

POINT PINOS COASTAL TRAIL PROJECT

City of Pacific Grove

Final Initial Study/Mitigated Negative Declaration
and
Responses to Comments
(Final IS/MND)



City of Pacific Grove
300 Forest Avenue
Pacific Grove, CA 93950

November 2017

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Final Initial Study/Mitigated Negative Declaration and Responses to Comments (Final IS/MND)

This Initial Study /Mitigated Negative Declaration (IS/MND) was posted to the City's website and distributed for public review and comment between October 6 and November 9, 2017.

The State Clearinghouse Number is 2017101022. It was received at the State Clearinghouse on 10/11/2017. The start of the review is dated 10/11/2017, with the end of review dated 11/9/2017 (CEQANet, 2017).

This Final IS/MND is printed in double-underline (additions) or ~~strikeout~~ (deletions) text to track any substantive changes that have occurred to the document or analysis since the Draft IS/MND was published.

Written responses to the comments submitted on the Draft IS/MND have been incorporated and are provided in Section 4 of this report. Please note these sections have been added in their entirety and are not shown in redline/strikeout text. Copies of the comment letters are provided in Appendix D to this report.

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1 INTRODUCTION

1.1 Project Overview

The proposed project is development of a 5-foot wide decomposed granite (DG) surfaced coastal trail within a natural setting seaward of Ocean View Boulevard, along approximately 0.8 mile of coastline, in the City of Pacific Grove. The coastal trail will connect from the existing curb side trail near Acropolis Street west to the Great Tidepool site, a distance of approximately 0.8 mile. The project locates the trail outside the 30-year coastal retreat setback line, except where moving the trail beyond this line is constrained by Ocean View Boulevard. In these cases, the trail will be along the north side of the road, such as along Crespi Pond. Constructing the trail beyond the setback line will require removal or relocation of many of the existing informal DG parking areas along the shoreline. Another project component is to move parking beyond the 30-year setback line, with a goal to avoid net loss of parking. In the short-term, the parking areas will be re-organized. Some areas will be closed while new parking areas are created to minimize loss of parking. Parking areas will be clearly delineated, with one-way loops, signs, timber or rock borders, and timber wheel stops. There will be designated concrete-surfaced ADA parking, a tour/school bus drop-off area, and limited designated spaces for RV parking. The long-term plan is to provide additional responses to coastal retreat. This plan moves all facilities, including the trail and Ocean View Boulevard, beyond the 30-year retreat line. Triggered by a specific average sea level measurement specified in the City Local Coastal plan (or earlier if so desired by the City), Ocean View Boulevard is closed as a public road between Asilomar Avenue and Sunset Drive/Lighthouse Avenue. The roadway would be converted to a two-way bike path to replace the existing bike lanes. The bike path would also serve as a maintenance access road to the sewage treatment plant and restrooms. Parking areas no longer used will be restored to habitat. Lateral access to designated shoreline access points or overlook areas will be maintained.

1.2 California Environmental Quality Act Compliance

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to evaluate the potential environmental effects of the proposed Point Pinos Coastal Trail Project, located in Pacific Grove, California. This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 *et. seq.*, and the State CEQA Guidelines, California Code of Regulations (CCR) Section 15000 *et. seq.*

An Initial Study is conducted by a lead agency to determine if a project may have a significant effect on the environment [CEQA Guidelines Section 15063 (a)]. If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines Section 15064(a). However, if the lead agency determines that revisions in the project plans or proposals made by or agreed to by the applicant mitigate the potentially significant effects to a less-than-significant level, a Mitigated Negative Declaration may be prepared instead of an EIR (CEQA Guidelines Section 15070(b)). The lead agency prepares a written statement describing the reasons a proposed project will not have a significant effect on the environment and, therefore, why an EIR need not be prepared. This IS/MND conforms to the content requirements under CEQA Guidelines Section 15071.

The lead agency is the public agency with primary approval authority over the proposed project. The lead agency for the project is the City of Pacific Grove.

1.3 Public Review Process

The Initial Study and Negative Declaration will be published and circulated for review and comment by the public and other interested parties, agencies, and organizations for a 30-day public review period from October 6, 2017 through November 6, 2017. Written comments may be submitted to the City of Pacific Grove at the address below or may be submitted by email to Daniel Gho at dgho@cityofpacificgrove.org by 5:00 pm on November 6, 2017.

City of Pacific Grove
Attn: Daniel Gho, Director of Public Works
2100 Sunset Drive
Pacific Grove, CA 93950

1.4 Report Organization

The purpose of this document is to evaluate the potential environmental effects of the proposed Point Pinos Coastal Trail Project, located within the City of Pacific Grove. Mitigation measures have been incorporated into the project as needed. This document is organized as follows:

Section 1 - Introduction

This chapter includes the objectives, location, description, and implementation of the project.

Section 2 – Summary of Findings

This section provides a summary of standard project requirements, impacts and environmental determination.

Section 3 – Environmental Checklist

This section includes a description of the setting and a discussion of the environmental issues (Aesthetics, Agriculture and Forestry, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, and Utilities and Services Systems). For each of these issues, the potential environmental impacts are identified. Mitigation measures are incorporated, where appropriate, to reduce the potential impacts to a less-than-significant level. This Chapter also includes the Mandatory Findings of Significance, which summarizes the overall significance of any potential impacts to natural and cultural resources, cumulative impacts, and impacts to human beings, as identified in the Initial Study.

Section 4 – Responses to Comments on Draft IS/MND

Section 4.5 – References and Preparers

This section includes the references and sources used in the preparation of this IS/ND and a list of those involved in the preparation of this document.

Appendices

Appendix A – Trail and Parking Area Construction, Trail and Parking Area Closure and Habitat Restoration Best Management Practices. This appendix outlines avoidance and minimization actions for project construction.

Appendix B – Special Status Species Tables. This appendix presents tables of special status species evaluated for the project area.

Appendix C - Mitigation and Monitoring Reporting Program. This appendix includes the program for monitoring and reporting the revisions required in the project and the measures imposed to mitigate or avoid significant environmental effects.

Appendix D – Comment Letters Submitted in Response to Draft IS/MND

2 SUMMARY OF FINDINGS

This document includes the Initial Study (IS) Environmental Checklist (see Chapter 3). This checklist identifies the potential environmental impacts by issue and a discussion of each impact that could result from the proposed project. A summary of the evaluation is presented here.

2.1 Standard Project Requirements

The City of Pacific Grove, as the lead agency, has incorporated the following Standard Project Requirements into the project:

Trail and Parking Area Construction, Trail and Parking Area Closure and Habitat Restoration Best Management Practices

See Appendix A

2.2 Potentially Significant Impacts

Based on the IS and supporting environmental analysis provided in this document, the proposed project would result in significant or potentially significant impacts to biological and cultural resources. With implementation of the following mitigation measures, the proposed project would result in less-than-significant impacts.

Biological Resources

Mitigation Measure BIO-1: Avoid Tidestrom’s Lupine. To avoid impacts to Tidestrom’s lupine the City will incorporate the following measures prior to commencement of all project activities:

- Activities within 50 feet of the two plant colonies shall be kept to the smallest feasible disturbance area. The limits of the work will be demarcated in the field. The City will install flagging, fencing, and other protective measures around the two Tidestrom’s lupine colonies that are to be avoided by the project.
- Invasive, non-native plant species (e.g., ice plant) that occur adjacent to work areas should be removed/controlled to prevent their encroachment into habitat supporting the Tidestrom’s lupine. Care will be given to ensure the root systems of Tidestrom’s lupine are not dislodged while invasive, non-native plants are hand-pulled. No herbicides will be used.

Mitigation Measure BIO-2 Minimize Impacts to Sensitive Habitats. To avoid impacts to coastal dune scrub and dune sedge meadow within the work area, the City will implement the following:

- Prior to construction, orange plastic construction fencing will be constructed at the limits of construction access and the work area so as to prevent impacts to adjacent vegetation.
- For trail work in dune scrub areas, any soil removed during trail construction should be temporarily stockpiled. As the soil likely contains native dune seeds, the upper two inches of soil shall be stockpiled separately from deeper soils and reapplied as the upper soil layer in rehabilitated areas. Stockpiled soil shall be used in the rehabilitated areas. The City will provide post-construction documentation that there is no net loss of coastal dune scrub by implementing habitat restoration of closed trails.
- For trail work in dune sedge meadow, the City shall salvage sod from the dune sedge meadow and relocate the sod to trail areas to be closed. The City will provide post-construction documentation that there is no net loss of dune sedge meadow by implementing habitat restoration of closed trails.

Mitigation Measure BIO-3. Avoid Impacts to Nesting Birds. To avoid impacts to nesting birds, the City will implement the following:

- If possible, schedule construction activities involving grading, vegetation stripping, or other involving heavy equipment, outside the migratory bird breeding season, which is August 1 – February 1.
- If construction-related activities must be scheduled during the breeding season, then focused surveys to identify active nests of migratory bird species will be conducted by a qualified biologist no more than 7 days before heavy equipment construction activities occur in these months.
- If a nest is found during construction, any disruptive work in the immediate area will be halted and construction must be shifted to another area of the project far enough away as to limit disrupting the active nest, the buffer area to be determined by the biologist. The nest will be monitored to determine when chicks have fledged and when it is safe to resume work around the nest site.
- Implement all recommended mitigation measures to replace removal of trees, which may provide nesting habitat for migratory birds.
- Because black oystercatchers breed adjacent to some portions of the Point Pinos Trail project corridor between the months of March through September, and their nesting success could potentially be disrupted by heavy equipment activity adjacent to nest sites, additional monitoring of these birds is recommended. The City will hire a qualified biologist to confer with the California Central Coast Black Oystercatcher Project biologists to determine if trail or parking lot construction is scheduled to occur adjacent to observed active nests. If so, construction in that buffer area should be postponed until the City's biologist determines that all young have fledged. The City's biologist should also recommend a buffer zone between construction and active oystercatcher nests, if evidence determines it is necessary to avoid impacts to the young.
- Buffer distances for oystercatcher nests should be site specific and at an appropriate distance, as determined by the City's biologist. There are many factors that may affect this bird's selection of nest site unrelated to nearby construction and thus would allow the nesting birds to succeed even during certain construction activities nearby. For example, if the work is located outside of the nesting bird's line of sight

(e.g., cliff that obstructs view), crashing waves on nearby rocks that are louder than the construction equipment, and frequent human presence on paths and beaches near the nests that birds become inured to prior to selecting their nest site. The buffer distances should be specified to protect the bird's normal bird behavior to prevent nesting failure or abandonment. The buffer distance recommendation should be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The City's biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer that avoids failure of nests is established.

