

**ADDENDUM TO THE PALO CORONA REGIONAL PARK GENERAL
DEVELOPMENT PLAN INITIAL STUDY – MITIGATED NEGATIVE DECLARATION**

FOR THE

RANCHO CAÑADA TRAIL REPLACEMENT AND RECONSTRUCTION PROJECT

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I. INTRODUCTION

The Board of Directors of the Monterey Peninsula Regional Park District (MPRPD), on March 3, 2021, approved the Palo Corona Regional Park General Development Plan and adopted the Initial Study – Mitigated Negative Declaration (IS/MND) prepared for the project.¹ The General Development Plan provides a planning blueprint for conservation, restoration, stewardship, and public access to manage the 4,585-acre Palo Corona Regional Park (“Park”). The primary focus of the General Development Plan is on hiking and passive recreation opportunities and includes improvements and additions to the Park’s existing trail network.

This Addendum has been prepared pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines in order to address proposed changes to the alignment and construction of recreational trails since approval of the General Development Plan. The changes are proposed in the context of resolving a Notice of Violation (NOV) issued by the California Department of Fish and Wildlife (CDFW) in June, 2022. This undertaking is known as the Rancho Cañada Trail Replacement and Reconstruction Project (“Project”).

The Project is also exempt from CEQA under the Class 1 exemption for existing facilities, the Class 2 exemption for replacement or reconstruction, and the Class 4 exemption for minor alterations to land. However, MPRPD has prepared this Addendum in accordance with CEQA Guidelines section 15164. The proposed changes to the construction and alignment of the trail network will not result in any new or more severe environmental effects than those identified and analyzed in the IS/MND. Further, there are no changes in circumstances or new information that would otherwise warrant any subsequent environmental review under Public Resources Code section 21166 or CEQA Guidelines section 15162. MPRPD has therefore determined that the IS/MND prepared for the General Development Plan adequately addresses the potential environmental impacts of the Rancho Cañada Trail Replacement and Reconstruction Project, and no further environmental review is necessary.

II. BACKGROUND

The General Development Plan, approved in March 2021, provides for improvements and additions to the Park’s trail network throughout its three units: the Front Ranch Unit, the Back Country Unit, and the Rancho Cañada Unit. The Rancho Cañada Unit is the former Rancho Cañada Golf Course and serves as the Park’s primary point of public access. The General Development Plan contemplates three different trail types to be constructed in the Rancho Cañada Unit: Multi-Use Trails; Community Trails; and Connector Trails.

- **Multi-Use Trails:** Multi-use trails would be created by converting existing golf cart paths into 10- to 12-foot paved multi-use trial paths via resurfacing,

¹ The General Development Plan IS/MND is incorporated herein by this reference.

widening, addition of a 6- to 8-foot-wide gravel shoulder, ADA-accessibility measures, and segment realignment or connection. The exiting golf cart paths would be connected to the South Bank Trail. (IS/MND, p. 13.) Some trails may be surfaced with gravel or other permeable material. (IS/MND, p. 13.)

- **Community Trails:** Community trails throughout the Park will utilize some existing and some proposed paths and will serve as primary circulation routes through the Rancho Cañada Unit. These trails will allow pedestrian and hikers only. The community trails through the Rancho Cañada Unit primarily follow the existing cart paths, with some segments of realignment or connection. These trails range from 6 to 8 feet wide and are paved. However, some of the existing concrete and asphalt cart paths are in poor condition with cracks or steep grades. MPRPD will assess the trails and determine which portions require re-surfacing or widening for greater accessibility. MPRPD may also phase out some sections of these trail improvements over time, primarily due to trail redundancy. (GDP, p. 67.)
- **Connector Trails:** Connector trails are meant to serve as secondary circulation routes through the Rancho Cañada and Front Ranch Units. Connector trails would mostly utilize existing cart paths, but would involve ADA-accessibility improvements and the replacement of concrete and asphalt with compacted-earth surface to reduce impervious surface area. (IS/MND, p. 14.) These trails are gravel or compacted-earth surface and range from 2 to 4 feet wide. (GDP, p. 67.)

Figure 4 in the General Development Plan IS/MND shows the trail alignments for the Rancho Cañada Unit.

