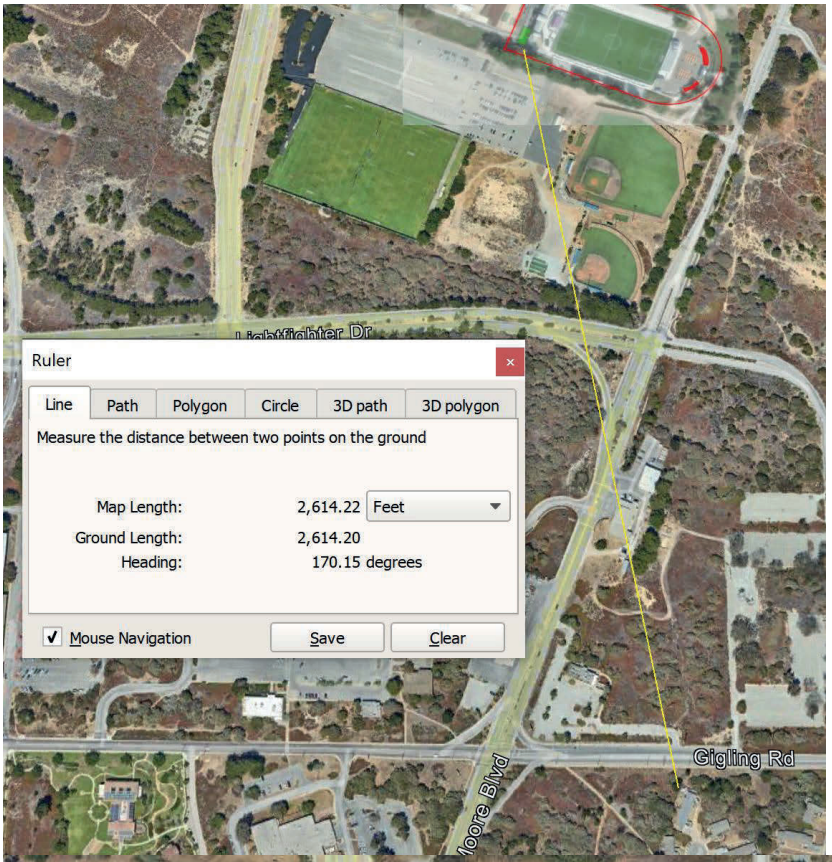
Save
Clear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Circle
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3D polygon
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Ground Length:
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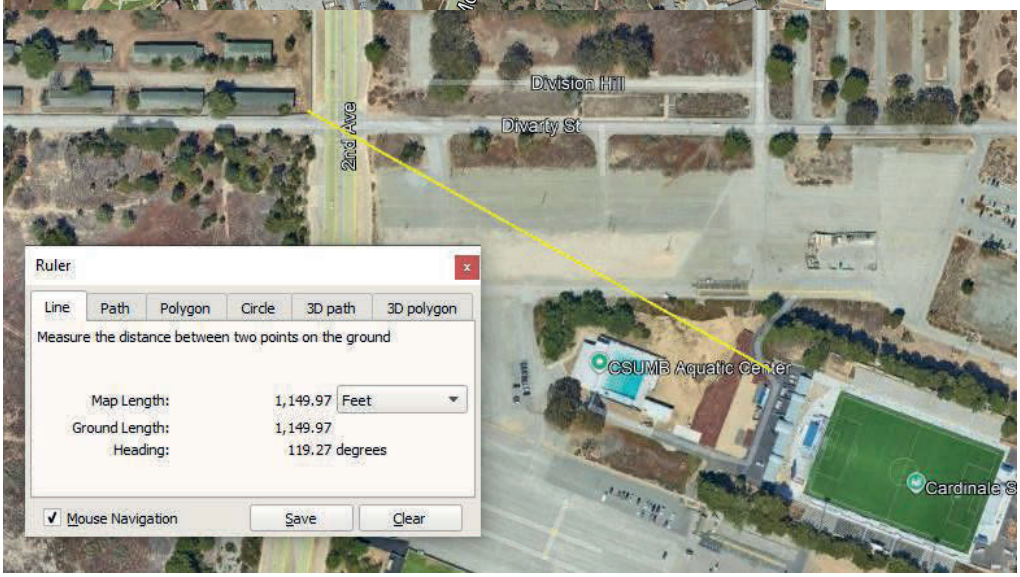
Clear
Gigling Rd


Division Hill
Divarty St
2nd Ave
Ruler
Line
Path
Polygon
Circle
3D path
3D polygon
Measure the distance between two points on the ground
Map Length:
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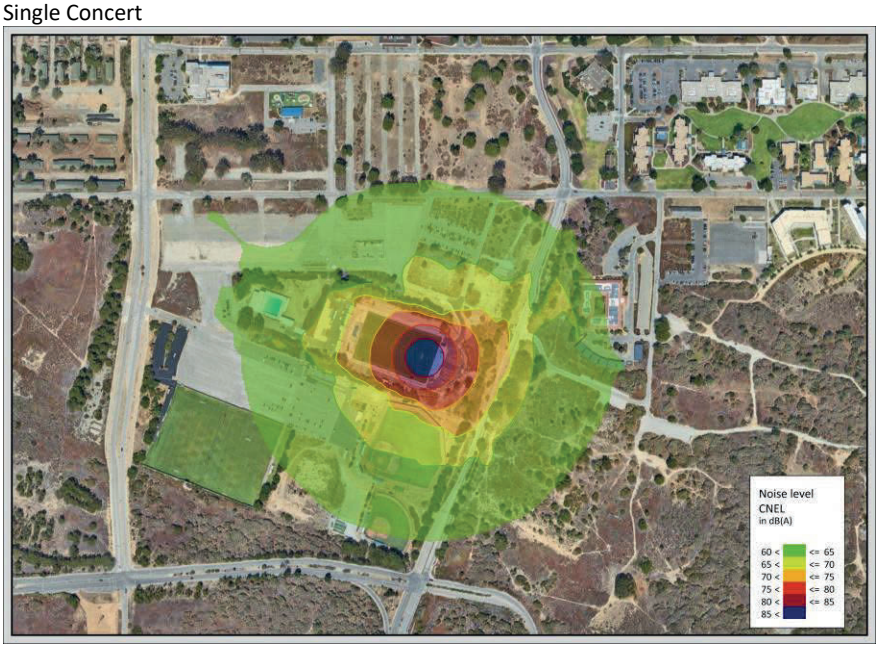
Feet
Ground Length:
1,149.97
Heading:
119.27 degrees
Mouse Navigation
Save
Clear
CSUMB Aquatic Center

Event Noise Modeling
Noise Prediction Model: SoundPlan
SoundPlan Spectrum: Concert, Large Stages
Source Level: 86.8 at 100 feet
Noise Source: Omni Directional
Single Concert: 7:00 p.m. to 10:00 p.m.
All-Day Concert: 7:00 a.m. to 10:00 p.m.

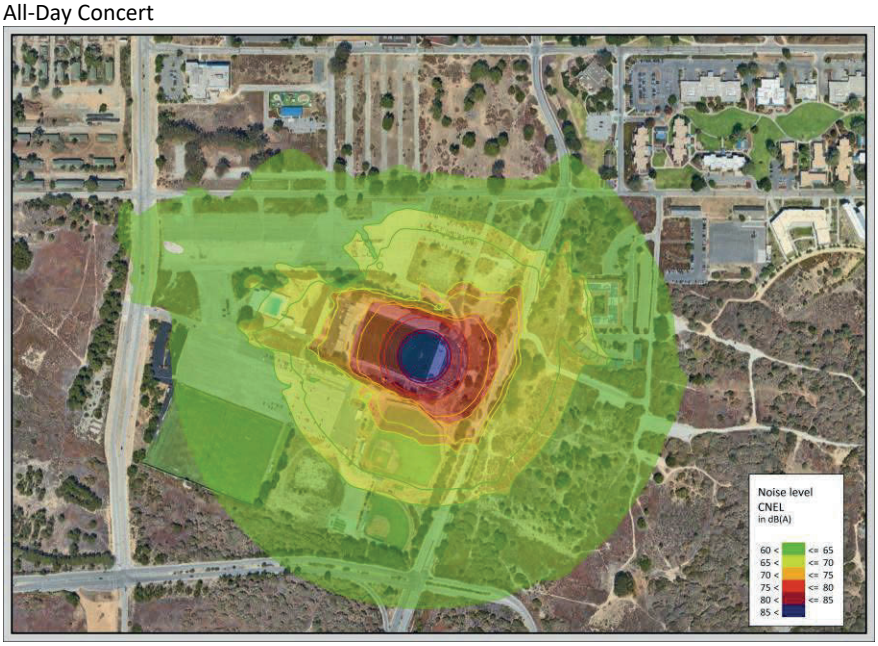
CONCERT NOISE LEVELS

SOURCE	EVENT TYPE	NOISE LEVEL	DISTANCE	NOTES
City of Merced. January 3, 2012. Merced Vision 2030 General Plan. https://www.cityofmerced.gov/business-and-development/planning/vision-2030-general-plan	OUTDOOR CONCERT	86.8	100 feet	Includes performances at the outdoor theater, including contemporary/pop, country, alternative rock music.

Single Concert



All-Day Concert



NOISE MEASUREMENT SURVEY FORM

SHEET	1	OF	1

DATE:	1/14/2026
PROJECT:	CSUMB STADIUM PROJECT
MONITORING STAFF:	KURT LEGLEITER

ST=Short-term Measurements (Not to scale. Locations are approximate.)

NOISE MEASUREMENT CONDITIONS & EQUIPMENT

MET CONDITIONS & MONITORING EQUIPMENT:	TEMP: 60-62 F. | HUMIDITY: 54-55 % | WIND SPEED: 3-5 MPH | GROUND: DRY			
	CLOUD COVER BY CLASS (OC=OVERCAST):	3	(1. HEAVY OC, 2. LIGHT OC, 3. SUNNY, 4. CLEAR NIGHT, 5. OC NIGHT)	
	MET. METER:	KESTREL 5500		
NOISE MONITORING EQUIPMENT:	SLM MODEL:	LD LXT		
	CALIBRATOR:	LARDAV CAL200		
NOISE MONITORING SETUP:	WITHIN 10 FT OF REFLECTIVE SURFACE?:	NO	MICROPHONE HEIGHT AGL (FT):	5
	CALIBRATED PRIOR TO AND UPON COMPLETION OF MEASUREMENTS:	YES	METER SETTINGS:	A-WHT / SLOW

NOISE & TRAFFIC MEASUREMENTS

MEASUREMENT		DURATION			MEASURED NOISE LEVELS		
LOCATION	START TIME	(Minutes)	MEASUREMENT LOCATION	PRIMARY NOISE SOURCES NOTED	LEQ	LMAX	
STM1	1410-1420	10	Near 2nd Avenue, ~70 feet from roadway.	Vehicle on roadways primary.	57.3	77.8	
STM2	1435-1445	10	Near Divarty St. on Division Hill, ~55 feet from roadway.	Vehicle on roadways primary.	52.2	71.5	
STM3	1505-1515	10	Near Divarty St., ~225 feet east of GJM Blvd. ~15 feet from roadway.	Vehicle on roadways primary.	53.5	74.9	
STM4	1535-1545	10	East of GJM Blvd near old Veterans Clinic. ~352 feet from GJM Blvd.	Vehicle on roadways primary.	54.1	69.4	

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Appendix G
Transportation Study

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Vehicle Miles Traveled Impact Analysis

CSUMB Stadium Expansion

Submitted to:

California State University, Monterey Bay (CSUMB) and Denise Duffy & Associates

Submitted on:

January 9, 2026

Fehr & Peers

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1. Introduction

This report summarizes a vehicle miles traveled (VMT) impact analysis for the expansion of use of the California State University, Monterey Bay (CSUMB) Stadium ("Stadium") in Seaside, California. The analysis evaluates both the direct VMT generated by the project and the cumulative, long-term effects on regional VMT. The regional context is shown in **Figure 1**.

Project History

The CSUMB Stadium, formerly known as the Freeman Stadium, was constructed over 70 years ago. In 2020, Monterey Bay Football Club (MBFC) approached CSUMB with a proposal to renovate and maintain the Stadium as a shared campus for the United Soccer League (USL) with CSUMB.

The stadium renovations provided for the following activities:

- 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 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.

The renovations and operations were evaluated in an Initial Study/Mitigated Negative Declaration (IS/MND) adopted by the California State University Chancellor's Office on September 8, 2021.

The renovations were completed in 2022, and the team played its first season in the stadium in Spring 2022.

Project Description

MBFC and CSUMB are proposing an expansion of the use of the CSUMB Stadium, the construction of two new locker room facilities and restroom buildings, and a gated staging area north of the Stadium. The project location is shown in **Figure 2**.

The proposed project description is based on the *Administrative Draft Project Description for the Stadium Expanded Use Project at California State University, Monterey Bay* (October 2025).

MBFC's additional use of the Stadium would include the following:

- Three (3) new teams:
  - One USL Super League (Women's Pro)
  - One USL League Two (Men's Amateur)
  - One USL W League (Women's Amateur)
- Winter Festival
- Weekend Concerts

CSUMB's additional use of the Stadium would include the following:

- Men's and women's California Collegiate Athletic Association (CCAA) Championship tournaments
- Men's and women's National Collegiate Athletic Association (NCAA) Division II National Championships
- Additional campus events including the Latinx Affinity Ceremony for graduating students and the Otter Cross Cultural Center affinity celebration

Project Site Access and Parking

The proposed project would not involve the construction of any new parking facilities. The proposed project would utilize the existing two parking lots, located to the north/northwest of the Stadium and south/southwest of the Stadium. A paved drive lane already exists leading up to the proposed storage and staging area, where an improved curb cut would allow vehicle access to the site. Perimeter fencing will be continued along the parking egress points to the Stadium to improve access management.

MBFC Operations

The CSUMB Stadium Expansion Project would provide for the following operational activities:

<u>Existing</u>:

- 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, 4-5 days per week for 3-4 hours each day, with an estimated 32 players, coaches, and staff at each practice,
  - Approximately 18 matches over 18 days during the United Soccer League Championship (USLC) regular season, with an average attendance of 4,200 spectators and 216 staff, 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 anticipated six activities per year)
- MBFC also hosts 1 post season match, 1 tournament, and 1 international friendly match
  - Each event requires 1 day and attracts 5,600 spectators

- Use of renovated playing field for academic courses and athletics programs when not in conflict with the MBFC schedule

Proposed Additions:

- Include three (3) new teams:
  - One (1) USL Super League (Women's Pro)
    - Training five (5) times a week (31 players and coaches)
    - 12 matches over 10 days during the USL Super League regular season (nine months) with an average attendance of 4,000 spectators and 110 staff
  - One (1) USL League Two (Men's Amateur)
    - Training five times a week (27 players and coaches)
    - 7 matches over 7 days during the USL League Two regular season (two months), with an average attendance of 300 spectators and 15 staff
  - One (1) USL W League (Women's Amateur)
    - Training five (5) times a week (27 players and coaches)
    - 7 matches over 7 days during the USL W league regular season (two months), with an average attendance of 300 spectators and 15 staff
  - For the MBFC match events, visiting teams are anticipated to travel with approximately 23 players and 25 staff members.
- Winter Festival
  - Once per year over 28 days, with an average attendance of 3,000 attendees per day and 150 staff (an additional 10 set-up days for staff)
- Weekend concerts
  - 20 times per year over 3 days each, with an average attendance of 6,000 attendees per day and 200 staff (an additional 1-2 set-up days for staff)

CSUMB Operations

In addition to campus events, there are low-attendance CSUMB athletic matches and events.

