

Appendix F
Responses to Comments

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RESPONSES TO COMMENTS

On July 9, 2021, the California State University Monterey Bay (CSUMB) campus circulated for public review a Draft Initial Study and Proposed Mitigated Negative Declaration (Draft IS/MND) for the Freeman Stadium Facilities Renovation Project (proposed project) at CSUMB. As required by Section 15073 of the California Environmental Quality Act (CEQA) Guidelines, the Draft IS/MND was circulated for 30 days. The comment period closed on August 9, 2021. CSUMB received six (6) comment letters on the Draft IS/MND during the public review period. All comments received on the Draft IS/MND are addressed in this appendix.

Section 15074(b) of the CEQA Guidelines requires the decision-making body to consider the Draft IS/MND and comments received on it prior to considering the project for approval. Responses to comments are not required by CEQA, although responses may be provided at the discretion of the lead agency. CSUMB has prepared responses to comments received on the Draft IS/MND as part of this Final IS/MND.

Comments were received on the Draft IS/MND from the following commenters:

- Letter A: California Department of Transportation, Caltrans District 5 (received August 9, 2021)
- Letter B: Kakoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria (received July 27, 2021)
- Letter C: Transportation Agency for Monterey County (received August 5, 2021)
- Letter D: Marina Coast Water District (received August 9, 2021)
- Letter E: Monterey-Salinas Transit (received August 9, 2021)
- Letter F: City of Seaside (received August 4, 2021)

Comment letters and responses to comments are provided on the following pages. When the response notes an correction to the text in the Draft IS/MND, the reader is directed to the Final IS/MND where all additions to the text are shown underlined and all deletions from the text are shown stricken. The comments received on the Draft IS/MND did not result in a "substantial revision" of the mitigated negative declaration, as defined by CEQA Guidelines Section 15073.5, and the new information added to the mitigated negative declaration merely clarifies, amplifies, or makes insignificant modifications to the Draft IS/MND. No new significant effects were identified since the commencement of the public review period that would require mitigation measures or project revisions to be added in order to reduce the project effects to less than significant.

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
www.dot.ca.gov/dist05/



Making Conservation
a California Way of Life.

August 9, 2021

MON-1-83.084
SCH#2021070153

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

Dear Mr. Forte:

COMMENTS FOR THE MITIGATED NEGATIVE DECLARATION (MND) – FREEMAN STADIUM FACILITIES RENOVATION PROJECT, SEASIDE, CA

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the Freeman Stadium Facilities Renovation Project located on the campus of California State University-Monterey Bay. The project consists of the renovation of Freeman Stadium to comply with national and international standards for hosting National Collegiate Athletic Association (NCAA) and United Soccer League (USL) soccer games. Caltrans offers the following comments in response to the MND:

A-1

1. 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. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.
2. We support the implementation of a Transportation Management Plan (TMP) with Transportation Demand Management (TDM) strategies to reduce vehicular trips. The TDM strategies will help meet Statewide goals of lowering vehicle miles traveled (VMT) and reducing greenhouse gasses (GHG's) by encouraging transit, carpooling, cycling, and walking modes.

A-2

A-3

Marcel Forte
August 9, 2021
Page 2

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

A-4

Sincerely,

Christopher Bjornstad

Chris Bjornstad
Associate Transportation Planner
District 5 Development Review

LETTER A: CALIFORNIA DEPARTMENT OF TRANSPORTATION, CALTRANS DISTRICT 5

RESPONSE TO COMMENT A-1

This comment acknowledges the objectives of the proposed project and states that the California Department of Transportation (Caltrans) has reviewed the proposed project and has provided comments in response to the MND. This comment does not raise an environmental issue warranting a response under CEQA or comment on the adequacy of the Draft IS/MND. No further response is necessary.

RESPONSE TO COMMENT A-2

Caltrans states that the agency supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote health and safety. Furthermore, Caltrans supports projects that support smart growth principles, which include pedestrian, bicycle, and transit infrastructure, as such projects align with the agency's mission, vision, and goals. As this comment does address the adequacy of the Draft IS/MND, no further response is necessary.

RESPONSE TO COMMENT A-3

This comment states that Caltrans supports the implementation of a Transportation Management Plan (TMP) with Transportation Demand Management (TDM) strategies to reduce vehicular trips and help meet Statewide goals of lowering vehicle miles traveled and reducing greenhouse gasses by encouraging transit, carpool, and walking modes. It should be noted that the proposed project includes a mitigation measure that requires CSUMB to develop and implement a Transportation Management Plan with Transportation Demand Management strategies (Mitigation Measure TR-1, page 84 of the Draft IS/MND), and to monitor and report on the effectiveness of this measure. Additionally, as summarized in Response to Comment A-2, Caltrans notes that the project supports the promotion of public health and safety and did not raise any concerns about safety or impacts to State highway facilities. Caltrans was also consulted on May 14, 2021, by CSUMB project staff regarding the proposed project. Caltrans did not express any concerns regarding transportation safety or impacts on the State highway facilities at that time.

RESPONSE TO COMMENT A-4

This comment is the closing salutation for Caltrans's comment letter and expresses appreciation for the opportunity to review and comment on the proposed project. This comment does not raise an environmental issue warranting a response under CEQA or comment on the adequacy of the Draft IS/MND. No further response is necessary.



KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria

7/27/2021

Mr. Marcel Forte
Associate Vice President for Facilities Management
California State University Monterey Bay
100 Campus Center, Building 37
Seaside, CA 93955

RE: Freeman Stadium Facilities Renovation Project

Thank you for your project notification email/letter dated, 7/9/2021, regarding cultural information on or near the proposed project site at, 4113 2nd Avenue, Seaside, California, 93955, on the CSUMB campus in Monterey County. We appreciate your effort to contact us and wish to respond. B-1

The Cultural Specialist has reviewed the project and concluded that it is within the aboriginal territories of the KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria. Therefore, we have a cultural interest and authority in the proposed project area.

Based on the information provided, the Tribe is not aware of any known cultural resources near this project site and a cultural monitor is not needed. However, we recommend cultural sensitivity training for any pre-project personnel. We also request that you incorporate KaKoon Ta Ruk Band of Ohlone-Costanoan Indians of the Big Sur Rancheria's Treatment Protocol into the mitigation measures for this project. Please submit the updated mitigation measures to the Cultural Specialist once completed. B-2

Please contact the individual listed below to schedule the cultural sensitivity training, prior to the start of the project.

Isaac Bojorquez
Chairman
Cell: (530) 723-2380
Email: chairman@kakoontaruk.org

Lydia Bojorquez
Vice-Chairperson
Cell: (530) 650-5943
Email: vicechair@kakoontaruk.org

Please refer to identification number KKTR-07092021-01 in any correspondence concerning this project.

Thank you for providing us the opportunity to comment.

Shurruru,

Tribal Chairperson

LETTER B: KAKOON TA RUK BAND OF OHLONE-COSTANOAN

RESPONSE TO COMMENT B-1

This comment acknowledges the opportunity to review and comment on the proposed project. Furthermore, this comment confirms that the Cultural Specialist for the KaKoon Ta Ruk Band of Ohlone-Costanoan Indians (Tribe) reviewed the project and concluded that it is within the territories of the tribe, and, therefore, there is a cultural interest and authority in the proposed project area.

RESPONSE TO COMMENT B-2

This comment states that the Tribe is not aware of any known cultural resources near the project site and a cultural monitor is not needed. The Tribe does request that cultural sensitivity training for any pre-project personnel is provided, and that the Tribe's Treatment Protocol be included in the mitigation measures for the proposed project. The Tribe provided contact information for two tribal representatives authorized to conduct the cultural sensitivity training prior to the start of project construction. It should be noted that the Tribe, together with the Torres Martinez Desert Cahuilla Tribe, were offered the opportunity to consult with the university in compliance with Assembly Bill 52 (AB 52) (Public Resources Code Section 21080.3.1), as requested by the tribes in writing, and did not respond to those requests with any comments.

Mitigation Measure CR-1 on page 55 of the Draft IS/MND includes specific language regarding cultural sensitivity training. More specifically, the mitigation measure states, "Prior to the initiation of ground-disturbing activities, the contractor and/or project applicant shall inform all supervisory personnel and all contractors whose activities may have subsurface soil impacts of the potential for discovering archaeological resources." To address the Tribe's request regarding its inclusion in the mitigation measure and implementation of its treatment protocol, Mitigation Measure CR-1 has been revised as follows to ensure consultation with and inclusion of all tribes with a stated cultural affiliation with campus lands:

CR-1 Prior to the initiation of ground-disturbing activities, the contractor and/or project applicant shall inform all supervisory personnel and all contractors whose activities may have subsurface soil impacts of the potential for discovering archaeological and tribal cultural resources.

If any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resource(s) shall be halted and the project applicant shall immediately notify the CSUMB Facilities Management Department of the discovery. A qualified archaeologist shall be consulted to assess the significance of the find(s) according to CEQA Guidelines Section 15064.5. If any find is determined by the archaeologist to be potentially significant, representatives from the CSUMB Facilities Management Department County and the archaeologist shall meet with representatives of those tribes that have indicated an affiliation with or cultural interest in the CSUMB campus regarding the find to determine the appropriate avoidance measures or other ~~appropriate mitigation~~. All significant cultural materials recovered at the site shall be, as necessary and at the discretion of the consulting archaeologist and representatives of the affiliated tribe(s), subject to scientific analysis, professional museum curation, and documentation according to current professional standards and the treatment protocol of the affiliated tribe(s). Appropriate ~~mitigation protocols~~ may include no action, avoidance of the resource, and/or ~~potential~~ data recovery and curation. Ground disturbance in the zone of suspended activity shall not commence without authorization from the archaeologist. Work may proceed on other parts of the site outside the 50-foot area while mitigation is being carried out.



August 5, 2021

California State University Monterey Bay
Attn: Marcel Forte, Associate Vice President for Facilities Management
Building 37
100 Campus Center
Seaside, CA 93955

Via email: mforte@csumb.edu

SUBJECT: Comments on Mitigated Negative Declaration for Freeman Stadium Facilities Renovation Project at California State University Monterey Bay

Dear Mr. Forte:

The Transportation Agency for Monterey County (TAMC) is the Regional Transportation Planning and Congestion Management Agency for Monterey County. Agency staff has reviewed the Mitigated Negative Declaration for the Freeman Stadium Facilities Renovation Project at California State University Monterey Bay (CSUMB).

The Monterey Bay Football Club is proposing to renovate, utilize, and maintain the existing Freeman Stadium and Field House at CSUMB as a shared campus and United Soccer League facility. The project proposes improvements to the existing Field House, athletic track and field, seating and parking, as well as installing a new scoreboard, ticket box, lighting, telecommunications and other utilities, concession stands and entrance. The facility would host the Monterey Bay Football Club, which will run an estimated 18 games per season, including events on Fridays, Saturdays and Sundays. The Stadium will also host various CSUMB special events, such as Commencement. The project is expected to result in increased vehicle miles traveled that will require mitigation and monitoring.