In September 2021, the MPRPD Board of Directors approved the Multi-Benefit Community Trail (“MBCT”), which was constructed in partnership with the Big Sur Marathon Foundation. In June 2022, following completion of the Multi-Benefit Community Trail, MPRPD received a Notice of Violation (NOV) from CDFW regarding potential violations of Fish and Game Code sections 1602 and 5650. Since receiving the NOV, MPRPD has been coordinating with CDFW to come to a resolution. The proposed changes to the Park’s trail network analyzed in this Addendum are aimed at fully resolving the NOV.

The proposed changes discussed herein will also align with MPRPD’s Rancho Cañada Floodplain Restoration Project (“Restoration Project”), which is a separate project from the General Development Plan and will be subject to separate CEQA compliance. However, the Rancho Cañada Trail Replacement and Reconstruction Project is designed to be compatible with the Restoration Project to ensure public access is maintained at the site during and after implementation of both projects.

III. PROJECT DESCRIPTION

MPPRD is proposing the Rancho Cañada Trail Replacement and Reconstruction Project to resolve a NOV issued by the CDFW regarding the Multi-Benefit Community Trail (“MBCT”) which was constructed in the Rancho Cañada Unit in spring 2022, and to realign and construct new trail segments to maintain public access at the Park after NOV remediation activities and the separate Rancho Cañada Floodplain Restoration Project (“Restoration Project”) are completed. **Figure 1** shows the project location. The Project would resolve the NOV by removing decomposed granite (DG) from the MBCT within the 100-year Federal Emergency Management Agency (FEMA) floodplain; retiring, retrofitting, or realigning the trail network at the Park according to California State Park Trail Design Standards (CSP Standards); grading and restoring a former golf course pond, and reseeding native riparian, wetland, and grassland plant communities in areas that are disturbed by Project activities. In addition, the Project would include construction of new trail segments according to CSP Standards to maintain and enhance public access at the Park via a consolidated multi-use trail network designed to enhance accessibility and nature-based recreation opportunities at the Park.

The Park is currently open and accessible to the public with most trails available for use. The Park would remain open and accessible except in active construction areas where the Project or Restoration Project activities are being implemented. Once the Project and the Restoration Project are completed, a new trail system would be left for public use. The current trail configuration is shown on **Figure 2** and **Figure 3** shows the proposed completed trail condition, where the Restoration Project would separately, but within the same area, remove and construct several trails according to the proposed completed trail condition in **Figure 3**.

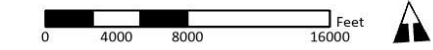
Project Activities

The Project would be phased to minimize disturbance at the Park, resolve the NOV, maintain public access, support implementation of the Restoration Project, and would entail the following activities.

- **Decomposed Granite Removal:** DG will be removed from those segments of the MBCT that are within the FEMA regulatory 100-year floodplain. Once the DG is removed from trail segments, the trail would then be retired, retrofitted, or realigned according to CSP Standards.
- **Trail Retirement:** Segments of trail that are not capable of meeting CSP Standards and/or would be rendered useless during or after the Restoration Project, would be retired. Once DG is removed, these retired segments would be decompacted and restored to a natural state and vegetated with native species.



Figure 1: Project Location



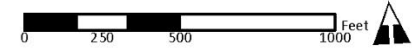
Data Sources: Whitson Engineers 2022, SWCA 2022, MPRPD 2022



Figure 2: Current Road & Trail Conditions



- | | | |
|---|------------------------------|--------------------------------|
| Decomposed Granite (12 ft) | Bare Soil / Aggregate 6 | Paved (12 ft) |
| Decomposed Granite (19 ft) | Bare Soil/ Aggregate (12 ft) | Paved- Closed to Public (6 ft) |
| Bare Soil / Aggregate- Maintenance Road (12 ft) | Concrete/Granitcrete (6 ft) | Bridge |
| Bare Soil / Aggregate (6 ft) | Paved (6 ft) | Rancho Canada Unit |



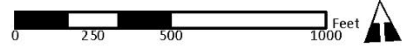
Data Sources: Whitson Engineers 2022, SWCA 2022, MPRPD 2022