Cultural Resources

Mitigation Measure CULT-1: Avoid impacts to Archaeological Sites. To avoid impacts to archaeological sites, the following measures and the BMPs (Best Management Practices or Standard Project Requirements) listed in Appendix A, as well as measures outlined in Mitigation Measure TRI-1, will be implemented:

- The project shall use specialized construction methods to avoid or minimize impacts to archeological resources. Methods shall be used where there is no or minimal intrusion into known sites or into unknown archaeological soils which might be inadvertently encountered during construction. Examples of such techniques would require that the required thickness of the sub grade for proposed path and parking area be the result of adding culturally sterile fill on top of the existing grade within the project footprint. Also, the number of signs or other new project elements which require ground disturbances for installation shall be extremely limited and shall be installed without concrete footings. Additionally, any drainage plan for new trails and parking areas shall be designed to prevent deleterious runoff or other sources of erosion which would adversely affect the sites over the long term.
- Advanced plans for construction shall be designed to minimize potential impact to cultural resources. Prior to approval, plans should be subject to archaeological plan review for assessment of project impacts and recommendations for mitigation of those impacts where appropriate.
- A qualified archaeologist shall be present for all ground disturbing activities. Please refer to Mitigation Measure TRI-1, which requires presence of a Native American monitor certified by the OCEN be present for all ground disturbance. If potentially significant archaeological resources are discovered, the monitor should be authorized to halt excavation until any finds are properly evaluated. The monitor will also be authorized to discontinue monitoring in soils, such as fill, where cultural resources cannot exist.
- ~~If in spite of measures to avoid it, disturbance occurs within a recorded historical resource, a minimum of two single specimen radiocarbon dates should be obtained for each impacted site, if suitable shell specimens are recovered.~~
- If a find is determined to be significant, work may remain halted near the find to permit development and implementation of a reburial data recovery mitigation plan

with the concurrence of the Lead Agency, ~~and implemented~~. The mitigation plan should be designed to reduce project impacts to a less than significant level, as required by CEQA.

- Following completion of the project, a *Preliminary Archaeological Report* should be prepared. ~~If suitable materials are found to warrant special studies, a *Final Comprehensive Technical Report* that includes all analysis will be submitted to the lead agency within six months of the conclusion of the archaeological fieldwork. If suitable materials are not found to warrant special studies, the preliminary report will serve as the final report on the Project.~~ The final report should include a revised site record for each of the sites covered by the monitoring, and new site records for other resources if any are found.
- Cultural materials, including ancestral remains, recovered during the project should be reburied on site processed and curated in a suitable public research facility. If that is not possible, they shall be offered to OCEN.
- A qualified archaeologist shall inspect the location of the trail removal and closures prior to any soil disturbance to confirm the locations where an archaeological monitor will be required. The archaeological monitor and OCEN monitor will remain on site as warranted in the opinion of the archaeological monitor and OCEN monitor. In the event that a potentially significant cultural deposit is uncovered during construction, all work will be stopped at the specific location of the find until the qualified archaeologist and OCEN monitor can evaluate it. Prior to work resuming at the location, the archaeologist and OCEN monitor will determine the appropriate avoidance, preservation or reburial recovery measures required, in compliance with CEQA. Work shall not resume at the location until the appropriate measures have been implemented as determined by the archaeologist and OCEN monitor.
- For new trail and parking area construction shall specify that all archaeological site boundaries near construction zones be marked by exclusionary fencing during construction. Due the extremely sensitive nature of the entire project area, a qualified archaeological monitor should be present during construction.
- Trail closure and removal measures where the trail bed is stable: Allow trail to revegetate naturally, retain all open areas except at trail entrances. Distribute cut native vegetation at trail entrances for length of approximately 20 feet. Install cable and rod fencing only as needed and avoid installing sign posts within, or in vicinity of, archaeological sites where feasible. Where sign post or similar new features are unavoidable (certainly some will be needed) within an archaeological site, intrusive element shall be pounded into the ground rather than excavated and installed with a concrete base. Pounding would be less of an impact.

Mitigation Measure CULT-2. Treatment of Previously Unidentified Human Remains.

During project construction, if human remains are discovered, the project applicant and/or its contractor shall cease all work within 25 feet of the find and notify the City of Pacific Grove Planning Division and the county coroner, per California Health and Safety Code Section 7050.5. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours.

Geology and Soils

Mitigation Measure GEO-1. Minimize Hazards from Wave Run-up During Storms. The proposed improvements shall be designed for appropriate visitor safety relative to erosion and wave activity. The trail and parking will be located inland from the recommended 30-year setback except where Ocean View Boulevard exists within the setback, in which case the trail will be located along the seaward edge of Ocean View Boulevard until the long-term plan is implemented and the road and trail are reduced or relocated outside of the setback. The evaluation of visitor safety shall assume that hazards exist from the existing bluff edge to the setback line. Those hazards may consist of vertical drop-offs, rills and gullies that present tripping or slip and fall risks, and ocean wave impact. The City shall periodically monitor, repair, and maintain the improvements to maintain safe conditions. Appropriate signage shall be installed to warn visitors of hazardous and risky conditions. During some ocean conditions, the trails and associated facilities shall be closed to use until the ocean subsides or maintenance and repairs occur.

Tribal Cultural Resources

Mitigation Measure TRI-1. Treatment of Tribal Cultural Resources. During project construction, a Native American monitor certified by the Ohlone/Costanoan-Esselen Nation (OCEN) will be present for all ground disturbance. If any tribal cultural resources are found, the project applicant and/or its contractor shall cease all work within 50 feet of the discovery and immediately notify the City of Pacific Grove Planning Division. The OCEN-certified Native American monitor will contact the OCEN Tribal Chair and in consultation with the City and an archeologist evaluate the finds and recommend appropriate mitigation measures for the inadvertently discovered tribal cultural resource. The City shall consider the mitigation recommendations and agree on implementation of the measure(s) that are feasible and appropriate. Such measures may include reburial of any ancestral remains, avoidance, preservation in place, excavation, documentation, or other appropriate measures.

2.3 Other Environmental Factors Potentially Affected

Less-than-significant impacts were identified for the following issues:

- Aesthetics (degradation of visual character of the areas)
- Air Quality (emissions)
- Biological Resources (conflicts with local plans)
- Cultural Resources (historical resources,)
- Geology and Soils (seismic and geologic hazards, soil erosion,)
- Hydrology and Water Quality (water quality, flood hazard, stormwater drainage, seiche, tsunami,)
- Noise (construction)
- Transportation/Traffic (construction traffic)

No impacts were identified for the following issues:

- Aesthetics (scenic vistas, scenic resources, visual character of surrounding area)
- Agriculture and Forestry Resources
- Air Quality (conflicts with plans, odors)
- Biological Resources (fault rupture, sensitive habitats, wetlands, nesting birds)
- Cultural Resources (historical resources)

- Geology and Soils (expansive soils, lateral spreading, soil suitability for septic systems)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality (groundwater, alteration of creek, failure of levee or dam, mudflow)
- Land Use and Planning
- Mineral Resources
- Noise (noise standards, vibration, aircraft noise)
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic (parking capacity, air traffic, hazards)
- Utilities and Service Systems

2.4 Environmental Determination

In accordance with Section 15064(f) of the CEQA Guidelines, a Mitigated Negative Declaration (MND) can be prepared if the proposed project would not have a significant impact on the environment after the inclusion of mitigation measures. Based on the available information and the environmental analysis presented in this document, there is no substantial evidence that, after incorporation of the mitigation measures, the proposed project would have a significant impact on the environment. Therefore, the City of Pacific Grove as the lead agency finds that a Mitigated Negative Declaration can be prepared.

3 INITIAL STUDY CHECKLIST

3.1 Background and Project Description

- 1. Project Title:** Point Pinos Coastal Trail Improvement Project
- 2. Lead Agency Name and Address:**
City of Pacific Grove
300 Forest Drive
Pacific Grove, CA 93950
- 3. Contact Person and Phone Number:**
Daniel Gho, Director of Public Works, (831) 648-5722
- 4. Project Location:** Area seaward of Ocean View Boulevard, between Asilomar State Beach and Marine Gardens Park, Pacific Grove, CA
- 5. Project Sponsor's Name and Address:**
City of Pacific Grove
300 Forest Avenue
Pacific Grove, CA 93950
- 6. General Plan Designation:** City of Pacific Grove Coastal Land Use Plan Designation – Open Space Recreational OS-R
- 7. Zoning:** City of Pacific Grove Zoning Designation – Open Space Recreation
- 8. Environmental Setting and Surrounding Land Uses:** The project site is located within a natural setting seaward of Ocean View Boulevard, along approximately 0.8 mile of coastline. Inland of Ocean View Boulevard is the Pacific Grove Municipal Golf Course. Private residential properties are located inland of Ocean View Boulevard from Asilomar Avenue to Perkins Park. Perkins Park is located midway between Acropolis Street and Coral Street. A City/Coast Guard Facility is situated near the Pacific Grove Municipal Golf Course (Figure 1).

Land uses on the southerly side of Ocean View Boulevard are the Municipal Golf Course, wastewater treatment plant, and residential development. The single family residential use occurs north of Ocean View Boulevard between Asilomar Avenue and Coral Street. On-street parking is available on Ocean View Boulevard, Acropolis Street, Asilomar Avenue and Lighthouse Avenue. Additional parking is within designated areas south of Ocean View Boulevard.