Agency staff offer the following comments for your consideration:

1. The Agency strongly supports the development and implementation of a trip reduction program that incorporates a management and operating plan to minimize vehicle trips going to and from the facility and the related performance monitoring of the program.
 - 1.1. As part of the trip reduction program, the Agency recommends that the following strategies are adopted as mitigation measures:
 - Incentives to encourage the use of alternative modes of transportation;
 - Preferred carpool parking spots;
 - A shuttle system for major events (e.g., when 2,000 or more tickets have been sold);

C-1

C-2

- Educational materials about the transit routes that can be used to access the Stadium;
 - Distribution of free or reduced-cost transit passes to event attendees; and,
 - Special event commuter shuttle between the 5th Street station for the [SURF! Busway and Bus Rapid Transit Project](#) and the Stadium, once the SURF! Service is active.
- 1.2. Our Agency appreciates acknowledgement of the Go831 Program, designed to support the development of employer-based commuter trip reduction programs. Go831 provides resources, technology and tools that will save both employees and employers money, while reducing the demand on our transportation system. For more information about the Go831 Program, visit <http://www.go831.org/> or contact TAMC's Go831 Smart Commute Coordinator, Tracy Burke Vasquez at tracy@tamcmonterey.org.
2. TAMC supports the integration of bicycle and pedestrian elements in the project area to promote comfortable and safe travel of bicyclists and pedestrians, from intersections and crosswalks, sidewalks and bicycle facilities. Please identify the bicycle and pedestrian routes that link the surrounding parking facilities and nearby land uses, including student housing developments, to the events at the Stadium. Our Agency further encourages the Stadium to install high visibility features at pedestrian crossings in addition to clear wayfinding signage for bicyclists and pedestrians.
3. The Agency requests justification for the assumption presented in the VMT Sensitivity Analysis that "75 percent of spectators [will arrive] in carpool vehicles with at least 3.5 persons per vehicle" (pg. 22). We believe that this figure is overestimating the amount of carpool vehicles and the occupancy of those vehicles.
4. The Agency requests that the environmental document include an evaluation of traffic safety impacts that Stadium events may present to the on and off ramps on State Route 1, State Route 156 and State Route 68 (e.g., identify locations where queues extend beyond storage capacity and are expected to block through movements on Caltrans facilities). Please coordinate with Caltrans to examine transportation safety impacts of the project on the State Highway System.
5. The Agency appreciates the support of CSUMB on the SURF! Busway and Bus Rapid Transit Project and the Fort Ord Regional Trail and Greenway project and suggests that the Stadium support the construction of these projects, since they will facilitate multimodal access to the Stadium and CSUMB at large.
6. The Agency strongly encourages coordination with Monterey-Salinas Transit on current, planned and future transit connections to the Stadium. Monterey-Salinas Transit's *Designing for Transit Guideline Manual* ([linked here](#)) should be used as a resource for accommodating existing and future transit access to the project site.

7. The Agency supports integration of secure bicycle parking and shared mobility resources on the project site. Bicycle racks should be placed near building entrances, and the development should ensure bike lockers and bike racks have adequate lighting to improve safety and visibility. TAMC's Dockless Shared Mobility resources are available online to support implementation of CSUMB's scooter share program:
<https://www.tamcmonterey.org/dockless-shared-mobility>
8. Consideration should be given to the installation of electric vehicle charging stations, as new construction provides an opportunity to install this needed infrastructure at a much lower cost.
9. The development will be required to pay a fair share contribution to the Regional Development Impact Fee program, to provide congestion relief from the effects of new development throughout Monterey County, including transportation improvements along the State Route 1 corridor.

C-9

C-10

C-11

Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Madilyn Jacobsen of my staff at madilyn@tamcmonterey.org or 831-775-4402.

C-12

Sincerely,



Debra L. Hale
Executive Director

LETTER C: TRANSPORTATION AGENCY FOR MONTEREY COUNTY

RESPONSE TO COMMENT C-1

This comment acknowledges that Transportation Agency for Monterey County (TAMC) staff reviewed the MND for the proposed project and summarizes the goals and objectives of the proposed project. This comment does not raise an environmental issue warranting a response under CEQA or comment on the adequacy of the Draft IS/MND. No further response is necessary.

RESPONSE TO COMMENT C-2

This comment states that the TAMC supports the development and implementation of a trip reduction program that incorporates a management and operation plan to minimize vehicle trips. TAMC recommends that additional strategies are adopted as Mitigation Measures. The Draft IS/MND includes the requirement to develop and implement a TMP with TDM strategies (Mitigation Measure TR-1, page 84 of the Draft IS/MND). The TMP will include a plan to reduce vehicle trips associated with the proposed project. CSUMB will consider the strategies proposed by TAMC in the development of the TMP and TDM and incorporate them as appropriate.

RESPONSE TO COMMENT C-3

TAMC appreciates the acknowledgment of the Go831 Program in the Draft IS/MND, which is designed to support the development of employer-based commuter trip reduction programs. This comment does not raise an environmental issue warranting a response under CEQA or comment on the adequacy of the Draft IS/MND. No further response is necessary.

RESPONSE TO COMMENT C-4

TAMC states that they support the integration of bicycle and pedestrian elements in the project area to promote alternative modes of transportation that are comfortable and safe. TAMC requests that bicycle and pedestrian routes to the stadium are identified on-site and within the surrounding areas. TAMC also encourages the installation of high visibility features at pedestrian crossings and wayfinding signage for bicyclists and pedestrians. It should be mentioned that Mitigation Measure TR-1 of the Draft IS/MND requires CSUMB to implement robust TMP and TDM programs intended to manage personal vehicular, transit, bicycle and pedestrian modes of transportation and parking at the stadium during practices and games. CSUMB will evaluate the potential of adding high visibility features and wayfinding signage. No further response is necessary.

RESPONSE TO COMMENT C-5

TAMC requests justification regarding the assumption that “75 percent of spectators will arrive in carpool vehicles with at least 3.5 persons per vehicle.” TAMC states that this figure overestimates the number of carpool vehicles and the occupancy of those vehicles. As stated on page 14 of Appendix D, the Monterey Bay Football Club (MBFC) provided spectator vehicle share data for games, which equated to 77%. As a continuation of the United Soccer League (USL) Championship’s Fresno Football Club, the MBFC has considerable experience with monitoring vehicle occupancy at games and this data was generated by the MBFC’s experience in past seasons over several years with the USL.

Additionally, the Draft IS/MND includes a comprehensive set of mitigation measures that require the development and implementation of a robust TDM program that is intended to further reduce trip generation, validate the VMT assumptions in the Draft IS/MND through monitoring of event attendance, and provide a

clear trigger for subsequent CEQA review if needed (see Section 4.17, Transportation, pp. 84-88 of the Draft IS/MND).

Specifically, Mitigation Measure TR-1 requires the development and implementation of a management and operating plan for shifting employees, team personnel, match spectators, and CSUMB visitors from driving alone to using transit, carpooling, cycling, and walking modes, while providing safe and convenient access for employees and spectators, prior to opening day of the MBFC Season. The measure contains clear performance standards (i.e., numeric thresholds for daily VMT per service population, annual vehicle trips, and annual project-generated VMT).

Mitigation Measure TR-2 requires monitoring of CSUMB-Community and MBFC home game events with respect to mode share, average vehicle, occupancy, and average vehicle distance traveled. This measure, which is to be implemented for the life of the project, is intended to ensure that the VMT threshold is not exceeded, validate the effectiveness of the TDM program, and indicate the potential need for additional TDM measures.

Mitigation Measure TR-3 requires a TMP with the TDM program, and is meant to achieve a reduction on automobile dependency through education, assistance, and incentives, the establishment of clear vehicular, bicycle, and pedestrian circulation, as well as circulation and access for event-supporting vehicles, on event days; manage parking; ensure sufficient personnel staff events; and other measures intended to support the TMP goals of not exceeding the numeric thresholds for daily VMT per service population, annual vehicle trips, and annual project-generated VMT.

Mitigation Measure TR-4 requires, as part of the TDM program for the proposed project, reliance on the existing CSUMB TDM program to reduce vehicle travel, and requires the measures to be in place prior to opening day of the MBFC season and thereafter.

Mitigation Measure TR-5 requires and defines the protocol for monitoring of each game and Campus-Community Event to ensure activities meet the anticipated primary performance standard (project generated VMT per service population), annual travel supporting performance standards (annual project generated VMT, and annual vehicle trips) and event-specific supporting performance standards (mode share, average vehicle occupancy and average vehicle distance). An annual monitoring memorandum is required to be submitted to CSUMB staff. The measure also requires additional trip-reduction measures in the event that these performance measures are not met.

Mitigation Measure TR-6 allows for CSUMB to develop an alternative regionwide monitoring approach in the event this is found to be more effective.

Finally, Mitigation Measure TR-7 identifies triggers for, and requires implementation of, remedial actions and triggers for subsequent environmental review in the event that monitoring reveals the anticipated primary performance standards are not being achieved (project generated VMT per service population), annual travel supporting performance standards (annual project generated VMT, and annual vehicle trips) and event-specific supporting performance standards (mode share, average vehicle occupancy and average vehicle distance).

RESPONSE TO COMMENT C-6

This comment requests that the environmental document include an evaluation of traffic safety impacts that Stadium events may present to the on and off ramps on State Route 1, State Route 156, and State Route 68. Additionally, TAMC recommends coordination with Caltrans regarding transportation safety impacts on State Highway Systems. As discussed in Response to Comment A-3, Caltrans was consulted on the proposed project on May 14, 2021, and Caltrans did not express any concerns regarding transportation safety or impacts on the State highway facilities. Furthermore, Caltrans provided a comment letter in support of the proposed project (please see Letter A).

RESPONSE TO COMMENT C-7

TAMC acknowledges the support of SURF! Busway and Bus Rapid Transit Project and the Fort Ord Regional Trail and Greenway Project. TAMC suggests that the proposed project support the construction of these various transportation projects. As this comment does not raise an environmental issue warranting a response under CEQA or comment on the adequacy of the Draft IS/MND, no further response is necessary.

RESPONSE TO COMMENT C-8

TAMC encourages coordination with MST on current, planned, and future transit connections to the project site. Mitigation Measure TR-4 (pg. 87 Draft IS/MND), TDM Program, addresses measures that when implemented would reduce CSUMB student, faculty, and staff vehicle travel and states, “Monterey Salinas Transit (MST) – The campus has entered into an annual agreement with MST that provides universal access on the MST bus network for all active CSUMB ID cardholders, three supplemental campus-serving and subsidized bus routes, and funding for a shared transit marketing student intern.” Furthermore, opportunities for collaboration and ongoing communication between MST and CSUMB will be maintained throughout the planning process for both the TMP/TDM Programs.

RESPONSE TO COMMENT C-9

TAMC states that they support the integration of secure bicycle parking and shared mobility resources on the project site. Furthermore, bicycle racks should be placed near building entrances, and the development should ensure bike lockers and racks have adequate lighting to improve safety and visibility. Mitigation Measure TR-4, TDM Program, addresses this comment with the “Bicycle Storage and Amenities” component. In addition, several hundred bicycle racks have been installed on the campus outside of residence halls and popular academic, recreation, and administrative buildings. Additional secure bicycle storage bunker is also available on campus. This infrastructure encourages and supports the existing CSUMB TDM program to reduce CSUMB student, faculty, and staff vehicle travel. Additional planning to support bicycle parking and shared mobility resources will be addressed through Mitigation Measure TR-1 and TR-3, TMP Objectives.

RESPONSE TO COMMENT C-10

This comment suggest consideration be given to the installation of electric vehicle charging stations. The proposed project would not include the installation of electric vehicle charging stations at or near the project site. However, electric vehicle charging stations are available at two other locations on the CSUMB campus, and are available for public use.

RESPONSE TO COMMENT C-11

This comment states that development will be required to pay a fair share contribution to the Regional Development Impact Fee program. While the Fort Ord portion of TAMC's fee was historically a part of the Fort Ord Reuse Authority Community Facilities District (CFD) fee, as a State entity, CSUMB is not subject to local jurisdictional development impact fees, including the CFD fee, for academic projects.

RESPONSE TO COMMENT C-12

TAMC acknowledges the opportunity to comment on the proposed project. As this comment does not raise an environmental issue warranting a response under CEQA or comment on the adequacy of the Draft IS/MND, no further response is necessary.



August 9, 2021

California State University Monterey Bay
Attn: Marcel Forte, Associate Vice President for Facilities Management
Building 37
100 Campus Center
Seaside, CA 93955

RE: Freeman Stadium Facilities Renovation Project - Marina Coast Water District (MCWD)
comments regarding the Draft Initial Study/Mitigated Negative Declaration (IS/MND)
dated July 2021

Dear Mr. Forte,

Marina Coast Water District (MCWD) is pleased to provide comments on such an exciting project for the CSU Monterey Bay (CSUMB) campus. MCWD is committed to supporting the growth of the CSUMB community as their water, recycled water and wastewater collection service utility partner.

D-1

The District believes in the vision of CSUMB that includes “a model pluralistic academic community where all learn and teach one another in an atmosphere of mutual respect and pursuit of excellence; a faculty and staff motivated to excel in their respective fields as well as to contribute to the broadly defined university environment.” To assist the campus in meeting this vision, the MCWD submits these comments on the Freeman Stadium Facilities Renovation project and stands ready to support the project as part of our service to CSUMB and our greater community.

As you know, MCWD provides water production, treatment, and distribution utility services as well as wastewater collection utility service where CSUMB’s Freeman Stadium Facilities Renovation Project is proposed. The IS/MND proposes an increased water demand of approximately 1.26 AFY and an increased wastewater generation of approximately 1.02 AFY.

