

MEMORANDUM

DATE: April 29, 2021

To: John Akeman, Park Planning Manager, County of Monterey Department of Public Works, Facilities, & Parks

FROM: Pam Reading, Principal in Charge/Senior Environmental Planner

SUBJECT: Categorical Exemption for the San Lorenzo Park Project, Monterey County, California

This memorandum was prepared to support a Categorical Exemption (CE) under the California Environmental Quality Act (CEQA) for the proposed San Lorenzo Park Project (proposed project) in Monterey County, California. The County of Monterey (County) is proposing improvements to San Lorenzo Park (SLP) (project site) at 1160 Broadway Street, along the Salinas River.

Article 19 of the *State CEQA Guidelines* includes, as required by Public Resources Code (PRC) Section 21084, a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the proposed project. This document demonstrates that the proposed project qualifies for a CEQA Exemption as a New Construction or Conversion of Small Structures (Class 3) and as a Small Habitat Restoration Project (Class 33), consistent with the provisions of *State CEQA Guidelines* Sections 15303, 15333, and 15300.2, and provides information for the County as the Lead Agency regarding a finding that the proposed project is exempt under CEQA.

PROJECT DESCRIPTION

Project Location and Setting

The project site is located at 1160 Broadway Street just outside King City, Monterey County, California. The project site is owned and operated by the County Department of Public Works, Facilities, and Parks. The Salinas River is located approximately 500 feet (ft) south of SLP. The primary project site access is provided by Broadway Street, which borders the northern perimeter of SLP. Regional vehicular access to the project site is provided by United States Route 101 (US-101), which is located approximately 0.2 miles (mi) southeast of the project site. Figure 1 (all figures are in Attachment A) shows the project location.

Existing Conditions

The project site is currently developed with existing park and recreational uses associated with SLP. SLP offers day-use facilities including picnic areas, a gazebo, playgrounds, horseshoe pits, volleyball courts, softball areas, and a walking trail along the banks of the Salinas River. SLP offers over 90

campsites including tent camping and recreational vehicle (RV) hookups and pull-through sites, and has a large-group picnic area and meeting facilities available for reservation. SLP is also home to the Monterey County Agricultural and Rural Life Museum, which comprises various buildings and exhibits, including the following: Exhibit Barn, Blacksmith Shop, Irrigation Building, Spreckels House, La Gloria Schoolhouse, and the King City Depot.¹

Project Vicinity and Surrounding Land Uses

According to the County Land Use Plan for Central Salinas Valley, the project site is designated as a national forest boundary associated with the San Lorenzo Recreation Area.² Per the County Zoning Code, the project site is zoned as a Public/Quasi-Public Zoning District.³ Agricultural uses surround the project site to the north, west and south, and residential uses are to the west of the project site.

Proposed Project

The County is proposing the following improvements to SLP:

- Installation of a splash pad
- Construction of a perimeter recreation trail
- Construction of an outdoor classroom
- Habitat Enhancement Area
- Removal of two existing play structures
- Installation of two new play structures in a new location
- Renovation of five existing barbeque areas
- Installation of five new Americans with Disabilities (ADA) compliant barbeque areas

These improvements are shown on Figure 2 and are described in more detail below. The County intends to pay for the improvements with grant money received from the Statewide Park Program (SPP).

Proposed Improvements

Splash Pad

The proposed project would install an approximately 100 by 80 square-foot splash pad with a recirculating water pump system. The splash pad would require water, electrical, and sewer connections. The splash pad would include a prefabricated restroom building with utility storage, an outdoor shower, 8-foot (ft) benches made of recyclable materials, picnic tables made of recyclable materials with an overhead shade structure, a drinking fountain, trash/recycle receptacles, and lockers for visitor storage. The splash pad would have a 4 ft perimeter safety fence and include signage portraying facility information, rules, and regulations.

¹ City of King. 2016. San Lorenzo Park. Website: <http://www.kingcity.com/for-visitors/san-lorenzo-park/> (accessed April 15, 2021).

² Monterey County Resource Management Agency. 2012. Monterey County Land Use Plan, Central Salinas Valley. August 20.