The events are outlined as follows:

Existing:

- Women's soccer program
  - 28-36 student athletes and 6 staff members
  - 10-12 matches, 2-3 recruiting camps, and one youth camp annually
- Men's soccer program
  - 28-36 student athletes and 6 staff members
  - 10-12 matches, 2-3 recruiting camps, 1 youth camp annually

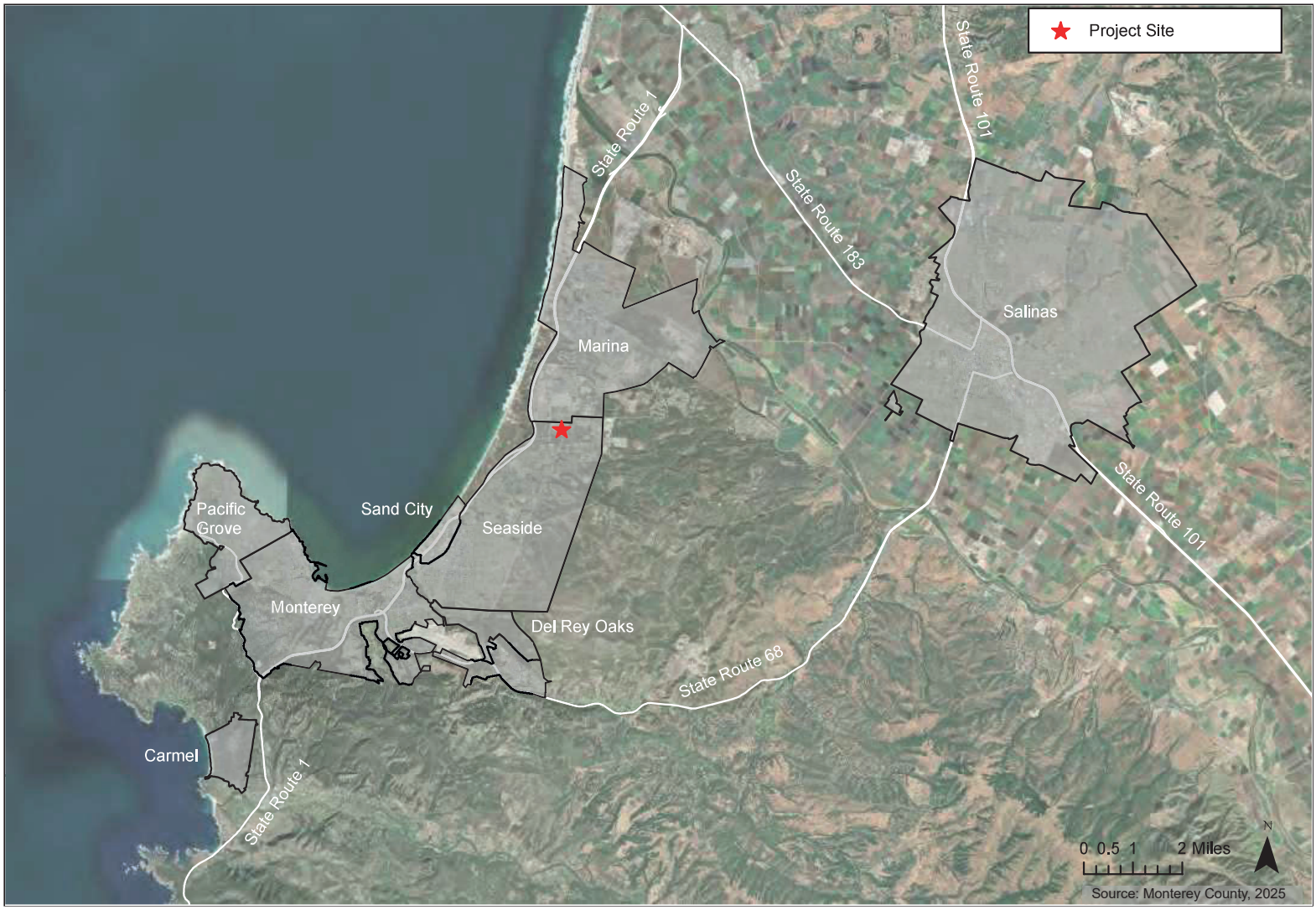
- For both programs, CSUMB occasionally hosts tournaments depending on post season opportunities each year. Both programs hold practices daily from 2-4 pm from the middle of August through early December and again from early February to late April
- Each match requires an additional 30-36 staff to operate the stadium and receives 150 attendees/spectators. Additionally, the summer youth camps accommodate 24-40 local youth and require 6-10 staff persons
- Use of renovated playing field for academic courses and athletics programs when not in conflict with the MBFC schedule
- Campus-sponsored or invited community events, such as Spring Commencement, concerts, or other events

Proposed Additions:

- Men's CCAA Championships
  - 120 players and 16 coaches/staff across 4 teams
  - 3 matches over 2 days, with 300 spectators and 20 staff
- Women's CCAA Championships
  - 120 players and 16 coaches/staff across 4 teams
  - 3 matches over 2 days, with 300 spectators and 20 staff
- Men's NCAA Division II National Championships[1]
  - 120 players and 16 coaches/staff across 4 teams
  - 3 matches over 5 days, with 400 spectators and 24 staff
- Women's NCAA Division II National Championships[1]
  - 120 players and 16 coaches/staff across 4 teams
  - 3 matches over 5 days, with 400 spectators and 24 staff
- Additional campus events:
  - Latinx Affinity Ceremony
    - Once per year over 1 day, with an average attendance of 2,000 attendees per day and 150 staff
  - Monte's 5k and post-race event
    - Once per year over 1 day, with an average attendance of 1,200 attendees per day and 150 staff
  - New Student Fall Convocation
    - Once per year over 1 day, with an average attendance of 2,000 attendees per day and 150 staff

[1] NCAA Division II National Championships have the potential to occur once every six (6) to eight (8) years at CSUMB depending on the national bid process.

- Otter Cross Cultural Center (OC3) Affinity Celebration
    - Once per year over 1 day, with an average attendance of 2,500 attendees per day and 50 staff
- Fall and Spring Concerts
    - Twice a year over 1 day, with an average attendance of 2,000 attendees per day and 150 staff
- Relay for Life
    - Once per year over 1 day, with an average attendance of 6,000 attendees per day and 50 staff
- Up to 25 other university-related events, with an average of 2,000 attendees per day and 75 staff



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 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
Monterey, CA 93940
(831) 373-4341

Figure 2

2. Approach and Overview of Methods

The California State University (CSU) Office of the Chancellor prepared the *2019 California State University Transportation Impact Study Manual* (CSU TISM), which supersedes the 2012 CSU TISM. The *2019 CSU TISM* provides guidance for the preparation of CEQA-compliant transportation impact analysis pursuant to SB 743 and is the operative TISM for the analysis presented here including the VMT threshold metrics. The *2019 CSU TISM* was prepared by CEQA practitioners with a focus on legal adequacy regarding CEQA compliance based on past court decisions.

Approach

The MBFC and CSUMB special event activities were evaluated for potential direct, indirect, and cumulative environmental impacts assuming average ticketed spectator capacity for each of the events. This VMT analysis estimates the new vehicle miles generated by the special events and the new full-time equivalent employees. Specifically, this impact analysis converts the MBFC and CSUMB special event activities to VMT by calculating the following:

- Total Annual Person Trips
- Total Annual Vehicle Trips
- Annual Project Generated VMT
- Daily Project Generated VMT
- Service Population
- Daily Project Generated VMT per Service Population

To determine whether the project has a direct impact on the environment, the project generated VMT per service population is compared 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). The indirect and cumulative impacts of the project are evaluated under Cumulative Conditions using the boundary VMT per service population (this is the vehicle travel on Monterey County roads divided by the service population of Monterey County).

Overview of Methods

The CSUMB 2020 Master Plan VMT assessment was CSUMB's first evaluation using VMT. As a part of that process the following steps were taken to establish SB 743 VMT thresholds:

- Select a VMT calculation tool
  - Use the Association of Monterey Bay Area Governments (AMBAG) regional travel forecasting model.
- Select the VMT accounting method(s)
  - Project generated VMT per service population (Direct Impacts): The sum of the "VMT from" and "VMT to" and within Monterey County under baseline conditions divided by the sum of the number of residents, employees, and students in the county.
  - Project's effect on VMT per service population (Cumulative Impacts): An evaluation of the change in travel comparing without and with project conditions on all roadways within

Monterey County under the Cumulative Conditions (Year 2035) scenario, divided by the sum of the number of residents, employees, and students in the county.

- Calculate the baseline and cumulative regional VMT estimates
  - The analysis presented here uses VMT from all trip purposes and vehicle types (i.e., there is not any separation of VMT by land use) for Monterey County with a baseline set as Existing Conditions VMT generated by Monterey County and cumulative set as VMT on all roadways in Monterey County under Cumulative without Project Conditions (see the Project Generated VMT per Service Population Estimation Method and Project's Effect on VMT Estimation Method (Using Boundary VMT) sections for detailed descriptions.)
- Set a VMT threshold(s)
  - The threshold applied to project generated VMT is 15 percent below the Existing Conditions for Monterey County.[2]
  - The threshold applied to project's effects on VMT threshold is no change from Cumulative Conditions to Cumulative with Project Conditions in the boundary VMT per service population.

As to direct impacts, project generated VMT per service population is the metric used to evaluate how the project VMT changes (increases or decreases) between the "without project" and "with project" scenarios, considering both VMT increases due to growth and VMT reductions due to changes in travel behavior. Project generated VMT per service population is used to evaluate if the VMT rate due to the project (i.e., the direct impacts) is greater than a specified VMT threshold; however, it does not evaluate a project's effect on VMT on the entire roadway system,[3] which is evaluated as part of the cumulative analysis.[4]

Regarding the cumulative analysis, the MBFC and CSUMB special event activities are a relatively small portion of the Monterey County travel; therefore, it is to be expected that the project's effect on VMT (cumulative impact) would have predominately localized VMT effects. Therefore, the project's effect on VMT, as evaluated by the cumulative effects of the project's land use and transportation changes, compares the changes in boundary VMT per service population between the Cumulative Conditions and Cumulative with Project and without Eastside Parkway[5] Conditions.

---

[2] The CSU has selected the 15 percent reduction relative to Monterey County based on the OPR *Technical Advisory*, which states "…OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold." (Quote from page 10 of the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018).

[3] An often-cited example of how a project can affect VMT is the addition of a grocery store in a food desert. Residents of a neighborhood without a grocery store have to travel a great distance to an existing grocery store. Adding the grocery store to that neighborhood will shorten many of the grocery shopping trips and reduce the VMT to/from the neighborhood. This concept is likely to occur with the addition of campus housing.

[4] For this analysis, service population is defined as the sum of all employees, residents, and students (Kindergarten through University).

[5] Eastside Parkway was a possible two-lane arterial connection that would connect General Jim More Boulevard and Inter-Garrison Road. Until June 30, 2020, the Fort Ord Reuse Authority (FORA) was responsible for providing the necessary funding. Since the sunsetting of FORA the responsibility to plan and fund the road has shifted to the local jurisdictions. At the time of this analysis a specific source of funding for future roads has not been identified or when such funding would be available, nor has a final Eastside Parkway project alignment been determined.

The analysis presented in this report focuses on the VMT for all trip purposes and vehicle types (i.e., there is no separation of VMT by land use). The project generated VMT threshold was developed using the Existing Conditions VMT for Monterey County because most of the MBFC spectators (more than 90 percent) and CSUMB campus population (nearly 90 percent of students, faculty, and staff) live within Monterey County. Similarly, most of the 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. 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 – that is, occurring near the CSUMB campus and within Monterey County.

Project Generated VMT per Service Population Estimation Method

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, as follows:

$$Project\ Generated\ VMT = (II + IX) + (II + XI) = 2 * II + IX + XI$$

- Internal-internal (II): The full length of all trips made entirely within the geographic area limits.
- Internal-external (IX): The full length of all trips with an origin within the geographic area and destination outside of the area.
- External-internal (XI): The full length of all trips with an origin outside of the geographic area and destination within the area.

The intra-zonal VMT and VMT between traffic analysis zones, or TAZs, that are in the study area causes some double counting, which is an expected result when summing the trip end based VMT. To ensure a VMT rate is expressed properly (i.e., that the numerator and denominator include the generators of both trip ends of the VMT), the project generated VMT is divided by the service population (residential population, employment population, plus student population), the generators of both trip ends of the VMT. The VMT estimates are also presented on a per service population basis to account for both the effects of population and/or employment growth and the effects of changes in personal travel behavior. For example, population growth may cause an increase in VMT, while travelers changing their behavior by using different travel modes or decreasing their vehicle trip lengths (such as a higher percentage of students living campus) would cause decreases in VMT.

Project's Effect on VMT Estimation Method (Using Boundary VMT)

As noted earlier, the project's effect on VMT, or cumulative impact, is evaluated using the boundary VMT, which captures all VMT on the roadway network within a specified geographic area, including local trips plus interregional travel that does not have an origin or destination within the area. The geographical boundary method only considers traffic within the physical limits of the selected study area and does not include the impact of vehicles once they travel outside the area limits. The use of boundary VMT is a more comprehensive evaluation of the potential effects of the project because it captures the combined effect of new VMT, shifting existing VMT to/from other neighborhoods, and/or shifts in existing traffic to alternate travel routes or modes. The boundary VMT is also divided by the service population (sum of residents, employees, and students) to account for the effects of population and/or employment growth and the effects of changes in personal travel behavior within the specified geographic area.

Figure 3 presents a representation of both project generated VMT and boundary VMT for Monterey County. Both metrics are needed for a comprehensive evaluation of a project's VMT effects.

Service Population

MBFC will generate new employment for the three 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 includes:

- 31 USL Super League players and staff,
- 27 USL League Two players and staff, and
- 27 USL W League players and staff.

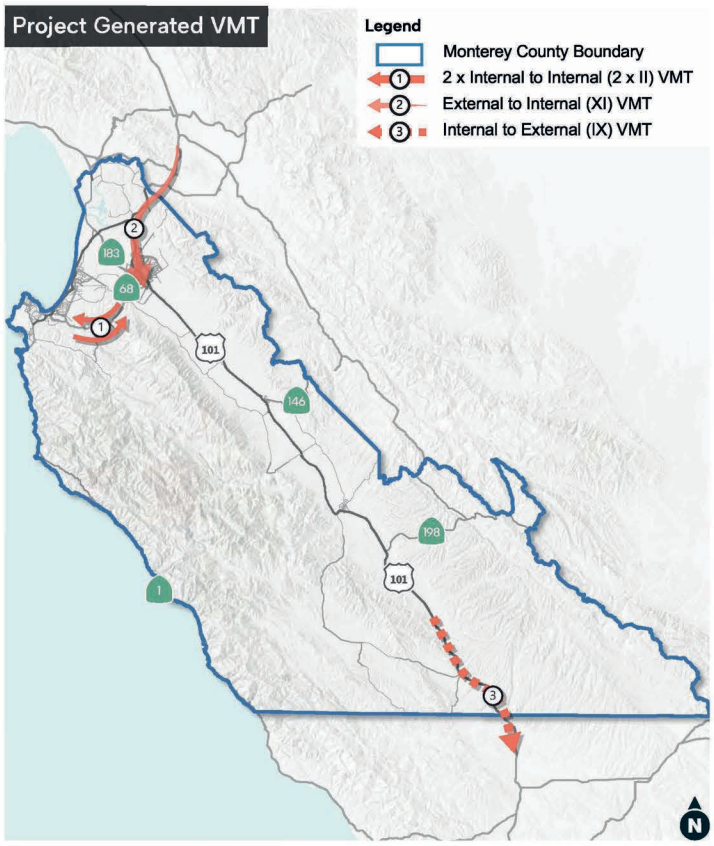
The 144 visitor team personnel includes:

- 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.

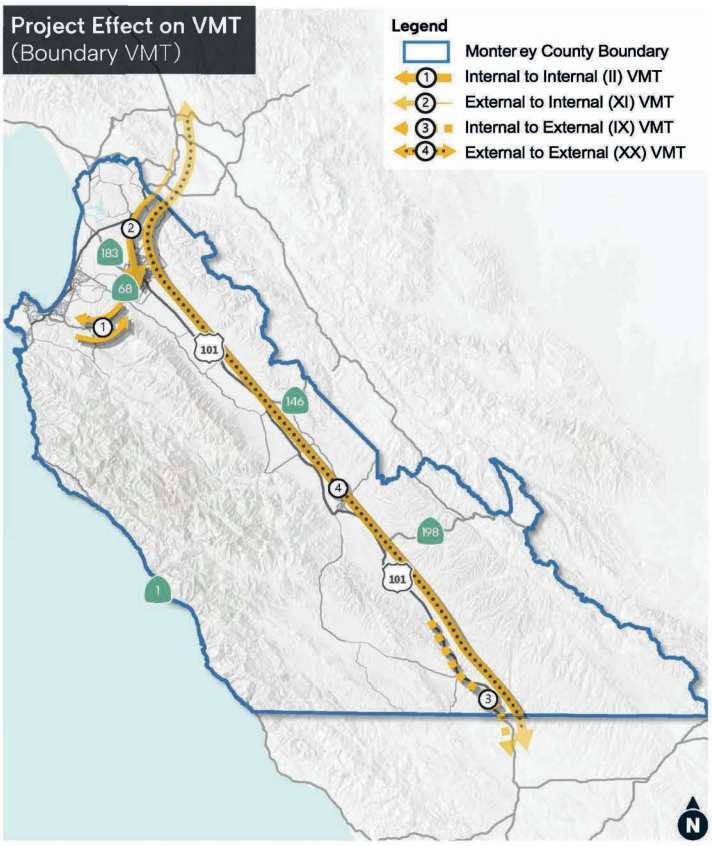
The additional CSUMB and MBFC events will share existing part-time event staff. Some of that new employment will be full-time while some employment will be part-time. To be consistent with the AMBAG travel model employment inputs, the part-time employment was converted to full-time employment. Match spectators are not included as an independent variable in the AMBAG travel model equations and therefore are not included in the service population.

The CCAA and NCAA team personnel for the championships are treated as part-time staff for the service population and will work 3 to 14 hours for each match based on information from CSUMB. The CSUMB staff have estimated that these new part-time team personnel will work approximately 13,328 annual hours of work per year. A full-time job is 2,080 hours per year, which would translate into 6 full-time equivalent employee jobs.