9. Description of Project:

Project Need. This project addresses a 0.8 mile stretch of coastline in the City of Pacific Grove generally known as Point Pinos. Point Pinos is at the very southern end of Monterey Bay and is characterized by its rugged rocky shoreline ~~subject to formed by~~ frequent pounding by storm-driven waves. Currently, the California Coastal Trail (CCT) exists along the entire coast of the

City of Monterey and along three of the four miles of the City of Pacific Grove's coast, except at Point Pinos. The Point Pinos Trail Project will complete the CCT in this 0.8-mile segment, eliminate existing informal trails that encroach into sensitive dune habitat, improve pedestrian safety and enhance the user experience. The project's goal is to facilitate public enjoyment of the Point Pinos coastline in a safe and environmentally responsible manner. A formal coastal trail, envisioned as a five-foot wide decomposed granite surface, will make it easier and safer for people to walk along the coast. This formal trail will provide greater coastal access to those with limited mobility. The project will include formalized and consolidated lateral access to the shoreline in the form of steps or ramps.

The Point Pinos coastline is very popular with visitors and local residents for views and access to the highly scenic coastline with its beaches, rock formations and tidepools. The free all-day parking immediately adjacent to the shore is an attractive opportunity, and the lots and roadside parking often fill to capacity during peak visitor periods. However, the shoreline is exhibiting significant erosion and loss of native vegetation through a combination of erosion from waves, runoff, compaction by cars and people, and burrowing ground squirrels. This project proposes to improve habitat, protect sensitive coastal resources, and provide trail and parking facilities that will be more sustainable and enjoyable in the long term.

The project area supports numerous "social" trails created by users to connect the parking lots and provide access to the shore. In some cases, these trails are exacerbating erosion and/or degrading native vegetation. In some sections, pedestrians must walk along the roadway as the shoreline extends almost to the road edge. Erosion at the edges of the parking areas and trails is exacerbated by wave impact and by tunneling ground squirrels.

Set along these trails and within the parking lots are approximately 20 existing benches, five interpretative signs, and two monument rocks, including the John Denver crash site memorial. In the eastern part of the project area, there is a picnic area with three tables and barbecue pits.

Some of the existing trails and parking areas are located within identified archaeological sites. Several of these trails, as well as the coast edges of some parking areas, have evidence of accelerated erosion and soil loss, which is presently impacting the archaeological sites. In these areas, the archaeological sites are directly exposed to disturbance by wave run-up and pedestrian uses.

Ocean View Boulevard is a gently curving two lane City road with bike lanes striped on each side. Vehicular parking is available along the roadway, in a designated paved parking area adjacent to the Pacific Grove Municipal Golf Course (near Crespi Pond), and in several informal off-street parking areas on the shoreline side of the roadway. Other than the above mentioned paved parking lot, all parking areas within and near the project area are surfaced with decomposed granite or crushed rock and have no delineation of lanes or spaces. The parking areas are generally bounded by vegetation and the coastal bluff or beach. Vehicles typically park as close to the shoreline as possible. Mid- and large-sized recreational vehicles are common in these parking areas. School buses also occur for field trips. At the west edge of the project area, near the Pacific Grove Municipal Golf Course there are roadside parallel parking areas. In these spots, signs urge drivers to pull entirely off the pavement to keep the bike lane clear. Further east along Ocean View Boulevard parallel parking is available in two

lots along the road. Further east is the first of five larger crescent-shaped parking lots with space for angled parking. Several of these lots are partially built on fill that was placed decades ago, with native or imported boulders used along the edge as “rip-rap”. The City has maintained the lots over the years by repairing the fill edge and rip-rap.

There is no existing ADA compliant parking, and no designated large-vehicle parking; however, there are specific areas where tour bus access is restricted. Parking is free and available every day of the year from 5am to midnight, except during large swells and/or big storm events, when the parking lots are closed. Posts and plastic chains are located at each entrance to facilitate these closures. Due to the informal nature of the parking areas, an exact quantification of the current number of parking spaces is not possible. Based on field observations and examination of aerial photography, there is currently space for approximately 3-5 large vehicles and 90-95 standard vehicles.

The nearest public transportation is approximately a quarter mile away. Monterey-Salinas Transit (MST) Bus Route 1 runs buses almost every hour from downtown Monterey with stops at the intersection of Acropolis and Del Monte and at the Lighthouse. Bike lanes exist on both the east and west directions of Ocean View Boulevard. Bike rentals are available in Monterey, and the ride along this stretch between Monterey and Asilomar is advertised as the prime attraction for bike renters. Pedestrians often walk in the bike lane, even when there are adjacent informal trails, sometimes forcing bicyclists to move out into the traffic lanes.

Much of the proposed trail and most of the existing parking lots are in the current wave impact zone and within the area that is estimated by project engineers to erode into the sea within 30 years. Both City policies and Coastal Act policies enforced by the California Coastal Commission dictate an “adaptive retreat” response to these coastal forces, rather than adding or maintaining coastal protection structures unless it is determined that there is no feasible alternative.

Project Alternatives

Four project alternatives were formulated during the design phase of the project, based on technical studies and City Advisory Group discussions; these alternatives are discussed in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). In June 2017, the City Advisory Group selected a preferred plan, as further described under Project Description.

Project Description. The proposed project is development of a 5-foot wide decomposed granite (DG) surfaced coastal trail to connect from the existing curb side trail near Acropolis Street west to the Great Tidepool site, a distance of approximately 0.8 mile. The project locates the trail outside the 30-year coastal retreat setback line, except where moving the trail beyond this line is constrained by Ocean View Boulevard. In these cases, the trail will be along the north side of the road, such as along Crespi Pond. Constructing the trail beyond the setback line will require removal or relocation of many of the existing informal DG parking areas along the shoreline; a project goal is to move parking beyond the 30-year setback line, as well. The project considers that if the City does not continue to maintain existing coastal edge protection structures (rip-rap), the rate of erosion relative to the 30-year setback line could be accelerated. For that reason, the setback from existing rip-rap protection to the trail has been increased beyond the 30-year setback where feasible. Another project goal is to minimize loss of parking.

Appendix A of the Point Pinos Coastal Trail Study and Plan includes maps which depict the trail alignment, parking areas, ADA parking areas, ~~and~~ beach access locations, and cross-sections of the proposed project and Appendix A of the IS/MND includes Trail Parking Area Construction, Trail and Parking Closure and Habitat Restoration Best Management Practices.

Short Term Plan. In the short-term, the parking areas will be re-organized. Some areas will be closed while new parking areas are created to minimize loss of parking. Parking areas will be clearly delineated, with one-way loops, signs, timber or rock borders, and timber wheel stops. There will be designated concrete-surfaced ADA parking, a tour/school bus drop-off area, and limited designated spaces for RV parking. The plan includes a series of beach/shoreline access points, with the objective to close and consolidate many “volunteer” access routes. The directional signs, parking fixtures, and interpretive signs and benches are intended to be low-key and to blend into a more natural looking shoreline less dominated by vehicles.

Long Term Plan. The long-term plan is to provide additional responses to coastal retreat. This plan moves all facilities, including the trail and Ocean View Boulevard, beyond the 30-year retreat line. Triggered by a specific average sea level measurement specified in the City Local Coastal plan (or earlier if so desired by the City), Ocean View Boulevard is closed as a public road between Asilomar Avenue and Sunset Drive/Lighthouse Avenue. The roadway would be reduced in width and the remainder converted to a two-way bike path to replace the existing bike lanes. The bike path would also serve as a maintenance access road to the sewage treatment plant and restrooms. Parking areas no longer used will be restored to habitat. Lateral access to designated shoreline access points or overlook areas will be maintained. Parking spaces in the western section would be reduced by 41 spaces. The parking at the eastern section will remain unchanged. The Long-Term Plan would result in a more natural stretch of coastline without the presence of parked cars and traffic.

The project (Short and Long-Term Plans) includes the following key components:

- Restoration of coastal dune and bluff scrub to benefit biotic resources
- Protection of archaeological sites
- Removal of user-created trails
- Improvements to the Point Pinos Coastal Trail
- Improvements to vehicular parking areas, trail entry points, and beach access

Coastal Dune and Bluff Scrub Habitat Restoration. The removal of user-made trails, as well as the removal of invasive, non-native plant species and revegetation of degraded areas would benefit the coastal dune and coastal bluff scrub habitats. Several areas of coastal scrub habitat located seaward of Ocean View Boulevard are currently designated as habitat mitigation areas for the nearby Pacific Grove Municipal Golf Course. These areas will be retained; however, trail construction in two locations may impinge into the habitat. If this occurs additional areas seaward of Sunset Avenue would be restored and/or rehabilitated as compensation. The project includes the closure and rehabilitation of approximately 2,610 linear feet of user-made trails. Closure of user-made trails, removal of invasive, non-native plant species, and revegetation of coastal dune and bluff scrub would benefit coastal biological resources, such that the project results in a net benefit to sensitive habitat. The IS/MND outlines measures to minimize impacts to sensitive habitat during trail construction and long-term trail maintenance. In addition, the

project includes habitat restoration to benefit sensitive habitat concurrent with coastal trail improvements.

Protection of Archaeological Sites. The project area features over six prehistoric archaeological sites along coastline. These sites are primarily shellfish gathering and processing sites located at the edge of the coastal bluffs. Many of these archaeological sites are presently affected by accelerated and severe erosion caused by natural processes, soil loss within existing trail beds, and human disturbance from foot traffic.

In areas with evidence of cultural resources, disturbance of the surface material would be avoided. Where the coastal trail and parking areas are proposed in areas with cultural resources, the area will be capped with clean soil/materials, which will avoid damage to the archaeological sites. Where existing trails or parking areas are identified for closure and rehabilitation, exposed cultural resources will be capped with clean soil/materials and the areas revegetated (i.e., hydroseeded) with native coastal scrub vegetation. Hydroseeding will be used for revegetation as it will cause the least disturbance to surface materials. In areas where a closed trail is not eroded, or heavily compacted, and native vegetation exists along the trail alignment, the trail may be closed at the entrance and allowed to revegetate naturally. Trail closure and habitat restoration methods may include temporary or permanent installation of cable and rod fencing and/or placement of vegetation trimmings.

California Coastal Trail. The Point Pinos Coastal Trail would be designated as part of the Coastal Trail. The Coastal Trail is an on-going effort to establish a trail along the California Coast, extending 1,200 miles from Oregon to Mexico. The California Coastal Conservancy is one of the state agencies involved in promoting and developing the Coastal Trail. The Coastal Conservancy is contributing funding to this project. The proposed project includes improvements to 0.8 mile of trail, which would be designated as Point Pinos Coastal Trail. The majority of the Coastal Trail will be constructed in areas that are currently used as parking area or are vegetated by ice plant, an invasive, non-native plant species. Approximately 200 linear feet of the trail will be placed within areas supporting native vegetation (i.e., native coastal scrub and dune sedge meadow).

