

APPENDIX B

Comment Letters Received During Scoping Periods

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**Notice of
Preparation**

May 12, 2017

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CSUMB Master Plan EIR - scoping comments

Inbox x



Guidi, Robert G CIV USARMY IMCOM CENTRAL (US)

11:39 AM (2 hours ago)

to me, Joelle

Good day Anya,

Hope all is going well. Thank you for the opportunity to provide input on the CSUMB Master Plan EIR scoping process. Please consider the comments for in-depth environmental analyses as follows:

1. **WATER RESOURCES** - A solid evaluation should be made when addressing sustainable water sources required to support future growth of the CSUMB Campus. Efforts to bring about a "regional" water solution are finally being realized after decades of planning. Nonetheless, the "regional solution" should not be viewed as the panacea for water needs. There are several local and site specific measures that should be addressed in the forthcoming EIR. Those measures include but are not limited to water conservation programs in graywater treatment/recycling, storm water diversion for reuse, low-flow water fixtures and developing a separate water works system.
2. **STORM WATER MANAGEMENT** - There should be a significant effort made to address Low-Impact Development (LID) measures and on-site water management. There could be opportunities to lessen or eliminate environmental impacts from storm water runoff by sharing facilities with others such as developers and neighboring property owners. Possible ways to reduce environmental impacts of storm water runoff should be examined.
3. **ALTERNATIVE MODES OF TRANSPORTATION** - CSUMB and MST continue to partner in providing additional transportation services. The EIR should address potential mitigations measures designed to further reduce the need for motorized vehicle use within the interior campus areas (e.g. enhancing shuttle bus services, providing incentives to bolster usage of bicycles or pedestrian activity.)
4. **TRANSPORTATION CIRCULATION** - CSUMB continues its positive efforts to create a uniform traffic flow and minimize the amount of motorized vehicles moving within inner campus areas. Extending the environmental impact analysis beyond the campus is strongly encouraged. Arterial roads and intersections now on the periphery still experience low Levels of Service (LOS) during peaking traffic times. Those areas now located on the outer limits many very well be within the main campus as it expands over time. The overall sphere of influence associated with transportation circulation/traffic flow should be part of the environmental analysis.

Please contact me if you require any clarification or have questions about the comments submitted. I look forward to participating in future meetings/workshops and reviewing the draft of this important environmental document.

Robert Guidi
Directorate of Public Works
Master Planning Division
Presidio of Monterey, CA
[831-242-7928](tel:831-242-7928) (M-F 8 A.M. to 6 P.M. Pacific)

DEPARTMENT OF TRANSPORTATION

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SAN LUIS OBISPO, CA 93401-5415
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<http://www.dot.ca.gov/dist05/>



*Serious drought
Help save water!*

June 8, 2017

MON-1-R83.4
SCH#2017051042

Ms. Anya Spear
California State University Monterey Bay Master Plan
100 Campus Center
Seaside, CA 93955

Dear Ms. Spear:

COMMENTS FOR THE NOTICE OF PREPARATION (NOP) FOR THE CALIFORNIA STATE UNIVERSITY MONTEREY BAY MASTER PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) – (2ND AVENUE/INTER-GARRISON) MONTEREY, CA

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the NOP for the California State University Monterey Bay Master Plan DEIR including projects identified in the university's Five-Year Capital Improvement Program 2016/2017 through 2020/2021 located adjacent to Highway 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.

Further, we seek to reduce vehicle trips and new vehicle miles traveled associated with the development by appropriate measures that avoid, minimize, or mitigate impacts through smart mobility community design and multimodal demand strategies. Caltrans offers the following comments in response to the NOP for the California State University Monterey Bay Master Plan DEIR:

1. The Transportation Agency for Monterey County (TAMC) collects development impact fees to help fund transportation projects of regional significance to address project long-range traffic impacts. Caltrans supports payment of the adopted TAMC development impact fees as required to mitigate any cumulative impacts.