³ County of Monterey. 2021. GIS Webapps. Website: <https://montereyco.maps.arcgis.com/apps/InformationLookup/index.html?appid=1dce0909198142128bc57aee61c811ea> (accessed April 12, 2021).

Perimeter Recreation Trail

The proposed project would construct a 4 ft wide paved pedestrian and bicycle trail with a 2 ft wide decomposed granite shoulder that would traverse the perimeter of the park and provide connection to a system of trails near the Salinas River and the King City regional trail. The recreational trail would provide interpretation of natural, cultural, and recreational resources via signage placed along the trail. The recreational trail would include a trail head/staging area; 6 ft redwood benches; trash/recycle receptacles; a drinking fountain; post mile markers (0.25 mi increments); a bike rack; an air pump/compressor; signage portraying directions, rules, and regulations; and a parcourse (with 5 stations).

Outdoor Classroom

The proposed project would construct a plaza area as an extension of the existing agricultural museum and outdoor barn. The plaza would function as an outdoor classroom to be used to meet the State requirements for interpretation of natural, cultural, and recreational resources as part of the 4th grade educational program. The plaza/outdoor classroom would include an accessible path of travel between the adjacent parking lot and plaza area with interpretive exhibits and displays.

Habitat Enhancement Area

The proposed project includes a habitat enhancement area within SLP near the park's entrance. Enhancement efforts would include phased removal of aging eucalyptus trees to be replanted at a 5:1 mitigation ratio consisting of successional replanting of the upper canopy native trees and native vegetation understory with species that provide symbiotic benefits. The proposed project would also include installation of a bio swale to provide storm water retention, an irrigation system, a pathway, redwood benches, interpretive signs providing plant identification information, and fencing to match the existing corral style perimeter fencing at SLP.

Play Structures

The proposed project would remove two existing play structures, which would be replaced at a new inclusive play area. The new inclusive play area would include two children's play structures for 2-to-5-year-olds and 5-to-12-year-olds. The new structures would be compliant with the United States Consumer Product Safety Commission's guidelines for public playgrounds and ADA. The play area would include additional play components and have a similar theme (agriculture/nature) as the proposed splash pad. The play area would include amenities such as 8 ft benches made of recyclable materials; picnic tables made of recyclable materials; a drinking fountain; trash/recycle receptacles; signage portraying facility information, rules, and regulations; landscaping; and an overhead shade structure. An ADA pathway would be installed from the existing parking area to the play area. Following removal of the existing play structures, the site would be restored to park area by grading and reseeding the turf.

Barbeque Areas

The proposed project would include the renovation of five existing barbeque areas and the installation of five new individual ADA-compliant barbeque areas. Each of the new barbeque areas would be 400 square feet and provide a picnic table on a decomposed granite pad, a barbeque grill,

an electrical hookup, trash/recycle receptacles, and an overhead shade structure. An ADA pathway would be installed from the existing parking area to each barbeque area.

Project Construction

Construction would take approximately 32 months and would occur in a single phase. Project construction is expected to start in July 2022.

EXEMPTIONS

Article 19 of the *State CEQA Guidelines* includes, as required by PRC Section 21084, a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the proposed project, and to demonstrate that the proposed project qualifies for a CEQA Exemption as a New Construction or Conversion of Small Structures and as a Small Habitat Restoration Project, consistent with the provisions of *State CEQA Guidelines* Sections 15303, 15333, and 15300.2. Specifically, the information provided herein shows the following:

- a. The project qualifies for an exemption under *State CEQA Guidelines* Sections 15303 (i.e., Class 3) and 15333 (Class 33) and, as a result, would not have a significant effect on the environment.
- b. The analysis shows there are no exceptions to qualifying for the exemption, as identified in *State CEQA Guidelines* Section 15300.2.

State CEQA Guidelines Section 15303, New Construction or Conversion of Small Structures, defines Class 3 projects as those consisting of the following: “construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel.” Section 15303(d) allows water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction. Section 15303(e) allows for accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

As described in the Project Description, the proposed project would include the construction of new, small recreational structures associated with the existing SLP, in addition to new water, electrical, and sewer connections. Therefore, the proposed project properly qualifies for an exemption under *State CEQA Guidelines* Section 15303.