Project Implementation. The coastal trail project would be conducted by the City and/or their designated contractors. Work would adhere to the Construction and Habitat Restoration Best Management Practices included in Appendix A.

The Coastal Trail improvements would be constructed using hand tools, power tools, and gas-powered tools. Parking lot improvements will utilize motorized equipment. The construction staging area(s) would be located at the existing vehicle turnouts. The staging areas would be utilized for material delivery and support. Trail construction would adhere to special status species/sensitive avoidance and minimization measures outlined in the IS/MND. In addition, the project includes habitat restoration to achieve benefits to sensitive habitat concurrent with Coastal Trail improvements/

The proposed project would be initiated depending on funding availability. The short-term plan is anticipated to be completed over an approximate 12-month period. The long-term plan would

be implemented based on sea level measurements, as specified in the City Local Coastal Plan (or earlier if so desired by the City), which could be within 30 years.

Project Requirements

The following Standard Project Requirements will be incorporated into the project: **Trail and Parking Area Construction, Trail and Parking Area Closure and Habitat Restoration Best Management Practices** (see Appendix A).

10. Other agencies whose approval is required

- California Regional Water Quality Control Board ((Storm Water Pollution Prevention Plan, SWPPP)
- California Coastal Commission (Coastal Development Permit)

3.2 Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation and Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