Ms. Spear
June 8, 2017
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2. Please be aware that if any work is completed in the State's right-of-way it will require an encroachment permit from Caltrans, and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <http://www.dot.ca.gov/trafficops/ep/index.html>.
3. At any time during the environmental review and approval process, Caltrans retains the statutory right to request a formal scoping meeting to resolve any issues of concern. Such formal scoping meeting requests are allowed per the provisions of the California Public Resources Code Section 21083.9 [a] [1].
4. Since the master plan is proposing an increase of full time student population, Caltrans looks forward to reviewing the detailed traffic analysis provided when the EIR document is circulated. With early coordination, we hope to identify the university's off campus traffic impacts and work together to develop the mitigation package to mitigate these consistent with CEQA and other current case-law relative to university expansion.

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) 549-3282 or email jill.morales@dot.ca.gov.

Sincerely,



JILLIAN R. LEAL-MORALES
Associate Transportation Planner, District 5
jill.morales@dot.ca.gov

cc: Orchid Monroy-Ochoa (D5)
Grant Leonard (TAMC)
Heather Adamson (AMBAG)

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
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Website: <http://www.nahc.ca.gov>
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May 17, 2017

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

RE: SCH#2017051042 California State University Monterey Bay Master Plan, Monterey County

Dear Ms. Spear:

The Native American Heritage Commission 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 section 21084.1, states that a project that may cause a substantial adverse change in the significance of an 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 Section 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, § 15064 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 with the area of project 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 or a notice of negative declaration or 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 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 sections 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 section 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 section 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 section 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 section 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 nonfederally 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 sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 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 section 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 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 section 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 sections 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 (http://ohp.parks.ca.gov/?page_id=1068) 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 been 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, section 15064.5(f) (CEQA Guidelines section 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 section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subs. (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, please contact me at my email address: frank.lienert@nahc.ca.gov

Sincerely,



for Frank Lienert
Associate Governmental Program Analyst

cc: State Clearinghouse



FORT ORD REUSE AUTHORITY

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June 9, 2017

Anya Spear, LEED AP
Associate Director of Campus Planning
California State University Monterey Bay, Campus Planning & Development
100 Campus Center, Seaside, California 93955

Re: Notice of Preparation dated May 11, 2017 for an Environmental Impact Report for the California State University Monterey Bay Master Plan

Dear Ms. Spear:

We are in receipt of the Notice of Preparation document dated May 11, 2017 for an Environmental Impact Report (EIR) for the California State University Monterey Bay Master Plan (CSUMB Plan). In that regard, we are providing the following comments and concerns about the impacts the Master Plan could have on the environment in the future from the perspective of the Fort Ord Reuse Authority's (FORA's) overall mission of regional recovery.

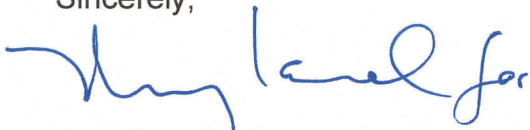
A primary concern and mandate of FORA is to minimize the increase in demand for transportation infrastructure and services both within the base area and the region. The Base Reuse Plan Circulation Concept for the former Fort Ord includes strategies and improvements for the system within the base, as well as for those regionally significant facilities that provide access to the former Fort Ord. This plan includes building or improving roadway facilities and a demand management network that consists of strategies and actions that can be used to minimize the demand for vehicle trips as an alternative to increasing roadway capacity. In developing the CSUMB Plan EIR, traffic volumes on roadways must be evaluated. FORA recently conducted a fee reallocation study; we urge your team to use the information gained from our study in your analysis. Furthermore, we applaud your effort to eliminate or reduce traffic-related impacts and anticipate that the transition to the scenario's 2016-2026 goals of modes (28% drive alone, 22% shared ride, 25% transit, 13% walk, 10% bicycle, 2% other) will be gradual. We recommend your team evaluate traffic flow and load in phases from road closures and extensions, so that traffic impacts during the transition are precisely measured and mitigated appropriately in each phase. In addition, discuss how you can maximize your transit options in coordination with Monterey Salinas Transit during this gradual transition.