State CEQA Guidelines Section 15333, Small Habitat Restoration Projects, defines Class 33 projects as those consisting of the following: “projects not to exceed five acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife provided that: a) there would be no significant adverse impact on endangered, rare or threatened species or their habitat pursuant to section 15065; b) there are no hazardous materials at or around the project site that may be disturbed or removed; and c) the project will not result in impacts that are significant when viewed in connection with the effects of past projects, the effects of other

current projects, and the effects of probable future projects.” As described in Section 15333(d), such restoration projects may include revegetation of disturbed areas with native plant species and stream or riverbank revegetation.

As described in the Project Description, the proposed project also includes a habitat enhancement area within SLP near the park’s entrance. The proposed improvements would be located within SLP’s existing boundary and would not exceed 5 acres (ac) in size. In addition, as further described below, the proposed project would not create a significant adverse impact on special-status species or habitat, disturb or remove hazardous materials, or result in cumulative impacts. Therefore, the proposed project properly qualifies for an exemption under *State CEQA Guidelines* Section 15333.

As the proposed project properly qualifies for an exemption under *State CEQA Guidelines* Sections 15303 (i.e., Class 3) and 15333 (Class 33), the proposed project would not have a significant effect on the environment. Additionally, the following analysis shows there are no exceptions to qualifying for the CE, as identified in *State CEQA Guidelines* Section 15300.2.

EXCEPTIONS TO CATEGORICAL EXEMPTIONS

In addition to investigating the applicability of *State CEQA Guidelines* Sections 15303 (Class 3) and 15333 (Class 33) to the proposed project, this memorandum assesses whether any of the exceptions to qualifying for the CE are present. The following analysis compares the criteria of *State CEQA Guidelines* Section 15300.2 (Exceptions) to the proposed project. As described in the analysis below, LSA has determined that none of the exceptions are applicable to the proposed project.

Criterion 15300.2(a): Location

- a. Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.*

Although the proposed project is located adjacent to the Salinas River, as discussed under Criterion 15300.2(c): Significant Effect below, the proposed project would not result in significant effects on the environment. Furthermore, the proposed project would benefit the surrounding natural community, as it would include a habitat enhancement area within SLP near the park’s entrance. In addition, the proposed project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under *State CEQA Guidelines* Section 15300.1(a) does not apply to the proposed project.

Criterion 15300.2(b): Cumulative Impact

- b. Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

A cumulative impact from several projects is the change in the environment that results from the incremental impact of a project when added to other closely related past, present, and reasonably

foreseeable probable future projects (*State CEQA Guidelines* §15355(b)). Related projects considered to have the potential of creating cumulative impacts in association with the proposed project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the proposed project.

There are no probable future projects or related projects within the vicinity of the project site.^{1,2} Therefore, the proposed project would not result in any cumulative impacts in combination with recent or future projects. The proposed project would also not result in any long-term or growth-inducing impacts that would be cumulatively considerable when viewed with any subsequent projects in the same location. No permanent or long-term effects, such as loss of wetlands or other sensitive natural communities, take of special-status species, increased vehicle trips, or creation of stationary sources of air and noise emissions, would occur as part of the proposed project. Although the proposed project would include a phased removal of aging eucalyptus trees, the trees would be replanted at a 5:1 mitigation ratio consisting of successional replanting of the upper-canopy native trees and native vegetation understory with species that provide symbiotic benefits. Furthermore, the effects of the proposed project would generally be beneficial, as the proposed project would provide upgraded recreational facilities to the local and regional community and would enhance the habitat area near the park entrance. Thus, the proposed project's contributions to potential cumulative impacts would not be cumulatively considerable, and the exception under *State CEQA Guidelines* Section 15300.2(b) does not apply to the proposed project.

Criterion 15300.2(c): Significant Effect

c. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

No unusual circumstances have been identified in or around the project site that would result in significant environmental impacts. The proposed project involves the construction of upgraded recreational facilities and the enhancement of a habitat area within an existing park. Furthermore, based on field reviews of the project site and review of the pertinent literature, as described below, the potential for significant adverse environmental impacts as defined under CEQA is negligible. With the implementation of standard regulatory compliance measures, there would be no significant environmental impacts under CEQA. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(c) does not apply to the proposed project.