POINT PINOS COASTAL TRAIL PROJECT IS/MND
CITY OF PACIFIC GROVE
DRAFT, SEPTEMBER 2017

3.3 Determination (to be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature
City of Pacific Grove

10-4-17
Date

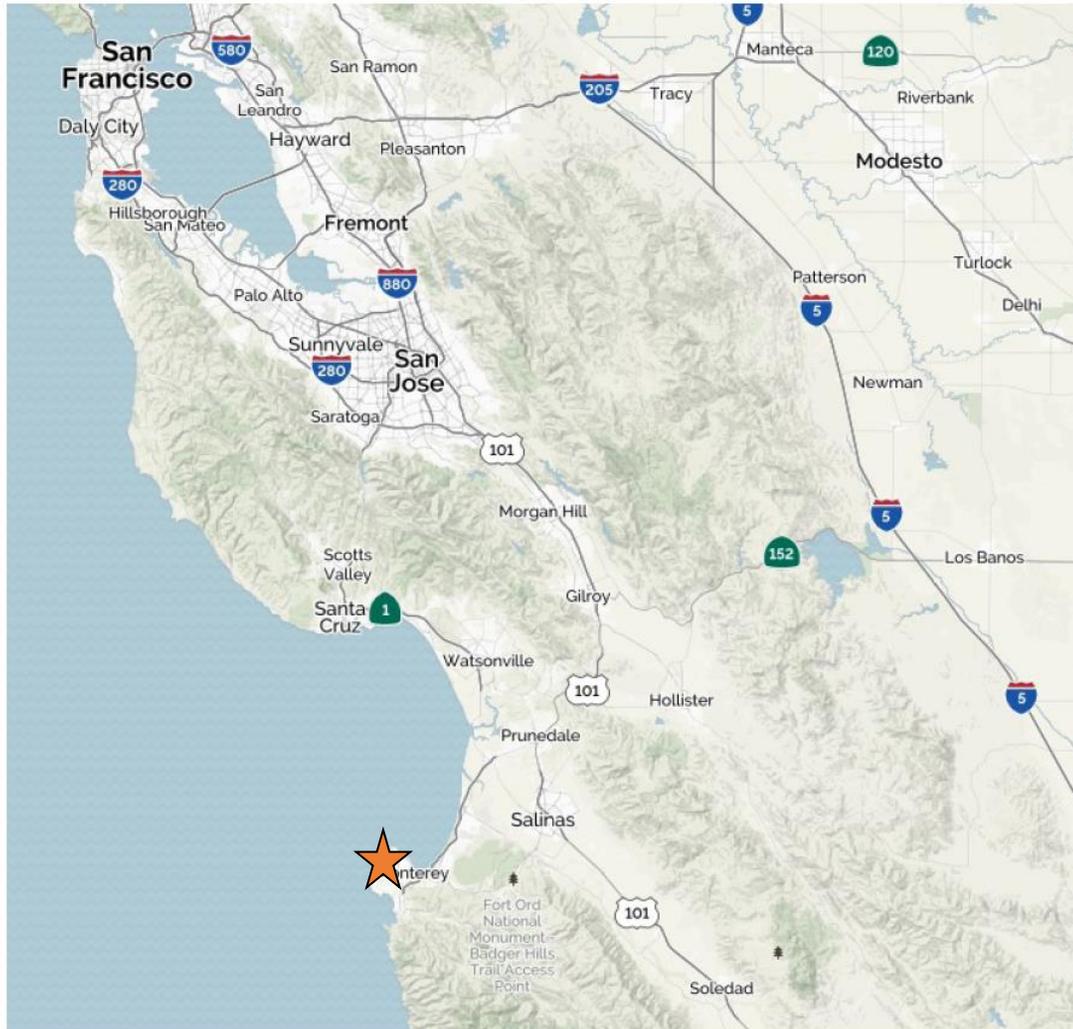


Figure 1 Location Map

POINT PINOS COASTAL TRAIL PROJECT IS/MND
 CITY OF PACIFIC GROVE
 FINAL, NOVEMBER 2017

Point Pinos Coastal Trail Project Area

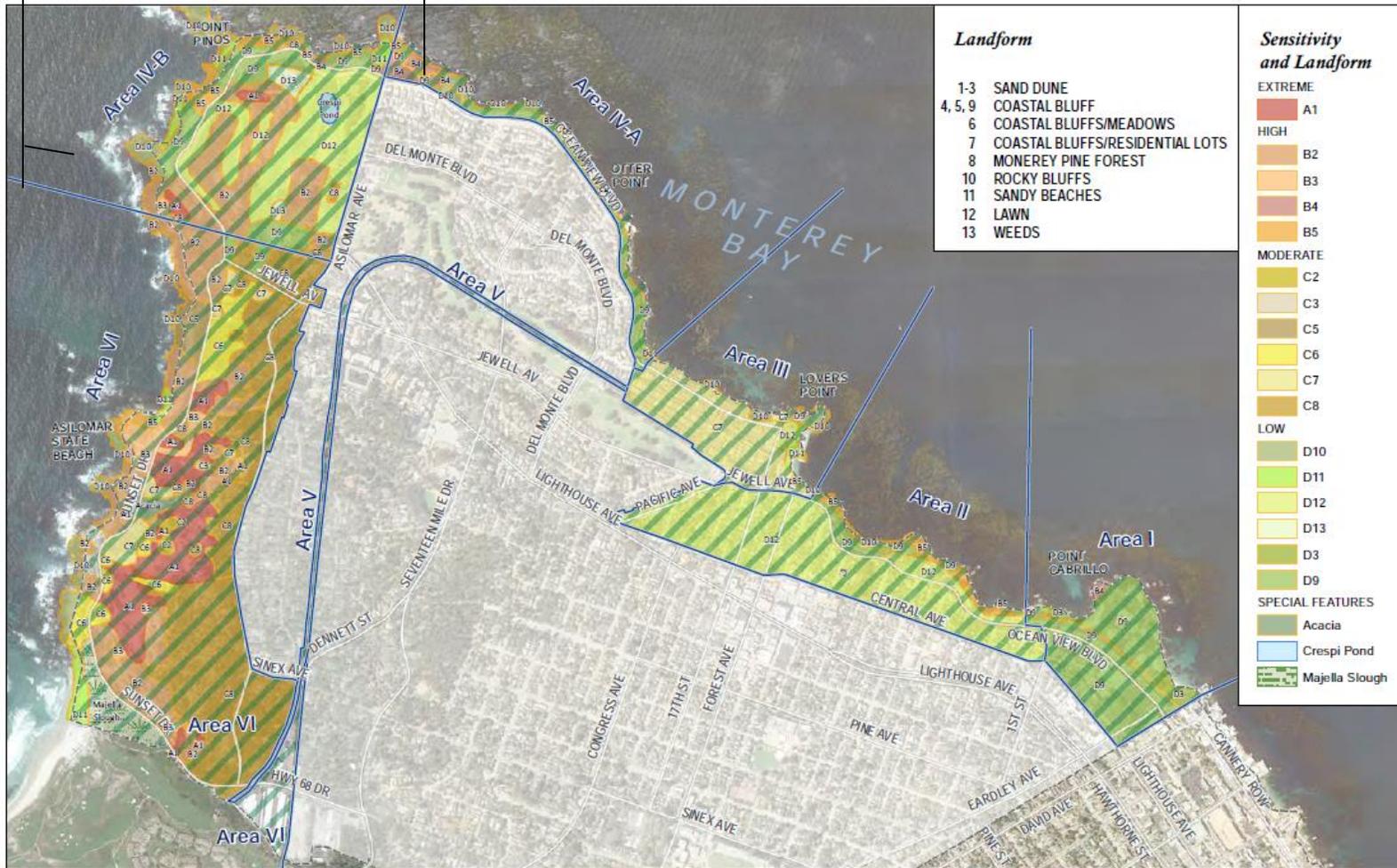


Figure 2. City of Pacific Grove Land Use Habitat Sensitivity Map

POINT PINOS COASTAL TRAIL PROJECT IS/MND
 CITY OF PACIFIC GROVE
 FINAL, NOVEMBER 2017

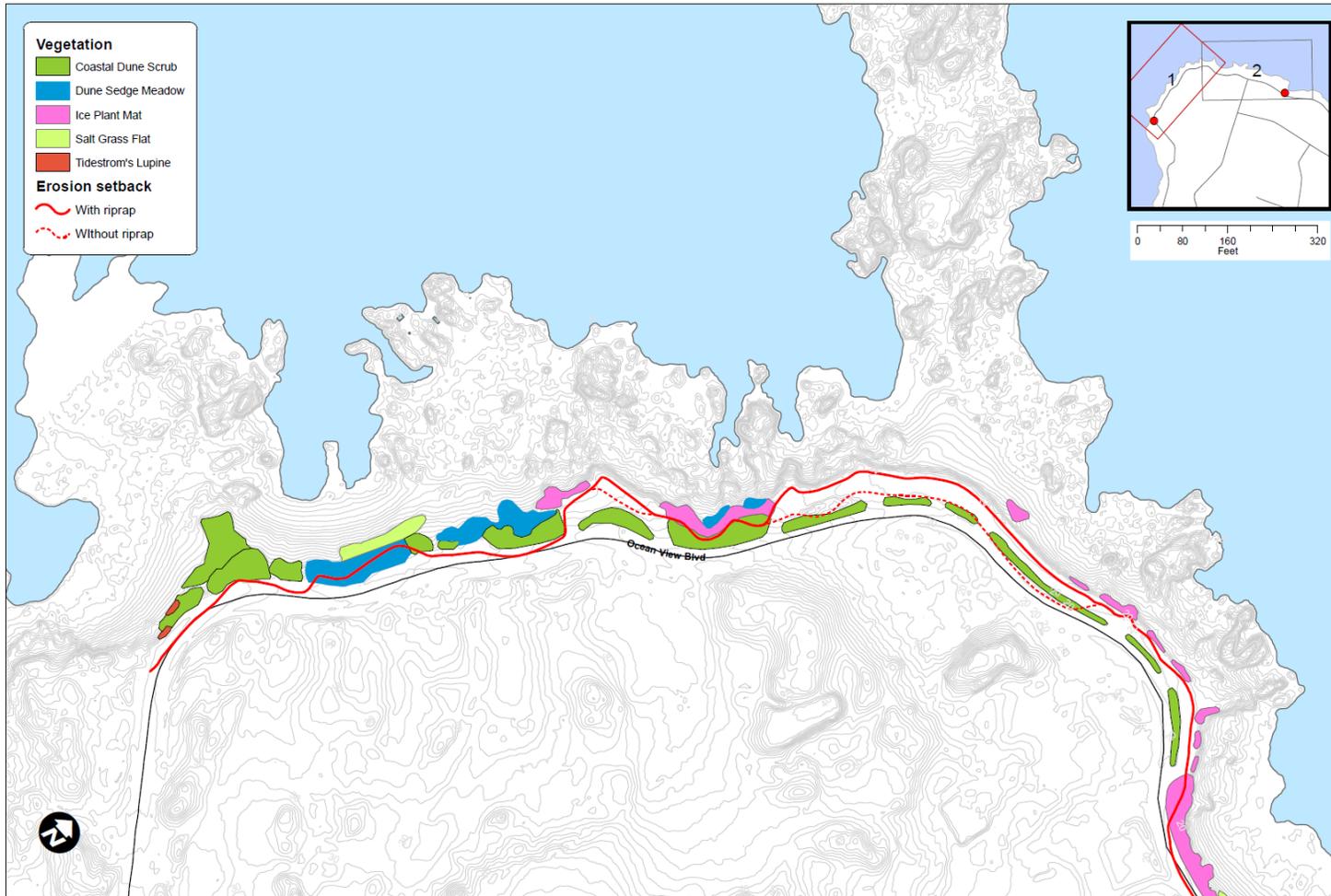


Figure 4. Habitat Map, 1 of 2

TrailPeople
 PARTNER FOR PROMOTING TRAILS AND
 BIKES FOR PEOPLE

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 Benicia, CA 94510
 (707) 205-1370
 www.trailpeople.net

Pacific Grove Pt Pinos Trail Improvements

1 inch = 160 feet

Date: 1/23/2017 Time: 8:25:39 PM Sheet: 1/2 PtPinos_plan_set_2page

Data: Trail People, Monterey County, CA Coastal Conservancy

POINT PINOS COASTAL TRAIL PROJECT IS/MND
 CITY OF PACIFIC GROVE
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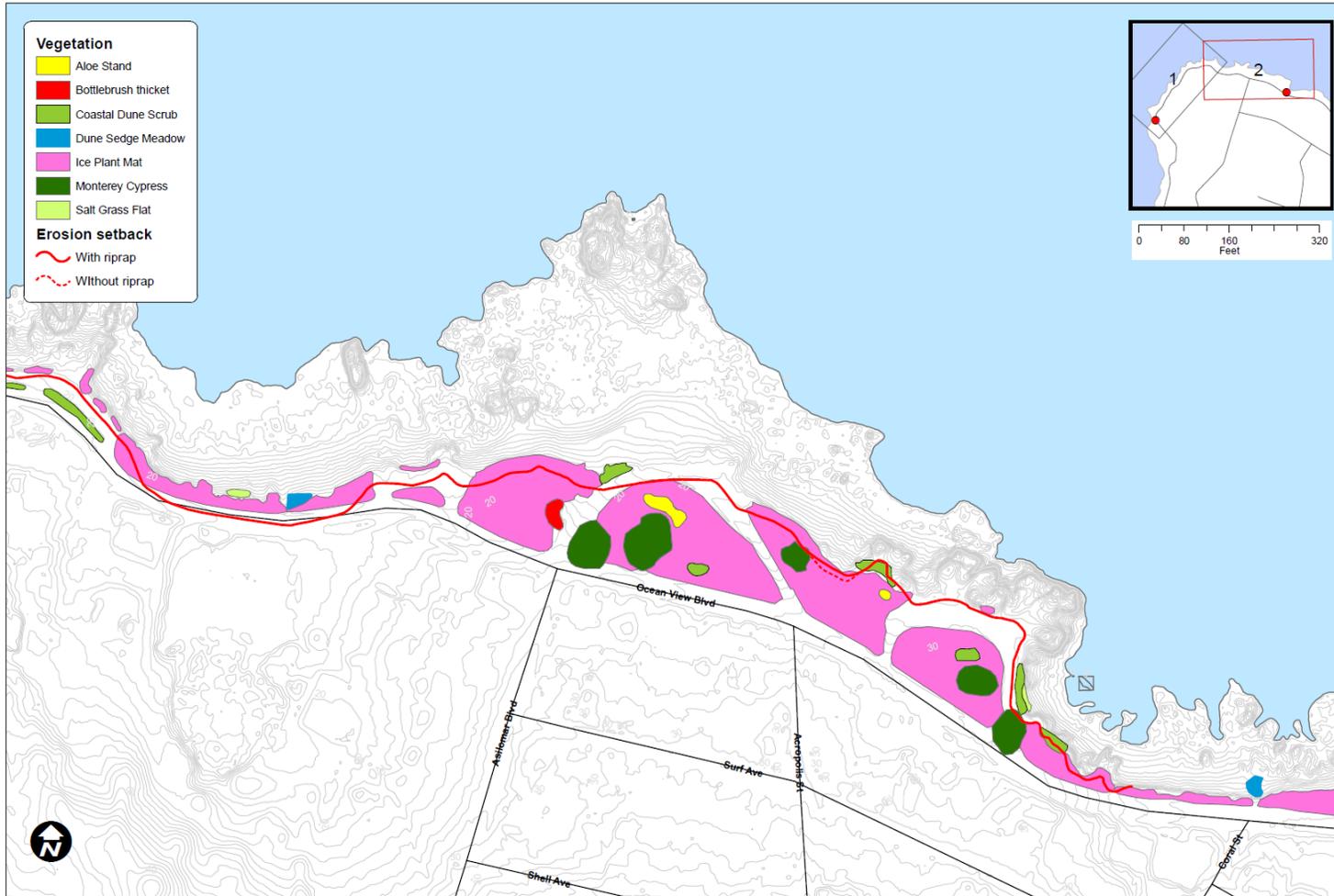


Figure 5. Habitat Map, 2 of 2

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 planning and designing trails and
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 (707) 206-1370
 www.trailpeople.net

Pacific Grove Pt Pinos Trail Improvements

1 inch = 160 feet

Date: 1/23/2017 Time: 8:25:41 PM Sheet 2/2 PtPinos_plan_set_2page

Data: Trail People, Monterey County, CA Coastal Conservancy

FIGURE 6 SITE PHOTOS



Figure 6A. View of coastal dune scrub between Ocean View Boulevard and Pacific Ocean and road edge parking, in southwestern portion of project area, looking northerly.



Figure 6B. Informal trail access to beach and rocky shore, looking northerly from Ocean View Boulevard.



Figure 6C. View of rocky shore and parking area, with rip-rap edge.



Figure 6D. Existing trail, with ice plant mat on left and central dune scrub on right.



Figure 6E. Rocky edge with ice plant mat and eroded edge, adjacent to parking area.



Figure 6F. View of Monterey cypress and trail near Acropolis Street.

3.4 Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

I. AESTHETICS

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project area features outstanding scenic views of the Pacific Ocean and Monterey Bay coastline, including rock outcroppings, coves, and pocket beaches. Located seaward of Ocean View Boulevard, the approximately 0.8-mile long project area is visible from both streets, residences along Ocean View Boulevard, the Pacific Grove Municipal Golf Course, and Asilomar State Beach.

The City's Land Use Plan (LUP) identifies scenic and visual characteristics to be protected (Section 2.5, LUP). The project site is located within Visual Units 1c and 1d (Coastal Corridor) on the City's Visual Units map. The Coastal Corridor, including the project area is considered a scenic resource, as Ocean View Boulevard provides nearly continuous unobstructed views of the sea. The LUP considers the retention of these views to the maximum extent possible is of major importance, because of the visual access to coastal waters they provide.

The project area includes approximately 0.8 mile of trail, benches, parking areas, and unimproved beach access. Eight vehicle turnouts with trail access points exist along the seaward side of Ocean

View Boulevard. The vehicle turnouts include a variety of post and cable fencing, signage, trash receptacles, and a small picnic area.