FORA is currently invested in helping the lead jurisdictions, Monterey County and City of Seaside, work collaboratively to plan for regional Oak Woodland protection on former Fort Ord. They are completing several policies and programs that the Base Reuse Plan requires to preserve contiguous areas of native Oak Woodland habitat. Your offices have been offered the opportunity to plan with them so that some 40 to 70 acres of

CSUMB's native Oak Woodland can be included in the regional corridor connecting Habitat Management Areas (HMAs) southeast of the CSUMB campus to the Landfill HMA to the north. The area in discussion is "East Campus Open Space." We find these policies to be aligned with your Master Plan's objective to retain Oak Woodlands. They also relate to your need to offset your project-related impacts. We urge you to embrace the opportunity to be a part of the Oak Woodland Conservation Area and to grant these agencies the opportunity to set aside conservation easements. The EIR should address how these specific areas are defined as mitigation for Oak Woodlands impacted by activities of the Master Plan and serve as components of regional mitigation areas. Also, coordinate with the County and Seaside to refer to related measures to be taken to protect and manage Oak Woodland habitat values. It is an excellent opportunity to align with the historic Fort Ord jurisdictions toward cohesive regional conservation planning.

In closing, we appreciate the opportunity to provide these comments. FORA is supportive of CSU's efforts to complete the promise of the Monterey Bay campus and look forward to the campus' central role in the regional recovery from the Fort Ord closure.

Sincerely,



Jonathan Brinkmann
Principal Planner

cc: Michael Houlemard, Executive Officer

State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Director



Building Services / Environmental Services / Planning Services / Public Works & Facilities
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Salinas, California 93901 www.co.monterey.ca.us/rma

June 12, 2017

Anya Spear
CSUMB Campus Planning and Development
100 Campus Center
Seaside, CA 93955

Subject: NOP for CSUMB Master Plan

Dear Ms. Spear,

Thank you for the opportunity to review the NOP for the CSUMB Master Plan. Monterey County land use departments have reviewed the NOP and have the following comments:

Office of the Sheriff

The area of the project/construction is not in the actual jurisdiction of the Monterey County Sheriff's Office. (MCSO).

However, there are areas on the Former Ft. Ord property that fall under the jurisdiction of the MCSO (Beat areas 6C and 4C).

These areas are near the borders of the CSUMB campus.

Due to this project, with the increase in housing, the population will increase. This does have the potential to increase calls for service in the surrounding areas of the campus, and thus could impact those areas in the jurisdiction of MCSO.

Also, in the event of a major crime/emergency, the CSUMB Police Department could request the assistance of MCSO.

At this time, even with these factors considered, the impact to MCSO services would be **less than significant**.

Thank you again for the opportunity to comment on the NOP.

Sincerely,

A handwritten signature in cursive script that reads 'Bob Schubert'.

Bob Schubert, AICP
Senior Planner

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Director



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June 12, 2017

Anya Spear, LEED AP
Associate Director of Campus Planning
CSUMB, Campus Planning & Development
100 Campus Center
Seaside, California 93955

**SUBJECT: COMMENTS TO NOTICE OF PREPARATION OF AN ENVIRONMENTAL
IMPACT REPORT FOR THE CALIFORNIA STATE UNIVERSITY
MONTEREY BAY MASTER PLAN**

Dear Ms. Spear,

Monterey County Resource Management Agency - Public Works (RMA-PW) has reviewed the Notice of Preparation (NOP) of an EIR for the CSUMB Master Plan, dated May 12, 2017. Based on the NOP, the proposed Master Plan would include projects identified in the CSUMB's 5-Year Capital Improvement Program, plus the additional space and facility needs to support planned growth to 12,700 full-time-equivalent (FTE) students, with on-campus housing for students, faculty and staff. The project would also include six "near-term projects." The RMA-PW is very interested to know about the project's potential impacts to County Roads and the surrounding traffic circulation network, especially given the severe congestion currently experienced in the vicinity of the campus.

We offer the following information and recommendations to aid you with the environmental review process:

- Any mitigation measure(s) proposed by the project should conform to regional planning documents, such as the Monterey County General Plan and TAMC's Regional Transportation Plan.
- The methodologies used to calculate the Levels of Service (LOS) should be consistent with the methods in the latest edition of the Highway Capacity Manual (2010 HCM). The analysis should use the latest Institute of Transportation Engineers (ITE) trip generation manual for trip rates (please refer to the County of Monterey's guide for the preparation of traffic impact studies <http://www.co.monterey.ca.us/home/showdocument?id=3846>).
- The Traffic Study should identify mitigation measures for all traffic circulation impacts on County roads. The significance criteria for County roads is described as follows:
 - Signalized Intersection: A significant impact would occur if an intersection operating at LOS A, B, C, or D degrades to E, F. For intersections already operating at unacceptable levels E, a significant impact would occur if a project adds 0.01 during peak hour or more to the critical movement's volume-to-capacity ratio. If the intersection is already operating at LOS F any increase (one vehicle) in the critical movement's volume-to-capacity ratio is considered significant.