It appears that the IS/MND includes an assessment of water and wastewater capacity only and does not include assessments for water and wastewater facility condition and/or re-location. Therefore, we find it difficult to support the current *Less Than Significant Impact* designation. The existing water and wastewater facilities will be impacted by the proposed project and until additional assessments and associated mitigation measures are included in the IS/MND those outstanding issues remain a difficulty the CEQA document must overcome.

D-2

To ensure that any proposed development avoids the creation of potential environmental impacts when constructing new water and wastewater collection facilities, MCWD published the attached *In-Tract Water and Wastewater Collection System Infrastructure Policy* (In-Tract Policy). MCWD believes that water and wastewater facility impacts are *Less Than Significant Impact with*

D-3

Mitigation Incorporated in the CSUMB’s IS/MND for the Freeman Stadium Facilities Renovation Project if the District’s In-Tract policy is incorporated by reference or as an attachment in the IS/MND.

↑
D-3

The addition of MCWD’s In-Tract Policy assures the following potential environmental impact issues are addressed:

D-4

- Replaces existing water and sewer lines and appurtenances that are at the end of their useful service life
- Prevents leaking water pipes wastes water
- Aging infrastructure is less likely to be stable during/after seismic events
- Replace undersized pipes (8-inch minimum) to provide adequate fire flows
- Hydrant spacing may be outdated and not adequate
- The existing water system may contain lead joints and asbestos-cement pipe that this project may need to properly abandon
- All water system infrastructure needs to be in road rights-of-ways or recorded easements for MCWD to be able to adequately access facilities as necessary to operate, monitor, and maintain facilities
- Replaces sewer lift station(s) may be at or near the end of the facility’s service life
- All wastewater collection system infrastructure needs to be in road rights-of-ways or recorded easements for MCWD to be able to adequately operate, monitor, and maintain facilities
- Water and sewer pipelines need to have minimum separation from each other and from other underground utilities such as high-pressure gas lines
- Water and sewer facilities cannot have structures, trees, or other impediments to access the facilities as necessary for maintenance and repairs

MCWD recommends that the IS/MND be updated to include:

D-5

1. A check in the box on page 21 for Utility / Service Systems
2. Change XIX(a) *Thresholds per CEQA Appendix G: Environmental Checklist* on page 92 from *Less Than Significant Impact* to *Less Than Significant Impact with Mitigation Incorporated*
3. Change XIX(c) *Thresholds per CEQA Appendix G: Environmental Checklist* on page 92 from *Less Than Significant Impact* to *Less Than Significant Impact with Mitigation Incorporated*

MCWD’s concerns regarding potential environmental impact(s) from increased water and sewer utility demands associated with this project and the potential water waste from leaking reused water mains and/or sanitary sewer leakage or overflow(s) due to sewer deficiencies and would be mitigated by adherence to the MCWD’s attached In-Tract policy.

D-6

We look forward to working with CSUMB in support of the University’s desire to improve its facilities and provide additional services to the community the District serves. This project represents a major step forward in the development of not only the campus but the continuing reuse of the former Ft. Ord and improves the overall safety of its infrastructure and the community.

D-7
↓

If you have any questions, please feel free to contact me at (831) 883-5951 or by email at pbreen@mcwd.org ↑ D-7

Sincerely,



Patrick Breen
Water Resources Manager

Attachment: MCWD In-Tract Water and Wastewater Collection System Infrastructure Policy
c: file

| D-8

Marina Coast Water District Water/Wastewater Systems

**In-Tract Water and Wastewater Collection System
Infrastructure Policy**

By
Marina Coast Water District



January 2004

Marina Coast Water District In-Tract Water and Wastewater Collection System Infrastructure Policy

Summary

During the last 10 to 15 years, an increasing number of studies nationwide have confirmed that water and sewer infrastructure replacement costs are soaring. Water pipe replacement costs alone are estimated to be \$1.7 billion per year nationwide, and numerous other studies add to the sense of urgency to improve the nation's underground infrastructure. The infrastructure found on the former Fort Ord is no exception. Much of the water and wastewater collection systems infrastructure is estimated to be 50 years old and integrity and performance issues have already been documented.

Under the Water/Wastewater Facilities Agreement between the District and the FORA, the District is responsible for the successful operation and maintenance of the water and wastewater collection systems on the former Fort Ord, as well as improvements to the systems as FORA reasonably determines are necessary. In an effort to assure the successful redevelopment of the former Fort Ord, the District may cause to be planned, designed, and constructed any other facilities as the District reasonably determines may be needed to carry out the goals as established by FORA.

Systems Age

The former Fort Ord water and wastewater collection systems are on average estimated to be 40 to 50 years old and are nearing the end of their useful life. From this point forward, the systems will continue to deteriorate at an unpredictable pace. A majority of all valves are experiencing failure. Many of the service taps (laterals connecting to mains) have been found to be leaking due to poor construction. Pipelines will increasingly become more brittle over time.

The District implemented a preventative maintenance program to enable a systematic approach to pipeline maintenance. However, when operation and maintenance crews continue to repair or replace components of a system that continues to fail unpredictably, the success of a prudent preventative maintenance program cannot be realized.

Water Infrastructure System

FORA and the District depend on the ability to extract and deliver up to 6,600 afy of groundwater from the Salinas River groundwater basin in accordance with a FORA-approved water allocation plan for land use jurisdictions.

The majority of water use in the Ord Community service area is estimated because meters have not yet been installed on residences. Within the overall water allocation for all jurisdictions, 532 afy (or 8 percent of 6,600 afy) is presently estimated and assigned as water loss. (Industry standards for water loss range from 6% to 15% and include water lost due to water line breaks, fire hydrant use, construction water, etc.) The District accepts its responsibility as the steward of the significantly important water resources in support of FORA's redevelopment plan, and will work to minimize water loss. The District has established a water loss goal of 5 percent from

water leaks. To achieve this goal, water use will need to be accurately measured and distributed through a watertight system

Wastewater Collection System

The District is responsible for maintaining a system free from sewage overflows. Much of the collection system was not constructed to current design standards and is showing signs of aging. It is difficult to determine the failure rate of an aging system as pipelines lose integrity over time. Sewage spills (overflows) is one of the symptoms of system failure. During 2002, the District experienced 15 sewage spills. Many of the spills occurred within redevelopment areas.

The District completed its Wastewater Master Plan for the Ord Community service area in 2001 which included visually inspecting (via video) many of the collection lines and connections. The Plan describes a system that requires an aggressive and costly collection pipe replacement program.

As the collection system continues to experience problems, the District is subject to increasingly tighter regulatory control that will not tolerate sewage spills. Per recent sewer system maintenance regulations promulgated by the California Regional Water Quality Control Board, the District is required to minimize sewage overflows. Given that the sewage system is not constructed to today's design standards, overflows are expected to continue to occur at an accelerated pace. By replacing components of the aging wastewater collection system, the District will be able to keep its permits in good standing and improve upon overall maintenance costs to customers.

Capital Improvement Program

The District is making every effort to keep rates affordable for our customers. With monthly water and wastewater collection rates already on the high end for this region, additional District-funded (in-tract) capital improvements would cause the rates to escalate further, adding to the burden on potentially low to middle income customers in an area where low-income housing is strongly encouraged. Requiring developers to be responsible for in-tract capital improvements to the water system and wastewater collection system would help contain District rates while ensuring the systems are progressively brought up to standard.

Pipelines Relocated from Planned Lots of Record and Planned Improvements

Upon conveyance, the District agreed to accept the systems "as-is" and "where-is". To address right of way issues to decrease District exposure to liabilities due to systems maintenance and/or repair, we must assure that new pipelines planned in redevelopment areas are not constructed to conflict with planned lots of record or planned improvements. Examples of planned improvements include structures, roads, landscape areas, walkways, parking facilities, etc. The District will work to relocate all systems within public easements, e.g. roadway easements. Better access to systems infrastructure will result in more cost effective repairs and reduced liability to the District.

In conclusion, an in-tract water and wastewater collection system infrastructure policy that clearly establishes requirements for developers to bring systems components to industry standards during redevelopment projects is supportive of District responsibilities to FORA and to our customers.

In-Tract Infrastructure Policy

For all proposed redevelopment projects in areas served by existing water and wastewater collection infrastructure, the developer will be required to implement one of the following procedures:

1. Where redevelopment will raze the existing buildings and streets:
 - Developer completes a subdivision water and sewer master plan per the District standards.
 - Developer replaces all existing water and wastewater collection pipelines and components within the project area to District standards, and replaces all existing water and wastewater collection pipelines and components adjacent to the project area to District standards, as project impacts necessitate.
 - Developer provides meter boxes for all structures and landscaping.
 - Developer provides for District's installation of remote read meters.

2. Where redevelopment will use existing buildings and infrastructure or will raze or remodel a portion or all of the existing buildings but streets and existing infrastructure will remain:
 - Developer completes a subdivision water and sewer master plan per the District standards. This subdivision master plan would include a physical and design standard condition assessment of the systems per District standards. The subdivision master plan must be approved by the District prior to receiving water and sewer service.
 - From the subdivision master plan, the Developer replaces components as required by the District.
 - Developer relocates the District's backbone water/sewer infrastructure (infrastructure that serves other upstream and downstream users) onto roadway right of way, as necessary.
 - When the Developer is planning to construct improvements, including, but not limited to, structures, landscape areas, walkways, parking facilities, etc., over existing water and sewer infrastructure, then the Developer is responsible to relocate existing water/sewer infrastructure away from under proposed improvements.
 - The developer will enter into a separate utility agreement with the District to provide for anticipated higher maintenance costs of the remaining older systems that will be left in place.
 - The separate utility agreement will include an annual water and wastewater collection inspection report to be completed by the Developer or its successor in accordance with District standards. That agreement will require the developer to provide an annual wastewater collection system, water system inspection report in accordance

with District standards and to provide master meters for the project. The water inspection report will include a water audit.

- Developer provides meter boxes for all structures and landscaping.
- Developer provides for District's installation of remote read meters.

LETTER D: MARINA COAST WATER DISTRICT

RESPONSE TO COMMENT D-1

The comment is introductory and affirms the Marina Coast Water District's (MCWD) commitment to supporting the growth of California State University, Monterey Bay and its readiness to support the proposed project as the provider of [domestic] water, recycled water, and wastewater collection services to the campus. It restates a portion of the university's own founding vision statement from its website. It confirms that MCWD is responsible for water production, treatment, and distribution as well as wastewater collection for the proposed project, and restates water demand and wastewater generation figures from the Draft IS/MND Project Description. The comment does not raise an environmental issue warranting a response under CEQA or address the adequacy of the Draft IS/MND and no further response is necessary.

RESPONSE TO COMMENT D-2

The comment states that the Draft IS/MND includes assessments only of water and wastewater [utility] capacity and does not address facility condition and/or re-location. The comment further states that "[t]he existing water and wastewater facilities will be impacted by the proposed project" and that additional assessments and associated mitigation measures are needed in the Draft IS/MND.

The Draft IS/MND addresses the conditions of water and sanitary sewer infrastructure, as quoted below, and provides citations to further analysis of water and sanitary sewer utility capacity contained in the 2007 Master Plan EIR and a Sanitary Sewer Capacity Analysis prepared by Whitson Engineers in 2019, both of which are explicitly incorporated by reference into the Draft IS/MND.

Specifically, the Draft IS/MND states the following regarding water infrastructure on p. 93, in Section 4.19, Utilities and Service Systems (shown as amended in this Final IS/MND):

"The 2007 Master Plan EIR examined existing infrastructure for campus buildout. While several components of existing water system infrastructure were identified as being deficient and would require replacement and/or improvement at the time the 2007 Master Plan EIR was prepared, infrastructure has since been improved."