The service population for this project is 235 employees (85 home team personnel and 144 visitor team personnel, and 6 full-time equivalents for the CSUMB part-time team personnel), as derived from the October 2025 project description.



Notes: External to External (XX) trips are excluded from this VMT metric. Adjustments to project generated VMT made to include the full length of trips that leave Monterey County to capture inter-regional travel.



Notes: Boundary VMT is all the VMT within Monterey County.

FIGURE3

Measuring Vehicle Miles Traveled (VMT)

C:\fpbox\Box\-Projects\SJ-Projects_SJ25_Projects\SJ25-2379_CSUMB_Stadium_Expansion_VMT\Graphics\ADOBE\Fig01_Measuring_VMT.ai

Fehr & Peers

3. VMT Thresholds

The VMT impact analysis presented in this report considers the project's direct impacts relative to project generated VMT per service population, as well the project's long-term effect on VMT using boundary VMT per service population evaluated under Cumulative Conditions.

Project Generated VMT Impact Thresholds and Impact Criteria

The regionwide threshold for project generated VMT applied in the analysis presented here 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). The CSU has selected the 15 percent reduction relative to Monterey County based on the OPR *Technical Advisory* and the fact that most of the students, faculty, and staff live within Monterey County, and similarly most of the MBFC spectators live in Monterey County. As a result, most of the MBFC and CSUMB 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 1** describes the project-generated VMT per service population threshold as 15% below the existing VMT of 28.12, or 23.91 (Monterey County VMT per Service Population of 28.12 x 85% = 23.91).

Table 1: 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

Notes:
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).

Source: Fehr & Peers, 2026.

Therefore, the project would cause a significant project generated VMT impact if:

- The project generated VMT per service population for the CSUMB campus under Existing with Project Conditions is greater than 23.91.

Project's Effect on VMT Thresholds and Impact Criteria

The impact threshold for the project's effect on VMT, or the project's cumulative impact, is the Monterey County Boundary VMT per Service Population, or 14.07 (see **Table 2** for illustration of how the 14.07 is calculated). Like the project generated VMT baseline, the boundary VMT baseline uses the Monterey County boundary VMT to evaluate the project's effects on VMT because the project effects are likely to be localized near the CSUMB campus and within Monterey County.

Table 2: Project's Effect on VMT (Boundary VMT) Cumulative Threshold

Item	Monterey County
Boundary Vehicle Miles Traveled (A)[1]	11,268,400
Service Population (B)[1,2]	800,900
Boundary VMT per Service Population (A/B = C)	14.07
Boundary VMT per Service Population Threshold (C)	14.07

Notes:
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).

Source: Fehr & Peers, 2026.

Therefore, 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.

4. VMT Estimates

The following special event activities are converted to vehicle trips and VMT. This is done by estimating the total annual person trips, total annual vehicle trips, total annual project generated VMT, and daily project generated VMT.[6]

For the purpose of this analysis, we used the same spectator distribution for all MBFC / CSUMB matches and events, which were derived from StreetLight[7] Data for 2024 and 2025. We used the following inputs:

- Analysis Zone:
  - The Stadium bounded by Divarty Street to the north, General Jim Moore Boulevard to the east, Lightfighter Drive to the south, and Second Avenue to the west.
- Days of Year: February 1, 2024, to December 31, 2024, and January 1, 2025, to August 31, 2025
- Days of Week: All days (Monday to Sunday)
- Time Periods of Day: All Day (24 hours)
- Streetlight Output Type: Vehicle Trips (Streetlight all vehicle volume)

This distribution shows that the past matches and events held at the Stadium have attracted a local draw of spectators. Since StreetLight does not have the level of granularity / enough data to parse out between CSUMB matches and events versus MBFC matches and events, the same spectator distribution was used for all matches and events.

MBFC

- USL Super League
  - Front office staff is shared with existing MBFC use.

[6] These VMT estimates do not take into consideration some foreseeable travel changes including increased use of Transportation Network Companies (TNCs) (e.g., Uber and Lyft), nor the potential for autonomous vehicles. Although the technology for autonomous vehicles is expected to be available over the planning horizon, the federal and state legal and policy frameworks are uncertain. Initial modeling of an autonomous future indicates that with automated and connected vehicles, the capacity of the existing transportation system would increase as vehicles can travel closer together; however, these efficiencies are only realized when a high percentage of vehicles on the roadway are automated and connected. There is also the potential for vehicle travel to increase with zero-occupancy vehicles on the roadway.

[7] StreetLight is a Big Data source that uses connected-vehicle data to estimate traffic behavior and origin-destination pairs.

- Team Practices: Approximately 10 months of training (practice) in the Field House and on the adjacent existing soccer fields, 5 days per week for 3-4 hours each day, with an estimated 31 players, coaches, and staff at each practice.
- Match Staff and Players: Approximately 12 matches over 10 days, with an estimated 110 part-time match-related personnel, home team (31 staff, coaches, and players), visiting team (48 staff, coaches, and players). The visiting team members are assumed to travel from the San Jose Airport in several small vans.
- Match Spectators: 4,000 per match. StreetLight Data estimates the following distribution of match spectator locations:
  - 8% CSUMB Students[8]
  - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
  - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
  - 3% Watsonville, Castroville, and Gilroy
  - 1% Santa Cruz
  - 1% Other (used San Jose as center point)

- USL League Two
  - Front office staff is shared with existing MBFC use.
  - Team Practices: Approximately 10 months of training (practice) in the Field House and on the adjacent existing soccer fields, 5 days per week for 3-4 hours each day, with an estimated 27 players, coaches, and staff at each practice.
  - Match Staff and Players: Approximately 7 matches over 7 days, with an estimated 15 part-time match-related personnel (i.e., ticket takers, concessions, security, parking, ushers, media, etc.), home team (27 staff, coaches, and players), visiting team (48 staff, coaches, and players). The visiting team members are assumed to travel from the San Jose Airport in several small vans.
  - Match Spectators: 300 per match. StreetLight Data estimates the following distribution of match spectator locations:
    - 8% CSUMB Students
    - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
    - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
    - 3% Watsonville, Castroville, and Gilroy
    - 1% Santa Cruz
    - 1% Other (used San Jose as center point)

- USL W League
  - Front office staff is shared with existing MBFC use.
  - Team Practices: Approximately 10 months of training (practice) in the Field House and on the adjacent existing soccer fields, 4-5 days per week for 3-4 hours each day, with an estimated 27 players, coaches, and staff at each practice.

[8] This includes students who live on-campus and off-campus.

- Match Staff and Players: Approximately 7 matches over 7 days, with an estimated 15 part-time match-related personnel (i.e., ticket takers, concessions, security, parking, ushers, media, etc.), home team (27 staff, coaches, and players), visiting team (48 staff, coaches, and players). The visiting team members are assumed to travel from the San Jose Airport in several small vans.
- Match Spectators: 300 per match. StreetLight Data estimates the following distribution of match spectator locations:
  - 8% CSUMB Students
  - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
  - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
  - 3% Watsonville, Castroville, and Gilroy
  - 1% Santa Cruz
  - 1% Other (used San Jose as center point)

- Winter Festival
  - Approximately once per year over 28 days (an additional 10 set-up days) with 150 part-time staff
  - Attendees: 3,000 per day. StreetLight Data estimates the following distribution of attendees:
    - 8% CSUMB Students
    - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
    - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
    - 3% Watsonville, Castroville, and Gilroy
    - 1% Santa Cruz
    - 1% Other (used San Jose as center point)

- Concerts
  - Approximately 20 times per year over 3 days (an additional 1-2 set-up days) with 200 part-time staff
  - Attendees: 6,000 per day. StreetLight Data estimates the following distribution of attendees:
    - 8% CSUMB Students
    - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
    - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
    - 3% Watsonville, Castroville, and Gilroy
    - 1% Santa Cruz
    - 1% Other (used San Jose as center point)

CSUMB

- Men's CCAA Championship

- Approximately 3 matches over 2 days with 20 part-time staff
- Match Spectators: 300 ticketed spectator capacity. StreetLight Data estimates the following distribution of attendees:
  - 8% CSUMB Students
  - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
  - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
  - 3% Watsonville, Castroville, and Gilroy
  - 1% Santa Cruz
  - 1% Other (used San Jose as center point)

- Women's CCAA Championship
  - Approximately 3 matches over 2 days with 20 part-time staff
  - Match Spectators: 300 per match. StreetLight Data estimates the following distribution of attendees:
    - 8% CSUMB Students
    - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
    - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
    - 3% Watsonville, Castroville, and Gilroy
    - 1% Santa Cruz
    - 1% Other (used San Jose as center point)

- Men's NCAA Championship
  - Approximately 3 matches over 5 days with 24 part-time staff
  - Match Spectators: 400 per match. StreetLight Data estimates the following distribution of attendees:
    - 8% CSUMB Students
    - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
    - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
    - 3% Watsonville, Castroville, and Gilroy
    - 1% Santa Cruz
    - 1% Other (used San Jose as center point)

- Women's NCAA Championship
  - Approximately 3 matches over 5 days with 24 part-time staff
  - Match Spectators: 400 per match. StreetLight Data estimates the following distribution of attendees:
    - 8% CSUMB Students
    - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
    - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)

        - 3% Watsonville, Castroville, and Gilroy
        - 1% Santa Cruz
        - 1% Other (used San Jose as center point)

- CSUMB Events
    - Latinx Affinity Ceremonies
        - Approximately 1 event over 1 day once a year with 2,000 attendees and 150 staff
    - Monte's 5k and Post-Race
        - Approximately 1 event over 1 day once a year with 1,200 attendees and 150 staff
    - Convocation
        - Approximately 1 event over 1 day once a year with 2,000 attendees and 150 staff
    - Fall and Spring Concerts
        - Approximately 1 event over 1 day twice a year with 2,000 attendees per day and 150 staff
    - OC3 Affinity Celebration
        - Approximately 1 event over 1 day once a year with 2,500 attendees and 50 staff
    - Relay for Life
        - Approximately 1 event over 1 day once a year with 6,000 attendees and 50 staff
    - Additional Events
        - Approximately 1 event over 1 day 25 times a year with 2,000 attendees per event and 75 staff
    - StreetLight Data estimates the following distribution of attendees:
        - 8% CSUMB Students
        - 72% Monterey Peninsula (e.g., Monterey, Seaside, Marina, Pacific Grove, Pebble Beach, and Carmel)
        - 15% Salinas Valley (e.g., Salinas, Gonzales, Soledad, Greenfield, and King City)
        - 3% Watsonville, Castroville, and Gilroy
        - 1% Santa Cruz
        - 1% Other (used San Jose as center point)

The special event activity is converted to daily vehicle traffic estimates using the following equations:

- Total Annual Person Trips (**Table 3** shows the estimates):
    - **A** persons * **B** days per week * **C** weeks or events per year * 2 daily person trips = **D** total annual person trips
        - The persons, days per week and weeks or events per year are from the MBFC or CSUMB campus staff. For each match, approximately 10 percent of employees will travel for two days, which equates to 1.1 days per week.
        - The person trips are multiplied by two to create a round trip to and from the stadium.
- Total Annual Vehicle Trips (**Table 4** shows the estimates):

- (**D** total annual person trips * **E** vehicle mode share) / **F** persons per vehicle = **G** total annual vehicle trips
    - The MBFC employees (e.g., coaches, players, team staff, and match staff) mode share is assumed to be the same as the Monterey County average from the California Household Travel Survey. The vehicle mode share for non-CSUMB student spectators of 84 percent (an expression of the drive-alone, carpool and rideshare mode share) was provided by MBFC. While the vehicle mode share for CSUMB student spectators of 58 percent is based on the *CSUMB Person Trip Travel Survey* administered in 2017. Finally, the visiting team and other services were assumed to only travel by vehicle.
    - Spectators arriving in a carpool or a rideshare/transportation network company (Lyft, Uber, etc.) vehicle are treated the same for vehicle trips. A rideshare deadheading is not included in the vehicle trips or VMT. Deadheading is not included in the vehicle trips or VMT as the project is not responsible for the rideshare trip.
    - The vehicle occupancy for the MBFC employees traveling by a vehicle (drive-alone plus carpool) is assumed to be 1.1 persons per vehicle, and 2.45 persons per vehicle for match day spectators based on observed data from MBFC matches.
- Annual Project Generated VMT (**Table 5** shows the estimates):
    - **G** total annual vehicles trips *** H** average trip length = **I** Annual Project Generated VMT
    - The team practices and match staff and players are assumed to travel the Monterey County average commute distance (11.8 miles) (2012 California Household Travel Survey).
    - The match spectators are assumed to travel from Monterey County, Santa Cruz County, and Santa Clara County. The distribution is based on a MBFC summary of season ticket deposit information. The vehicle distance was measured between the stadium and each city listed. The distance used for a group of cities is weighted based on the resident population.
    - The Campus and off-season activities are based on the same average distance of approximately 16 miles as the match spectators.
    - The other services average distance is based on average trip distance to Monterey Peninsula.
- Daily Project Generated VMT (**Table 6** shows the estimates):
    - **I** Annual Project Generated VMT / **J** days of operation = **K** project generated VMT
    - The project generated VMT per day is estimated by dividing the total annual VMT by 365 days.

The above equations for the VMT calculations are based on observed data including the following:

- The NCAA Championship inputs (e.g., service population, annual person trips, etc.) were adjusted to reflect the infrequent nature of the championship matches.
- Based on 2024 / 2025 origin-destination patterns derived from StreetLight Data, which is a Big Data source that uses connected-vehicle data, and surveys collected from the 2022 matches about 80% of all trips originate within Monterey County (including students) and 15% of all trips originate from Salinas Valley, with the remaining 5% originating from outside these two regions.

- The vehicle mode share for non-CSUMB student spectators increase is based on surveys collected from the 2022 matches.
- Vehicle occupancy for match day spectators is based on field observations and surveys from the 2022 matches.

Table 3: Total Annual Person Trips

Activity	Number of People (A)	Days per Week (B)	Weeks or Events (C)	Total Annual Person Trips (A*B*C)*2 =D)
MBFC				
USL Super League				
Team Practices	31	5	48	14,880
Match Staff and Players – Home Team and Staff	141	1.1	12	3,722
Match Staff and Players – Visting Team	48	1	12	1,152
Match Spectators – CSUMB Students	320	1	12	7,680
Match Spectators – Monterey Peninsula	2,880	1	12	69,120
Match Spectators – Salinas Valley	600	1	12	14,400
Match Spectators – Watsonville/Castroville/Gilroy	120	1	12	2,880
Match Spectators – Santa Cruz	40	1	12	960
Match Spectators – Other	40	1	12	960
Subtotal (a)	*4,220*			*115,754*
USL League Two				
Team Practices	27	5	48	12,960
Match Staff and Players – Home Team and Staff	42	1.1	7	647
Match Staff and Players – Visting Team	48	1	7	672
Match Spectators – CSUMB Students	24	1	7	336
Match Spectators – Monterey Peninsula	216	1	7	3,024
Match Spectators – Salinas Valley	45	1	7	630
Match Spectators – Watsonville/Castroville/Gilroy	9	1	7	126
Match Spectators – Santa Cruz	3	1	7	42
Match Spectators – Other	3	1	7	42
Subtotal (b)	*417*			*18,479*
USL W League				
Team Practices	27	5	48	12,960
Match Staff and Players – Home Team and Staff	42	1.1	7	647
Match Staff and Players – Visting Team	48	1	7	672
Match Spectators – CSUMB Students	24	1	7	336
Match Spectators – Monterey Peninsula	216	1	7	3,024

Activity	Number of People (A)	Days per Week (B)	Weeks or Events (C)	Total Annual Person Trips (A*B*C)*2 =D)
Match Spectators – Salinas Valley	45	1	7	630
Match Spectators – Watsonville/Castroville/Gilroy	9	1	7	126
Match Spectators – Santa Cruz	3	1	7	42
Match Spectators – Other	3	1	7	42
Subtotal (c)	*417*			*18,479*
MBFC Events				
Event Staff	350	1–5[1,4]	20–38[2,4]	51,400
Event Attendees	9,000	1–3[1,4]	20–28[2,4]	888,000
Subtotal (d)	*9,350*			*939,400*

Activity	Number of People (A)	Days per Week (B)	Weeks or Events (C)	Total Annual Person Trips (A*B*C)*2 =D)
CSUMB				
CCAA Men's Championship				
Match Staff and Players – Home Team and Staff	20	1	3	120
Match Staff and Players – Visting Team	136	1	3	816
Match Spectators – CSUMB Students	24	1	3	144
Match Spectators – Monterey Peninsula	216	1	3	1,296
Match Spectators – Salinas Valley	45	1	3	270
Match Spectators – Watsonville/Castroville/Gilroy	9	1	3	54
Match Spectators – Santa Cruz	3	1	3	18
Match Spectators – Other	3	1	3	18
Subtotal (e)	*456*			*2,736*
CCAA Women's Championship				
Match Staff and Players – Home Team and Staff	20	1	3	120
Match Staff and Players – Visting Team	136	1	3	816
Match Spectators – CSUMB Students	24	1	3	144
Match Spectators – Monterey Peninsula	216	1	3	1,296
Match Spectators – Salinas Valley	45	1	3	270
Match Spectators – Watsonville/Castroville/Gilroy	9	1	3	54
Match Spectators – Santa Cruz	3	1	3	18
Match Spectators – Other	3	1	3	18
Subtotal (f)	*456*			*2,736*

Activity	Number of People (A)	Days per Week (B)	Weeks or Events (C)	Total Annual Person Trips (A*B*C)*2 =D)
NCAA Men's Championship[3]				
Match Staff and Players – Home Team and Staff	4	1	3	24
Match Staff and Players – Visting Team	23	1	3	138
Match Spectators – CSUMB Students	5	1	3	30
Match Spectators – Monterey Peninsula	48	1	3	288
Match Spectators – Salinas Valley	10	1	3	60
Match Spectators – Watsonville/Castroville/Gilroy	2	1	3	12
Match Spectators – Santa Cruz	1	1	3	6
Match Spectators – Other	1	1	3	6
Subtotal (g)	*94*			*564*
NCAA Women's Championship[3]				
Match Staff and Players – Home Team and Staff	4	1	3	24
Match Staff and Players – Visting Team	23	1	3	138
Match Spectators – CSUMB Students	5	1	3	30
Match Spectators – Monterey Peninsula	48	1	3	288
Match Spectators – Salinas Valley	10	1	3	60
Match Spectators – Watsonville/Castroville/Gilroy	2	1	3	12
Match Spectators – Santa Cruz	1	1	3	6
Match Spectators – Other	1	1	3	6
Subtotal (h)	*94*			*564*
CSUMB Events				
Event Staff	775	1	1-25[2,4]	5,450
Event Attendees	17,700	1	1-25[2,4]	135,400
Subtotal (i)	*18,385*			*140,850*
Total (a+b+c+d+e+f+g+h+i=j)	**33,889**			**1,239,562**

Note:

1. Days per week varies for each event and is provided under project description in Chapter 1.
2. Weeks or events varies for each event and is provided under project description in Chapter 1.
3. Number of people divided by six to denote championship happening every six years.
4. Event attendee total annual person trips are calculated using the proposed MBFC and CSUMB operations (including the number of people, days per week, and frequency of the event) described in Chapter 1 for the additional events hosted by MBFC and CSUMB.

