

# Exemption Analysis for the Rancho Cañada Trail Replacement and Reconstruction Project

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Prepared for:

Monterey Peninsula Regional  
Park District

February 2024

Prepared by:



Consulting  
Engineers and  
Scientists



Exemption Analysis for the

# **Rancho Cañada Trail Replacement and Reconstruction Project**

Prepared for:

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## 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.
- **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.

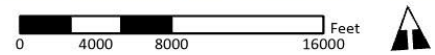




Figure 1: Project Location



★ Project Location



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





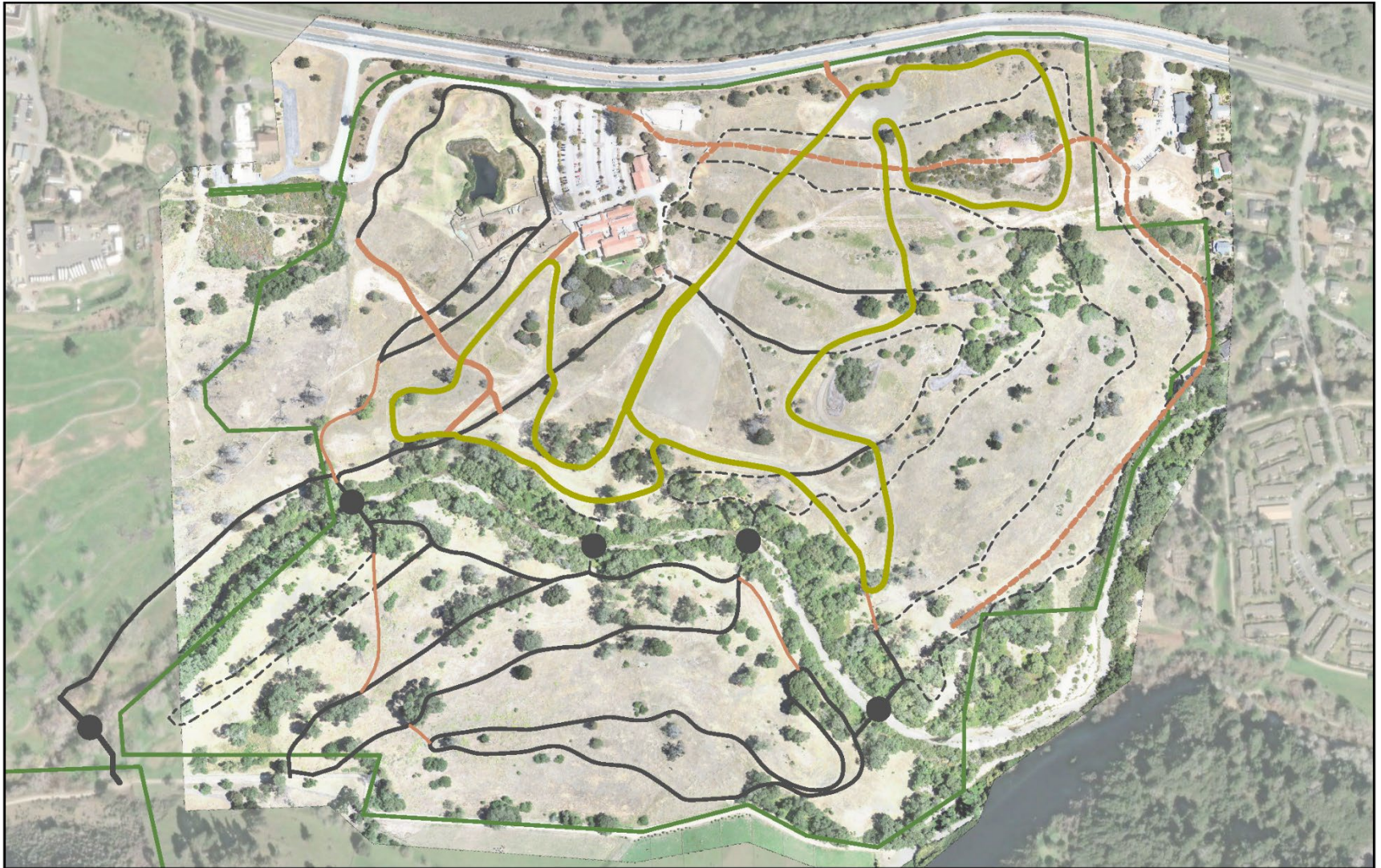
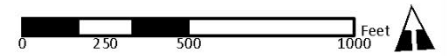


Figure 2: Current Road & Trail Conditions



- |   |                               |                                |
|---|-------------------------------|--------------------------------|
| 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/Granitecrete (6 ft)  | Bridge                         |
| Bare Soil / Aggregate (6 ft)                    | Paved (6 ft)                  | Rancho Canada Unit             |



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

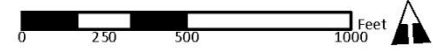




**Figure 3: Proposed Trail Conditions**



- 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 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.