- Unsignalized Intersections: A significant impact would occur if any traffic movement has LOS F or any traffic signal warrant is met.
- Road segments: A significant impact would occur if a roadway segment operating at A through E degrades to a lower level of service of E, or F. If a segment is already operating at LOS F any increase during peak hour (one vehicle) is considered significant.
- The EIR/Traffic Study should address the project's impacts on all county, regional, and city roadways. The geographic area covered in the scope of the traffic study should be of sufficient size to adequately identify all of the project's impacts. The traffic report should disclose all projects' access points and analyze the effects on county, cities, and regional roadway systems.
- In developing the cumulative scenarios for the traffic forecasts, trip distributions and traffic analysis, should be consistent with regional traffic model projections, i.e. AMBAG model.
- At a minimum, the following project scenarios should be analyzed: Existing Conditions, Existing plus Project, Background, Background plus project, Cumulative No Project, and Cumulative plus Project.
- As noted in the NOP, the campus is committed to a sustainable campus master plan, which includes plans and recommendations to reduce vehicle trips to campus. The report should provide details for the implementation of effectiveness of such vehicle trip reduction strategies. Also, the report should include the needs and benefits of providing pedestrian/bicycle facilities.
- In order to identify the project's potential impacts to the roadway system, the EIR will require:
 - Level of Service Analysis (LOS) for the following intersections:
 - Inter-Garrison Rd/Reservation Rd
 - Reservation Rd/Davis Rd
 - Davis Rd/Blanco Rd.
 - Level of Service Analysis (LOS) for the following road segment:
 - Reservation Rd from Inter-Garrison Rd to Davis Rd
 - Davis Rd from Reservation Rd to Blanco Rd
 - Davis Rd from Blanco Rd to Market St.
 - Blanco Rd from Reservation Rd to Davis Rd.
- The report needs to consider traffic while school is in regular and summer sessions and consider all planned development within the vicinity of the project.

We welcome the opportunity to participate and consult with you in developing the scope of the traffic analysis. We also look forward to reviewing and commenting on the Draft Environmental Impact Report. Should you have any further questions please contact me at (831) 755-4628, or email at martinezrr@co.monterey.ca.us.

Sincerely,



**Raul Martinez, Assistant Engineer.
Resource Management Agency, Public Works & Facilities Division
Traffic Section**



May 17, 2017

Ms. Anya Spear, LEED AP
Associate Director of Campus Planning
CSUMB, Campus Planning & Development
100 Campus Center
Seaside, California 93955

Subject: Notice of Preparation – Environmental Impact Report for the California State University Monterey Bay Master Plan

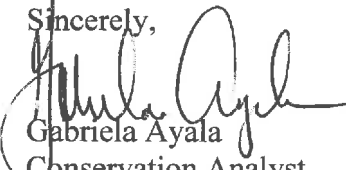
Dear Ms. Spear:

The Monterey Peninsula Water Management District (MPWMD or District) appreciates the opportunity to comment on the Environmental Impact Report (EIR) dated May 2017 for California State University Monterey Bay's (CSUMB) Master Plan. The California State University Monterey Bay campus is physically located on the former Fort Ord.

The CSUMB campus is outside of the MPWMD's boundaries and is not subject to our Rules and Regulations. The project will be served by Marina Coast Water District, a Water Distribution System not regulated by MPWMD. Inquiries regarding construction at the CSUMB campus should be addressed to Marina Coast Water District.

Thank you for the opportunity to review and provide feedback on the Environmental Impact Report for California State University Monterey Bay's Master Plan. If you have questions, please contact me at gabby@mpwmd.net or 831-658-5601

Sincerely,


Gabriela Ayala
Conservation Analyst

U:\demand\CEQA Docs\20170517_CSUMB_MasterPlanEIR_Ayala.docx

RECEIVED

MAY 24 2017

CSUMB CP&D



RESOURCE MANAGEMENT SERVICES

440 Harcourt Avenue
Seaside, CA 93955

Telephone (831) 899-6737
FAX (831) 899-6211
TDD (831) 899-6207

June 9, 2017

Anya Spear, LEED AP
CSMUB, Campus Planning and Development
100 Campus Center
Seaside, CA 93955

RE: Notice of Preparation CSUMB Master Plan EIR

The City of Seaside is submitting the following comments on the scope and content of the CSUMB Master Plan EIR.