Aesthetics

The proposed project is located within an existing park that is currently developed with day-use and overnight recreational facilities. Proposed structures would be visually compatible with the existing use of the site. As further described below under the discussion of Criterion 15300.2(d): Scenic

¹ King City Community Development Department. 2021. Current Public Review Documents. Website: <http://www.kingcity.com/city-departments/community-development-department/> (accessed April 14, 2021).

² County of Monterey. 2021. Current Major Projects. Website: <https://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/public-works-facilities/current-major-projects> (accessed April 14, 2021).

Highway, no scenic vistas or highways are located within the vicinity of the project site. No new sources of light or glare would be constructed as part of the proposed project. Therefore, the proposed project would not impact scenic views or scenic resources, degrade the existing visual character or quality of the project site, or create a new source of substantial light or glare.

Agriculture and Forestry Resources

The project site is an existing park that is currently developed with day-use and overnight recreational facilities. No agriculture or forestry resources currently exist within the existing park/ project site or would be impacted due to development of the proposed project.

Air Quality

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading and other earthmoving activities. Emissions from construction equipment are also anticipated. The Monterey Bay Air Resources District (MBARD) has developed screening criteria in its CEQA Air Quality Guidelines to provide lead agencies with a conservative indication of whether the proposed project would result in potentially significant air quality impacts. If the proposed project is below the screening criteria, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions. For construction sites with earthmoving (grading and/or excavation), the MBARD screening size is 2.2 ac per day. Since construction of the proposed project would disturb less than 2.2 ac per day, based on the MBARD screening criteria, construction of the proposed project would not result in short-term air quality impacts.

Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity), and area sources (e.g., landscape maintenance equipment use) related to the proposed project. Implementation of the proposed project would not result in a significant increase in the generation of vehicle trips that would increase air pollutant emissions. The proposed project would result in low levels of area source emissions associated with landscape maintenance and off-site emissions due to energy generation. However, these emissions would be minimal and would not exceed the pollutant thresholds established by MBARD.

Since the proposed project would not result in significant construction- or operation-related air quality impacts, the proposed project would not conflict with applicable air quality plans and would not expose sensitive receptors to substantial pollutant concentrations. In addition, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, the proposed project would not result in short- or long term air quality impacts.

Biological Resources

The project site is currently developed with existing park and recreational uses. Existing recreational facilities include group picnic areas and tables, campsites, RV hookups, children's play areas, volleyball courts, softball fields, a museum, and a walking trail along the park perimeter.

An LSA biologist conducted a literature review and records search on April 9, 2021, to identify existing occurrence records of special-status plant and animal species in the vicinity of the project

site. Database records from the California Department of Fish and Wildlife (CDFW), the California Natural Diversity Database (CNDDDB)—RareFind 5, and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California were utilized to assist in determining the existence or potential occurrence of any special-status plant and animal species¹ in or immediately adjacent to the project site. Similarly, LSA reviewed the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online system² and the USFWS Critical Habitat Mapper,³ which present candidate, threatened, and endangered species; crucial habitat; national wildlife refuges; and/or migratory birds that occur within or near a defined search area. The USFWS National Wetlands Inventory⁴ was also reviewed to determine whether any potential wetlands or surface waters had been previously identified on the site. CNDDDB records within a 5 mi radius surrounding the project site are included in Appendix B.

A field survey of the project site and surrounding areas was conducted on April 9, 2021, to document existing site conditions and the potential presence of sensitive biological resources.

The project site consists of nonnative grassland and landscaped and developed areas. Habitat on the project site is considered low quality. No sensitive natural vegetation communities or special-status wildlife species were identified on the project site during the field surveys (refer to Figure 3), and no special-status plant or wildlife species are expected to occur within the project site due to the lack of suitable habitat and developed/maintained conditions present in all portions of the project site. A total of 25 wildlife species were observed on or near the project site during the April 2021 field survey. However, the species that were observed commonly occur in and around open space and developed areas throughout California (e.g., house finch [*Haemorhous mexicanus*], mourning dove [*Zenaida macroura*], and black phoebe [*Sayornis nigricans*]). No aquatic resource areas (e.g., wetlands, vernal pools, or critical habitats for sensitive species) were observed on the project site during the field survey. Additionally, there are no water bodies or drainage features on the project site that may be subject to jurisdiction by the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and/or CDFW. Furthermore, the project site does not function as a wildlife movement corridor.