## Findings

The CEQA Guidelines provide a list of several categorical exemptions which are applicable to projects that the Natural Resources Agency has determined do not pose a significant risk to the environment. The proposed project is exempt from CEQA under the Class 1 exemption for Existing Facilities. The Class I exemption applies to the “operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing...facilities...or topographical features, involving negligible or no expansion of existing or former use.” (CEQA Guidelines, § 15301.) Specifically, the Project will involve repair, maintenance, and minor alterations to “[e]xisting highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities.” (CEQA Guidelines, § 15301(c).)

The proposed project would involve negligible or no expansion of existing use at the Park because replacing, realigning, or retiring trails will not necessarily involve an expansion of use. The proposed project would resolve the NOV and include construction of new trail segments according to CSP Standards to maintain public access at the Park via a substantially consolidated trail network. The Parks is currently open and accessible to the public with most trails available for use. The proposed project would not expand the uses of the trails.

The proposed project would be completed over four seasons and would not result in any significant environmental impacts. Those that may occur would be primarily located in existing disturbed areas within the Park (i.e. the existing trail). Short term minor impacts to biological resources may occur from small equipment use and general project activities, however avoidance and minimization measures listed above will be implemented. Additionally, the project is expected to have a beneficial impact on biological resources following project completion by stabilizing soils and preventing runoff water quality issues in the Carmel River corridor. The presence of heavy equipment would temporarily impact the aesthetics of the site and would increase noise; however, these impacts would be short-term and would return to pre-project conditions following the completion of the project. Transportation to and from the site would result in the production of greenhouse gas emissions and other criteria air pollutants, however, the amount of greenhouse gas emissions and other criteria air pollutants that the project produces would be minimal and insignificant.

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. No project impacts are anticipated for recreation, utilities/service systems, cultural resources, land use/planning, population/housing, wildfire, energy, hazards/hazardous materials, mineral resources, public services, or tribal cultural resources. The project would have less-than-significant impacts on aesthetics, air quality, biological resources, noise, greenhouse gas emissions, and transportation. The proposed project would not have a significant impact on any resources, nor would it require mitigation. There are no unusual circumstances associated with the project site that would lead to potential significant environmental effects.

In addition to the Class 1 exemption, at least two other CEQA categorical exemptions cover some or all of the trail restoration work included in the proposed project: (1) Replacement and

Reconstruction (Class 2); and (2) Minor Alterations of Land (Class 4). An agency may rely on and cite several different exemptions to support a determination that CEQA review is not required for a particular activity. (See *North Coast Rivers Alliance v. Westlands Water Dist.* (2014) 227 Cal.App.4th 832.) An agency may also combine several exemptions to find an entire project exempt from CEQA. (*Surfrider Foundation v. California Coastal Com.* (1994) 26 Cal.App.4th 151, 156.)

Class 2 consists of “replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.” (CEQA Guidelines, § 15302.) The proposed project would involve replacing, realigning, or retiring trails that will largely be in the same site and have the same purpose, with some updated alignments to resolve the NOV and improve overall trail connectivity.

The Class 4 exemption consists of “minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.” (CEQA Guidelines, § 15304.) Multiple examples listed in CEQA Guidelines section 15304 apply to the proposed project, including [c] “filling of earth into previously excavated land with material compatible with the natural features of the site;” and [f] “minor trenching and backfilling where the surface is restored.” Additionally, the proposed project would not involve removal of healthy, mature, scenic trees.

MPPRD has considered whether the categorical exemptions relied upon is negated by one of the exceptions identified in CEQA Guidelines, section 15300.2 and Public Resources Code, section 21084, and upon such consideration, none of the exceptions have been found to apply.

## Reference

California State Parks. 2019. *Trails Handbook*. Available: [https://www.parks.ca.gov/?page\\_id=29674](https://www.parks.ca.gov/?page_id=29674) Accessed: September 7, 2023.