Discussion

- a) Scenic Vistas. *Less than Significant.* The project is located within a highly scenic area. View of Monterey Bay, the Pacific Ocean, and coastline are the prominent views in the project area and along Ocean View Boulevard. Ocean View Boulevard is designated as a “scenic drive” in the Pacific Gove General Plan. The existing vehicle turnouts along Ocean View Boulevard within the project area offer scenic vistas. The project area also features numerous overlook sites along the coastal bluffs, most of which are presently unimproved. The overlook sites offer scenic views of the open ocean, Monterey Bay, coves, beaches and the coastline. The project proposes improvements to the existing vehicle parking lots, including making one-way loops, angled parking indicated by signs and timber wheel stops. There will be designated concrete-surfaced ADA parking, a tour bus drop-off area, and limited designated spaces for RV parking. These parking improvements would likely enhance rather than adversely affect scenic vistas from the vehicle turnouts as many of the parking occurs haphazardly and scenic views can be blocked by oversize recreational vehicles. The project would include improved beach access at eleven sites. If stairs are used over the existing rock rip-rap, they would not be easily visible as they will be located on the coastal bluffs below the view of the trail and parking areas. The trail improvements would be minimally visible from the existing vehicle turnouts along Sunset Avenue. The trail improvements will have no substantial adverse effect on the scenic vistas within the project area.
- b) Scenic Resources. *No Impact.* As noted in a), above, Ocean View Boulevard is designated as a scenic route in the Pacific Gove General Plan. The closest State scenic highway is Highway 1, which is located approximately 5 miles southeast of the project site. The project area is not visible from Highway 1. The project would not affect any trees, significant rock outcroppings, or historic features within a State Scenic Highway.
- c) Visual Character of Surrounding Area. *Less than Significant.* Most of the proposed improvements (surfacing with aggregate base, beach access steps, new parking areas) would not be easily visible from Ocean View Boulevard or nearby residences due to the scrub vegetation and terrain. Signage, fencing, and trash receptacles exist at the trail entrances and are currently visible from Ocean View Boulevard. The project would repair existing deteriorated signs, fencing, and posts. The trail improvements would utilize natural materials to blend with the natural surroundings. These improvements include surfacing the Coastal Trail segments (0.8 mile) with aggregate material to a width of 5 feet and removal of user-made trails. Where trails are removed, the trail bed would revegetate over time. The project would remove approximately 2,610 linear feet of trails, which would allow the areas to revegetate and be restored to the natural setting. No fencing is proposed along the trails except at locations where temporary fencing is needed for trail closures. The City would use cable and rod fencing only when needed to discourage continued park visitor use on the closed trails. Therefore, the minimal improvements proposed would have a less-than-significant impact and would not substantially degrade the existing visual character or quality.

- d) Light and Glare. No Impact. The proposed project does not include any lighting and would not produce glare. No impact would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California DePoint of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project area is situated seaward of Ocean View Boulevard on City-owned property. The California Department of Conservation Monterey County Important Farmland Map identifies the

project area as “Urban and Built-up land”. The Pacific Grove General Plan and zoning designation for the project area is Open Space Recreation (OS-R). Surrounding areas are zoned for open space and residential uses. Grazing or agricultural use do not occur within the project area.

Discussion

- a) Conversion of Agricultural Land. No Impact. The project site and adjacent areas are not used for agriculture and is not identified as farmland. The project would involve renovation of existing recreational trails and parking areas and would not convert the land from farmland to a non-agricultural use.

- b) Conflict with Williamson Act. No Impact. The City of Pacific Grove zoning is Open Space Recreation (OS-R) within the Coastal Zone. The purpose of this zoning district is to provide for the establishment, enhancement and maintenance of outdoor recreation uses in the City. The project features walking trails, which is one of the principal uses allowed within this zoning. The project would not conflict with the zoning or preclude any future agricultural use within the project area. The project area is not subject to a Williamson Act contract. Therefore, no conflicts or impacts to agricultural zoning or Williamson Act contracts would occur as a result of the proposed project.

- c-d) Timber Production and Conversion of Forest Land. No Impact. Timberland harvesting is not identified as a permitted use within lands designated as Open Space - Recreation. The vegetation type within the project area is predominantly coastal dune and bluff scrub. No impact to timber resources would occur. The project would not conflict with existing zoning or rezoning of forest land or timberland. The project will not result in the loss of forest land or conversion of forest land to a non-forest use.

- e) Involve Changes that Could Lead to Conversion of Agricultural and Forest Lands. No Impact. The project includes improvements to existing walking trails and removal of user-made trails. No farmland or forest land is present within the project area. The project would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

III. AIR QUALITY

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located in Monterey County, which lies within the North Central Coast Air Basin. This Basin is under the jurisdiction of the Monterey Bay Unified Air Pollution Control District (MBUAPCD) and United States Environmental Protection Agency (EPA) Region IX. The MBUAPCD is responsible for air monitoring, permitting, enforcement and long-range air quality planning for Monterey, Santa Cruz, and San Benito counties. The EPA is the federal agency responsible for establishing standards and emission limits for sources of air pollutants. The California Air Resources Board (CARB) is the State Agency responsible for coordinating the State and federal air pollution programs within California. CARB has established State ambient air quality standards for criteria pollutants, including ozone, carbon monoxide (CO), suspended particulate matter (PM₁₀), and fine suspended particulate matter (PM_{2.5}). The State Area Designation Maps for Ambient Air Quality Standards 2010 show that Monterey County is in attainment (air quality as good as, or better than, the California ambient air quality standards) for PM_{2.5} and CO, and in non-attainment (not meeting California ambient air quality standards) for ozone and PM₁₀. The MBUAPCD AQMP identifies a trend of declining ozone emissions, primarily related to lower vehicle emissions. The MBUAPCD determined progress was continuing to be made toward attaining the 8-hour ozone standard during the three-year period reviewed. The project is located within a mostly residentially developed area that does not generate significant air pollution. Prevailing ocean winds and the lack of industrial uses and high traffic levels within the vicinity of the Point Pinos Coastal Trail result in

relatively clean air levels. The closest air monitoring stations to the project site within Monterey County are the Carmel Valley –Ford Road site and the Salinas site. The measurements for ozone, CO, PM₁₀, and PM_{2.5} have not exceeded the State or national standards.

Discussion

- a) Conflict with AQMP. No Impact. The Air Quality Management Plan for the Monterey Bay Region was first prepared in 1991 in response to the California Clean Air Act of 1988. The current applicable plan is the 2017 Air Quality Management Plan. The project includes trail improvements and habitat restoration within an existing City-maintained open space. The project would not conflict with or obstruct implementation of any applicable air quality management plan for the MBUAPCD or Monterey County. No impact would occur.
- b-c) Project and Cumulative Air Emissions. No Impact. The project site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Unified Air Pollution Control District (MBUAPCD). The Environmental Protection Agency (EPA) is the federal agency responsible for establishing standards and emission limits for sources of air pollutants. The California Air Resources Board (CARB) is the State agency responsible for coordinating both State and federal air pollution programs within California. CARB has established more stringent air quality standards for California.

In 1997, the basin was re-designated from a moderate non-attainment area for Federal standards to a maintenance/attainment area. The basin is presently in attainment for the Federal fine particulate matter (PM₁₀), ozone, nitrogen dioxide, sulfur dioxide, and carbon monoxide standards, and is unclassified or in attainment for the Federal PM₂₅ and lead standards. The basin is classified as non-attainment for the State 1-hour ozone and PM₁₀ standards. The basin is in attainment for all other state standards, except for carbon monoxide which for which it is unclassified.

The MBUAPCD has developed the *CEQA Air Quality Guidelines* as an advisory document to provide recommended procedures for analyzing air quality impacts within the North Central Coast Air Basin. MBUAPCD guidelines indicate that construction activities that generate 82 pounds per day (ppd) of fine particulate matter (PM₁₀) would have a significant impact on local air quality when they are located nearby and upwind of sensitive receptors. According to MBUAPCD Guidelines, projects requiring minimal earthmoving on 8.1 or more acres per day, or grading and excavation on 2.2 or more acres per day are likely to exceed this threshold and a detailed PM₁₀ analysis is required. The project will be constructed in stages. The first stage will be the short-term plan of trail construction and re-alignment of the parking areas. This work will involve disturbance of approximately 0.66 acre of vegetated area over an approximately 12-month period, which is less than the MBUAPCD screening threshold which requires a detailed analysis. The long-term project actions will cover a smaller area and a shorter ground disturbance period. Project construction activities would result in a short-term increase in equipment and truck emissions at the project site; however, Best Management Practices will be implemented during construction to minimize the potential impacts due to dust created during construction (see item d). Thus, no significant dust generation or PM₁₀ emissions impacts would be expected to occur in the vicinity of the project site during construction activities. Furthermore, the project will be completed in stages over a period of up to 30 years.

The project would require the temporary use of equipment for excavation, grading, construction, and transport of materials which would generate air emissions. The proposed project would also involve capping of existing trail alignments and closed parking lots; these actions would require minimal ground disturbance. The temporary short-term nature of the construction emissions would be less-than-significant and would not result in any criteria air pollutant emissions at a level that would violate any air quality standard or contribute substantially to any air quality violations. The temporary construction-related impacts would not result in a cumulatively considerable pollutant. The potential increase in motor vehicle trips from increased use of the improved athletic fields would be minimal and would be less-than-significant. Increase vehicular trips would not result in any criteria air pollutant emissions at a level that would violate any air quality standard or contribute substantially to any air quality violations.

- d) Sensitive Receptors. *Less than Significant.* Under CEQA, residences, schools, daycare centers, and health care facilities, such as hospitals, or retirement and nursing homes, are considered sensitive receptors. Residences are located on the southerly side of Ocean View Boulevard between Asilomar Avenue and Coral Street, across from the project site. The project involves trail and parking area renovation, which would not result in stationary emissions. The project does not significantly alter the number of parking spaces or changes existing land use activities; therefore, the project will not result in a substantial increase in traffic-related pollutant concentrations that could affect sensitive receptors.

The proposed project would primarily involve capping of existing trail alignments and closed parking lots, and therefore would require minimal excavation and ground disturbance. Motorized equipment would be utilized for creation of the new parking areas and to transport materials. The dust and equipment exhaust emissions during construction would be minimal. Thus, site visitors and adjacent residences would not be exposed to substantial pollutant concentrations and the impact would be less-than-significant.