The Draft IS/MND further states the following regarding sanitary sewer infrastructure on p. 93, in Section 4.19, Utilities and Service Systems:

"In May 2019, as requested by CSUMB, Whitson Engineers conducted a Sanitary Sewer Capacity Analysis. The analysis was prepared based on water use information obtained from records of MCWD billings to CSUMB, MCWD system maps and as-built plans, and proposed Master Plan concept figures. More specifically, wastewater flow generation, existing and future dry and wet weather flow rates, infiltration into the sanitary sewer system of surface runoff, inflow factors, peaking factors, and flow depth were assessed based on the MCWD Procedure and Design Requirements. The 2016-2017 Loading data was used to determine existing conditions for the analysis. Per this data, the Field House generates 211 GPD of wastewater under existing conditions. The current project proposes the renovation of 2,000 GSF of space within the existing Field House, including the installation of new showers, sinks, and other locker room fixtures to accommodate increased use by the MBFC and visiting teams, and a new beer garden. As a result of these improvements, the project would generate an additional 37 GPD of wastewater over existing conditions. Based on the analysis prepared by Whitson Engineers, Collector N has sufficient capacity for the anticipated increase in wastewater as a result of the project."

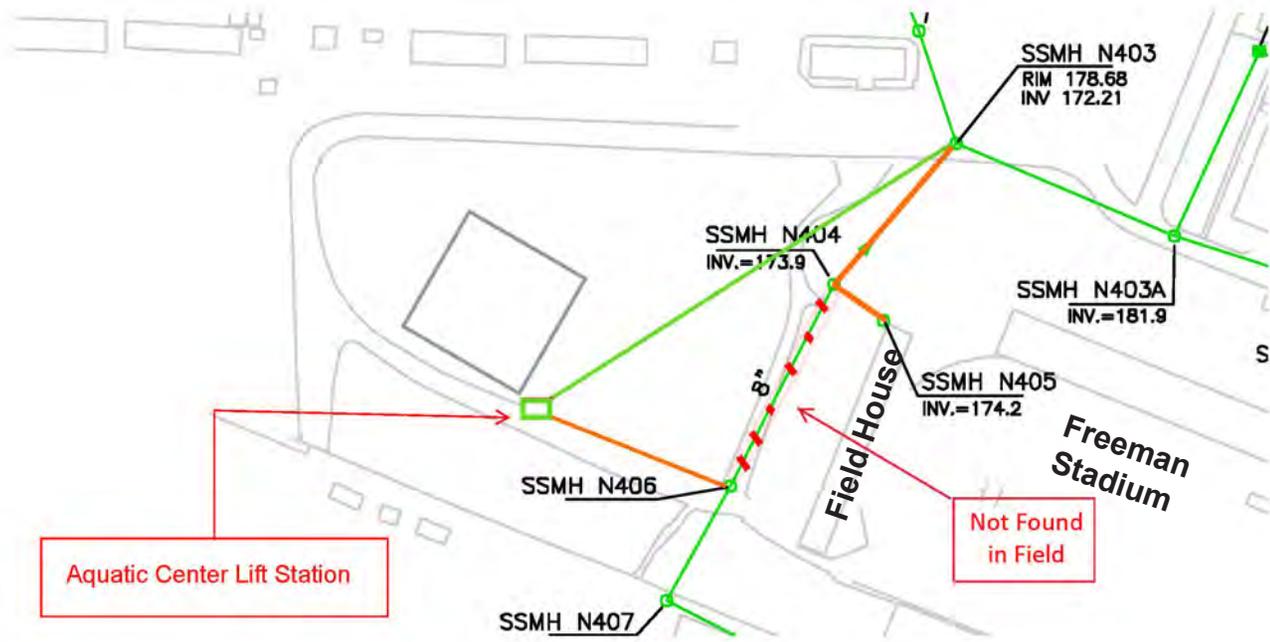
The 2019 Sanitary Sewer Capacity Analysis cited by the Draft IS/MND states in its Executive Summary,

“The results of the analysis including flows from planned future campus growth also show that adequate capacity exists in the pipe collectors with flow depths less than the MCWD maximum criteria, with the exception of one pipe segment in Collector H [between Manholes H316 and H317]. With the exception of the two items described above [Collector H between Manholes H316 and H317 and an expandable lift station constructed as part of Promontory student housing], all other MCWD pipe facilities within the main campus are shown to be adequately sized to accommodate CSUMB’s plans for future campus growth.”

With respect to the capacity of the sanitary sewer infrastructure serving the project site, an Addendum to the 2019 Sanitary Sewer Capacity Analysis prepared in May 2020 reviewed future growth on the CSUMB campus as proposed in the Draft 2017 Campus Master Plan, which included approximately 50,000 net new square feet of athletic and recreational facilities. Based on review of all pipe lengths, sizes, and inverts used for the analysis obtained from MCWD, system maps, and campus as-built plans. The 2020 Addendum concluded that the entirety of the campus sanitary sewer system had ample capacity to serve the campus’s future growth. The 2020 Addendum specifically concluded that the capacity deficiency cited in the 2007 Master Plan EIR and in the 2019 Sanitary Sewer Analysis report in Collector H between Manholes H316 and H317 was mistakenly identified based on a drawing error in a MCWD map and that no deficiency exists in that line. (Whitson Engineers, Addendum – Sanitary Sewer Capacity Analysis, California State University, Monterey Bay, May 2020). The modest increase in wastewater generated by the Field House as the result of the Freeman Stadium Facilities Renovation project is well below that assumed in the 2020 Addendum for the future athletic and recreational facilities square footage increase, and, therefore, would be accommodated by the existing sanitary sewer system serving the project site.

Collector N is the portion of the existing sanitary sewer system that serves the project site. In addition to commissioning the 2019 Sanitary Sewer Capacity Analysis, CSUMB investigated the physical condition of Collector N in June 2021 as part of preparation of the Draft IS/MND and plans for the Freeman Stadium Facilities Renovation Project. In 2007, in consultation with the MCWD, the campus replaced the portion of on-campus Collector N sanitary sewer infrastructure between manholes N405, where the project would connect to the system, and manhole N403, as shown in **Figure 1** of this Appendix. This line was visually inspected by camera and based on this inspection was determined to be in excellent condition (communication with Mike Lerch, Director of Energy and Utilities, Energy Management Services, CSUMB, August 2021; Inspection Report, Sections 1 through 6, prepared by Greenline, June 16, 2021; and Monterey Bay FC Facilities Renovation Civil Existing Condition Map, verified by Greenline, May 2021) (**Attachment 1** to this Appendix). Accordingly, no replacement or relocation of the existing sanitary sewer line serving the project site is warranted.

CSUMB has constructed several new water pipelines in the immediate project vicinity and serving the project site in recent years, as shown in **Figure 2** of this Appendix. In 2002, when the university constructed its Aquatic Center, it constructed an approximately 400-foot water pipeline between the Aquatic Center meter (at the northern edge of the landscaped area containing the Aquatic Center) and the existing MCWD water distribution pipeline in Divarty Street to the north. In 2007, when the university remodeled the existing Field House, in cooperation with MCWD, it constructed an approximately 200-foot water pipeline from the Field House to the 400-foot water pipeline constructed in 2002 between the Aquatic Center meter and MCWD line in Divarty Street, as well as a fire hydrant at the edge of the Field House parking lot. These new lines replaced existing MCWD infrastructure shown in **Figure 2**. At the time those improvements were made, the university also constructed new lateral pipelines from the Aquatic Center and the Field House, respectively, to the new 400-foot and 200-foot lines. Therefore, the existing water pipelines serving the project site (i.e., between the project site and the MCWD distribution line in Divarty Drive) date only to 2002 and 2007; the typical design life of a water pipeline is approximately 70 years (communication with Mike Lerch, Director of Energy and Utilities, Energy Management Services, CSUMB, August 2021). No replacement or relocation of the existing water pipelines serving the project site is warranted.



- Existing Sanitary Sewer System
- Replaced by CSUMB in 2007



Title: **Existing Sanitary Sewer System**

Source: 2021 Google Imagery AMBAG, MCWD 2005, CSUMB 2021

Date 9/02/2021
 Scale N/A
 Project 2020-45



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Figure
1



Title: Existing Water System

Source: 2021 Google Imagery AMBAG, MCWD 2005, CSUMB 2021

Date 8/24/2021
 Scale N/A
 Project 2020-45



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Figure
2

New infrastructure serving the project, such as the proposed 800-foot, 8-inch sanitary sewer line and 800-foot, 2.5-inch domestic and irrigation water lines to be owned by CSUMB that would connect to the stadium and extend to the beer garden, would require trenching, as stated on p. 12 of the Draft IS/MND under “Construction.” Trenching and other ground-disturbing activities would be subject to the regulatory requirements applicable to construction-related air emissions and set forth in the Draft IS/MND. The project would also be subject to the mitigation measures contained in the Draft IS/MND applicable to biological resources, archaeological resources, and tribal cultural resources, and mitigation measures contained in the MMRP for the 2007 Master Plan EIR, which all campus projects are required to implement. No other environmental impacts were identified or are anticipated as the result of ground disturbance for the Freeman Stadium project, including utility trenching, and therefore no additional mitigation is required.

The commenter states that “we find it difficult to support the *Less than Significant Impact* designation.” At the outset, it should be noted that CEQA is only concerned with physical changes to the existing environment (CEQA Guidelines Section 15064). In the context of utilities and service systems, the relevant question is whether the project would “require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, ... the construction or relocation of which could cause significant environmental effects” (CEQA Guidelines, Appendix G, Section XIX(a)). Here, however, MCWD has not provided any evidence to support its claim that the existing water or sanitary sewer infrastructure serving the proposed project is deficient and in need of replacement or relocation, or that the replacement or relocation of such infrastructure would result in significant environmental impacts. As MCWD owns and operates all water supply lines on the campus upstream of the meters including the line currently serving the project site and all sanitary sewer lines excluding sewer laterals extending to facilities, MCWD is responsible for maintaining such lines in good condition. The existing stadium and field house currently use 0.17 acre feet per year (AFY) for CSUMB athletic uses and events and the project would only require 1.2, which is well within the campus’s existing water allocation of 1,035 AFY. The project site is already equipped with a 2-inch domestic water meter and a 2-inch irrigation water meter that together accommodate 515.2 AFY; the project would use approximately 1.26 AFY for domestic and irrigation needs (see Section 4.10, Hydrology and Water Quality, checklist questions a-c), p. 69, and Section 4.19, Utilities and Service Systems, checklist question a), in the Draft IS/MND). Accordingly, the project-related increase in water demand is not anticipated to require the replacement or relocation of existing water lines serving the project site.

The Draft IS/MND, including technical analysis in the 2007 Master Plan EIR and the 2019 Sanitary Sewer Capacity Analysis which the Draft IS/MND incorporates by reference, and the information provided above concerning the campus’s recent replacement of the portion of the Collector N sanitary sewer line serving the project site and the construction in 2002 and 2007 of new water pipelines serving the project site, provide detailed assessments of both the capacity and condition of existing water and sanitary sewer infrastructure. Based on these sources and assessments, the capacity and condition of this infrastructure were appropriately determined adequate to serve the project in the Draft IS/MND.

RESPONSE TO COMMENT D-3

The comment states that MCWD’s In-Tract Water and Wastewater Collection System Infrastructure Policy is intended to ensure that any proposed development avoids the creation of potential environmental impacts when constructing new water and wastewater collection facilities, and requests inclusion of the policy in the Draft IS/MND as mitigation.

The MCWD’s In-Tract Water and Wastewater Collection System Infrastructure Policy contains, under Item 1 on p. 4, requirements applicable to redevelopment when buildings and infrastructure are proposed to be razed, which is not the case for the proposed project and is, therefore, inapplicable.

Item 2 on p. 4 of the In-Tract Infrastructure Policy presents requirements applicable to the use or remodeling of existing buildings and infrastructure where streets and infrastructure will remain, as is the case for the

proposed project. Contrary to MCWD’s characterization in its comment letter, these stipulations are not mitigation for environmental impacts, but instead represent procedures pertaining to the responsibility for and placement of relocated infrastructure or newly constructed infrastructure for ease of future access and maintenance. Moreover, no project-related impacts to existing water or sanitary sewer infrastructure or need for infrastructure replacement or relocation were identified in the Draft IS/MND, apart from the need for two new 800-foot domestic and irrigation water lines and an 800-foot sanitary sewer line that would connect the stadium and proposed beer garden component to existing infrastructure.

The comment states that the In-Tract Water and Wastewater Collection System Infrastructure Policy ensures “potential environmental impact issues are addressed.” However, MCWD has not provided any evidence to support its claims that the existing water or sanitary sewer infrastructure serving the proposed project is deficient and in need of replacement or relocation, or that replacement or relocation of such infrastructure would, in turn, result in significant environmental impacts. Accordingly, no additional mitigation measures are warranted.