Source: Fehr & Peers, 2026.

Table 4: Total Annual Vehicle Trips

Activity	Total Annual Person Trips (D)	Vehicle Mode (E)	Persons per Vehicle (F)	Total Annual Vehicle Trips (D* E)/F=G)
MBFC Operations				
USL Super League Operations				
Team Practices	14,880	93%	1.1	12,580
Match Staff and Players – Home Team	3,722	93%	1.1	3,147
Match Staff and Players – Visiting Team	1,152	100%	8	144
Match Spectators – CSUMB Students	7,680	58%	2.45	1,818
Match Spectators – Monterey Peninsula	69,120	86%	2.45	24,263
Match Spectators – Salinas Valley	14,400	86%	2.45	5,055
Match Spectators – Watsonville/Castroville/Gilroy	2,880	86%	2.45	1,011
Match Spectators – Santa Cruz	960	86%	2.45	337
Match Spectators – Other	960	86%	2.45	337
Subtotal (a)	*115,754*			*48,692*
USL League Two Operations				
Team Practices	12,960	93%	1.1	10,957
Match Staff and Players – Home Team	647	93%	1.1	547
Match Staff and Players – Visiting Team	672	100%	8.0	84
Match Spectators – CSUMB Students	336	58%	2.45	80
Match Spectators – Monterey Peninsula	3,024	86%	2.45	1,061
Match Spectators – Salinas Valley	630	86%	2.45	221
Match Spectators – Watsonville/Castroville/Gilroy	126	86%	2.45	44
Match Spectators – Santa Cruz	42	86%	2.45	15
Match Spectators – Other	42	86%	2.45	15
Subtotal (b)	*18,479*			*13,024*

Activity	Total Annual Person Trips (D)	Vehicle Mode (E)	Persons per Vehicle (F)	Total Annual Vehicle Trips (D* E)/F=G)
USL W League				
Team Practices	12,960	93%	1.1	10,957
Match Staff and Players – Home Team	647	93%	1.1	547
Match Staff and Players – Visiting Team	672	100%	8.0	84
Match Spectators – CSUMB Students	336	58%	2.45	80
Match Spectators – Monterey Peninsula	3,024	86%	2.45	1,061
Match Spectators – Salinas Valley	630	86%	2.45	221
Match Spectators – Watsonville/Castroville/Gilroy	126	86%	2.45	44
Match Spectators – Santa Cruz	42	86%	2.45	15
Match Spectators – Other	42	86%	2.45	15
Subtotal (c)	*18,479*			*13,024*
MBFC Events				
Event Staff	51,400	93%	1.1	43,456
Event Attendees	888,000	84%[1]	2.45	303,587
Subtotal (d)	*939,400*			*347,043*
CSUMB Operations				
CCAA Men's Championship				
Match Staff and Players – Home Team	120	93%	1.1	101
Match Staff and Players – Visiting Team	816	100%	8.0	102
Match Spectators – CSUMB Students	144	58%	2.45	34
Match Spectators – Monterey Peninsula	1,296	86%	2.45	455
Match Spectators – Salinas Valley	270	86%	2.45	95
Match Spectators – Watsonville/Castroville/Gilroy	54	86%	2.45	19
Match Spectators – Santa Cruz	18	86%	2.45	6
Match Spectators – Other	18	86%	2.45	6
Subtotal (e)	*2,736*			*818*

Activity	Total Annual Person Trips (D)	Vehicle Mode (E)	Persons per Vehicle (F)	Total Annual Vehicle Trips (D* E)/F=G)
CCAA Women's Championship				
Match Staff and Players – Home Team	120	93%	1.1	101
Match Staff and Players – Visiting Team	816	100%	8.0	102
Match Spectators – CSUMB Students	144	58%	2.45	34
Match Spectators – Monterey Peninsula	1,296	86%	2.45	455
Match Spectators – Salinas Valley	270	86%	2.45	95
Match Spectators – Watsonville/Castroville/Gilroy	54	86%	2.45	19
Match Spectators – Santa Cruz	18	86%	2.45	6
Match Spectators – Other	18	86%	2.45	6
Subtotal (f)	*2,736*			*818*
Men's NCAA Championship				
Match Staff and Players – Home Team	24	93%	1.1	20
Match Staff and Players – Visiting Team	138	100%	8.0	17
Match Spectators – CSUMB Students	30	58%	2.45	7
Match Spectators – Monterey Peninsula	288	86%	2.45	101
Match Spectators – Salinas Valley	60	86%	2.45	21
Match Spectators – Watsonville/Castroville/Gilroy	12	86%	2.45	4
Match Spectators – Santa Cruz	6	86%	2.45	2
Match Spectators – Other	6	86%	2.45	2
Subtotal (g)	*564*			*174*
Women's NCAA Championship				
Match Staff and Players – Home Team	24	93%	1.1	20
Match Staff and Players – Visiting Team	138	100%	8.0	17
Match Spectators – CSUMB Students	30	58%	2.45	7
Match Spectators – Monterey Peninsula	288	86%	2.45	101
Match Spectators – Salinas Valley	60	86%	2.45	21
Match Spectators – Watsonville/Castroville/Gilroy	12	86%	2.45	4
Match Spectators – Santa Cruz	6	86%	2.45	2
Match Spectators – Other	6	86%	2.45	2
Subtotal (h)	*564*			*174*

Activity	Total Annual Person Trips (D)	Vehicle Mode (E)	Persons per Vehicle (F)	Total Annual Vehicle Trips (D*E)/F=G)
Community Events				
Event Staff	5,450	93%	1.1	4,608
Event Attendees	135,400	84%[1]	2.45	*46,290*
Subtotal (i)	*140,850*			*50,898*
Total (a+b+c+d+e+f+g+h+i=j)	**1,239,562**			**474,665**

Note: Underlined text indicates metric to be monitored in Transportation Management Plan. Performance standards to be provided.

1. The vehicle mode shown is the average. The calculation uses spectator distribution data described in Chapter 4 similar to the match spectator calculations for MBFC and CSUMB.

Source: Fehr & Peers, 2026.

Table 5: Annual Project Generated VMT

Activity	Total Annual Vehicle Trips (G)	Average Vehicle Trip Lengths (H)	Total Annual VMT (G*H=I)
MBFC Operations			
USL Super League Operations			
Team Practices	12,580	11.84	148,952
Match Staff and Players – Home Team	3,147	11.84	37,258
Match Staff and Players – Visiting Team	144	69.30	9,979
Match Spectators – CSUMB Students	1,818	18.91	34,378
Match Spectators – Monterey Peninsula	24,263	8.26	200,412
Match Spectators – Salinas Valley	5,055	23.19	117,225
Match Spectators – Watsonville/Castroville/Gilroy	1,011	27.24	27,540
Match Spectators – Santa Cruz	337	38.00	12,806
Match Spectators – Other	337	67.00	22,579
Subtotal (a)	*48,692*		*611,129*
USL League Two Operations			
Team Practices	10,957	11.84	129,731
Match Staff and Players – Home Team	547	11.84	6,476
Match Staff and Players – Visiting Team	84	69.30	5,821
Match Spectators – CSUMB Students	80	18.91	1,513
Match Spectators – Monterey Peninsula	1,061	8.26	8,764
Match Spectators – Salinas Valley	221	23.19	5,125
Match Spectators – Watsonville/Castroville/Gilroy	44	27.24	1,199
Match Spectators – Santa Cruz	15	38.00	570
Match Spectators – Other	15	67.00	1,005
Subtotal (b)	*13,024*		*160,204*

Activity	Total Annual Vehicle Trips (G)	Average Vehicle Trip Lengths (H)	Total Annual VMT (G*H=I)
USL W League			
Team Practices	10,957	11.84	129,731
Match Staff and Players – Home Team	547	11.84	6,476
Match Staff and Players – Visiting Team	84	69.30	5,821
Match Spectators – CSUMB Students	80	18.91	1,513
Match Spectators – Monterey Peninsula	1,061	8.26	8,764
Match Spectators – Salinas Valley	221	23.19	5,125
Match Spectators – Watsonville/Castroville/Gilroy	44	27.24	1,199
Match Spectators – Santa Cruz	15	38.00	570
Match Spectators – Other	15	67.00	1,005
Subtotal (c)	*13,024*		*160,204*
Events			
Event Staff	43,456	11.84	514,519
Event Attendees	303,587	12.64	3,837,340
Subtotal (d)	*347,043*		*4,351,859*
CSUMB Operations			
CCAA Men's Championship			
Match Staff and Players – Home Team	101	11.84	1,196
Match Staff and Players – Visiting Team	102	69.30	7,069
Match Spectators – CSUMB Students	34	18.91	643
Match Spectators – Monterey Peninsula	455	8.26	3,758
Match Spectators – Salinas Valley	95	23.19	2,203
Match Spectators – Watsonville/Castroville/Gilroy	19	27.24	518
Match Spectators – Santa Cruz	6	38.00	228
Match Spectators – Other	6	67.00	402
Subtotal (e)	*818*		*16,017*

Activity	Total Annual Vehicle Trips (G)	Average Vehicle Trip Lengths (H)	Total Annual VMT (G*H=I)
CCAA Women's Championship			
Match Staff and Players – Home Team	101	11.84	1,196
Match Staff and Players – Visiting Team	102	69.30	7,069
Match Spectators – CSUMB Students	34	18.91	643
Match Spectators – Monterey Peninsula	455	8.26	3,758
Match Spectators – Salinas Valley	95	23.19	2,203
Match Spectators – Watsonville/Castroville/Gilroy	19	27.24	518
Match Spectators – Santa Cruz	6	38.00	228
Match Spectators – Other	6	67.00	402
Subtotal (f)	*818*		*16,017*
Men's NCAA Championship			
Match Staff and Players – Home Team	20	11.84	237
Match Staff and Players – Visiting Team	17	69.30	1,178
Match Spectators – CSUMB Students	8	18.91	151
Match Spectators – Monterey Peninsula	102	8.26	843
Match Spectators – Salinas Valley	21	23.19	487
Match Spectators – Watsonville/Castroville/Gilroy	4	27.24	109
Match Spectators – Santa Cruz	1	38.00	38
Match Spectators – Other	1	67.00	67
Subtotal (g)	*174*		*3,110*
Women's NCAA Championship			
Match Staff and Players – Home Team	20	11.84	237
Match Staff and Players – Visiting Team	17	69.30	1,178
Match Spectators – CSUMB Students	8	18.91	151
Match Spectators – Monterey Peninsula	102	8.26	843
Match Spectators – Salinas Valley	21	23.19	487
Match Spectators – Watsonville/Castroville/Gilroy	4	27.24	109
Match Spectators – Santa Cruz	1	38.00	38
Match Spectators – Other	1	67.00	67
Subtotal (h)	*174*		*3,110*

Activity	Total Annual Vehicle Trips (G)	Average Vehicle Trip Lengths (H)	Total Annual VMT (G*H=I)
Community Events			
Event Staff	4,608	11.84	54,559
Event Attendees	46,290	12.64	585,106
Subtotal (i)	*50,898*		*639,665*
Total (a+b+c+d+e+f+g+h+i=j)	**474,665**		**5,961,317**

Note:
Underlined text indicates metric to be monitored in Transportation Management Plan.
1. Assume attendee location distribution is like match spectator location distribution, use same vehicle trip lengths and distribution as the match spectators. The average distance is approximately 13 vehicle miles.
2. Used average distance between the stadium and Monterey Peninsula.
3. Assume attendee location distribution is like CSUMB student match spectator. The average distance is approximately 13 vehicle miles.
4. The average vehicle trip length for players is 4.00 miles and for home team personnel is 11.84 miles.

Source: Fehr & Peers, 2026.

Table 6: Project Generated Vehicle Miles Traveled by Event

Activity	Annual Project Generated VMT (I)	Days of Operation (J)	Daily Project Generated VMT (I/J=K)
MBFC Operations			
USL Super League Operations			
Team Practices	148,952	365	408
Match Staff and Players – Home Team	37,260		102
Match Staff and Players – Visiting Team	9,979		27
Match Spectators – CSUMB Students	34,378		94
Match Spectators – Monterey Peninsula	200,412		549
Match Spectators – Salinas Valley	117,225		321
Match Spectators – Watsonville/Castroville/Gilroy	27,540		75
Match Spectators – Santa Cruz	12,806		35
Match Spectators – Other	22,579		62
Subtotal (a)	*611,31*		*1,673*

Activity	Annual Project Generated VMT (I)	Days of Operation (J)	Daily Project Generated VMT (I/J=K)
USL League Two Operations			
Team Practices	129,731	365	355
Match Staff and Players – Home Team	6,476		18
Match Staff and Players – Visiting Team	5,821		16
Match Spectators – CSUMB Students	1,513		4
Match Spectators – Monterey Peninsula	8,764		24
Match Spectators – Salinas Valley	5,125		14
Match Spectators – Watsonville/Castroville/Gilroy	1,199		3
Match Spectators – Santa Cruz	570		2
Match Spectators – Other	1,005		3
Subtotal (b)	*160,204*		*439*
USL W League			
Team Practices	129,731	365	355
Match Staff and Players – Home Team	6,476		18
Match Staff and Players – Visiting Team	5,821		16
Match Spectators – CSUMB Students	1,513		4
Match Spectators – Monterey Peninsula	8,764		24
Match Spectators – Salinas Valley	5,125		14
Match Spectators – Watsonville/Castroville/Gilroy	1,199		3
Match Spectators – Santa Cruz	570		2
Match Spectators – Other	1,005		3
Subtotal (c)	*160,204*		*439*
Events			
Event Staff	514,519	365	1,410
Event Attendees	3,837,340		10,513
Subtotal (d)	*4,351,859*		*11,923*

Activity	Annual Project Generated VMT (I)	Days of Operation (J)	Daily Project Generated VMT (I/J=K)
CSUMB Operations			
CCAA Men's Championship			
Match Staff and Players – Home Team	1,196	365	3
Match Staff and Players – Visiting Team	7,069		19
Match Spectators – CSUMB Students	643		2
Match Spectators – Monterey Peninsula	3,758		10
Match Spectators – Salinas Valley	2,203		6
Match Spectators – Watsonville/Castroville/Gilroy	518		1
Match Spectators – Santa Cruz	228		1
Match Spectators – Other	402		1
Subtotal (e)	*16,017*		*43*
CCAA Women's Championship			
Match Staff and Players – Home Team	1,196	365	3
Match Staff and Players – Visiting Team	7,069		19
Match Spectators – CSUMB Students	643		2
Match Spectators – Monterey Peninsula	3,758		10
Match Spectators – Salinas Valley	2,203		6
Match Spectators – Watsonville/Castroville/Gilroy	518		1
Match Spectators – Santa Cruz	228		1
Match Spectators – Other	402		1
Subtotal (f)	*16,017*		*43*
Men's NCAA Championship			
Match Staff and Players – Home Team	237	365	1
Match Staff and Players – Visiting Team	1,178		3
Match Spectators – CSUMB Students	151		0
Match Spectators – Monterey Peninsula	843		2
Match Spectators – Salinas Valley	487		1
Match Spectators – Watsonville/Castroville/Gilroy	109		0
Match Spectators – Santa Cruz	38		0
Match Spectators – Other	67		0
Subtotal (g)	*3,110*		*7*

Activity	Annual Project Generated VMT (I)	Days of Operation (J)	Daily Project Generated VMT (I/J=K)
Women's NCAA Championship			
Match Staff and Players – Home Team	237	365	1
Match Staff and Players – Visiting Team	1,178		3
Match Spectators – CSUMB Students	151		0
Match Spectators – Monterey Peninsula	843		2
Match Spectators – Salinas Valley	487		1
Match Spectators – Watsonville/Castroville/Gilroy	109		0
Match Spectators – Santa Cruz	38		0
Match Spectators – Other	67		0
Subtotal (h)	*3,110*		*7*
Community Events			
Event Staff	54,559	365	149
Event Attendees	585,106		1,603
Subtotal (i)	*639,665*		1,752
Total (a+b+c+d+e+f+g+h+i=j)	**5,961,317**		**16,326**

Source: Fehr & Peers, 2026.