Figure 3: Proposed Trail Conditions



- Bare Soil/ Aggregate (6ft)
- Bare Soil/ Aggregate (13 ft)
- Paved (6 ft)
- Paved (12 ft)
- Paved and Aggregate (6 ft and 13 ft)
- Bare Soil / Aggregate - Maintenance Road (12 ft)
- Bridge
- Rancho Canada Unit
- Elevated Terrain
- Restored Floodplain



Data Sources: Whitson Engineers 2022, SWCA 2022, MPRPD 2022

- **Trail Retrofit:** Segments of the MBCT that are necessary for Park operations or public access would be retrofitted according to CSP Standards after DG is removed using approved trail bed materials, including compacted bare dirt, crushed aggregate, or enzyme amended bare dirt /crushed aggregate or they may be constructed with concrete or GraniteCrete for a more durable, hardened surface to meet accessibility requirements.
- **Trail Realignment/Construction:** Some retired trail segments would need to be realigned or replaced with new trail alignments to maintain Park operations and public access. These trails would also be designed and constructed according to CSP Standards using approved trail bed materials, including compacted bare dirt, crushed aggregate, or enzyme amended bare dirt or crushed aggregate, or they may be constructed with concrete or GraniteCrete for a more durable, hardened surface to meet accessibility requirements.
- **Concrete/Asphalt Replacement:** The Project will retrofit some trail segments that are currently asphalt or concrete paths originally part of the former golf course. The Project could remove this asphalt and concrete and retrofit these alignments with compacted bare dirt, crushed aggregate, or enzyme amended bare dirt/crushed aggregate.
- **Multi-Use Trail Widening:** Some existing concrete trail segments would be widened by an additional 13 feet with bare earth/aggregate according to CSP Specifications.
- **Pond Restoration:** During construction of the MBCT one segment of the trail was prepared adjacent to a pond (former golf course pond, referred to as Pond 1) where the native soil was graded, but further construction including placement of DG was never completed. See **Figure 3** for the location of Pond 1. Grading resulted in the edge of native soil upturned for the trail encroaching along the edge of the pond. The edge of the pond would be restored by excavating a shallow bench, approximately 2 feet in depth and 5 feet in width from the existing pond edge, following the trail disturbance edge around the pond (approximately 230 linear feet). Once the excavation is completed, the new bench would be planted with native wetland transitional species including some wetland container plants and native upland seeding at the upland edge of the bench. The existing 0.65-acre pond would be enhanced by creation of the 0.026-acre wetland bench. Creation of the bench would generate approximately 85 cubic yards of soil that would be reused onsite for retrofitted or constructed trail materials in accordance with CSP Standards.

- **Staging and Laydown:** Staging and laydown would be facilitated from existing disturbed areas within the Park. Two alternative areas are proposed for staging and laydown including an existing 0.43-acre gravel lot to the east of the Park parking lot that is currently used for Park operations staging and equipment storage and a 0.58-acre disturbed dirt area in the northern central portion of the MBCT. This disturbed area was used for MBCT construction and remains disturbed.

Construction Schedule

Activities are expected to commence after receipt of the Lake and Streambed Alteration Agreement from CDFW. Work would continue until wet conditions prevent further progress, and any work extending into the wet season would only be done with appropriate General Development Plan BMPs and IS/MND mitigation measures implemented to minimize sedimentation, erosion, and pollutant migration outside of the project area.

IV. LEGAL STANDARD

Under CEQA, lead agencies must conduct an evaluation of proposed changes to a project in order determine whether further environmental analysis is required. (Pub. Resources Code § 21166; CEQA Guidelines, § 15162.) Once an environmental impact report or mitigated negative declaration has been completed for a project, a lead agency may not require preparation of a subsequent environmental review unless the conditions set forth in Public Resources Code section 21166 and CEQA Guidelines section 15162 are satisfied.

When a previous environmental review for a project has been prepared and approved, no subsequent or supplemental environmental review shall be required unless, “on the basis of substantial evidence in the light of the whole record,” the agency determines one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous negative declaration . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the

previous negative declaration was adopted . . . shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous negative declaration . . . ;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous negative declaration;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(*CEQA Guidelines*, §§ 15162(a)(1)-(3); see also Pub. Res. Code, § 21166.)