Moreover, MCWD does not specify what project-specific environmental impacts its In-Tract Water and Wastewater Collection System Infrastructure Policy would address and mitigate. The bulleted list of “potential environmental impact issues” presented in the comment, and MCWD’s In-Tract Water and Wastewater Collection System Infrastructure Policy itself, are not mitigation measures for environmental impacts, but instead represent a mix of best management practices recommended as part of routine maintenance or decisions to upgrade infrastructure for reasons of water or cost savings or public health (e.g., prevent leaks, undertake proper abandonment of lines containing lead or asbestos cement) and MCWD’s policies governing the construction new infrastructure.

RESPONSE TO COMMENT D-4

As stated in the response to Comment D-3, the Draft IS/MND determined that the proposed project would not require the replacement or relocation of existing water or sanitary sewer infrastructure serving the project site and would require only the construction of two new domestic and irrigation water lines and a sanitary sewer line extending to the stadium and proposed beer garden. As noted in the response to MCWD’s comment D-2, environmental impacts potentially resulting from trenching and other ground-disturbing activities would be subject to the regulatory requirements applicable to construction-related air emissions and set forth in the Draft IS/MND; the mitigation measures contained in the Draft IS/MND applicable to biological resources, archaeological resources, geology and soils, and tribal cultural resources; and mitigation measures contained in the MMRP for the 2007 Master Plan EIR, which all campus projects are required to implement.

As discussed in detail in the response to Comment D-2, the existing domestic water and sanitary sewer lines that would serve the proposed project were determined in the Draft IS/MND to be relatively new and adequate in terms of condition and capacity, and leaks from either set of lines are unlikely, and unlikely to result in significant environmental impacts. The conditions cited in the comment, “leaking reused water mains and/or sanitary sewer leakage or overflows” are not anticipated as a result of project implementation and do not constitute significant environmental impacts requiring mitigation, but rather routine maintenance issues. CSUMB is responsible for maintaining the water and wastewater lines serving the project site and is obligated to maintain water and sanitary sewer infrastructure in good condition and in compliance with MCWD standards. Water lines are metered and should a major leak occur, it would be detectible through increased water usage as indicated by the water meter.

RESPONSE TO COMMENT D-5

The comment recommends that the Draft IS/MND’s Appendix G environmental impact checklist checkboxes be updated to reflect the agency’s opinion that Utilities and Service Systems should be designated as “Less Than

Significant with Mitigation Incorporated” and that the responses to the two checklist questions related to water and wastewater utility infrastructure should be similarly updated.

As explained in the responses to Comments D-2, D-3, and D-4, the Draft IS/MND appropriately designated impacts for these environmental issues as Less Than Significant, based on the information contained in the Draft IS/MND in response to those questions, the information contained in the 2007 Campus Master Plan Update and 2019 Sanitary Sewer Capacity Analysis and 2020 Addendum to that report, which are incorporated by reference into the Draft IS/MND, and the additional discussion provided in these responses to MCWD’s comments. No change to the Draft IS/MND is warranted.

RESPONSE TO COMMENT D-6

MCWD provided a copy of its In-Tract Water and Wastewater Collection System Infrastructure Policy as an attachment to their comment letter. As stated in the response to Comment D-2, the Draft IS/MND appropriately designated impacts related to water and wastewater infrastructure as less than significant, based on substantial evidence in the Draft IS/MND and elsewhere in the project record that the existing such infrastructure serving the project site is relatively new and has been determined to have adequate capacity for the proposed project and to be in good condition. No mitigation measures are warranted.

Furthermore, as discussed in the response to Comment D-3, MCWD has not provided any evidence to support its claims that the existing water or sanitary sewer infrastructure serving the proposed project is deficient and in need of replacement or relocation, or that replacement or relocation of such infrastructure would, in turn, result in significant environmental impacts. Moreover, MCWD does not specify what project-specific environmental impacts its In-Tract Water and Wastewater Collection System Infrastructure Policy would address and mitigate. Finally, the In-Tract Water and Wastewater Collection System Infrastructure Policy does not contain mitigation measures for environmental impacts, but rather a mix of best management practices related to routine maintenance or decisions to upgrade infrastructure for reasons of water or cost savings or public health, as well as policies guiding the construction new infrastructure.

RESPONSE TO COMMENT D-7

The comment represents the closing salutation to MCWD’s comment letter and cites the project as a major step forward in the development of the campus and continued reuse of Fort Ord, and an improvement in the overall safety of its infrastructure and community. This comment does not raise an environmental issue warranting a response under CEQA or address the adequacy of the Draft IS/MND, and no further response is necessary.

RESPONSE TO COMMENT D-8

This comment is an attachment to MCWD’s comment letter and contained the MCWD In-Tract Water and Wastewater Collection System Infrastructure Policy. See comment D-6 for a response to the provision of this attachment and MCWD’s request for its inclusion by reference as mitigation in the Draft IS/MND.



August 9, 2021

Dear Mr. McCluney:

On behalf of Monterey-Salinas Transit District (MST), please accept these comments in response to your request regarding the public draft of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Freeman Stadium Facilities Renovation Project at California State University, Monterey Bay (CSUMB). As Monterey County’s sole public transit operator, MST is excited to assist in welcoming a professional soccer team to our Central Coast area, and we are providing these comments to better facilitate bus service to the project and to assist in the named CEQA mitigations.

E-1

Background and Existing MST-CSUMB Services

Each school year, MST enters into an annual agreement with CSUMB to operate Lines 19, 25, and 26, which are typically scheduled to operate during the school year only using cutaway buses. The capacity of the bus is 18 passengers per vehicle, and these routes circulate on campus, between the main campus and east campus, and from campus to Salinas. MST also currently operates Lines 18 and 16 year-round, which connects the CSUMB campus to the community of Marina and provides connections to Monterey and Salinas via Line 20. However, since the COVID-19 pandemic, MST has faced numerous challenges in operations, and CSUMB has scaled back operations too, which has resulted in some service being scaled back. CSUMB has entered into an agreement with MST for only Fall 2021; atypical from the traditional contract, which typically covers services throughout the school year.

E-2

As part of its response to recovering from the COVID-19 pandemic, MST is evaluating its entire transit network through a planning initiative called a Comprehensive Operational Analysis (COA). The COA may also result in the cancellations of existing routes near the project area and addition of new services in other areas. The draft transit network plan will be available to the public in September 2021. Approval of the COA by MST’s Board of Directors is expected in late 2021

Environmental Impacts Relevant to MST

The IS/MND submitted evaluated transportation impacts per the CEQA Appendix G: Environmental Checklist. Potential environmental impacts subject to the operation of MST include those in the Transportation/Traffic section. The Checklist identified less than significant impacts with mitigation incorporated for the project, since it would a) conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and b) conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Under Vehicle Miles Traveled (VMT) thresholds set forth by the CEQA Guidelines, the proposed project would cause a significant project generated VMT impact if the VMT per service population for the CSUMB campus under existing with project conditions is greater than 23.91 (IS/MND page 79). According to the findings of the Initial Study, the project generated VMT per service population for this project is an overall VMT

E-3

Advocating and delivering quality public transportation as a leader within our community and industry.

of 28.12, which is above the threshold (IS/MND page 80). Even with carpools and less than maximum capacity crowds, the project generation rate would be 25.57 VMT, still resulting in a potentially significant VMT per service population impact (IS/MND page 83).

↑
E-3

Mitigation Measures Relevant to MST

Seven transportation mitigation measures are proposed as part of this IS/MND. MST generally concurs with all transportation mitigations and provides the following comments to the relevant mitigation measures listed below:

E-4

TR-1: The CSUMB campus shall develop and implement a Transportation Management Plan (TMP) with a Transportation Demand Management (TDM) Program component prior to the opening day of the MBFC season. MST should be a major stakeholder in the development of this plan and CSUMB should be required to include MST in all meetings, workshops, hearings, and activity in the development of this plan.

TR-3: The TMP with a TDM program shall address the following objectives for the MBFC and CSUMB special events:

E-5

- Reduce the overall number of automobile trips to and from the stadium and required parking supply;
- Identify the paths of vehicular circulation to and from the stadium for the various vehicle types that would need access to the site, including passenger vehicles, service and delivery vehicles, garbage/recycling trucks, taxis, buses, and emergency vehicles; and
- Identify sidewalk and crosswalk improvements near the project site.

To best support these mitigation measures, CSUMB, MBFC, and MST should explore a private-public partnership to enhance bus service and/or provide special bus service for games and other MBFC-related activity as part of this project mitigation. Improvements to MST service could be accomplished in the form of a contractual agreement to develop special routes, bus patterns, thoroughfare improvements, and span of service to ensure that automobile trips are reduced by providing convenient and accessible bus service to the stadium. Further details about how this bus service could be accomplished can be agreed upon through the TMP development process as mentioned in TR-1.

MST has also identified existing bus pull outs on General Jim Moore Blvd in the northbound and southbound travel direction that could serve as new bus stops, near the main entry to the stadium. As part of this project, CSUMB should develop sidewalk and crosswalk improvements to build these bus stops, provide safe street crossings, and provide access to the stadium using existing and/or proposed MST bus Lines or special services. Any new bus stops should be consistent with MST's Designing for Transit Guidelines (2020).

TR-4: As part of the CSUMB's existing TDM program, CSUMB has entered into an annual agreement with MST that provides universal access on the MST bus network for all active CSUMB ID card holders, three supplemental campus-serving and subsidized bus routes, and funding for a shared transit marketing student intern. According to the findings of the IS/MND, this is a minimum measure that is put in place already and will be in place prior to opening day

↓

of the MBFC and thereafter (IS/MND 86). Such an agreement should be revisited and revised with MBFC to enhance these services to better include the community that MBFC is serving. Any such revisions should be discussed in the as part of the TMP process mentioned in TR-1.

↑ E-5

TR-7: If the trip reduction target assumed in the IS/MND is not being met, the TDM program shall be updated to identify replacement and/or additional feasible TDM measures to be implemented. According to the findings of the IS/MND, such TDM measures shall include enhanced CSUMB TDM Program that would address travel by MBFC spectators and complement other multimodal infrastructure investments, transit mobility, and active mode (bicycle and pedestrian mobility). MST should be consulted by CSUMB and MBFC to provide input on infrastructure mobility and transit mobility enhancements, should the TMP and TDM programming monitoring results show that the trip reduction target assumed is not being met.

E-6

MST remains committed to the ongoing partnership with CSUMB to provide services throughout the University's school year and looks forward to a partnership with MBFC. Any questions, comments, or concerns can be addressed directly by me, and I welcome further conversations if needed.

E-7

Sincerely,



Sloan Campi

Planning Manager

LETTER E: MONTEREY-SALINAS TRANSIT

RESPONSE TO COMMENT E-1

This comment acknowledges the proposed project and gives appreciation for Monterey-Salinas Transit's (MST) opportunity to provide comments to better facilitate transportation services to the proposed project. This comment does not raise an environmental issue warranting a response under CEQA or address the adequacy of the Draft IS/MND, and no further response is necessary.

RESPONSE TO COMMENT E-2

This comment discusses the annual agreement between CSUMB and MST and highlights the various lines that provide service to the campus. The comment further states that due to COVID-19, MST has faced numerous challenges which have resulted in scaling back operations. The campus and MST have had annual agreements for over 10 years. CSUMB and MST recently signed a contract for the Fall 2021 academic semester and intends to negotiate a new agreement to be effective January 2022. Due to COVID-19, MST mentions that they are evaluating the entire transit network and changes to service routes could result. This comment does not raise an environmental issue warranting a response under CEQA or address the adequacy of the Draft IS/MND, and no further response is necessary.

RESPONSE TO COMMENT E-3

MST restates the conclusion of the Draft IS/MND that the project-generated vehicle miles traveled (VMT) per service population for the proposed project has an overall VMT of 28.12, which exceeds the threshold of 23.91. The comment further restates the conclusion of the Draft IS/MND that even with carpools and reduced visitors, the project-generated VMT would be 25.57. The Draft IS/MND acknowledges this (see page 83) and, as MST states in Comment E-4, provides mitigation measures to address this impact and reduce it to a less than significant level.