Section	Comments
2.1, Page 3	Provide explanation and/or example of type of institutional partnerships CSUMB can enter into with the City of Seaside.
2.1, Page 3	Provide explanation how athletics and recreation areas would be expanded near Seaside Municipal Boundaries.
2.1, Page 5	Identify development outside of areas currently served by existing trunk mains on CUMB Campus that could require extension of trunk mains at the university's expense.
Section 3, Hydrology and Water Quality, Page 8	Has CSUMB identified locations for potential bio swale treatment areas.
Section 3, Population Housing, Page 8	The City of Seaside would encourage CSUMB to develop higher density residential structures on the south side of the campus at heights of four stories or more to match the housing development on the "Promnitory" project site
Section 3, Public Services and Recreation, Page 9	Identify whether the EIR should evaluate wildland fire maintenance and fire protection services. Identify how mutual aid would be coordinated between adjacent municipal jurisdictions.

The City of Seaside wants to thank CSUMB and its consultants for providing the City of Seaside with the opportunity to provide its written comments on the CSUMB Master Plan EIR.

Sincerely

Rick Medina
Senior Planner



June 12, 2017

Anya Spear
Associate Director of Campus Planning
CSUMB, Campus Planning and Development
100 Campus Center
Seaside, CA 93955

SUBJECT: Comments on the Notice of Preparation for the CSUMB Master Plan


Dear Ms. Spear:

The Transportation Agency for Monterey County is the Regional Transportation Planning and Congestion Management Agency for Monterey County. Agency staff has reviewed the Notice of Preparation for the CSUMB Master plan Environmental Impact Report and offers the following comments:

1. The Agency supports the development of a detailed Traffic Impact Analysis to inform the EIR about the impacts to local and regional road networks. In particular, we support the detailed analysis of the Master Plan's proposed Travel Demand Management (TDM) strategies.
2. The Agency looks forward to providing comments on the draft environmental impact report.

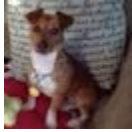
Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Grant Leonard of my staff at 831-775-0903.

Sincerely,


Debra L. Hale
Executive Director

NOP EIR Master Plan

Inbox x



Mark Lasnik

11:33 AM (23 minutes ago)

to me

Hi Anya. I hope that you and your family are well.

My initial feedback about the pursuit of an "ambitious" Transportation Scenario is:

due to the fact that parking will be limited and consolidated to the campus periphery, there is no stated plan to encourage employees to use active transportation. I'd like to see in print a plan that CSUMB management has to create a positive employment environment between supervisor and line staff, in regards to the impact that using active transportation has on start and end time. Let's not re-invent the wheel. How do universities and private employers handle start and end times where active transportation is the primary source?

If management does not initiate the conversation with staff to utilize active transportation, the vast majority of staff will not initiate that conversation. An "improved shuttle service" needs definition...will the arrival time at the multimodal hubs qualify as arriving to work "on time"? Will transit and shuttle schedules be so coordinated that our culture will eliminate supervisors' need to pay attention to work start and end times?

My best to you,
M

Thank you.

Mark Lasnik, LEED® AP

[831-582-5216](tel:831-582-5216)

CSU Monterey Bay

Please do not print this email unless absolutely necessary.

**Revision to
Previously Issued
Notice of Preparation**

August 9, 2019

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NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>



RECEIVED
AUG 22 2019
CSUMB CP&D

August 15, 2019

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

RE: SCH# 2017051042, California State University Monterey Bay Master Plan Project, Monterey County

Dear Ms. Spear:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP) 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 (http://ohp.parks.ca.gov/?page_id=1068) 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:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse



September 5, 2019

Anya Spear, LEED AP
Associate Director of Campus Planning
CSUMB, Campus Planning & Development
100 Campus Center
Seaside, CA 93955

SUBJECT: Comments on the Revised Notice of Preparation for the Environmental Impact Report for the CSUMB Master Plan

Dear Anya Spear:

The Transportation Agency for Monterey County (TAMC) is the Regional Transportation Planning and Congestion Management Agency for Monterey County. TAMC staff have reviewed the CSUMB Master Plan and revised Notice of Preparation and offer the following comments:

1. As TAMC indicated in our comment letter on the original NOP dated June 12, 2017, the Agency supports the development of a detailed Traffic Impact Analysis to inform the EIR about the impacts to local and regional road networks. In particular, we support the detailed analysis of the Master Plan's proposed Transportation Demand Management (TDM) strategies.
2. Although not expressly stated, the proposed TDM measures identified in the Master Plan are either currently provided through TAMC's Go831 program or in line with Go831 regional trip reduction goals. Because student travel is not confined to CSUMB's jurisdictional boundary, and because big life changes (like starting a new school or new job) are critical opportunities for travel behavior change, please consider including the following information in the Mobility chapter:
 - Under "TDM Resources" consider adding:
 - i. Regional TDM Coordination with TAMC's Go831 program – The Go831 program operates in Monterey County and provides resources to employers and schools to develop or enhance their own TDM programs.
 - ii. New Student & Staff Transportation Orientation – integrate TDM resources into new student orientation activities and provide hands-on opportunities to try a variety of transportation options. Example: a

lunchtime workshop where students can learn about benefits, tips and resources to carpool, while meeting potential carpool buddies.

- iii. Personal Trip Reduction Plans – provide personal trip reduction plans to new student and faculty as part of their orientation. Personal trip reduction plans allow for new students and staff to receive more specific TDM information that is relevant to their needs and interests instead of overwhelming them with all of the transportation options available.
3. TAMC encourages the use of Intersections Control Evaluations (ICE analysis) when determining intersection control type for primary intersections. The Agency recommends including ICE analyses in the EIR traffic and circulation technical study for the intersections identified in the Master Plan as “Campus Entry” points:
 - Inter-Garrison Rd / 7th Ave / 8th St
 - 8th St / 6th Ave / Engineering Equipment Rd
 - Divarty St. / General Jim Moore Blvd
 - General Jim Moore Blvd / Lightfighter Drive.
 4. Please consider a roundabout at 2nd Ave and the CSUMB Sports Complex, between Divarty Street and Lightfighter Drive.
 5. Please consider coordination between the CSUMB Master Plan and the adjacent Seaside Campus Town Project.
 6. TAMC strongly supports the Master Plan’s prioritization and proposal of increased bicycles and pedestrian access on the CSUMB campus. TAMC supports the Master Plan’s prioritization of pedestrian travel as the primary mode of travel on campus, and the Master Plan’s vision of a bicycle share program, and covered bicycle parking with supporting Fix-it stations. We encourage consideration of the connectivity of the proposed bicycle and pedestrian paths with the neighboring communities
 7. TAMC is grateful for CSUMB’s ongoing consideration and coordination with the proposed Fort Ord Regional Trail and Greenway (FORTAG) trail alignment in relation to the CSUMB campus, with specific emphasis on bicycle and pedestrian connections to the proposed trail.
 8. The Transportation Agency recommends coordination with Monterey-Salinas Transit (MST) about the Master Plan’s vision for transit. Monterey-Salinas Transit’s *Designing for Transit* Guideline Manual should be used as a resource for accommodating the existing (16, 18, 19, 25, 26, 74) and potential future transit access to the project site.
 9. TAMC supports the Master Plan’s goal to improve wayfinding to promote pedestrian and bicycle travel within the CSUMB campus and throughout neighboring communities. TAMC encourages utilizing the Agency’s *Wayfinding Plan* and *Wayfinding Sign Design Package* as resources.


Additionally, the Agency offers the following minor edit:

Figure 7.10 and 7.11 of the Master Plan should use the recently updated Fort Ord Regional Trail and Greenway (FORTAG) alignment. Enclosed is a geographic file (.kmz) containing the current alignment. TAMC recommends coordination regarding FORTAG with Stefania Castillo, Transportation Planner, at stefania@tamcmonterey.org.

Thank you for the opportunity to comment on the proposed project. TAMC looks forward to providing comments on the draft environmental impact report.

If you have any questions, please contact Madilyn Jacobsen of my staff at 831-775-4402 or madilyn@tamcmonterey.org.