The proposed project includes removing the existing eucalyptus grove near the park entrance and replacing it with native vegetation. Eucalyptus trees are not subject to the 2010 Monterey County

¹ The term “special-status species” refers to those species that are listed or proposed for listing under the California Endangered Species Act and/or Federal Endangered Species Act, California Fully Protected Species, California Species of Special Concern, and California Special Animals. It should be noted that “Species of Special Concern” and “California Special Animal” are administrative designations made by the California Department of Fish and Wildlife and carry no formal legal protection status. However, Section 15380 of the *State CEQA Guidelines* indicates that these species should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

² United States Fish and Wildlife Service (USFWS). 2021. IPaC Information for Planning and Consultation. Website: <https://ecos.fws.gov/ipac/> (accessed April 2021).

³ USFWS. 2021. National Wetlands Inventory. Wetlands Mapper. Website: <https://www.fws.gov/wetlands/data/Mapper.html> (accessed April 2021).

⁴ USFWS. 2021. National Wetlands Inventory. Wetlands. Website: <https://www.fws.gov/wetlands/> (accessed April 2021).

Zoning Ordinance for tree removals;¹ therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources. Furthermore, the project site is not covered by and therefore would not conflict with the provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan or other adopted local, regional, or state approved habitat conservation plan. Replacing the eucalyptus grove with native vegetation will result in a net increase of native habitat and biological resource functions and values and would result in a beneficial impact to biological resources.

Project construction could involve the removal of trees and vegetation that provide nesting habitat for a variety of resident and migratory bird and raptor species. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Therefore, project contract specifications would stipulate that vegetation removal should occur outside the nesting season if possible, which is typically between January 1 through September 15. If vegetation removal or construction activities during the nesting season are not avoidable, project contract specifications would stipulate that, in compliance with the MBTA and the California Fish and Game Code, the County should retain a qualified biologist to conduct a preconstruction survey within 36 hours prior to construction activities. The survey area should include the proposed construction site and surrounding habitat areas that could be indirectly impacted by increased noise and vibration. If active bird nests are observed within the direct and/or indirect disturbance limits, the qualified biologist should identify an appropriately sized exclusion zone around the nest in which no work would be allowed until the qualified biologist determines that the nest is no longer active.

Project construction could involve the removal of trees and vegetation that provide roosting habitat for bat species. All bats are protected from take as nongame mammals under Section 4150 of the California Fish and Game Code. Therefore, to ensure compliance with Section 4150 of the California Fish and Game Code, project contract specifications should stipulate that the County retain a qualified biologist to conduct a preconstruction survey for roosting bats within a week prior to tree removal or trimming activities. If nonvolant (flightless) bats are found to be roosting in trees scheduled for removal or trimming, tree removal/trimming activities should not occur. Tree removal and trimming activities may commence once the qualified biologist confirms that the nonvolant roosting bats are absent. The qualified biologist should continue monitoring for nonvolant bats until the tree removal and trimming activities are complete.

Cultural Resources

Please refer to the discussion below under Criterion 15300.2(f), Historical Resources.

Energy

Energy use from utilizing construction equipment would be short-term and temporary. Energy use during operation would include a small amount of electricity use. As such, construction and operation of the proposed project would not result in the wasteful, inefficient, or unnecessary

¹ County of Monterey. 2013. Monterey County Municipal Code. Title 16. Environment. Chapter 16.60— Preservation of Oak and Other Protected Trees. Website: https://library.municode.com/ca/monterey_county/codes/code_of_ordinances?nodeId=TIT16EN_CH16.60PROAOTPRTR (accessed April 21, 2021).

consumption of fuel or energy. Furthermore, the proposed project would not conflict or obstruct a State or local plan for renewable energy or for addressing energy efficiency.