RESPONSE TO COMMENT E-4

This comment restates a portion of Mitigation Measure TR-1. This mitigation measure requires CSUMB to develop and implement a TMP and TDM program component prior to opening day of the MBFC season. MST suggests an amendment to the mitigation measure to state that MST should be a major stakeholder and included in all meetings, workshops, hearings, and activities to develop the TMP. CSUMB acknowledges that MST is a valued partner in the development, refinement, and operation of its campus transit system and will be included in discussions regarding TMP/TDM planning. The comment also suggests an addition to the Mitigation Measure TR-3 that requires CSUMB to explore the private-public partnership between CSUMB, MBFC, and MST to enhance bus service and/or provide special bus service for games and other MBFC-related activity as part of the project mitigation. Additionally, this comment suggests that CSUMB develop sidewalk and crosswalk improvements to build out the existing bus stops identified by MST, and that such construction should be consistent with MST's design guidelines. The TMP developed by CSUMB will examine infrastructure for transit facilities and will look at pedestrian access to these transit facilities in tandem. No further comment is necessary.

RESPONSE TO COMMENT E-5

This comment discusses Mitigation Measure TR-4, which discusses the existing CSUMB TDM program to reduce CSUMB student, faculty, and staff vehicle travel. MST suggests that the agreement between CSUMB and MST be revisited and revised to enhance the existing public transportation services to better include the community the MBFC is serving. While this comment does not comment on the adequacy of the Draft

IS/MND, this comment will be considered as part of annual renewal of the agreement between CSUMB and MST.

RESPONSE TO COMMENT E-6

This comment refers to Mitigation Measure TR-7, which outlines the process for remedial action and discussed the trigger for subsequent environmental review. MST requests that they be consulted by CSUMB and MBFC to provide input on the infrastructure mobility and transit mobility enhancements, should the TMP and TDM program monitoring results show that the trip reduction target assumed is not being met. While this comment does not raise an environmental issue warranting a response under CEQA, MST will be consulted and remain an active partner in the process of advancing transit service and access to and from the proposed project site. No further response is necessary.

RESPONSE TO COMMENT E-7

MST acknowledges the opportunity provided by CSUMB to review and comment on the proposed project. This comment does not raise an environmental issue warranting a response under CEQA or address the adequacy of the Draft IS/MND, and no further response is necessary.

From: [Matthew McCluney](mailto:Matthew.McCluney)
To: [Erin Harwayne](mailto:Erin.Harwayne)
Subject: Seaside email
Date: Monday, August 16, 2021 12:17:39 PM

From: Trevin Barber <TBarber@ci.seaside.ca.us>
Date: August 4, 2021 at 2:59:55 PM PDT
To: mforte@csumb.edu
Subject: Fwd: Public Draft IS/MND for the Freeman Stadium Facilities Renovation Project at CSUMB

Hi Marcel,

Pleasure to electronically meet you. My name is Trevin and I'm the new Economic Development Director for the City of Seaside. I recently learned about the stadium renovation project from Matthew's initial study. I'm interested in learning more about the Freeman Stadium Facilities Renovation Project from you, would you be available for a phone call in the near future?

Specifically: Seaside has an interest in the economic/fiscal impact from the stadium project. As you may know our primary source of funding for emergency services (police and fire) is sales tax receipts and therefore a stadium project could generate a substantial amount of sales tax. I'd like to understand this impact a little bit better. Further, the general contractor/project manager may want assistance applying for a BOE/CDTFA direct pay permit, and I'm happy to do help with that.

Please feel free to reach out at your convenience. I sincerely appreciate your time and consideration in this matter.

Sent from my iPhone

F-1

Regards,

Matt

Matthew S. McCluney, AICP, LEED GA

Senior Facilities Planner

[Campus Planning and Development](#)

California State University, Monterey Bay

100 Campus Center Seaside, CA 93955



LETTER F: CITY OF SEASIDE

RESPONSE TO COMMENT F-1

This comment expresses interest in gaining more insight on the proposed project and requests a future meeting with CSUMB. Furthermore, the comment acknowledges that the City of Seaside has an interest in the economic/fiscal impact of the project since it receives funding for public services (e.g., fire and police) through sales tax receipts. Section 15131(a) of the CEQA Guidelines states that “economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes cause in turn by the economic or social changes.” Therefore, this comment does not raise an environmental issue warranting a response under CEQA or address the adequacy of the Draft IS/MND, and no further response is necessary. CSUMB has discussed this inquiry directly with the City of Seaside.

Attachment 1
Sewer Inspection Report and Monterey Bay Football Club Facilities Renovation Civil
Existing Condition Map

GREENLINE

Tel:
Fax:
E-mail:

Inspection Report

Date 6/16/2021	P/O. No.	Weather Dry	Surveyor's Name TOM	Pipe Segment Reference	Section No. 2
Certificate No. U 904 1562	Survey Customer	System Owner	Date Cleaned	Pre-Cleaning No Pre-Cleaning	Sewer Category

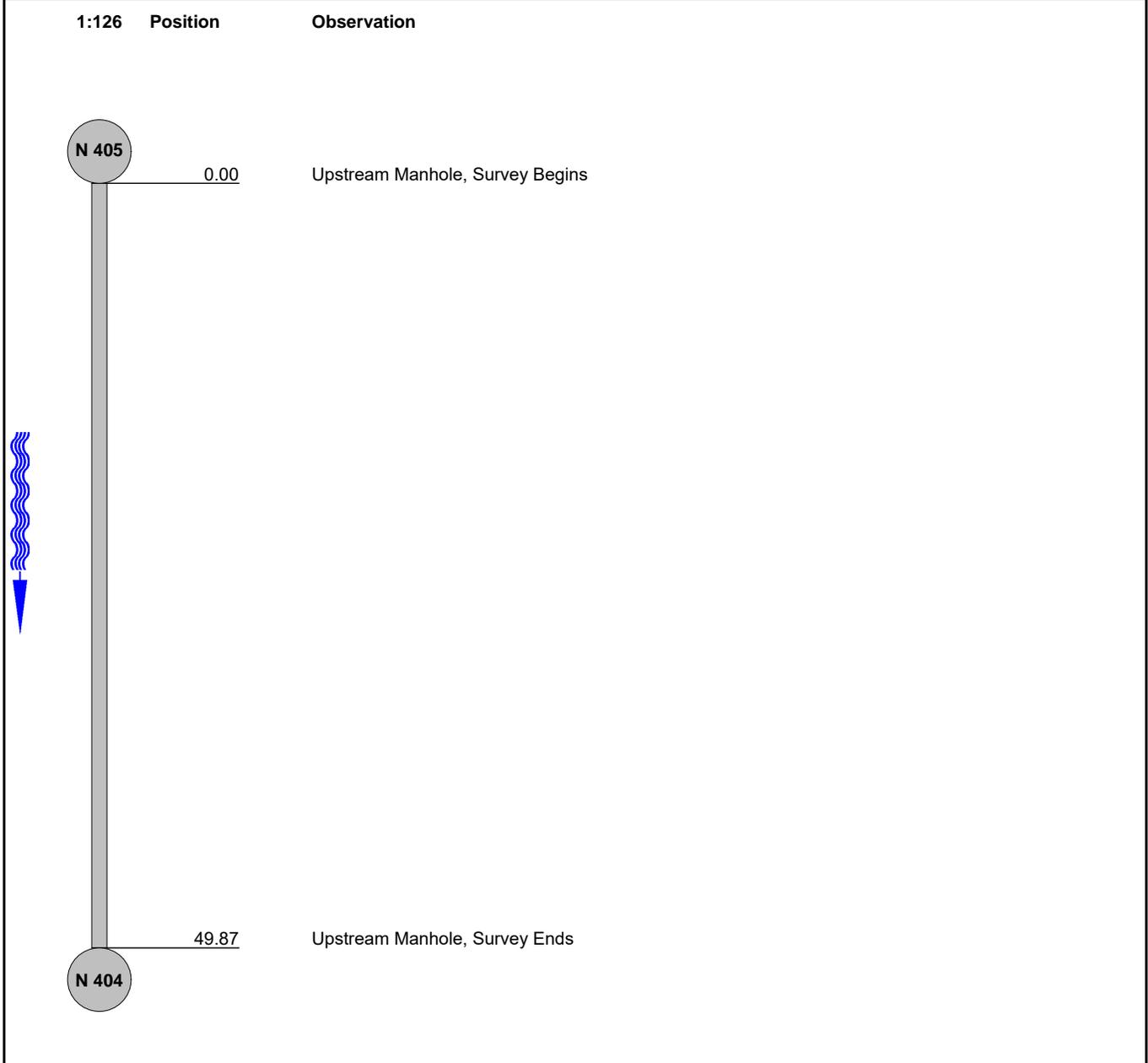
Street123 City Loc. details Location Code	2ND AVE MARINA	Use of Sewer Sanitary Drainage Area Flow Control Not Controlled Length surveyed 49.87 ft	Upstream MH N 405 Downstream MH N 404 Dir. of Survey Downstream Section Length 49.87 ft
--	---------------------------------	--	--

Purpose of Survey Year Laid Year Rehabilitated Tape / Media No.	Joint Length Dia./Height Material Lining Method
--	--

6 inch
Polyvinyl Chloride

Add. Information :

1:126 Position Observation



QSR	QMR	SPR	MPR	OPR	SPRI	MPRI	OPRI
0000	0000	0	0	0	0	0	0

GREENLINE

Tel:
Fax:
E-mail:

Inspection Report

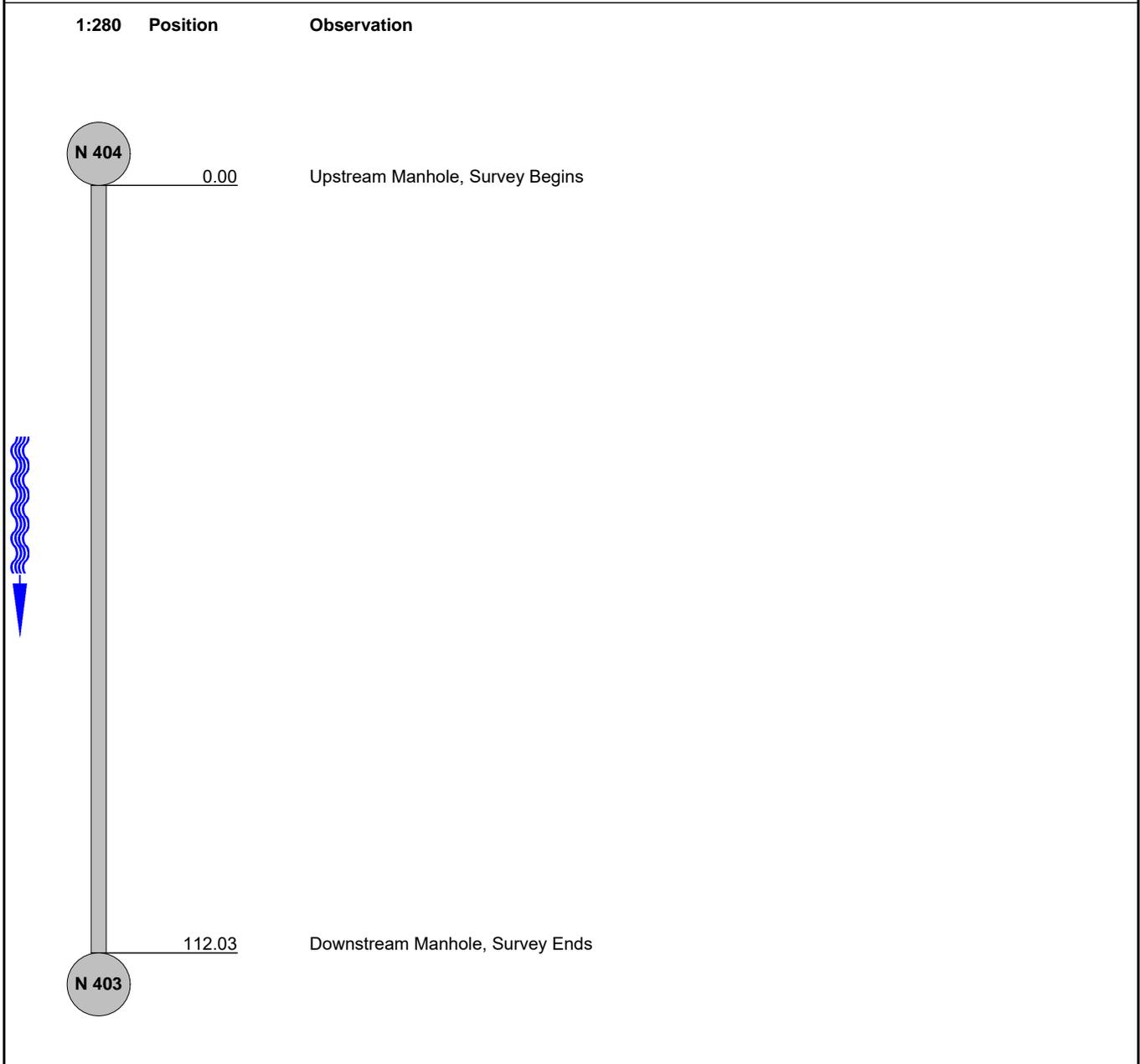
Date 6/16/2021	P/O. No.	Weather Dry	Surveyor's Name TOM	Pipe Segment Reference	Section No. 3
Certificate No. U 904 1562	Survey Customer	System Owner	Date Cleaned	Pre-Cleaning Jetting	Sewer Category