Sincerely,

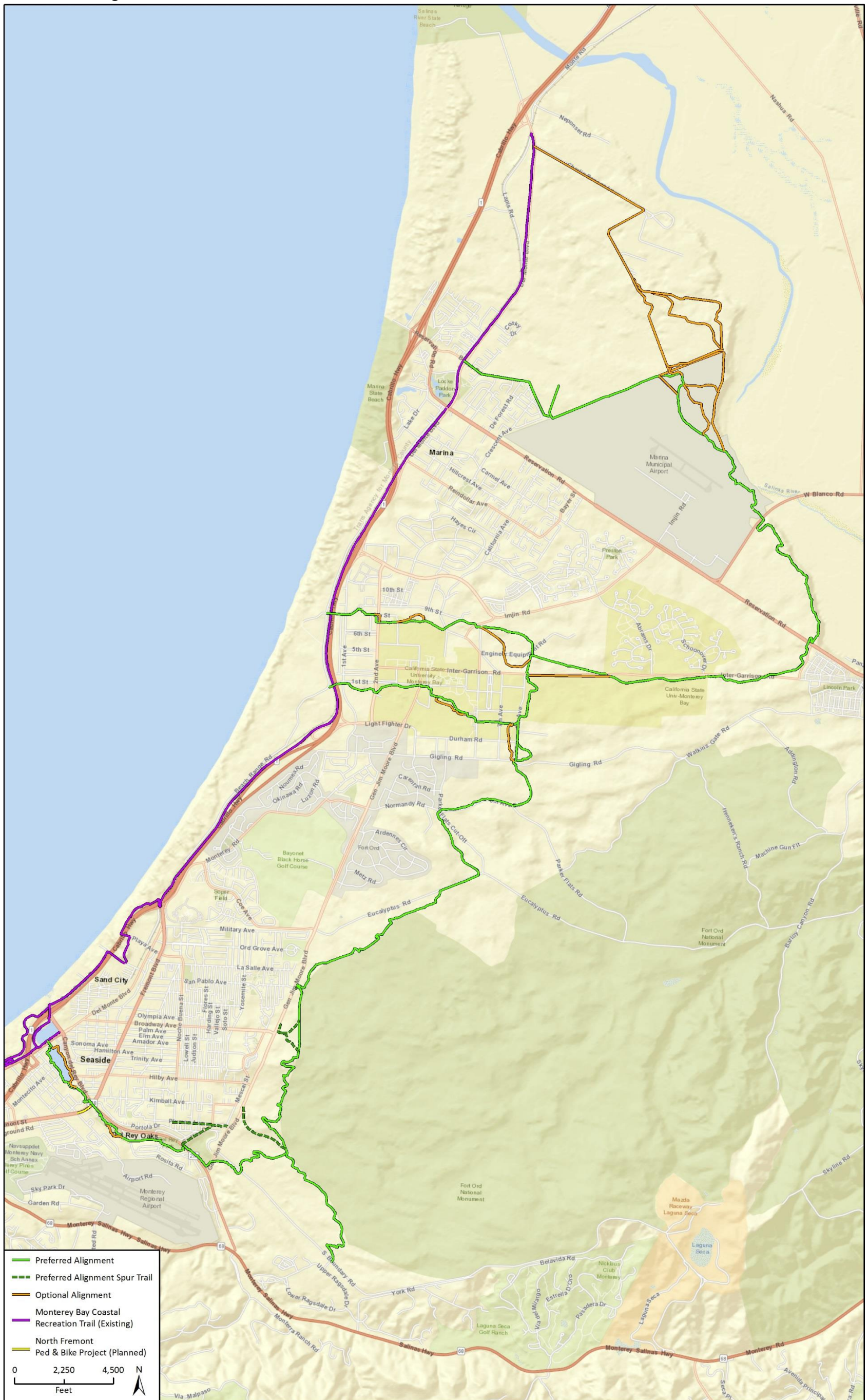
A handwritten signature in blue ink, appearing to read 'DLH', with a long horizontal flourish extending to the right.

Debra L. Hale
Executive Director

Enclosures:

- FORTAG Alignment (.kmz)
- FORTAG Alignment (.pdf)

Figure 1 FORTAG Alignment



Imagery provided by ESRI and its licensors © 2019. Additional data provided by Alta, 2019.

Fig 1 FORTAG Proposed Alignment

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