Geology and Soils

The project site, like most of California, would be subject to seismic ground shaking in the event of an earthquake. The proposed project would be required to comply with the California Building Code (CBC) in effect at the time of construction and would not exacerbate an existing geologic or seismic hazard. Furthermore, the project site is not located within a known earthquake fault zone, liquefaction zone, or landslide zone.¹ Therefore, the proposed project would not result in impacts related to geology and soils.

Greenhouse Gas Emissions

Construction activities, such as site preparation, excavation, on-site heavy-duty construction vehicles, equipment hauling materials to and from the site, and motor vehicles transporting the construction crew, would produce combustion emissions from various sources. However, due to the small area of disturbance and limited number of project improvements, greenhouse gas (GHG) emissions during construction would be negligible. In addition, operation of the proposed project would generate minimal GHG emissions associated with vehicle trips, electricity, and activities such as landscaping and routine maintenance. However, these emissions would be minimal and would not exceed thresholds established by MBARD. As such, the proposed project would not generate substantial GHG emissions that may have a significant impact on the environment and would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Hazards and Hazardous Materials

Please refer to the discussion below under Criterion 15300.2(e), Hazardous Waste Sites.

Hydrology and Water Quality

Construction activities would involve disturbance, grading, and excavation of soil, which could result in temporary erosion and movement of sediments into the storm drain system, particularly during precipitation events. However, the proposed project would comply with all applicable National Pollutant Discharge Elimination System (NPDES) requirements to reduce impacts to water quality. If project construction results in the disturbance of greater than 1 ac of soil, the proposed project would be subject to the State Water Resources Control Board (SWRCB) Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ) (Construction General Permit). If compliance with the Construction General Permit is required, the County and its contractor would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) and best management practices (BMPs), including, but not limited to, erosion control and sediment control BMPs designed to minimize erosion and retain sediment on site, and good housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Regardless, because of the

¹ California Department of Conservation. 2016. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/> (accessed April 15, 2021).

small amount of ground disturbance during construction, project construction activities have a low potential to impact water quality. Furthermore, proposed improvements would not substantially alter the existing drainage pattern of the site or area, and the resulting increase in storm water runoff associated with implementation of the proposed project would be minimal due to the small increase in impervious surface. In addition, as part of the habitat enhancement, the proposed project would include installation of a bio swale to provide storm water retention. Therefore, the proposed project would not result in impacts associated with hydrology and water quality.

Land Use and Planning

The proposed project involves improvements within an existing park that is currently developed with day-use and overnight recreational facilities and therefore would not divide an established community. In addition, the proposed project does not propose or require any changes to the land use or zoning designations. Therefore, the proposed project would not have impacts associated with land use and planning.

Mineral Resources

The project site is located within the Central Salinas Valley planning area, which does not contain any known mineral resources of value as designated by the State Geologist.¹ Therefore, the proposed project would not impact mineral resources.

Noise

The County Municipal Code limits loud and unreasonable noise within unincorporated areas of the County between the hours of 9:00 p.m. to 7:00 a.m. the following morning. Loud and unreasonable noise includes any sound that is audible at a distance of 50 ft in any direction from the source of sound or any sound that exceeds the nighttime hourly equivalent continuous sound level (L_{eq}) (45 A-weighted decibels [dBA]) or the maximum noise level (65 dBA). Construction of the proposed project would be restricted to the daytime hours of 7:00 a.m. to 9:00 p.m. as allowed by the County Municipal Code. Therefore, the proposed project would have no construction-related noise impacts.

Since the proposed project involves upgrading existing recreational facilities, noise generated from daily operational use of the proposed project would be similar to noise currently generated by existing uses at the site. The proposed project would not result in a significant increase in the generation of vehicle trips; therefore, the proposed project would also not result in an increase in vehicle noise at the project site. Furthermore, given the nature of the existing uses at the site and the proposed park improvement, the proposed project does not include any sources of stationary noise (e.g., a heating, ventilation, and air conditioning [HVAC] system). Therefore, implementation of the proposed project does not result in impacts associated with stationary noise. Therefore, the proposed project would have no long-term noise impacts.