Street123 City Loc. details Location Code	2ND AVE MARINA	Use of Sewer Sanitary Drainage Area Flow Control Not Controlled Length surveyed 112.03 ft	Upstream MH N 404 Downstream MH N 403 Dir. of Survey Downstream Section Length 112.03 ft
--	---------------------------------	---	---

Purpose of Survey Year Laid Year Rehabilitated Tape / Media No.	Joint Length Dia./Height Material Lining Method
--	--

8 inch
Polyvinyl Chloride

Add. Information :



QSR	QMR	SPR	MPR	OPR	SPRI	MPRI	OPRI
0000	0000	0	0	0	0	0	0

GREENLINE

Tel:
Fax:
E-mail:

Inspection Report

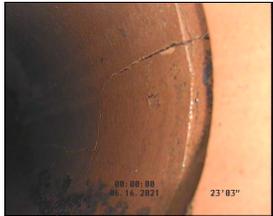
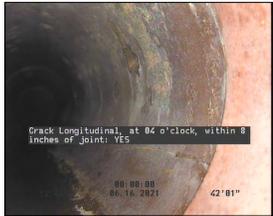
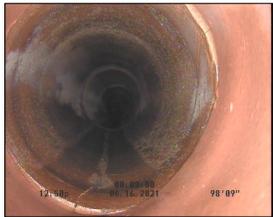
Date 6/16/2021	P/O. No.	Weather Dry	Surveyor's Name TOM	Pipe Segment Reference	Section No. 4
Certificate No. U 904 1562	Survey Customer	System Owner	Date Cleaned	Pre-Cleaning Jetting	Sewer Category

Street123 City Loc. details Location Code	2ND AVE MARINA Use of Sewer Sanitary Drainage Area Flow Control Not Controlled Length surveyed 134.61 ft	Upstream MH N 403 Downstream MH N 402 Dir. of Survey Downstream Section Length 134.61 ft
--	--	---

Purpose of Survey Year Laid Year Rehabilitated Tape / Media No.	Joint Length Dia./Height Material Lining Method
--	--

8 inch
Vitrified Clay Pipe

Add. Information :

1:350	Position	Observation	
	0.00	Upstream Manhole, Survey Begins	 23.28 FT
	23.28	Crack Longitudinal, at 05 o'clock, within 8 inches of joint: YES	 35.88 FT
	35.88	Crack Circumferential, from 04 to 08 o'clock, within 8 inches of joint: YES	 42.07 FT
	42.07	Crack Longitudinal, at 04 o'clock, within 8 inches of joint: YES	 97.64 FT
	97.64	Repair Patch, from 11 to 01 o'clock, within 8 inches of joint: YES	 98.74 FT
	98.74	Crack Circumferential, from 01 to 07 o'clock, within 8 inches of joint: YES	 98.74 FT
	116.92	Tap Factory Made, at 10 o'clock, -, within 8 inches of joint: YES, 4"	
	134.61	Downstream Manhole, Survey Ends	 98.74 FT

QSR	QMR	SPR	MPR	OPR	SPRI	MPRI	OPRI
2212	0000	6	0	6	1.5	0	1.5

GREENLINE

Tel:
Fax:
E-mail:

Inspection photos

City : MARINA	Street : 2ND AVE	Date :	Pipe Segment Reference :	Section No : 4
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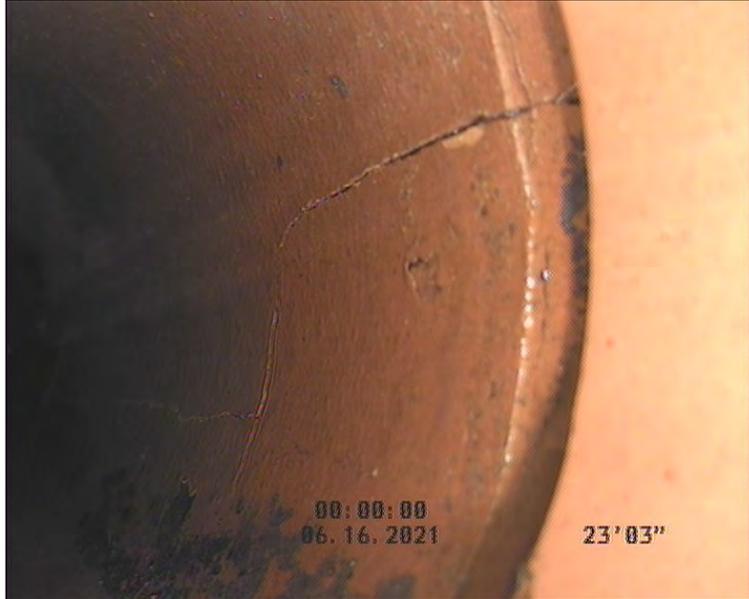


Photo: 4_1_2_16062021_145618_A.JPG
23.28FT, Crack Longitudinal, at 05 o'clock, within 8 inches of joint: YES



Photo: 4_1_3_16062021_145744_A.JPG
35.88FT, Crack Circumferential, from 04 to 08 o'clock, within 8 inches of joint: YES

GREENLINE

Tel:
Fax:
E-mail:

Inspection photos

City : MARINA	Street : 2ND AVE	Date :	Pipe Segment Reference :	Section No : 4
-------------------------	----------------------------	--------	--------------------------	--------------------------

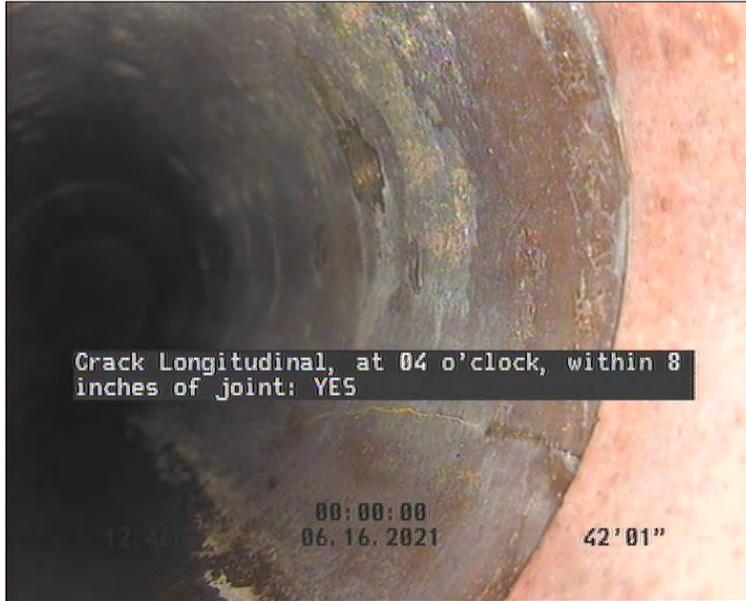


Photo: 4_1_4_16062021_145845_A.JPG
42.07FT, Crack Longitudinal, at 04 o'clock, within 8 inches of joint: YES

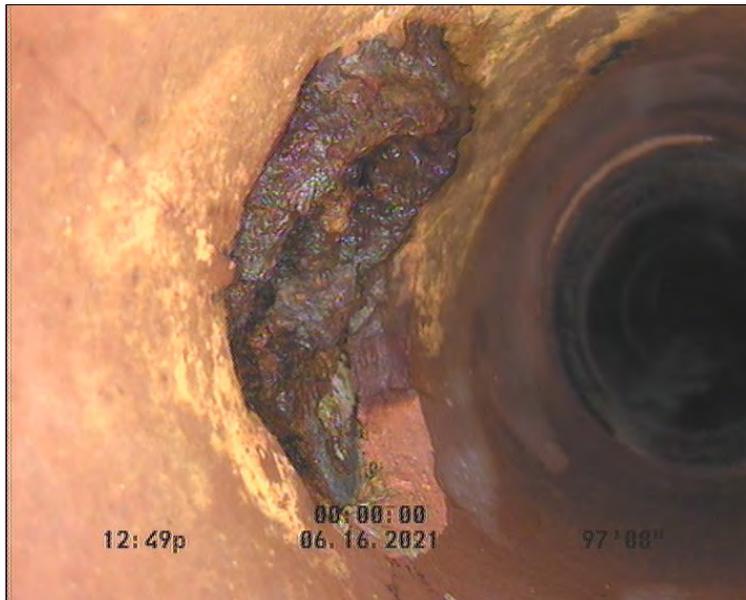


Photo: 4_1_5_16062021_150225_A.JPG
97.64FT, Repair Patch, from 11 to 01 o'clock, within 8 inches of joint: YES

GREENLINE

Tel:
Fax:
E-mail:

Inspection photos

City : MARINA	Street : 2ND AVE	Date :	Pipe Segment Reference :	Section No : 4
-------------------------	----------------------------	--------	--------------------------	--------------------------

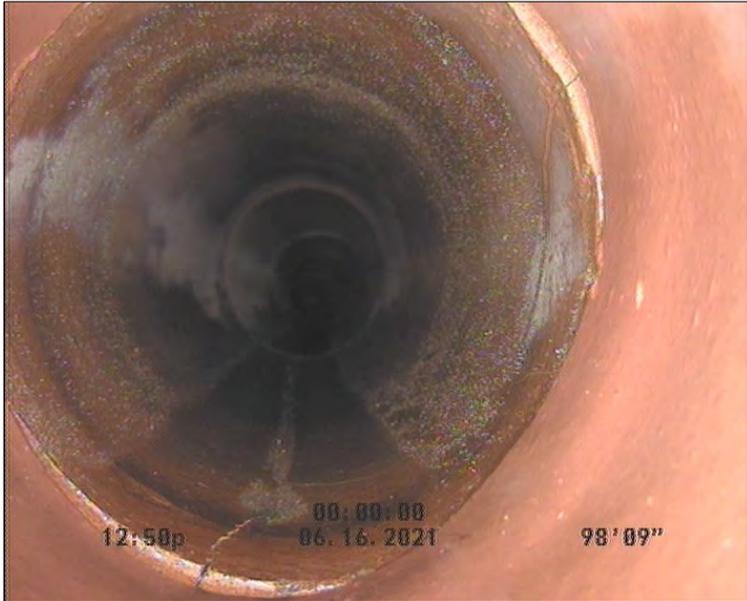


Photo: 4_1_6_16062021_150308_A.JPG
98.74FT, Crack Circumferential, from 01 to 07 o'clock, within 8 inches of joint: YES

GREENLINE

Tel:
Fax:
E-mail:

Inspection Report

Date 6/16/2021	P/O. No.	Weather Dry	Surveyor's Name TOM	Pipe Segment Reference	Section No. 5
Certificate No. U 904 1562	Survey Customer	System Owner	Date Cleaned	Pre-Cleaning Jetting	Sewer Category

Street123 City Loc. details Location Code	2ND AVE MARINA	Use of Sewer Sanitary Drainage Area Flow Control Not Controlled Length surveyed 39.47 ft	Upstream MH N 402 Downstream MH N 401 Dir. of Survey Downstream Section Length 39.47 ft
--	---------------------------------	--	--

Purpose of Survey Year Laid Year Rehabilitated Tape / Media No.	Joint Length Dia./Height Material Lining Method
--	--