- e) Odors. *No Impact.* The project would not result in the long-term generation of odors. Construction related emissions could result in short-term generation of odors; however, only small mechanized equipment would be utilized for creating new parking areas and to transport materials within the project area. The trail work would primarily be completed using hand tools. The project would have no objectionable odor impacts.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project area supports seven plant community types: coastal bluff scrub, dune sedge meadow, salt grass flat, ice plant mat, bottlebrush thicket, Monterey cypress tree groves, and aloe stands. The project is located on the USGS Monterey 7.5' quadrangles. Site visits were conducted in October and December 2016 by Biotic Resources Group and Dana Bland & Associates to document plant communities and wildlife resources. All plant species observed were identified and recorded in a field notebook. Botanical nomenclature follows *The Flowering Plants of Monterey County - An Illustrated Field Key, Second Edition* (Matthews and Mitchell, 2015) and *The Jepson Manual Vascular Plants of California* (Baldwin, 2012).

The California Natural Diversity Database (CNDDDB Rare Find, Commercial Version, 2016) and the California Native Plant Society's (CNPS) Rare Plant Inventory (CNPS, 2016) were searched for records of special status species within the project quadrangle (Monterey) and surrounding quadrangles (i.e., Marina, Seaside, Soberanes Point, and Mt. Carmel). Mapped data on vegetation types and special status species as maintained by the City of Pacific Grove was also reviewed and utilized to document resources within the project area.

Coastal Bluff Scrub. The majority of the project area supports coastal bluff scrub. The scrub is characterized by the dense growth of shrubs and herbs on the bluff faces and terraces with often windswept shrubs and salt-spray tolerant herbs.

Shrubs commonly observed within the scrub habitat include coastal sagewort (*Artemisia pycnocephala*), lizard tail (*Eriophyllum staechadifolium*), coyote brush (*Baccharis pilularis*), seacliff buckwheat (*Eriogonum parvifolium*), and mock heather (*Ericameria ericoides*). Sub-shrubs and herbaceous species are numerous; species observed within the project area include common yarrow (*Achillea millefolium*), seaside daisy (*Erigeron glaucus*), Gray's locoweed (*Astragalus nuttallii*), yellow sand verbena (*Abronia latifolia*), peach primrose (*Camissoniopsis cheiranthifolia*), salt grass (*Distichlis spicata*), and gumplant (*Grindelia sp.*).

The scrub habitat was also found to support invasive non-native plant species; the most prominent species are ice plant (*Carpobrotus spp.*), mustards (*Brassica spp.* and *Hersfeldia sp.*), New Zealand spinach (*Tetragonia tetragonoides*), and sea rocket (*Cakile maritima*),

Generally, the berries of shrubs and the seeds of herbaceous plants in the coastal scrub habitat provide important forage for wildlife. Wildlife may perch on the outer perimeter of mixed scrub to take advantage of hunting opportunities in adjacent openings, and take cover in the denser shrub patches as needed. The dense shrub patches may provide nesting habitat for some birds tolerant of the high human traffic in this particular scrub habitat. However, the coastal scrub habitat at this site is highly fragmented into very small, isolated patches by the roadway, parking lots, and the golf course and residential areas on the inland side of the roadway.

Common wildlife species that may utilize some of the coastal scrub patches within the project area include western fence lizard (*Sceloporus occidentalis*), Anna's hummingbird (*Calypte anna*), western scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), and white-crowned sparrow (*Zonotrichia leucophrys*).

Dune Sedge Meadow. Patches of dune sedge meadow occur in openings within the coastal scrub, often in low areas that receive more moisture than the surrounding scrub. These meadows are characterized by the presence of the native perennial dune sedge (*Carex pansa*). Other plant species include lizard tail, coastal sagewort, sea rocket, salt grass, locoweed, seaside daisy, and ice plant. The patches of meadow within the project area are relatively small and the use of these areas by wildlife is expected to be similar to the surrounding coastal scrub habitat.

Salt Grass Flat. Patches of salt grass, a native stoloniferous species, occur in mesic areas along the coastal bluff. The salt grass forms dense mats. Other herbaceous species include fleshy jaumea (*Jaumea carnosa*), Pacific silver-weed (*Potentilla anserina ssp. pacifica*), and seaside daisy. The patches of salt grass habitat within the project area are relatively small and isolated, and the use of these areas by wildlife is expected to be limited to perching for birds, and occasional forage for common species that eat vegetative plant material, such as an occasional brush rabbit.

Ice Plant Mat. Mats of non-native ice plant occur in the project area. Small patches occur amid the coastal bluff scrub, yet larger expanses occur along Sunset Drive. These mats support almost a monoculture of ice plant; however, in some areas other plant species are found, such as beach primrose, lizard tail, sea rocket, seaside daisy, and New Zealand spinach. A roadside swale in once ice plant mat also supports additional non-native species, such as rabbitsfoot grass (*Polypogoon monspeliensis*), cut-leaved plantain (*Plantago coronopus*), Italian ryegrass (*Lolium perenne*), and curly dock (*Rumex crispus*). The non-native ice plant habitat is of little value to native wildlife.

Bottlebrush Thicket. A thicket of bottlebrush (*Callistemon sp.*), a non-native shrub, rows near the picnic area in the central portion of the project area. The thicket abuts a parking area and dune scrub. The bottle brush thicket within the project area may be used by common wildlife species such as Anna’s hummingbird for forage and nesting, as well as other common birds that can tolerate the high human presence.

Monterey Cypress Trees and Tree Groves. The project area supports five Monterey cypress (*Hesperocyparis macrocarpa*) tree groves. The groves support 24 trees, some are single trunk and others are larger, multi-trunked individuals. Tree diameters ranges from a low of 7.7 inches to a high of 45.0 inches. Although Monterey cypress are native to Monterey County, the trees within the project area are located outside the species’ native stands; the trees likely became established through plantings or natural colonization from nearby planted individuals. Table 1 lists the tree groves and tree measurements within each grove.

Table 1. Monterey Cypress Tree Groves in Project Area

Tree Grove	Number of Trees	Diameters (inches) ¹
A	10	13.4, 17.6, 22.6, (14.8/13.0), 6.4, 15.5, 25.6, 9.6, 25.9, (19.2/13.5/14.2/8.8/11.5)
B	4	(16.8/42.5), 28.4, (38.8/10.7), (33.5/17.3/7.7/10.4)
C	1	(20.2/ 45.0/ 21.9)
D	2	(24.4/ 30.8), (16.9/19.2)
E	7	9.0, (10.1/21.1), 15.9, 9.7, (19.2/17.6), 19.3, 13.3
Total	24	

¹ parenthesis represent measurements of multi-trunk trees

The tree groves provide perching, roosting, cover, foraging and nesting opportunities for native wildlife. Because the tree groves lack a natural stratified understory, the habitat does not provide the variety of niches for wildlife usually found in a natural forest habitat. Common wildlife species that may occur in the tree groves include mourning dove (*Zenaida macroura*), western scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), chestnut-backed chickadee (*Poecile rufescens*), and California towhee (*Pipilo crissalis*).

Aloe Stand. The project area supports a stand of non-native aloe (*Aloe sp.*). This large, non-native succulent grows amid an ice plant patch and Monterey cypress tree grove. The aloe stand within the project area is expected to be similar in wildlife use as the bottlebrush, which is limited to season forage for nectar, and perhaps nesting by common birds.

Rocky Shore. The project area supports rocky shore habitat, including tidepools and small sandy beaches. The Point Pinos area is located within the Monterey Bay National Marine Sanctuary, the Pacific Grove Marine Refuge and the Pacific Grove Marine Gardens Fish Refuge. The heterogenous rocky conditions, combined with the nutrient-rich cold water, supports a rich diversity of marine flora and fauna (Tenera Environmental, 2003). This habitat also supports diverse marine bird life and marine mammal uses (i.e., harbor seal haul-out areas). The rocks commonly support cormorants (dominated by Brandt's), Brown Pelicans (in season -summer, fall), several gull species, and black oystercatchers. Signs describing the black oystercatcher and their nesting sites occur in the project area. Several other bird species utilize the rocky inlets and sandy beaches. Ground squirrels are also prevalent amid the rocky edge, particularly amid the rock slope protection near vehicular turnout.

Sensitive Biological Resources

Federal Endangered Species Act (FESA). The U. S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NOAA) administer the FESA of 1973 and Title 16 (implementing regulations) of the U.S. Code of Regulations (CFT) 17.1 et seq. USFWS administers the FESA for wildlife and most aquatic species; NOAA Fisheries administers the FESA for anadromous fish and marine species. FESA designates and provides protection for threatened and endangered plants and animals and their critical habitat. Section 9 of FESA prohibits the “take” of federally listed wildlife species; however, the “incidental take” of federally listed species may be permitted during the course of an otherwise lawful activity through provisions included in Section 7 or Section 10 of the Act. Section 7 of the Act applies to projects where a federal agency is involved by issuing a permit, funding, or conducting the project. Under Section 7, the federal agency involved with the project consults with the USFWS, which authorizes limited incidental take of the affected species in the form of a Biological Opinion letter, with specific terms and conditions to avoid and minimize the effects on the species. Tidestrom’s lupine is a federally listed plant species and is known to occur in the western portion of the project area. Smith blue butterfly, a federally-listed species, is not expected to occur in the project area.

California Endangered Species Act. Section 2080 of the California Fish and Game Code prohibits the “take” of species listed under the California Endangered Species Act (CESA) of 1984. Incidental take of state listed species may be authorized by Section 2081 of the Code, after consultation with the CDFW, and development of minimization and mitigation measures. Tidestrom’s lupine is listed as an Endangered species under CESA and is known from the western portion of the project area.

Porter-Cologne Water Quality Control Act. Water quality in California is governed by the Porter-Cologne Water Quality Control Act and certification authority under Section 401 of the Clean Water Act, as administered by the Regional Water Quality Control Board (RWQCB). The Section 401 water quality certification program allows the State to ensure that activities requiring a Federal permit or license comply with State water quality standards. Water quality certification must be based on a finding that the proposed discharge will comply with water quality standards which are in the regional board’s basin plans. The Porter-Cologne Act requires any person discharging waste or proposing to discharge waste in any region that could affect the quality of the waters of the state to file a report of waste discharge. The RWQCB issues a permit or waiver that includes implementing water quality

control plans that take into account the beneficial uses to be protected. Waters of the State subject to RWQCB regulation extend to the top of bank, as well as isolated water/wetland features and saline waters. Should there be no Section 404 nexus (i.e., isolated feature not subject to USACE jurisdiction); a report of waste discharge (ROWD) is filed with the RWQCB. The RWQCB interprets waste to include fill placed into water bodies. Project improvements will occur above the Mean High Water Line and will be outside the RWQCB's jurisdiction, pending confirmation by this agency.