Population and Housing

The proposed project includes improvements to an existing park currently developed with day-use and overnight recreational facilities. The proposed project would not directly induce population

¹ County of Monterey. 2008. Monterey County 2007 General Plan Environmental Impact Report: Mineral Resources. September.

growth in the region, as it is intended for use by the existing population. Although the proposed project would involve new utility connections, the proposed project will tie into existing infrastructure and will not involve the construction or extension of existing infrastructure (e.g., roads or sewer lines) that will indirectly induce population growth. Additionally, the proposed project is located within an existing park and therefore would not displace existing people or housing. Therefore, the proposed project would not result in impacts to population and housing.

Public Services

The proposed project includes improvements to an existing park currently developed with day-use and overnight recreational facilities. The proposed project improvements would not require additional public services (e.g., fire protection, police protection, schools, or parks) beyond what currently exists. Therefore, the proposed project would not result in impacts to public services.

Recreation

The proposed project includes improvements to an existing park currently developed with day-use and overnight recreational facilities. Although development of the proposed project may result in increased use of the existing SLP, the intent of the proposed project is to improve the overall character and condition of the project site to accommodate existing and future visitor use. Therefore, the proposed project would not result in the physical deterioration of the existing SLP as a result of an increase in visitors. Additionally, the proposed project involves improvements to a recreational facility and therefore would not require the construction or expansion of other recreational facilities that may have adverse physical effects on the environment. Therefore, the proposed project would not result in impacts associated with recreational facilities.

Transportation

As a result of adoption and enactment of Senate Bill (SB) 743 by the California legislature, delay and level of service (LOS) are no longer criteria for determination of transportation impacts in CEQA. With the current *State CEQA Guidelines*, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT). VMT is the amount and distance of automobile travel attributable to a project. For agencies and jurisdictions that have not yet adopted or established VMT guidelines or thresholds, the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA (TA)*, dated December 2018, provides guidance for analyzing a project's impacts related to VMT. The OPR TA recommends that a project generating 110 average daily trips or fewer be screened from a VMT analysis due to the presumption of a less than significant impact. The proposed project would upgrade recreational facilities within the existing SLP. Although the proposed project may generate additional trips to and from the project site, it is unlikely to generate more than 100 ADT. Therefore, the proposed project would not result in a substantial or measurable increase in VMT. In addition, the proposed project would maintain the existing access driveways and would not require any improvements to the existing roadways adjacent to the project site. Therefore, the proposed project would not result in impacts related to design hazards, incompatible uses, or inadequate emergency access. The proposed project would not result in transportation-related impacts.

Tribal Cultural Resources

As discussed under Criterion 15300.2(f): Historic Resources below, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines*. In addition, given the previous disturbance of the project site and the negative findings during the site survey, the likelihood of encountering subsurface tribal cultural resources during ground-disturbing activities is low. Furthermore, AB 52 consultation is not required for categorically exempt projects. Therefore, impacts to tribal cultural resources would not occur.

Utilities and Service Systems

The project site is currently served by existing utility service providers. The proposed project would upgrade recreational facilities within the existing SLP, connecting to existing utility infrastructure. Given the nature the proposed park improvements (e.g., installation of a splash pad and new play structures, renovation of existing barbeque areas, construction of an outdoor classroom, construction of a perimeter trail, and replacement of a eucalyptus grove with native habitat), demand for water, wastewater treatment, storm water drainage, or electricity would be negligible. Therefore, the proposed project would have no impact on utilities or service systems.

Wildfire Hazard

The project site is not located within any State Responsibility Areas (SRA) for fire service and is not within a very high fire hazard severity zone.¹ Therefore, the proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Conclusion

As described above, the proposed project would not result in any significant effect on the environment due to unusual circumstances. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(c) does not apply to the proposed project.

Criterion 15300.2(d): Scenic Highway

- d. A categorical exemption shall not be used for a project, which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway. This criterion does not apply to improvements required as mitigation by an adopted Negative Declaration or certified EIR.*

The project site is not within view of an officially designated or eligible State Scenic Highway.² Therefore, no scenic resources within view of a State Scenic Highway would be altered as part of the

¹ California Department of Forestry and Fire Protection. 2020. California Fire Hazard Severity Zone Viewer. Website: <https://egis.fire.ca.gov/FHSZ/> (accessed April 15, 2021).