10 inch
Vitrified Clay Pipe

Add. Information :

1:112	Position	Observation
		Upstream Manhole, Survey Begins
	39.47	Survey Abandoned

QSR	QMR	SPR	MPR	OPR	SPRI	MPRI	OPRI
0000	0000	0	0	0	0	0	0

GREENLINE

Tel:
Fax:
E-mail:

Inspection Report

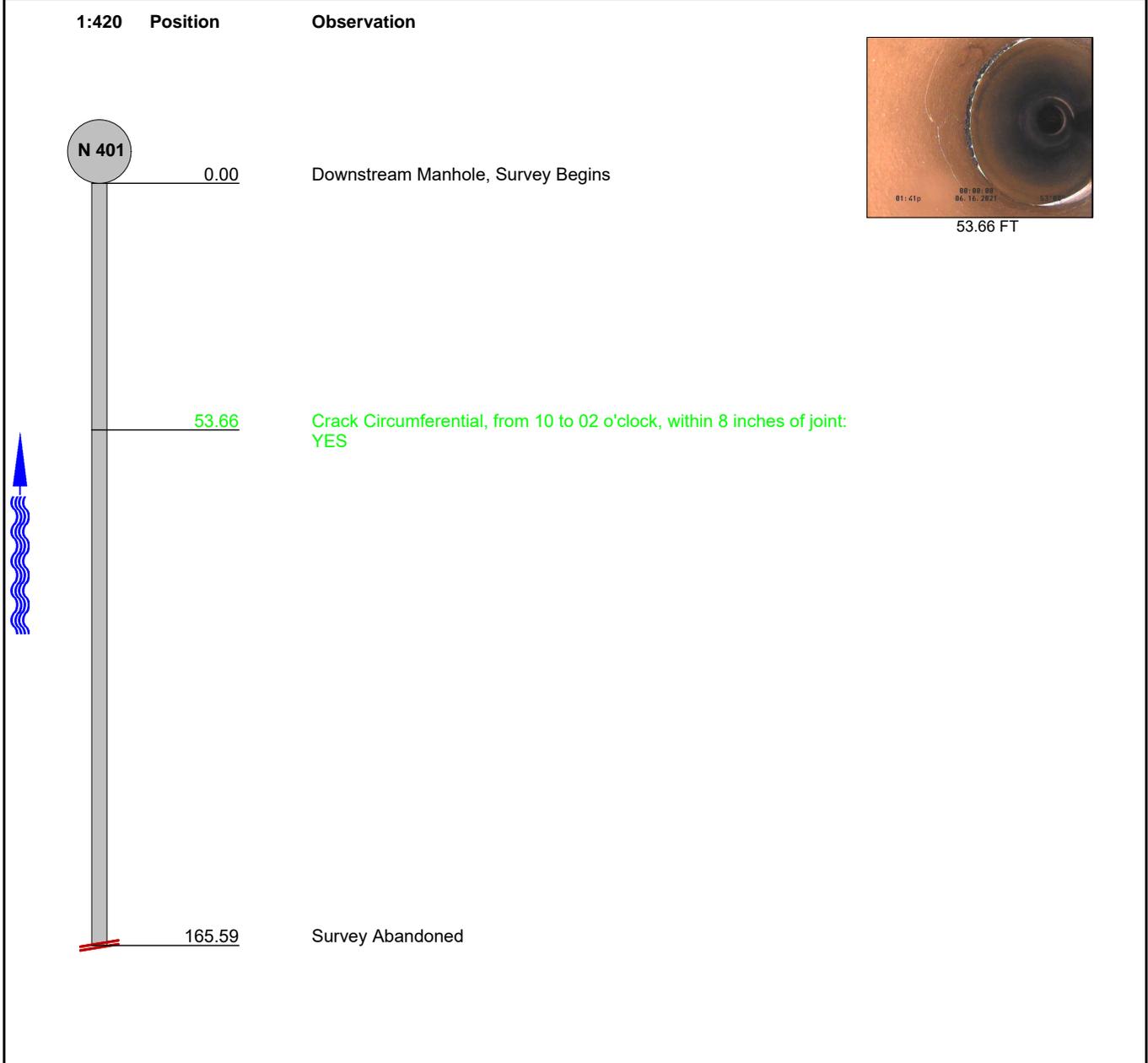
Date 6/16/2021	P/O. No.	Weather Dry	Surveyor's Name TOM	Pipe Segment Reference	Section No. 6
Certificate No. U 904 1562	Survey Customer	System Owner	Date Cleaned	Pre-Cleaning Jetting	Sewer Category

Street123 City Loc. details Location Code	2ND AVE MARINA	Use of Sewer Sanitary Drainage Area Flow Control Not Controlled Length surveyed 165.59 ft	Upstream MH N 402 Downstream MH N 401 Dir. of Survey Upstream Section Length 165.59 ft
--	---------------------------------	---	---

Purpose of Survey Year Laid Year Rehabilitated Tape / Media No.	Joint Length Dia./Height Material Lining Method
--	--

8 inch
Vitrified Clay Pipe

Add. Information :



QSR	QMR	SPR	MPR	OPR	SPRI	MPRI	OPRI
1100	0000	1	0	1	1	0	1

GREENLINE

Tel:
Fax:
E-mail:

Inspection photos

City : MARINA	Street : 2ND AVE	Date : 	Pipe Segment Reference : 	Section No : 6
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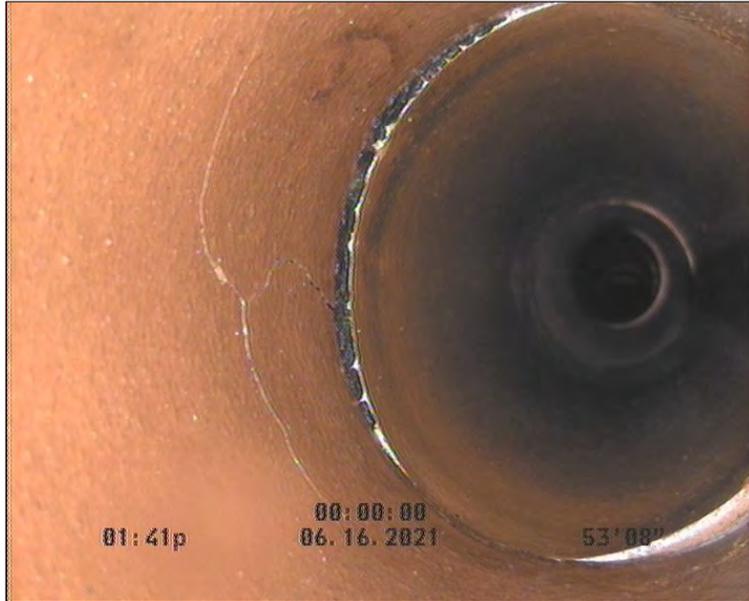


Photo: 6_1_2_16062021_155350_A.JPG
53.66FT, Crack Circumferential, from 10 to 02 o'clock, within 8 inches of joint: YES



Project
MONTEREY BAY FC I
FACILITIES RENOVATION
4111 SECOND AVENUE
SEASIDE, CA 93955
Prepared For
CALIFORNIA STATE
UNIVERSITY MONTEREY BAY
100 CAMPUS CENTER SEASIDE, CA 93955



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San Francisco, CA 94104 USA
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CIVIL ENGINEER
Whitson Engineers
6 Harris Ct.
Monterey, CA 93940

CIVIL ENGINEER
Lloyd Sports + Engineering
7349 N. Via Paseo Del Sur, Suite 515-324
Scottsdale, AZ 85258

AUDIOVISUAL
Wrightson, Johnson, Haddon & Williams, Inc.
3424 Midcourt Road, Suite 124
Carrollton, TX 75006

ACCESSIBILITY
Ed Roether Consulting
2255 Mission Boulevard
Louisburg, KS 66053

CODE
Henderson Engineers
8345 Lenora Drive, Suite 300
Kansas City, KS 66124

Key Plan



Professional Seals



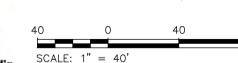
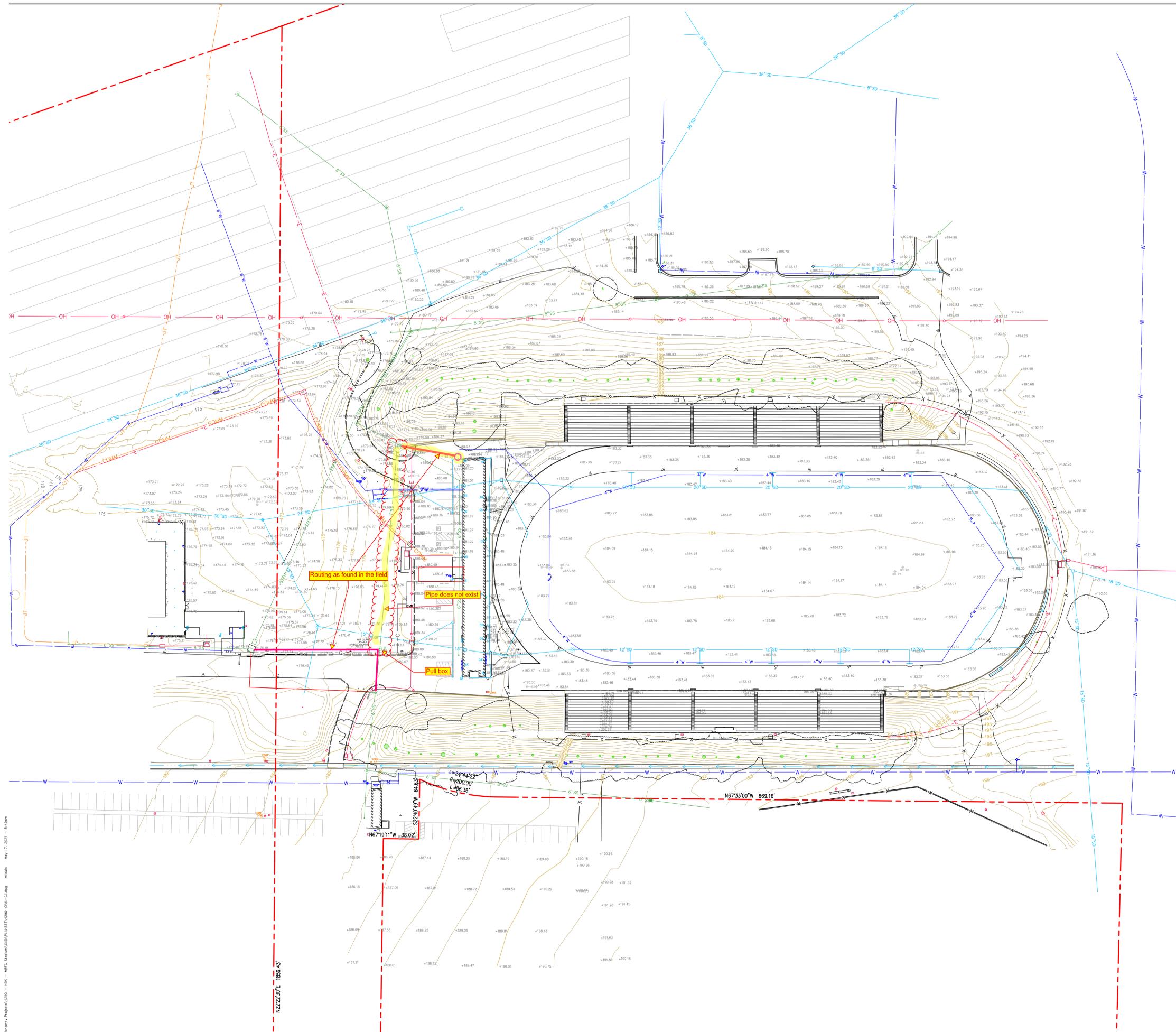
No.	Description	Date
1	75% Preliminary Design	2021-03-28
2	100% Preliminary Design	2021-03-28
3	95% Construction Documents	2021-05-07

Project No: 4290.00
Sheet Title

CIVIL EXISTING
CONDITIONS MAP

Original is 42 x 36. Do not scale contents of this drawing.
Sheet Number

C100



T:\Monterey\Projects\4290 - 100% - 80% Station\DWG\PLANS\1\100-010-C100.dwg May 11, 2021 - 5:48pm m.was