To provide context, the daily project generated VMT is compared to the CSUMB Campus project generated VMT under Existing Conditions and Existing with Project Conditions in **Table 7**. The project generated VMT rate of 69.46 is greater than the CSUMB campus under Existing Conditions. The project would increase the CSUMB campus project generated VMT rate to 23.66 under Existing with Project Conditions.

Table 7: Project Generated Vehicle Miles Traveled

	Existing Conditions	Project Generated VMT	Existing with Project Conditions
CSUMB Campus Comparison			
Project Generated Vehicle Miles Traveled (A)[1]	178,500	16,326	194,826
Service Population (B)[1,2]	8,000	235	8,235
Project Generated VMT per Service Population (A/B = C)	22.31	69.47	23.66

Notes:
1. Rounded service population and VMT to nearest 100 for the CSUMB campus.
2. Service population is defined as the sum of all employees, residents, and students (Kindergarten through University).

Source: Fehr & Peers, 2026.

The boundary VMT shown in **Table 8** for Cumulative Conditions and Cumulative with Project Conditions is the VMT on the roadway system within Monterey County. To evaluate the indirect and cumulative conditions, the boundary VMT is summarized under Cumulative Conditions. The project generated VMT is added to the Cumulative Conditions boundary VMT to estimate the Cumulative with Project Conditions boundary VMT. Because the project generated VMT includes some trips that travel outside of Monterey County, the change in the Cumulative with Project Conditions boundary VMT is overstated. The Cumulative with Project Conditions boundary VMT exceed Cumulative Conditions because the project effect on VMT induces more travel with the number of expanded uses.

Table 8: Boundary Vehicle Miles Traveled

	Cumulative Conditions	Project Generated VMT	Cumulative with Project Conditions
Monterey County			
Boundary Vehicle Miles Traveled (A)[1]	11,268,400	16,326	11,284,726
Service Population (B)[1,2]	800,900	235	801,135
Boundary VMT per Service Population (A/B = C)	14.07	69.47	14.09

Notes:
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).

Source: Fehr & Peers, 2026.

5. VMT Impact Assessment

This section analyzes the project's impacts on vehicle miles traveled (VMT), including daily VMT estimates required for the SB 743 assessment. The VMT thresholds applied are consistent with the *2019 CSU Transportation Impact Study Manual* (TISM), which provides CEQA-compliant guidance for transportation impact analysis under SB 743. These thresholds were established using the AMBAG regional travel model.

Project-specific VMT was estimated by converting MBFC and CSUMB special event activities into VMT. Direct effects are evaluated using project-generated VMT per service population under Existing with Project Conditions, while cumulative impacts are assessed using boundary VMT under Cumulative with Project Conditions.

The results of the project generated VMT and project's effect on VMT analyses are presented in **Table 9** and **Table 10**, respectively. Each analysis is separately addressed below.

Project Generated VMT

As shown in **Table 9**, 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, which is the metric relative to assessing impacts under CEQA VMT would be almost 300 percent greater than the VMT threshold (23.91 project generated VMT per service population). This is due to MBFC hosting three new leagues and special events that will have 3,000 – 6,000 attendees per day, and CSUMB hosting four championship events and community events that will have 1,200 - 6,000 attendees per event / day.

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. Under the Existing with Project Conditions, the project would generate a VMT per service population of 69.47. This number is above the applicable threshold of 23.91. Therefore, the project generated VMT would exceed the applicable thresholds under Existing with Project Conditions and be a potentially significant impact.

MBFC plans to host three new leagues (with the associated practices and matches for each league) and other events on 48 days in the year, and CSUMB plans to host four championships and 32 other community events, with most of the spectators for each event expected to travel by vehicle. Annually, the project would generate:

- 1,239,562 person trips,
- 474,665 vehicle trips, and
- 5,961,317 annual project generated VMT

The more than 5.9 million annual project generated VMT occurs under the conditions described earlier. Most of the annual project generated VMT is generated by the MBFC match spectators, MBFC event participants, and CSUMB and community guests 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 a 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.

As stated in Chapter 4, StreetLight Data shows the previous matches and events in 2024 and 2025 had a more local draw of spectators. If these matches and events attract a regional draw of spectators, the VMT impact would be more significant.

Table 9: Project Generated VMT for SB 743 VMT Assessment

	Project Generated VMT
Project Site	
Project Generated Vehicle Miles Traveled (A)[1]	16,326
Service Population (B)[1,2]	235
Project Generated VMT per Service Population (A/B = C)	69.47
Initial Impact Assessment	
Project Generated VMT per Service Population Threshold (23.91)	69.47
(Impact Conclusion)	Potentially Significant

Notes:
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).

Source: Fehr & Peers, 2026.

Project Mitigation

CSUMB has the CSUMB Stadium Renovation Transportation Management Plan (TMP) from 2022. The purpose of the TMP is 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. The TMP with TDM Program manages and monitors MBFC and CSUMB special event spectator traffic with the primary performance standard of achieving less than 23.91 daily project generated VMT per service population and the following annual travel supporting performance standards:

- Achieving fewer than 61,185 annual vehicle trips.
- Achieving less than 872,715 annual project generated VMT.

The proposed project would generate the following:

- 474,665 vehicle trips, and
- 5,961,317 annual project generated VMT.

The project generated VMT per service population of 69.47 would be above the 23.91 threshold. Since the initial stadium renovation, MBFC and CSUMB have been implementing the *CSUMB Stadium Renovation Transportation Management Plan* (August 2022) 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 newly renovated Stadium. To reduce the VMT impact, CSUMB will continue implementing the TMP's transportation demand management measures which include pedestrian facility improvements, transit facility and service improvements, bicycle and e-scooter facility and service improvements, traffic management, and wayfinding.

Adapting the CSUMB TMP for Additional Activities

The CSUMB Transportation Management Plan (TMP) is designed as a flexible framework that can be updated to address new or expanded activities at the stadium or on campus. Here's how the TMP would adapt:

- **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.

CSUMB will continue to monitor the 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 a set of 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 the VMT impact.

The TMP's role is to minimize this demand's effect by:

- Encouraging higher vehicle occupancy (carpooling)
- Shifting trips to transit, walking, and biking
- Managing parking supply and event operations

However, as activities grow, some increase in vehicle trips and VMT is likely. The TMP's adaptive approach ensures that CSUMB can respond proactively. There are no additional feasible mitigation strategies available to CSUMB to reduce this impact to a less-than-significant level. Therefore, implementation of the proposed Project would result in a VMT impact that is considered ***significant-and-unavoidable***.

Project's Effect on VMT

As shown in **Table 10**, this analysis evaluated whether the project would result in an increase in the countywide boundary VMT per service population from "Cumulative Conditions" to "Cumulative with Project Conditions." 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.

The project's effect on VMT under Cumulative with Project Conditions of 14.08 is slightly above the threshold of 14.07. Therefore, the project would exceed the applicable thresholds relative to the project's effect on VMT under Cumulative with Project Conditions and be potentially significant.

Table 10: 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	11,284,726
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)

Notes:
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).

Source: Fehr & Peers, 2026.

As noted for the project-generated impact, the CSUMB Transportation Management Plan (TMP) serves as the primary mitigation for this impact. CSUMB should monitor the 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 a set of tools to reduce the transportation impacts of additional activities, it cannot fully eliminate those impacts.

As activities grow, some increase in vehicle trips and vehicle miles traveled (VMT) is likely. The TMP's adaptive approach ensures that CSUMB can respond proactively. However, there are no additional feasible mitigation strategies available to CSUMB to reduce this impact to a less-than-significant level. Therefore, implementation of the proposed project would result in a cumulative VMT impact that is considered ***significant-and-unavoidable***.

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Appendix H
Public Comments

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Comment Letter A
California Department of Fish and Wildlife

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
wildlife.ca.gov

June 26, 2026

Matthew S. McCluney, AICP
Director of Campus Planning & Development
California State University Monterey Bay
100 Campus Center
Seaside, California 93955
(831) 582-4721
fm@csumb.edu

Subject: California State University Monterey Bay Stadium Expanded Use Project (Project)
Draft Environmental Impact Report (DEIR)
State Clearinghouse No.: 2025021013

Dear Matthew McCluney:

The California Department of Fish and Wildlife (CDFW) received a DEIR from the Board of Trustees of the California State University (Board of Trustees) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. A-1

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, A-2

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. A-2

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. To the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required. A-3

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). A-4

Unlisted Species: Species of plants and animals need not be officially listed as considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, A-5

PROJECT DESCRIPTION SUMMARY

Proponent: California State University Monterey Bay (CSUMB)

Objective: The proposed Project would include two components at the existing CSUMB Stadium: 1) an expansion of existing programming at the CSUMB Stadium by CSUMB and the Monterey Bay Football Club; and 2) the construction and operation of two new locker rooms and shower facilities, two new permanent restroom facilities, and a gated event storage and staging area just north of the CSUMB Stadium. A-6

Location: The proposed Project is located on the CSUMB campus within the City of Seaside in Monterey County, California, at 4113 2nd Avenue (Assessor's Parcel Number 031-101-044).

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COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations below to assist the Board of Trustees in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for this Project. CDFW previously commented on the Notice of Preparation (NOP) for the Project in a letter dated May 9, 2025 (Attachment 1). A-7

Special-Status Species

The DEIR notes that the Project site consists primarily of existing infrastructure and campus facilities, with some vegetated areas. Specifically, the Project site includes an approximately 1.25-acre compacted dirt lot comprised of ruderal vegetation and scattered trees and shrubs located north of the CSUMB Stadium, and approximately 6,000-square feet of developed areas within the CSUMB Stadium consisting of graveled/paved areas or buildings. The DEIR and aerial imagery show that the Project site is surrounded by the CSUMB baseball and softball fields to the south, two soccer fields and a parking lot to the southwest, the CSUMB Aquatic Center and parking lot to the west, a parking lot and disc golf course and to the north, and disturbed/ruderal vegetation to the east.

The DEIR includes a Biological Resources Report (BRR) based on information compiled through a reconnaissance-level survey performed on June 2, 2021, botanical surveys performed on April 9 and May 13, 2025, and a review of primary literature and data sources. The DEIR acknowledges that nesting raptors or other protected avian species may be present within the trees and shrubs around the CSUMB Stadium, and within the trees and shrubs proposed for removal within the Project site. The DEIR also acknowledges that one special-status plant species, California Rare Plant Rank (CRPR) 1B.2 Monterey spineflower (*Chorizanthe pungens* var. *pungens*), was identified during the 2025 surveys within the proposed gated event storage and staging area (i.e., compacted dirt lot). The DEIR includes mitigation measures to reduce biological resource impacts to less than significant including preparation and implementation of a restoration plan for Monterey spineflower; development and implementation of an Employee Education Program; and implementation of various general avoidance and protective measures. CDFW has concerns about the ability of some of the proposed mitigation measures to reduce potential impacts to less than significant and avoid unauthorized take of the State candidate Crotch's bumble bee (*Bombus crotchii*) and Western bumble bee (*Bombus occidentalis*). CDFW also has concerns about the ability of the proposed mitigation measures to reduce potential impacts to less than significant and avoid unauthorized take of special-status plant species, including, but not limited to, the State endangered and CRPR 1B.1 seaside bird's-beak (*Cordylanthus rigidus* ssp. *littoralis);* and the State threatened, federally endangered, and CRPR 1B.2 Monterey gilia (*Gilia tenuiflora* ssp. *arenaria*). A-8

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Crotch's bumble bee and Western bumble bee

The BRR included in the DEIR states that Crotch's bumble bee (CBB) and western bumble bee (WBB) are unlikely to occur within or immediately adjacent to the Project site and that the Project site is outside the current range of WBB. Furthermore, with regard to CBB and WBB, the BRR states that marginal habitat is present within the Project site, but that the Project site does not provide adequate sources of nectar for the entire life cycle of these species. As a result, the BRR states that CBB and WBB are unlikely to be impacted by the proposed Project.

Previously, in response to the NOP for the Project, CDFW recommended that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the DEIR. Based on the information provided in the BRR, it is unclear how the habitat assessment for CBB and WBB was conducted and whether the habitat assessment included data from site visits within the Project site and the surrounding landscape to observe and document potential habitat, including potential foraging resources such as flowering plants; nesting resources such as small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs; and/or overwintering resources such as leaf litter. As such, CDFW recommends the following: A-9

Recommended Mitigation Measure 1: CBB and WBB Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment in accordance with the methodology outlined in the Survey Considerations for California Endangered Species Act Bumble Bee Species (CDFW 2023) to determine if portions of the Project site and surrounding landscape contain suitable habitat for CBB and WBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

Recommended Mitigation Measure 2: CBB and WBB Surveys

If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for CBB and WBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

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Recommended Mitigation Measure 3: CBB and WBB Avoidance and Take Authorization

If CBB or WBB is detected, CDFW recommends that all small mammal burrows, thatched/bunch grasses, and any other potential nesting sites be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB or WBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. A-9

Special-Status Plants

The DEIR indicates that Monterey spineflower was identified during the 2025 focused botanical surveys. The BRR included in the DEIR states that Monterey gilia and seaside bird's-beak were not observed in the Project site during the 2025 focused botanical surveys and are considered not present. Detailed survey results were not included in the DEIR, and thus the nature of the survey effort is unclear. Although two botanical surveys were conducted during the flowering period for Monterey gilia (April and May), the timing of the surveys may have been too early to detect seaside bird's-beak, which generally begins flowering in mid/late-July through August before senescing by mid-September (Watts et al. 2010).

As the Project site contains suitable habitat for special-status plant species such as Monterey spineflower, and may also potentially provide habitat for Monterey gilia and seaside bird's-beak, CDFW recommends that the Project site be surveyed for special-status plants within areas of suitable habitat by a qualified botanist following the Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) the survey season(s) immediately prior to construction. This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. Please note that adverse conditions from yearly weather patterns may prevent botanical field surveyors from determining the presence of, or accurately identifying, some special-status plants in the surveyed area. Disease, drought, predation, fire, herbivory, or other disturbance may also preclude presence or identification of special-status plants in any given year. Furthermore, special-status plants may be present as dormant seeds within the seed bank. Visiting the survey site in more than one year increases the likelihood of detection. As such, CDFW recommends the following: A-10

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Recommended Mitigation Measure 4: Special-Status Plant Preconstruction Survey(s)

Depending on the time between initial survey efforts and Project construction, CDFW recommends that a qualified botanist survey the Project site for special-status plants following the Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) the survey season(s) immediately prior to construction.

Recommended Mitigation Measure 5: Special-Status Plant Avoidance and Take Authorization

CDFW recommends special-status plant species be avoided whenever possible by delineating and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or the habitat type(s) required by special-status plants species. If buffers cannot be maintained, consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plants and/or how to implement the Project to avoid take. If State endangered, threatened, or rare plants are identified during special-status plant surveys and take cannot be avoided, then to ensure compliance with CESA and the Native Plant Protection Act (NPPA), consultation with CDFW for acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) and/or California Code of Regulations, Title 14, section 786.9, subdivision (b), is necessary to comply with CESA and the NPPA. A-10

Editorial Comments and/or Suggestions

Nesting Birds: CDFW encourages that ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

CDFW further recommends that a qualified biologist conduct a pre-construction survey for active nests no more than 10 days prior to the start of ground- or vegetation-disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project-specific activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral A-11

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changes resulting from the activities. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures. A-11

Mitigation Measure BIO-3 of the DEIR requires a qualified biologist to implement a 300-foot no-disturbance buffer for raptors. CDFW recommends this buffer distance be adjusted to a minimum 500-foot no-disturbance buffer around active nests of non-listed raptors and implementation of a minimum 250-foot no-disturbance buffer around active nests of non-listed bird species if continuous monitoring is infeasible. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when Project activities would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance. A-12

California Natural Diversity Database (CNDDB): Please note that the CNDDB is populated by voluntary submission records of species detections. As a result, species may be present in locations not depicted in the CNDDB, but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDB does not mean a species is not present. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project site. A-13

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. A-14

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FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) A-15

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR and to assist the Board of Trustees in identifying and mitigating Project impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols).