If none of the conditions set forth in CEQA Guidelines section 15162(b) allowing a lead agency to prepare a subsequent negative declaration are met, CEQA Guidelines section 15164 authorizes the lead agency to prepare an addendum to the previously approved negative declaration. In relevant part, CEQA Guidelines section 15164 states:

- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

V. ANALYSIS

MPPRPD has determined that no subsequent negative declaration is required for this project based on the following analysis.

The IS/MND for the General Development Plan was prepared under the direction of the MPPRPD in accordance with the requirements of CEQA and the CEQA Guidelines. The IS/MND examined the potential environmental effects of the General Development Plan, consisting of trail improvements, trail realignment, and new trail construction throughout the Park. The MPPRPD board of Directors adopted the IS/MND on March 3, 2021.

Potentially significant environmental impacts were analyzed and mitigation measures were adopted for the General Development Plan upon approval in March 2021. The proposed Rancho Cañada Trail Replacement and Reconstruction Project will change the alignment and construction of some trails described in the General Development

Plan. The previously adopted mitigations for the General Development Plan continue to apply to the proposed Project. Additionally, MPRPD will apply the Best Management Practices (BMPs) identified in the General Development Plan to minimize potential impacts during implementation of the proposed Project.

The new trail alignment under the Project and that contemplated in the General Development Plan will occupy the same area and involve the same recreational uses. The construction of new trails will also involve the same methods contemplated in the General Development Plan IS/MND. Therefore the proposed Project represents a minor modification to the relevant components of the General Development Plan analyzed in the IS/MND.

The proposed Project's modifications to the trails analyzed in the General Development Plan IS/MND would result in no change to previously identified effects for the following topic areas:

- Agriculture and Forestry Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Implementing the proposed Project would result in minor, short-term impacts during construction. These would be consistent with those analyzed in the General Development Plan IS/MND and would affect the following resource areas:

- Aesthetics
- Air Quality
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Recreation
- Transportation

The presence of heavy equipment and associated disturbance during Project construction would temporarily impact the aesthetics of the site, increase noise levels, and affect local recreation use. However, these impacts would be short-term and aesthetic conditions, noise levels, and recreation use following Project completion would

be similar to pre-Project conditions. These impacts would be similar to those evaluated in the General Development Plan IS/MND.

Implementing the proposed Project would result in production of greenhouse gas emissions and other criteria air pollutants, energy consumption, and traffic as a result of travel to and from the Project site and/or operation of on-site equipment. However, the amount of greenhouse gas emissions and other criteria air pollutants, energy use, and traffic increases associated with Project construction would be consistent with levels anticipated in the General Development Plan IS/MND.

Project construction could adversely impact special-status wildlife species, such as California red-legged frog,, but BMPs from the General Development Plan meant to address potential impacts to biological resources will continue to apply and relevant BMPs will be implemented during Project activities, consistent with the IS/MND. Additionally, the project is expected to have a beneficial impact on biological resources following project completion by improving on-site habitat conditions and stabilizing soils and preventing runoff water quality issues in the Carmel River corridor.

The proposed Project would have beneficial impacts on geology and soils and hydrology and water quality as a focal point of the project's purpose is to stabilize soils and prevent water quality impacts from decomposed granite into the Carmel River corridor during storm/flooding events. In addition, Project activities would be implemented in accordance with General Development Plan BMPs and local regulations designed to avoid and minimize potential construction-related adverse effects on water quality, including soil erosion.

VI. CONCLUSION

The Rancho Cañada Trail Replacement and Reconstruction Project, which modifies the trail alignment of the General Development Plan, would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects examined in the General Development Plan IS/MND. Moreover, there is no new information and there are no changed conditions that would result in any new or substantially more severe significant impacts than those examined in the IS/MND.

VII. MITIGATION MEASURES

Based on its review of the Rancho Cañada Trail Replacement and Reconstruction Project and its familiarity with the project environment, MPRPD has determined that there is not any new information that was not available at the time of the previous IS/MND that would show that the any revisions to the previously approved mitigation measures are necessary.

All applicable mitigation measures adopted for the General Development Plan would be implemented for the proposed Project.