² California Department of Transportation. 2018. California State Scenic Highway System Map. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983> (accessed April 15, 2021).

proposed project, and the exception under *State CEQA Guidelines Section 15300.2(d)* does not apply to the proposed project.

Criterion 15300.2(e): Hazardous Waste Sites

- e. A categorical exemption shall not be used for a project located on a site, which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The project site does not include any active storage sites listed on the SWRCB Leaking Underground Storage (LUST) database¹ or the California Department of Toxic Substances Control (DTSC) site cleanup program,² two of the component databases of the State's Hazardous Waste and Substances Site List (Cortese List) of known hazardous materials compiled pursuant to Government Code Section 65962.5. Therefore, no impacts associated with locating a project on a site included on a list of hazardous materials would occur, and the exception under *State CEQA Guidelines Section 15300.2(e)* does not apply to the proposed project.

Criterion 15300.2(f) Historic Resources

- f. A categorical exemption shall not be used for a project, which may cause a substantial adverse change in the significance of a historical resource.*

As documented in Attachment C, a cultural resources survey assessment (consisting of background research and a field survey) was conducted to assess the potential of the proposed project to impact cultural resources.

Background research included a record search at the Northwest Information Center (NWIC). The NWIC record search results indicate that two previous cultural resources studies have included a portion of the project site. Both studies were archaeological surveys conducted in the 1970s. An additional nine cultural resources studies, all archaeological surveys, have been conducted within 0.5 mi of the project site. The record search results indicate that no cultural resources have been recorded within the project site as a result of previous studies. Two historic-period built environment cultural resources have been recorded within 0.5 mi of the project site: P-27-002322 (El Camino Real/Highway 101) and P-27-002820 (the King City High School District). Both resources are more than 0.25 mi from the project site.

A field survey was conducted on April 21, 2021. No archaeological resources were identified during the field survey.

While sediments in the project site date to a time period that includes human occupation of the area, the project site has been subject to disturbance as a result of development since prior to 1919. Because the project does not propose any impacts to existing buildings, no historic-period buildings

¹ State Water Resources Control Board. 2021. GeoTracker. Website: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1160+Broadway+St%2C+King+City%2C+CA+93930> (accessed April 15, 2021).

² California Department of Toxic Substances Control. 2021. EnviroStor. Website: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1160+Broadway+St+%23+14+King+City%2C+CA+93930> (accessed April 15, 2021).

would be impacted by the proposed project. Additionally, a majority of the ground disturbance during project construction would be direct-bury, consisting of hand excavation of holes no more than 1 ft wide and 1.5 ft deep, with placement of poles directly in the holes followed by backfill, and the remaining excavation would be to a depth of no more than 2 ft at any location. Given the previous disturbance of the project site dating to before 1919, the use of the project site as a park for decades, and the small areas of ground disturbance associated with direct-bury for poles, there is a low likelihood that intact subsurface cultural resources would be encountered during proposed construction due to near-surface sediment disturbance from previous development.

There are no known historical resources as defined by CEQA that would be impacted by the proposed project. If human remains are encountered during construction activities, the regulatory process outlined in Health and Safety Code Section 7050.5 must be followed, which involves coordination with the Native American Heritage Commission and a Native American Most Likely Descendant. Adherence to this code and PRC Section 5097.98, which addresses the treatment of Native American human remains, means that the proposed project would not cause an adverse change in the significance of a historical or archaeological resource. Therefore, *State CEQA Guidelines* Section 15300.2(f) does not apply to the proposed project.

SUMMARY

As described above, none of the exceptions are applicable to the proposed project. On the basis of the evidence provided above, the proposed project is eligible for Class 3 and Class 33 CEs in accordance with Sections 15303, New Construction or Conversion of Small Structures, and 15333, Small Habitat Restoration Project, of the *State CEQA Guidelines*. Because the proposed project meets the criteria for categorically exempt projects listed in *State CEQA Guidelines* Sections 15303 and 15333 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the proposed project.

Attachments: A: Figures
B: California Natural Diversity Database (CNDDDB) Search
C: Cultural Resources Survey Assessment

ATTACHMENT A

FIGURES

ATTACHMENT B

CNDDDB SEARCH

ATTACHMENT C

CULTURAL RESOURCES SURVEY ASSESSMENT