Please see the enclosed, Attachment 2, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. If you have any questions regarding this letter or further coordination, please contact Stephanie Manzo, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 578-0409, or by electronic mail at stephanie.manzo@wildlife.ca.gov. A-16

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT 1 – CDFW Comment NOP Comment Letter May 9, 2025
ATTACHMENT 2 – Mitigation Monitoring and Reporting Program

ec: State Clearinghouse
Governor's Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

Mattew McCluney, AICP
mmccluney@csumb.edu

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REFERENCES

California Department of Fish and Wildlife. 2018. Protocols for surveying and evaluating impacts to special-status native plant populations and sensitive natural communities. Sacramento, California, USA.

California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act candidate bumble bee species. Sacramento, California, USA.

Watts S. M., M. M. Uhl, S. P. Maurano, and E. E. Nuccio. 2010. Using small-scale studies to prioritize threats and guide recovery of a rare hemiparasitic plant: *Cordylanthus rigidus* ssp. *littoralis*. PLoS ONE 5(1): e8892.

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Attachment 1

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 9, 2025

Matthew McCluney, AICP
California State University Monterey Bay
100 Campus Center Seaside, California 93955
(831) 582-4721
mmccluney@csumb.edu

Subject: California State University Monterey Bay Stadium Expanded Use Project (Project)
Notice of Preparation (NOP)
SCH No.: 2025021013

Dear Matthew McCluney:

The California Department of Fish and Wildlife (CDFW) received a NOP to prepare a Draft Environmental Impact Report (DEIR) from the Board of Trustees of the California State University (Board of Trustees) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. While the comment period may have ended, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish and Game Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802).

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

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need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, activities evaluated in a project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish and Game Code, § 1600 et seq.). Likewise, to the extent implementation of a project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

PROJECT DESCRIPTION SUMMARY

Proponent: California State University Monterey Bay (CSUMB)

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

Location: The Project is located at 4111 2nd Avenue, Seaside, within Assessor's Parcel Number (APN) 0311-0104-4000.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Board of Trustees in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for this Project.

Based on a review of the Project description, a review of California Natural Diversity Database (CNDDB) records, and the surrounding habitat, the Project site is within the geographic range of several special-status wildlife species, including the State candidate Crotch's bumble bee (*Bombus crotchii*) and Western bumble bee (*Bombus occidentalis*).

Additionally, the Project site is within the geographic range of several special-status plant species including, but not limited to, the State endangered and California Rare Plant Rank (CRPR) 1B.1 seaside bird's-beak (*Cordylanthus rigidus ssp. Littoralis)*, and the State threatened, federally endangered, and CRPR 1B.2 Monterey gilia (*Gilia tenuiflora ssp. Arenaria*).

Crotch's and Western Bumble bee

The Project site is within the geographic range of Crotch's bumble bee (CBB) and Western bumble bee (WBB). CBB and WBB are known to inhabit areas of grasslands

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and scrub that contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses, and these habitat elements appear to be present within the Project site. As such, CDFW recommends that a qualified biologist conduct a habitat assessment to assess Project related impacts to CBB and WBB as part of the biological technical studies conducted in support of the DEIR. If suitable habitat is identified during these surveys, CDFW recommends that a qualified biologist conduct focused surveys for CBB and WBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023) as part of the biological technical studies conducted in support of the DEIR.

In addition to conducting CBB and WBB habitat assessments and surveys, CDFW recommends the DEIR include the following measures:

Recommended Mitigation Measure 1: CBB Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment prior to construction to determine if portions of the Project site and immediate surrounding vicinity contain habitat suitable to support CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

Recommended Mitigation Measure 2: CBB and WBB Surveys

If potentially suitable habitat is identified, CDFW recommends that additional surveys be conducted for CBB and WBB, and their requisite habitat features, following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

Recommended Mitigation Measure 3: CBB and WBB Avoidance

If CBB or WBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB or WBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 4: CBB and WBB Take Authorization

If take cannot be avoided, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If take cannot be avoided, take

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authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Special-status Plants

The Project site is within a geographic range of Monterey gilia and seaside bird's-beak and historical occurrences have been documented for both species within two miles of the Project site. As the Project site may contain suitable habitat for special-status plant species, including the species mentioned above, CDFW recommends that the Project site(s) be surveyed for special-status plants within areas of suitable habitat by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities" (CDFW 2018) as part of the biological technical studies conducted in support of the DEIR. This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period.

In addition to conducting special-status plant surveys, CDFW recommends the DEIR include the following:

Recommended Mitigation Measure 5: Special-Status Plant Focused Surveys

Depending on the time between the initial survey efforts conducted in support of the DEIR and Project activities, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities" (CDFW 2018) during the survey season immediately prior to initiation of Project activities. This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary.

Recommended Mitigation Measure 6: Special-Status Plant Avoidance

CDFW recommends special-status plant species be avoided whenever possible by delineation and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

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Recommended Mitigation Measure 7: Special-Status Plant Take Authorization

If a State-listed plant species is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization would need to occur through issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), or Fish and Game Code section 1900 and California Code of Regulations, title 14, section 786.9.

EDITORIAL NOTES AND SUGGESTIONS

CNDDB

Please note that the CNDDB is populated by and records voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDB does not mean a species is not present. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project site.

Cumulative Impacts

CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). Cumulative impacts are recommended to be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area should also be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the Board of Trustees in identifying and mitigating this Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Please

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see the enclosed, Attachment 1, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Evelyn Barajas-Perez, Environmental Scientist, at (805) 503-5738 or evelyn.barajas-perez@wildlife.ca.gov.

Sincerely,

DocuSigned by:
FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT

ec:

State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

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REFERENCES

California Department of Fish and Wildlife. 2018. Protocols for surveying and evaluating impacts to special status native plant populations and sensitive natural communities. California Department of Fish and Wildlife. Sacramento, California, USA.

California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act (CESA) candidate bumble bee species. Sacramento, California, USA.

California Department of Fish and Wildlife. 2025. Biogeographic information and observation system. <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 29 March 2025.

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: California State University Monterey Bay Stadium Expanded Use Project

SCH No.: 2025021013

RECOMMENDED MITIGATION MEASURE	**STATUS/DATE/INITIALS**
Before Disturbing Soil or Vegetation	
Crotch's bumble bee *(CBB*) and Western bumble bee (*WBB)*	
Recommended Mitigation Measure 1: CBB and WBB Habitat Assessment	
Recommended Mitigation Measure 2: CBB and WBB Surveys	
Recommended Mitigation Measure 4: CBB and WBB Take Authorization	
Special-status Plants	
Recommended Mitigation Measure 5: Special-Status Plant Focused Surveys	
Recommended Mitigation Measure 7: Special-Status Plant Take Authorization	
During Construction	
Crotch's bumble bee *(CBB*) and Western bumble bee (*WBB)*	
Recommended Mitigation Measure 3: CBB and WBB Avoidance	
Special-Status Plant	
Recommended Mitigation Measure 6: Special-Status Plant Avoidance	

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Attachment 2

Docusign Envelope ID: F39B8C6B-7897-8FFE-83E2-FEC02DA8DE9E

Attachment 2

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: California State University Monterey Bay Stadium Expanded Use Project (Project)
Draft Environmental Impact Report (DEIR)

SCH No.: 2025021013

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Crotch's bumble bee (CBB) and Western bumble bee (WBB)	
Recommended Mitigation Measure 1: CBB and WBB Habitat Assessment	
Recommended Mitigation Measure 2: CBB and WBB Surveys	
Recommended Mitigation Measure 3: CBB and WBB Avoidance and Take Authorization	
Special-Status Plants	
Recommended Mitigation Measure 4: Special-Status Plant Preconstruction Survey(s)	
Recommended Mitigation Measure 5: Special-Status Plant Avoidance and Take Authorization	
During Construction	
Crotch's bumble bee (CBB) and Western bumble bee (WBB)	
Recommended Mitigation Measure 3: CBB and WBB Avoidance and Take Authorization	
Special-Status Plants	
Recommended Mitigation Measure 5:	

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Special-Status Plant Avoidance and Take Authorization	

Comment Letter B

Judicial Council of California

Comment Letter B

Judicial Council *of* California

2860 Gateway Oaks Drive, Suite 400 · Sacramento, California 95833-4336
Telephone 916-263-7885 · Fax 916-263-1966

PATRICIA GUERRERO
Chief Justice of California
Chair of the Judicial Council

MICHELLE CURRAN
Administrative Director

June 29, 2026

Matthew S. McCluney, AICP
CSUMB Director of Campus Planning & Development
100 Campus Center, Seaside, CA
fm@csumb.edu

Re: CSUMB Stadium Expanded Use Project – Draft EIR

The Judicial Council of California ("Judicial Council") has reviewed the Draft Environmental Impact Report ("DEIR) for the California State University Monterey Bay ("CSUMB") Stadium Expanded Use Project ("Project") dated May 2026. The Project affects Judicial Council owned properties where a future court facility will be located, and the Project would impact the surrounding area and facility. The future court facility impacted by this project is: B-1

- New Fort Ord Courthouse ("New Courthouse"), parcel APN 031-151-013-000, SCH #2022070304

The Judicial Council has identified potential impacts to the future court facility resulting from the Project's construction. The Judicial Council understands that the Project includes expanding programming at Cardinale Stadium and adjacent CSUMB athletic facilities at the southeast corner of Divarty Street and 2nd Avenue in the city of Seaside. The Judicial Council has identified four topic areas that may be significantly impacted after the construction phase of the project in relation to judicial operations: Transportation, Greenhouse Gas Emissions, Noise, and Public Services. Impacts to these four areas will negatively affect the court's ability to maintain access to justice and guarantee uninterrupted judicial proceedings. Additionally, the Judicial Council requests that the Project coordinate with the impacted court to provide detailed traffic and noise plans and provide advanced notification of programmed events to minimize conflicts with the court calendar. B-2

Transportation

Transportation impacts would be significant and unavoidable after mitigation in the following areas: vehicle-generated greenhouse gas emissions, vehicle-related noise, and vehicle miles traveled during operation. The New Courthouse sits on a parcel approximately 700 feet from the B-3

CSUMB athletic field (Figure 1) and has a public construction schedule of 2027 through 2029 and an executed design-build contract. The Judicial Council is requesting that the DEIR be revised to account for cumulative impacts of the two projects during overlapping construction, including combined construction traffic, vehicle miles traveled, greenhouse gas emissions, criteria air pollutant emissions, and noise. B-3

Once constructed, the Project may impact future court operations which will have typical weekday court operating hours of 8:00 AM to 5:00 PM. The Judicial Council requests that the DEIR be revised to account for future transportation impacts on future court operations. Traffic, parking constraints, and in-custody transport may be significantly impacted during court operations when CSUMB programmed events are occurring. The New Courthouse will be accessed from two driveways on Divarty Street: a western driveway for staff and in-custody transports to the secure sallyport, and an eastern driveway for jury, public, and service access. The Project must include a comprehensive impact assessment during CSUMB programmed events. The DEIR should describe 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. This should include concrete mitigation plans for the preservation of public transit access routes, post-event egress traffic management plans, and maintenance of rideshare and taxi drop-off areas near court entrances. B-4

The analysis should also describe how event parking will be contained on stadium-controlled lots within CSUMB's parcels (#031-101-017-000 and #031-101-045-000) to prevent spillover onto the courthouse parcel once it is operational. B-5

Greenhouse Gas Emissions

The CSUMB DEIR identifies vehicle greenhouse gas emissions as significant and unavoidable after mitigation. Because the New Courthouse is close to the Project area, the Judicial Council is concerned about increased regional emissions and related climate effects. The Judicial Council requests that the DEIR address whether event-day combustion emissions and elevated vehicle idling could affect courthouse outdoor air quality, mechanical-system intake locations, and the public approach. B-6

Noise

The DEIR also indicates that vehicle-related noises will be significant and unavoidable. Court proceedings are noise-sensitive due to testimonies, jury deliberations, and secure in-custody transfers all requiring predictable acoustic conditions. At distances of approximately 700 feet to the closest athletic field and approximately 1,300 feet to Cardinale Stadium proper, event public-address systems, crowd noise during concerts and tournaments, and post-event egress traffic on 2nd Avenue and Divarty Street can reasonably be expected to be audible inside and around the future courthouse. The Judicial Council is requesting that the DEIR be revised and provide modeled noise contours at the courthouse property line and at the planned building footprint, addressing event public-address systems, and crowd noise. The analysis should identify the B-7

events, such as Monterey Bay Football Club Team events, 28-day Winter Festival, concerts, NCAA Division II National Championships, California Collegiate Athletic Association Championships, and graduation ceremonies, that would overlap with weekday court operating hours (8:00 AM to 5:00 PM). B-7

Public Services

This Project must recognize that courts provide essential public services that cannot be interrupted without serious consequences to the delivery of and access to justice. The Judicial Council is requesting revisions to the DEIR to account for requirements for courthouse operation continuity measures during CSUMB's programmed events. The Judicial Council also requests a construction plan, which includes consultation with the Judicial Council during construction planning phases and establishes advanced coordination requirements for major construction activities and programmed events. B-8 B-9

Thank you for the opportunity to review and comment on the DEIR. Judicial Council staff is available to coordinate on the matters outlined in this letter. Please contact me at alexandra.cervantes@jud.ca.gov to arrange for a meeting or for any questions on this letter. B-10

Sincerely,

Alexandra Cervantes

Alexandra Cervantes
Senior Facilities Analyst

cc:

Jagan Singh, Deputy Director, Facilities Services, Judicial Council
James Koerner, Manager, Facilities Services, Judicial Council
Jennifer Chappelle, Manager, Risk Management, Facilities Services, Judicial Council
Hilda Iorga, Facilities Supervisor, Facilities Services, Judicial Council
Yassen Roussev, Supervisor, Sustainability, Judicial Council

NEW FORT ORD COURTHOUSE SITE AND CSUMB STADIUM PROJECT

Parcel relationships and DEIR-cited distances · Judicial Council of California, Facilities Services

DRAFT · May 19, 2026

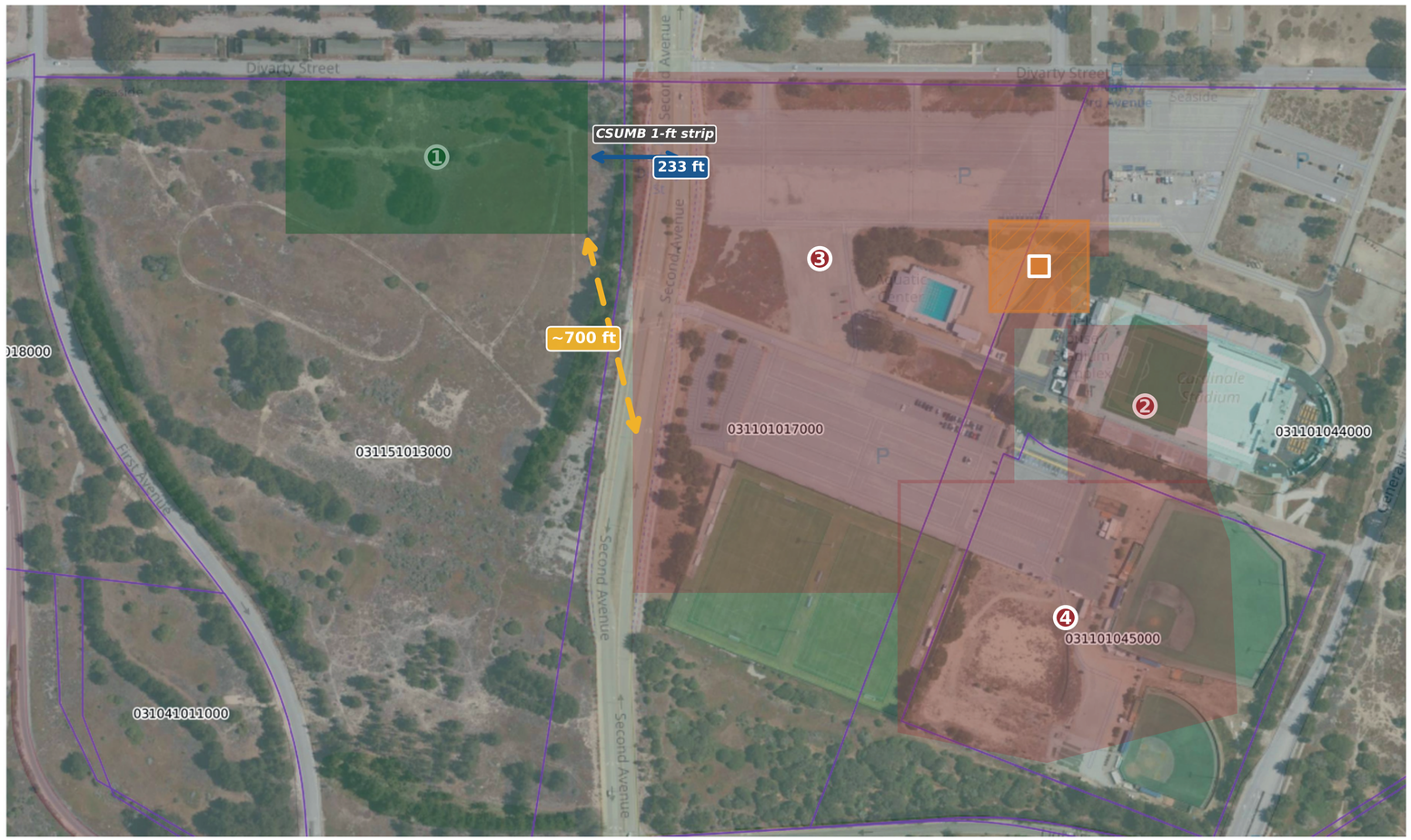

Figure 1

MAP KEY

1 New Fort Ord Courthouse

5-acre Judicial Council site, planned carve-out at NE corner of parent APN 031-151-013-000 (City of Seaside title, Projects at Main Gate Specific Plan, 49.175-acre legal). Hensel Phelps design-build, $174.7M. Construction Apr 2027–Aug 2029. Seven courtrooms, 83,000 GSF, 280 parking, 150 PV canopy spaces + BESS.

2 Cardinale Stadium

APN 031-101-044-000. The stadium structure itself. Principal parcel cited in the CSUMB Stadium Expanded Use Project DEIR. Public review May 15 – Jun 29, 2026.

3 Parking, Aquatic Center, practice fields

APN 031-101-017-000. Large surface parking lot, Aquatic Center, and CSUMB grass practice soccer fields. Proposed event staging area (S) sits within this parcel just north of the stadium. Contains the closest CSUMB athletic field cited in the NFOC EIR.

4 Baseball, east field, scrub

APN 031-101-045-000. CSUMB baseball field and east athletic field, plus undeveloped scrub area. Subject to expanded programming under the DEIR.

SYMBOLS & MEASUREMENTS

JCC carve-out (illustrative)

Planned 5-acre courthouse site at NE corner of parent parcel; not yet recorded as a separate APN.

Stadium project parcels

APNs 031-101-044-000, 017-000, and 045-000 under common CSUMB / State of California control.

Proposed staging area (S)

1.25-acre event staging zone within parcel 017, sited "just north of the stadium" per CSUMB DEIR.

~700 ft · NFOC SE → closest grass field

Cited "approximately 700 feet southeast" in NFOC Draft EIR p. 4.1-8.

233 ft · NFOC east edge → CSUMB campus

Cited "approximately 233 feet directly east" in NFOC Draft EIR p. 4.1-8.

REGIONAL LOCATOR

★ Project / NFOC site

■ Other Monterey County courthouses

BASE MAP *CalTopo, May 2026, on USDA Farm Service Agency aerial imagery Parcels © Regrid. Distance citations: JCC NFOC Draft EIR (April 2023) p. 4.1-8. Parcel lines (purple) are CalTopo / Regrid; colored overlays added.*

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Comment Letter C

City of Seaside

Comment Letter C

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the CSUMB Stadium Expanded Use Project. The City of Seaside values its partnership with CSUMB and recognizes the importance of the stadium as a regional community, athletic, and event asset. C-1

The comments below are provided in that spirit. They are intended to help clarify the environmental analysis, support coordination with nearby City development areas, and ensure that expanded stadium operations can occur in a manner that is compatible with surrounding neighborhoods, planned housing, and transportation infrastructure. The City's comments are not intended to oppose or delay the project, but rather to identify areas where additional analysis, clarification, or operational measures may help avoid future issues. C-2

First, with respect to lighting and Impact AES-3, the Draft EIR acknowledges that while the existing stadium lighting would remain unchanged, the duration of evening events and use of the lighting would increase. The analysis references existing sensitive receptors, including the proposed Campus Town Development, located approximately 0.17 miles away, and concludes that impacts would be less than significant. However, Appendix B appears to include references to residential units located 0.51 and 0.7 miles away, but does not specifically reference or analyze the Campus Town units. In addition, Figure 2 of Appendix B does not appear to show an analysis of the Campus Town Development, which is currently being developed with residential units.

The City respectfully requests that Appendix B be updated to specifically include analysis of potential lighting impacts to the proposed residential units within the Campus Town Development from the increased hours of nighttime operations. If the less-than-significant conclusion relies in part on physical features, such as existing trees or other screening located between the stadium and Campus Town, the City requests that the Final EIR identify those features and describe how they would be maintained or otherwise ensure continued shielding of potential light impacts. C-3

Second, the City notes a minor correction on Page 4.1-14, Paragraph 1, Line 7. The phrase "Desing Guidelines" should be corrected to "Design Guidelines." C-4

Third, with respect to nighttime noise, the City understands that the projected noise levels may remain below the maximum residential threshold identified in the Seaside General Plan. However, the nighttime noise levels provided for Receiver 7 in Table 9 of Appendix F appear to be very close to the maximum permitted level. While technically allowable, the difference between ambient noise levels and project-generated noise could still be noticeable, particularly if amplified sound or event-related noise continues beyond 10:00 p.m.

The City respectfully requests that the Project Description clarify the maximum hours of operation for amplified sound and consider inclusion of reduced allowable noise levels or operational controls after 10:00 p.m. The City also requests consideration of an operational measure requiring the project operator to reduce volumes or implement corrective measures for future events if actual measured noise levels exceed the maximum levels permitted by the Seaside General Plan. C-5

Fourth, with respect to transportation and parking, Table 3-1 of the Draft EIR indicates that 1,680 parking stalls are available in six different lots on the CSUMB campus. However, the Draft EIR does not appear to identify the location of these lots or clarify whether all of the parking in these lots would be dedicated and available for stadium events. The Draft EIR also states that the parking supply would be sufficient to accommodate events with up to 6,000 attendees, but it is unclear what evidence or operational assumptions support that conclusion. C-6

The City is interested in avoiding unintended parking impacts on nearby neighborhoods and developments, particularly if transportation alternatives are underutilized. The City respectfully requests that Mitigation Measures TR-1 through TR-6 be reviewed and refined, as appropriate, to encourage event attendees to use transportation alternatives such as shuttles, rideshare, transit, bicycle/pedestrian access, and designated on-campus parking, rather than parking in nearby off-site locations. C-7

Fifth, the City recommends additional coordination regarding projected increases in water and wastewater demand associated with the project. The Draft EIR identifies an increase from approximately 0.47 AFY to 8.45 AFY for both water and wastewater. The City requests confirmation that this increase has been reviewed in relation to existing infrastructure serving the area and that it will not create downstream impacts for City infrastructure, planned development, or related service systems. C-8

Finally, the City notes a potential technical clarification related to solid waste calculations. The Draft EIR appears to identify existing solid waste generation of approximately 0.2478 tons annually and post-project solid waste generation of 3,192,009 tons per year. The City requests that CSUMB verify this calculation and the application of the cited CalRecycle waste generation factor, including whether the applicable factor is expressed as pounds per visitor or pounds per 100 visitors. If necessary, the City requests that the Final EIR correct the solid waste quantity calculations and any related conclusions to ensure the analysis accurately reflects anticipated stadium event operations. C-9

The City appreciates CSUMB's continued coordination and looks forward to working collaboratively as the project proceeds. Please feel free to contact me or City staff if further discussion would be helpful. C-10

Best regards,

Greg McDanel, ICMA-CM
City Manager | City of Seaside, CA
President | International Town & Gown Association
440 Harcourt Ave
Seaside, CA 93955
831-899-6701 - Office
gmcdanel@ci.seaside.ca.us

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Comment Letter D
Marina Coast Water District

Comment Letter D

MARINA COAST WATER DISTRICT

920 2ND AVENUE, SUITE A, MARINA, CA 93933-2099
Home Page: www.mcwd.org
TEL: (831) 384-6131 FAX: (831) 883-5995

June 26, 2026

Submitted via email to fm@csumb.edu
Matthew S. McCluney, AICP
Director of Campus Planning & Development
California State University, Monterey Bay
100 Campus Center
Seaside, CA 93955

Re: Marina Coast Water District Comments on the Draft Environmental Impact Report for the CSUMB Stadium Expanded Use Project (SCH No. 2025021013)

Dear Mr. McCluney:

Please find below MCWD's comments from our review of the Draft Environmental Impact Report for the CSUMB Stadium Expanded Use Project (SCH No. 2025021013).

Marina Coast Water District (MCWD) provides potable water and sanitary sewer service to the CSUMB campus, including the stadium site, and owns and operates the infrastructure serving it, including the sanitary sewer collector (Collector N) that would receive the project's flows. MCWD also serves as the Groundwater Sustainability Agency for this portion of the Salinas Valley Groundwater Basin. MCWD submits these comments within the 45-day public review period, which closes at 5:00 p.m. on June 29, 2026. D-1

As the water and sewer service provider, MCWD's primary request is that the project applicant submit final design plans to the MCWD Engineering Department for review and approval once they are 100% complete, prior to construction. This will allow the District to confirm that all new water and sewer facilities meet MCWD standards and connect properly to the existing system. D-2

MCWD looks forward to coordinating with CSUMB on this project. Please contact Andrew Racz (aracz@mcwd.org) in MCWD's Engineering Department to begin the review process. D-3

Thank you,

Patrick J. Breen
Water Resources Manager
Marina Coast Water District & Groundwater Sustainability Agency
pbreen@mcwd.org | (831) 883-5951

MARINA COAST WATER DISTRICT
11 RESERVATION ROAD
MARINA, CA 93933-2099

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JUL 06 2026

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Comment Letter E
Monterey Bay Air Resources District

Monterey Bay Air Resources District
Serving Monterey, San Benito, and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940

PHONE: (831) 647-9411 • FAX: (831) 647-8501

June 16, 2026

Matthew S. McCluney, AICP
California State University Monterey Bay
100 Campus Center
Seaside, CA 93955
Submitted via email: fm@csumb.gov

Re: Draft Environmental Impact Report (EIR) for the Stadium Expanded Use Project

Dear Mr. McCluney,

Thank you for providing the Monterey Bay Air Resources District (MBARD) with the opportunity to comment on the Stadium Expanded Use Project. MBARD has reviewed the Draft Environmental Impact Report and has the following comments: E-1

MBARD
Page 4.2-1 of the Draft EIR, replace "criteria for air pollutants" with "criteria air pollutants". E-2

National Standards
On page 4.2-5 of the Draft EIR, Table 4.2-1, "Summary of Ambient Air Quality Standards (AAQS)," states that the AAM for Fine Particulate Matter ($PM_{2.5}$) is 12 µg/m^3. Effective May 6, 2024, the United States Environmental Protection Agency revised the federal primary annual PM2.5 standard by lowering the level from 12.0 µg/m^3 to 9.0 µg/m^3.
Link to Federal Register: https://www.govinfo.gov/content/pkg/FR-2024-03-06/pdf/2024-02637.pdf. E-3

Fugitive Dust Control
In the Draft EIR on pages 4.2-18 and 4.2-19, there is a discussion on the analysis that the Stadium Expanded Use Project would not exceed the daily PM_{10} threshold of 82 lbs./day. The value of daily PM_{10} at 11.6 lbs./day shows fugitive dust will still occur and can be further mitigated while maintaining both (1) compliance with MBARD Rule 402 (Nuisance) and (2) consistency with MBARD's CEQA Guidelines (Section 8.2) by implementing the following Best Management Practices as applicable:

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high wind (over 15 mph).
- Cover all trucks hauling dirt, sand, or loose materials.
- Cover inactive storage piles.
- Maintain at least 2'0" of freeboard in haul trucks.
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).

E-4

Greenhouse Gas Emissions

MBARD supports the project's incorporation of electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants and greenhouse gases, MBARD suggests including publicly available dual-port Level 2 & DC fast-charge charging stations throughout the project area. MBARD recommends CSUMB focus charging station efforts on sites in the nearby stadium parking lots where installation of charging station equipment would be relatively simpler and potentially more cost-effective if construction can be completed at the same time as stadium improvements. E-5

Vehicle Miles Traveled (VMT) Reduction

On page 4.7-15 of the Draft EIR, Table 4.7-2, titled "Operation GHG Emissions (Tons/Year)", shows mobile source emissions of the proposed expanded use of the stadium would total 2,143.8 MTCO2e/year, exceeding Sacramento Metropolitan Air Quality Management District's (SMAQMD) operational threshold of 1,100 $MTCO_2e$/year. Page 4.7-17 of the Draft EIR concludes that "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)".

Mitigation Measure TR-5

MBARD recommends making the annual monitoring memorandum and subsequent decisions on implementing further measures available for public review and comment, rather than operating under self-monitoring.

Mitigation Measure TR-3

MBARD recommends making the upfront design and plans more effective at lowering VMT by incorporating additional VMT mitigation measures, especially since there is no deadline for reducing mobile source emissions and no consequence for not attaining the performance standards.

Quantified VMT reductions for TDM measures are provided in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health Equity (December 2021), available at https://www.caleemod.com/handbook/index.html. The Handbook's transportation measures provide a menu of strategies. MBARD recommends that the EIR use this methodology to substantiate the VMT reductions attributed to Mitigation Measures TR-1 through TR-6. E-6

Sidewalk, Crosswalk, and Bicycle Infrastructure

Page 4.14-1 of the Draft EIR includes the "recommendation to include bike facilities (e.g., bike racks and bike fix-it stations) as part of the project to encourage multimodal transportation." The Freeman Stadium Renovations Project includes changes to sidewalk, crosswalk, or bicycle infrastructure immediately surrounding the stadium, but not in a way that connects the stadium to surrounding paths for walking, biking, and more. The Freeman Stadium Renovations Project identifies "sidewalk and crosswalk improvements near the project site" and provides physical improvements only to the area immediately surrounding the stadium. This does not, however, address how sidewalk, crosswalk, and bicycle infrastructure may encourage multimodal transportation. E-7

MBARD recommends including sidewalk, crosswalk, and bicycle infrastructure improvements in the design phase. Such changes are most effective at achieving VMT reductions by incorporating the stadium as a destination in the existing network of public paths.

Public Transit Bus Use

Future stadium attendees who take a public transit bus to the nearest bus stop to the stadium (located near the CSUMB Alumni and Visitor Center) are approximately a 0.8-mile walking distance from the stadium. This walking distance may disincentivize the use of public transit to get to the stadium for events. Information on public transit bus use on page 7.16 in the CSUMB 2022 Transportation Demand Management Strategies (CSUMB 2022 Master Plan Guidelines, Link: https://csumb.edu/media/csumb/legacy/legacy-site-images/section-editors/facilities/2022-master-plan/CSUMB-Master-Plan-Guidelines-2022.pdf) , indicates that it will "[i]mprove campus circulator shuttle via a new campus shuttle service and/or regional transit stops, on main Campus, to provide service within one quarter mile of all occupied buildings or high traffic programmed sites, and directly on site at multimodal hubs and general parking lots."

MBARD recommends CSUMB evaluate establishing a stadium event shuttle service or coordinating with MST to provide stadium event attendees the opportunity to take a public transit bus service directly to the stadium. Secondarily, MBARD recommends CSUMB evaluate establishing a stadium event shuttle service, or coordinating with MST, to provide stadium event attendees the opportunity to take a public transit bus service, which would then require a one-way walk to the stadium that is no longer than one quarter mile. E-8

Additionally, between the CSUMB Alumni and Visitor Center and the stadium, the pedestrian route is not clearly delineated from an adjacent parking lot, which may present a safety concern and further discourage public transit bus use.

To encourage public transit bus use for stadium events, MBARD recommends that CSUMB improve and clearly delineate the pedestrian routes connecting public transit bus stops to the stadium.

Engine Permitting

If a generator, boiler, or other stationary source of air pollutants is needed to support the construction process or will be installed for use in the operation of the project, a permit may be required. Per Rule 201, any stationary piston-type internal combustion engine of greater than or equal to 50 brake horsepower (bhp) requires a permit. Please contact MBARD's Engineering Division if there are any questions regarding the permitting process. E-9

Portable Equipment Registration Program

If project construction uses portable equipment registered with CARB in the Portable Equipment Registration Program (PERP), MBARD must be notified within two working days of commencing operations when the registered unit will be at the location for more than five days. Portable equipment not registered with CARB may be subject to MBARD permit requirements. E-10

MBARD appreciates the opportunity to comment on the Stadium Expanded Use Project. Please let me know if you have any questions. I can be reached at (831) 718-8029 or elessman@mbard.org. E-11

Regards,

Eli Lessman

Eli Lessman
Air Quality Planner II

cc: Richard A. Stedman, Air Pollution Control Officer
David Frisbey, Planning and Air Monitoring Manager
Shawn Boyle, Planning and Air Monitoring Supervisor

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Comment Letter F

Monterey-Salinas Transit

June 23, 2026

Matthew S McCluney
Director of Campus Planning
100 Campus Center
Seaside, CA 93955

RE: Draft Environmental Impact Report for the California State University Monterey Bay Stadium Expanded Use Project

Dear Mr. McCluney:

Monterey-Salinas Transit (MST) provides public transportation through Monterey County and operates fixed-route services to the California State University, Monterey Bay (CSUMB) campus. MST has a long-standing partnership with CSUMB that allows students, faculty, and staff to ride MST services for free using their Otter ID. MST is excited to continue their partnership with CSUMB in the coming years and continue connecting students with higher education and essential services. F-1

Existing-Future MST Service

MST operates Line 25 (Salinas-CSUMB), which typically runs during the academic year. This route provides hourly service between the Salinas Transit Center and the CSUMB Alumni and Visitor Center. In addition, MST operates Line 17 and 18 year-round, which connects the CSUMB campus to surrounding communities, including Marina and Sand City.

The 4th Avenue & Alumni and Visitor Center stop functions as a key transfer point for MST routes and is within walking distance of the CSUMB Stadium site.

Looking ahead, the CSUMB Stadium will directly benefit from MST's future SURF! Busway and Bus Rapid Transit project. SURF! plans for 15-minute weekday service using zero-emission buses and includes a new mobility hub at 5th Street, featuring bicycle facilities and other multimodal amenities. F-2

Once completed, SURF! will offer direct, frequent, and reliable transit to nearby employment centers, educational institutions, housing, and planned developments. The CSUMB Wave Shuttle will also have the opportunity to serve the 5th Street Station, enhancing connections between campus destinations, the CSUMB stadium, and regional transit services. Coordinating schedules between MST and CSUMB shuttle services will be critical to ensuring convenient transfers and maximizing system efficiency.

The SURF! BRT Busway and 5th Street Station are currently under construction and anticipated to begin service in Spring 2028.

DEIR Comments

Transportation

MST strongly supports the Transportation Demand Management (TDM) strategies identified in the DEIR, particularly those aimed at encouraging transit and active modes of transportation. MST also supports the long-term commitment to updating TDM polices as conditions evolve and new transportation solutions arise.

In addition to CSUMB's carsharing and ridesharing programs, MST partners with *Commute with Enterprise* to operate a regional vanpool program. This program connects groups of four (4) or more commuters and provides them with a shared vehicle, maintenance, insurance, and roadside assistance. Eligible Vanpools may receive a monthly subsidy of up to $500 upon submission of ridership reports. This program offers a cost-effective alternative for commuters and complements to other TDM strategies.

Incorporating MST's vanpooling program into the project's TDM strategy would provide a cost-effective and flexible commuting option, particularly for employees and visitors traveling from areas not directly served by CSUMB or MST transit services. This program complements other TDM measures and supports broader efforts to reduce vehicle miles traveled. Please visit MST's website for more information regarding the *Commute with Enterprise* vanpool program.

MST also supports the inclusion of bicycle storage, bicycle amenities, and pedestrian-friendly design elements (pedestrian malls). MST recommends that the Lead Agency prioritize enhanced bicycle and pedestrian infrastructure in the projects area and ensure strong connections to existing transit stops and the future 5th Street mobility hub. Early coordination with MST on these improvements would help support multimodal access and encourage greater transit usage. F-3

MST remains a committed partner with CSUMB to provide services to the campus throughout the academic school year and looks forward to a partnership with the CSUMB Stadium and teams. If you have any questions about the above comments, please do not hesitate to me at epatel@mst.org or 831-264-9288. F-4

Sincerely,

Emma Patel
Planning Manager

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Comment Letter G
Transportation Agency for Monterey County

Comment Letter G

TRANSPORTATION AGENCY FOR MONTEREY COUNTY
55-B PLAZA CIRCLE, SALINAS, CA, 93901
(831) 775-0903
TAMCMONTEREY.ORG

June 22, 2026

California State University, Monterey Bay
Attn: Matthew S. McCluney, AICP, Director of Campus Planning & Development
100 Campus Center
Seaside, California, 93955

Via email: fm@csumb.edu

SUBJECT: Comments on the CSUMB Stadium Expanded Use Project – Draft EIR

Dear Mr. McCluney:

The Transportation Agency for Monterey County (TAMC) is the Regional Transportation Planning and Congestion Management Agency for Monterey County, and Agency staff have reviewed the Draft Environmental Impact Report for the CSUMB Stadium Expanded Use Project.

The CSUMB Stadium Expanded Use Project would intensify use of the existing stadium by substantially increasing the frequency, size, and variety of athletic and non-athletic events, including collegiate championships, professional soccer matches, concerts, and community activities. The project also includes modest supporting improvements, including two locker room/shower buildings, two permanent restroom facilities, and a storage/staging area within the existing stadium footprint.

Although physical changes are limited, the project represents a major operational expansion that would significantly increase visitor activity and travel demand. This increase in event attendance and frequency is projected to generate a substantial rise in vehicle miles traveled (VMT), approximately 69.47 VMT per service population compared to a threshold of 23.91, along with about 5.96 million annual VMT, which is the primary driver of environmental impacts. Consequently, the project effectively transforms the stadium into a higher-intensity regional venue, with increased transportation demand as its most notable effect.

G-1

The Transportation Agency offers the following comments for your consideration:

1. Under Section 4.14.1.2 Project Site Setting, under the Existing Pedestrian and Bike Facilities:

G-2a

a. Please include the 2018 Monterey County Bike Network Map from the 2018 Monterey County Active Transportation Plan, which can be found here: 2018 Active Transportation Plan - Transportation Agency for Monterey County. This plan is currently being updated, so as the Project is being implemented, we suggest referring to the new Active Transportation Plan after it is adopted. G-2a

b. Please include the Fort Ord Regional Trail and Greenway (FORTAG) map, which can be found here: Fort Ord Regional Trail & Greenway - Transportation Agency for Monterey County , due to the Project's proximity to FORTAG CSUMB Loop South Segment. G-2b

c. The EIR should also describe how the project site would connect to and interact with the FORTAG system, including: G-2c

   i. Existing and planned access points

   ii. Pedestrian and bicycle connectivity between the stadium and the trail

   iii. Potential use of the trail network by event attendees

This information is necessary to demonstrate the availability of feasible non-auto travel options that could support VMT reduction.

2. Under Mitigation Measures, TR-4: Transportation Demand Management Program:

   a. We suggest a more explicit discussion of the regional active transportation facilities that could support the service population of the stadium and contribute to reducing their VMT. For example, specifying additional bike parking that will be at or near the proposed Project or FORTAG CSUMB Loop South Segment connectivity. Specifically, the EIR should: G-3a

      i. Identify the location, quantity, and type of bicycle parking provided at or near the stadium;

      ii. Describe secure bicycle storage and micromobility staging areas for event attendees;

      iii. Identify clear and safe connections to regional facilities, including the FORTAG CSUMB Loop South segment.

The elements should be included as mitigation measures to ensure implementation and enforceability. G-3a

b. Mitigation Measure TR-4 should include quantifiable performance standards for non-auto travel modes (e.g., transit, bicycling, walking, and carpooling). Establishing mode share targets is necessary to demonstrate that the TDM program will effectively contribute to VMT reductions, particularly given that project VMT significantly exceeds established thresholds. G-3b

c. The EIR should evaluate whether the project could contribute to implementation of the Fort Ord Regional Trail and Greenway (FORTAG), particularly segments providing direct access to the campus and stadium project. If feasible, such contributions could serve as a component of VMT mitigation, provided that a clear nexus to project-generated travel and measure VMT reduction is demonstrated. G-3c

3. Under Section 4.14.6, References:

a. We suggest replacing the links for the California State University 2022 Master Plan Guidelines, and the California Office of Planning and Research 2018 Technical Advisory on Evaluating Transportation Impacts CEQA, as they are non-functional. G-4a

b. We suggest adding to the reference list the 2018 Monterey County Bike Network from the 2018 Monterey County Active Transportation Plan, also mentioned above, which can be found here: 2018 Active Transportation Plan - Transportation Agency for Monterey County G-4b

TAMC looks forward to reviewing any additional documents that follow after the Draft EIR. If you have any questions, please contact Sophia Linnevers of my staff at sophia@tamcmonterey.org or 831-775-4404. G-5

Sincerely,

Todd A. Muck
Executive Director

"TAMC\Projects and Programs - Docs\Environmental Document Review\Working Folders\McCluney - Draft EIR CSUMB Stadium Expanded Use.docx"

Comment Letter H

Amah Mutsun Tribal Band of San Juan Bautista

Amah Mutsun Tribal Band of San Juan Bautista
&
AMTB

2451 Tyrolean Way, Sacramento CA 95821

Our rates for 2026 are

$200.00 per hour.

4 hours minimum

Cancellations not 48 hours (about 2 days) prior will be charged as a 4-hour minimum. There is a round trip mileage charge if canceled after they have traveled to site.

Anything over 8 hours a day is charged as time and a half.

Weekends are charged at time and a half.

Holidays are charged at double the time.

For fiscal year (FY) 2026, standard per diem rate of $425. ($333. lodging, $92 M&IE).

M&IE Breakdown FY 2026

M&IE Total	Continental Breakfast/ Breakfast	Lunch	Dinner	Incidental Expenses	First & Last Day of Travel
$92.00	$23.00	$26.00	$38.00	$5.00	$69.00

Beginning 2026, the standard mileage rates for the use of a car round trip (also vans, pickups or panel trucks) will be: $.70 cents per mile driven for business use or what the current federal standard is at the time.

Our Payment terms are 5 days from date on invoice.

Our Monitors are Members of the Amah Mutsun Tribal Band of Mission San Juan Bautista.

If you have any questions, please feel free to contact the A.M.T.B. Inc. at the below contact information.

Sincerely,

Irenne Zwierlein

Irenne Zwierlein

2451 Tyrolean Way, Sacramento CA
95821
amtbinc21@gmail.com

(916)730-9468

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 03/06/2026

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATIONIS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
AUTO DATA PROCESSING INS AGCYINC
76250717
71 HANOVER ROAD
FLORHAM PARK NJ 07932

CONTACT NAME:

PHONE (A/C, No, Ext): (800) 524-7024 **FAX (A/C, No):** (800) 524-4013

E-MAIL ADDRESS:

INSURER(S) AFFORDING COVERAGE	NAIC#
INSURER A : Hartford Underwriters Insurance Company	30104
INSURER B : Hartford Casualty Insurance Company	29424
INSURER C :	
INSURER D :	
INSURER E :	
INSURER F :	

INSURED
AMTB LLC
2451 TYROLEAN WAY
SACRAMENTO CA 95821-4809

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED.NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/Y YYY)	LIMITS	
A	COMMERCIAL GENERAL LIABILITY CLAIMS-MADE [X] OCCUR [X] General Liability GEN'L AGGREGATE LIMIT APPLIES PER: [X] POLICY [ ] PRO-JECT [ ] LOC OTHER:			76 SBU BX9D7K	01/14/2026	01/14/2027	EACH OCCURRENCE	$1,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence)	$1,000,000
							MED EXP (Any one person)	$10,000
							PERSONAL & ADV INJURY	$1,000,000
							GENERAL AGGREGATE	$2,000,000
							PRODUCTS - COMP/OP AGG	$2,000,000
A	**AUTOMOBILE LIABILITY** [ ] ANY AUTO [ ] ALL OWNED AUTOS [ ] SCHEDULED AUTOS [X] HIRED AUTOS [X] NON-OWNED AUTOS			76 SBU BX9D7K	01/14/2026	01/14/2027	COMBINED SINGLE LIMIT (Ea accident)	$1,000,000
							BODILY INJURY (Per person)	
							BODILY INJURY (Per accident)	
							PROPERTY DAMAGE (Per accident)	
	UMBRELLA LIAB [ ] OCCUR **EXCESS LIAB** [ ] CLAIMS-MADE DED [ ] RETENTION $						EACH OCCURRENCE	
							AGGREGATE	
B	**WORKERS COMPENSATION AND EMPLOYERS' LIABILITY** ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y/N [ ] **(Mandatory in NH)** If yes, describe under DESCRIPTION OF OPERATIONS below	N/ A		76 WEG BR0UU9	03/04/2026	03/04/2027	[X] PER STATUTE [ ] OTH-ER	
							E.L. EACH ACCIDENT	$1,000,000
							E.L. DISEASE -EA EMPLOYEE	$1,000,000
							E.L. DISEASE - POLICY LIMIT	$1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES **(ACORD 101, Additional Remarks Schedule, may be attached if more space is required)**

Those usual to the Insured's Operations.

CERTIFICATE HOLDER

For Informational Purposes
2451 TYROLEAN WAY
SACRAMENTO CA 95821-4809

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Susan L. Castaneda

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Provisions to Address Discovery of a Tribal Cultural Resource During Construction

Tribal Cultural Resources Sensitivity Training. The project sponsor, in consultation with any Cultural Resources Team if one is available, shall retain the services of an Ohlone Native American representative and/or archeological consultant from the Qualified List of Archaeological Consultants to provide cultural sensitivity and archeological awareness training to all work crews who will be involved in ground disturbing activities at the project site. The training shall inform all project contractors, subcontractors and work crew members to be on the alert for evidence of the presence of potential tribal cultural resource(s), of how to identify the evidence of such a resource(s), and of stop work, resource protection, and notification requirements in the event of suspected discovery of a tribal cultural resource by construction crew members. H-1

Stop Work and Notification Upon Discovery. Should any indication of a tribal cultural resource be encountered during any soils-disturbing activity of the project, the project Head Foreperson and/or project sponsor shall immediately notify tribe and shall immediately suspend any soils-disturbing activities in the vicinity of the discovery until the Cultural Monitor and a qualified archeological consultant from the Qualified Archeological Consultants List have assessed the find and the respective parties have determined whether and what additional measures should be undertaken. H-2

Preservation in Place. In the event of the discovery of a tribal cultural resource, the cultural resource team (if one is present on job), the project sponsor, the archeological consultant, and the Ohlone representative shall consult to determine whether preservation in place would be feasible and effective in preserving the values represented by the resource. The archeological consultant, in consultation with the Ohlone representative, shall document the find to current professional standards. The tribe may also require that the project sponsor immediately implement a site security program if the resource is at risk from vandalism, looting, or other damaging actions.

If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, the archeological consultant shall prepare a Resource Preservation Plan (RPP) in consultation with the Ohlone representative, for review, which shall be implemented by the project sponsor during construction.

If it is determined that preservation in place would not be feasible or effective, then archeological assessment and treatment shall be implemented and in consultation with the Ohlone representative, as detailed below. H-3

Archeological Treatment. If it is determined, in consultation with the Ohlone representative and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option to preserve the values represented by the resource, then the archeological consultant, in consultation with the Ohlone representative, shall conduct archeological assessment to determine H-4

the significance of the find and determine whether it retains sufficient integrity to warrant additional treatment. If the tribal cultural resource is determined to be a significant archeological resource, the archeological consultant, in consultation with the Ohlone representative, shall recommend appropriate archeological treatment to preserve the data and values of the tribal cultural resource, which may include archeological data recovery. Data recovery shall be implemented in consultation with the Ohlone representative and shall include appropriate analyses and reporting. If an archeological interpretive, monitoring, and/or testing program is required, it shall be consistent with Standard guidelines for such programs and shall be implemented immediately. H-4

Human Remains and Funerary Objects. The treatment of any human remains, and funerary objects discovered during any soils disturbing activity shall comply with applicable State laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. The project sponsor shall immediately notify the Medical Examiner of the County in which the job resides and the Tribe of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner will notify the California State Native American Heritage Commission (NAHC) within 24 hours and all provisions of Public Resources Code 5097.98 will be followed. H-5

Interpretive Program. If it is determined, in consultation with Ohlone representative and the project sponsor, determines that preservation-in-place of the tribal cultural resource is not a sufficient or feasible option, the project sponsor, in consultation with local Native American representatives, shall prepare a Cultural Resources Public Interpretation Plan (CRPIP) to guide the interpretive program. The CRPIP shall be submitted for review and approval prior to implementation of the program. The interpretive program may but is not limited to artist installations, preferably by local Native American artists, oral histories with local Native Americans, cultural displays, educational panels, or other interpretive elements agreed upon by the sponsor, and Ohlone Native American representatives, and shall include an on-site acknowledgement that the project is built on traditional Ohlone land. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. Upon approval of the CRPIP and prior to project occupancy, the interpretive program shall be implemented by the project sponsor. The project sponsor shall work with the tribal representative to identify the scope of work by the tribal representative to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Tribal representatives shall be compensated for their work as identified in the agreed upon scope of work. H-6