California Streambed Alteration Agreement. California Department of Fish and Wildlife (CDFW) is a trustee agency that has jurisdiction under Section 1600 et seq. of the CDFW Code. Under Sections 1600-1603 of the California Fish and Game Code, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream or lake which supports fish or wildlife. CDFW also regulates alterations to ponds and impoundments; CDFW jurisdictional limits typically extend to the top of bank or to the edge of riparian habitat if such habitat extends beyond top of bank (outer drip line), whichever is greater. Under California Fish and Game Codes 1600-1603, modifications to the bed or bank of such a feature are subject to review and permitting by CDFW. Project improvements will occur above the Mean High Water Line and will be outside CDFW's jurisdiction, pending confirmation by this agency.

CDFW also recognizes sensitive vegetation communities include: a) areas of special concern to resource agencies, b) areas protected under the California Environmental Quality Act (CEQA), c) areas designated as sensitive natural communities by California Department of Fish and Wildlife (CDFW), d) areas outlined in Section 1600 of the California Fish and Game Code, e) areas regulated under Section 404 of the federal Clean Water Act (CWA), and f) areas protected under local regulations and policies. The CDFW tracks sensitive vegetation communities that are considered rare (CDFG 2010). Vegetation types are ranked between S1 and S5. For vegetation types with ranks of S1-S3, all associations within the type are considered to be highly imperiled. If a vegetation alliance is ranked as S4 or S5, these alliances are generally considered common enough to not be of concern; however, it does not mean that certain associations contained within them are not rare (CDFG, 2007 and 2010). The project area was observed to support one vegetation type with an imperiled status. Dune sedge meadow is ranked S3.

California Fish and Game Code for Wildlife. Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code list animals that are fully-protected species and may not be taken or possessed at any time. Permits or licenses to take any fully protected species are issued only for very limited types of activities such as research. Section 3503, 3503.5 and 3513 of the Code protect resident, migratory non-game, and birds-of-prey. No fully protected species are known from the project area; however, marine mammals, such as harbor seals, occur nearby on rocky shoreline areas.

California Oak Woodland Conservation Act. This Act formally recognizes the role of oak woodlands as wildlife habitat, erosion control, and sustaining water quality. The Act encourages voluntary, long-term private stewardship and conservation of oak woodland by landowners and promotes landowners to protect biologically functional oak woodlands. In a related action, effective January 2005, the State amended CEQA with the addition of Public Resources Code 21083.4. This Code requires that counties consider the significance of oak woodland conversions under CEQA and adopt an oak woodland management plan pursuant to the Oak Woodlands Conservation Act that contains measures to minimize impacts to oak woodlands along riparian zones, near wetlands and those that contain snags or other features used by wildlife. If significant impacts are determined under CEQA, mitigation alternatives may include conserving oaks through the use of conservation easements (2:1 ratio, conserved to impacted),

restoration of former oak woodland area (2:1 ratio), contribution to the Oak Conservation Fund established under CDFG, or other mitigation measures developed by the Counties. If a planting program is implemented, replanting shall be at a 3:1 ratio (tree replacement) with requirements for planting maintenance and monitoring for seven years. The proposed project does not cause any significant impacts to oak woodlands as outlined in this Act.

Native Plant Protection Act. The Legislature formally recognized the plight of rare and endangered plants in 1977 with the passage of the Native Plant Protection Act (NPPA). The NPPA directs the CDFW to carry out the Legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The NPPA gave the California Fish and Game Commission the power to designate native plants as endangered or rare, and to require permits for collecting, transporting, or selling such plants. An occurrence of Tidestom's lupine, a State-listed plant, is located in the western portion of the project site.

Rivers and Harbors Act and Clean Water Act. The US Army Corps of Engineers (USACE) regulates activities within waters of the United States pursuant to congressional acts: Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act (1977, as amended). Section 10 of the Rivers and Harbors Act requires a permit for any work in, over, or under navigable waters of the United States. Navigable waters are defined as those waters subject to the ebb and flow of the tide to the Mean High Water mark (tidal areas) or below the Ordinary High Water mark (freshwater areas). Areas below the Mean High Water Mark below the sea cliff edge would be within the USACE's jurisdiction. In addition, the small seeps that support the salt grass flats may meet the definition of a wetland under USACE definitions; however, a formal delineation of Waters of the U.S. was not conducted as part of the biological evaluation. Coastal access improvements will occur above the Mean High Water Line and will be outside the USACE's jurisdiction, pending confirmation by this agency.

California Coastal Act. The California Coastal Commission was established by voter initiative in 1972 (Proposition 20) and later made permanent by the Legislature through adoption of the California Coastal Act of 1976. In partnership with coastal cities and counties, The Coastal Commission plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the Coastal Act to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The coastal zone varies in width from several hundred feet in highly urbanized areas up to five miles in certain rural areas, and offshore the coastal zone includes a three-mile-wide band of ocean. The proposed project is located within the coastal zone and is subject to provisions of the City of Pacific Grove Local Coastal Program and subject to review and permitting by the Coastal Commission. The coastal dune scrub, dune bluff scrub, and dune sedge meadow are considered an Environmentally Sensitive Habitat (ESHA) under the Coastal Act. In addition, the small seeps that support the salt grass flats may meet the definition of a wetland under CCC definitions; however, a formal delineation of coastal review wetlands was not conducted as part of the biological evaluation.

City of Pacific Grove General Plan and LCP. The project is located within the coastal zone with the City of Pacific Grove. The Coastal Commission certified the City of Pacific Grove's 1989 Coastal Land Use Plan; however, the City never finalized or received certification of an Implementation Plan. Therefore, the City lacked a completed Local Coastal Program, and jurisdiction over Pacific Grove's

Coastal Zone remained with the Coastal Commission. The project area is located within Area IV-B and a portion of Area IV-A. Within the coastal zone, Environmentally Sensitive Habitat Areas”, or “ESHAs,” are defined as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. These areas include, but are not limited to, dune, wetland, stream and rookery areas. For the Point Pinos Coastal Trail project area, ESHA status is expected to pertain to the coastal bluff scrub, dune sedge meadow, and the salt grass flat (potential coastal review wetland). Development in ESHA shall be limited to uses dependent on the resource, and shall be sited and designed to protect against significant disruption of habitat values including to rare and endangered species. Other stabilizing native dune plants shall also be protected, relocated, or replanted with similar native plants.

The rocky shore and bay/ocean areas that extend outward from Point Pinos are within the Monterey Bay National Marine Sanctuary, the Pacific Grove Marine Refuge, and the Pacific Grove Marine Gardens Fish Refuge. A portion of the rocky shore east of Point Pinos toward Cannery Row is designated an Area of Significant Biological Significance (ASBS). Areas south of Point Pinos are within the Asilomar State Marine Reserve. The City established the Pacific Grove Marine Refuge in 1952 to recognize the biodiversity of the area and provide for resource conservation. The marine refuge extends from the mean high tide line outward to a depth of 60 feet offshore, a distance of approximately 1,000 feet from the shore. The Pacific Grove Marine Gardens Fish Refuge was established by CDFW in 1963. It covers the same area and provides a means for the State to provide marine resource management and protection. The Asilomar State Marine Reserve extends from Point Pinos south to Point Joe (Pebble Beach) and is managed by CDFW. The City of Pacific Grove has adopted ordinances for allowed activities in the marine refuge. Ordinance 00-12 prohibits the collecting of all marine plants and allows up to one handful of non-living plant and animal material (i.e., detached plants, pebbles, flotsam and jetsam). The ordinance also requires that any scientific collecting permit issued by CDFW be approved by the City Manager. Fishing is allowed within the Fish Refuge, as per CDFW sport fishing license regulations.

The City General Plan identifies protected trees. All trees on public property, six inches or greater in trunk diameter, measured at 54 inches above native grade are designated as protected trees.

Special Status Plant Species

Plant species of concern include those listed by either the Federal or State resource agencies and species identified as rare (on List 1B) by CNPS. Special status species searched for within the project area are listed in Table 2, based on species recorded for the region by CNDDDB and CNPS. The biological evaluation did not include a spring/summer season survey for special status plant species.

Seven special status plant species have been recorded from the Point Pinos area based on CNDDDB records; however, only one, Tidestrom’s lupine (*Lupinus tidestromii*) (a state and federally-listed endangered species), has been found within the project area based on recent surveys conducted for the City of Pacific Grove. The closest extant occurrence of other a state or federally-listed species are Menzies wallflower (*Erysimum menziesii ssp. menziesii*), Monterey spineflower (*Chorizanthe pungens pungens*), and beach layia (*Layia carnosa*) from the dunes at the Pacific Grove Golf Course and Asilomar State Beach. Information of species occurrence/potential occurrence in the project area is presented in Appendix B, Table 1.

Special Status Wildlife Species

Special status wildlife species known from the general project vicinity were evaluated for their potential to occur at the project site. Special status wildlife species include those proposed for listing as threatened or endangered, candidates for listing, and those listed by either the Federal or State resource agencies, as well as those identified as State species of special concern. In addition, all raptor nests are protected by Fish and Game Code, and all migratory bird nests are protected by the Federal Migratory Bird Treaty Act.

Special status wildlife species were evaluated for their potential presence in the project area as described in Appendix B, Table 2. The coastal scrub and coastal bluff scrub supports sparse occurrences of seacliff buckwheat which can be habitat for the Smith's Blue butterfly, a species federally listed as endangered. (USFWS 2006, Smith's Blue Butterfly (*Euphilotes enoptes smithi*), 5-Year Review: Summary and Evaluation). The relatively small areas of coastal bluff and dune habitat with buckwheat (the required adult and larval food plant) are fragmented by development to the east and the busy roadway. The occurrence of buckwheat within the coastal bluff and dune habitats is sparse. This butterfly has low vagility (movement and dispersal) capability, and thus the sparse occurrence of buckwheat plants, and the fragments of habitats (islands basically), and the lack of any records of Smith's blue butterfly within the general vicinity (Pacific Grove to Pebble Beach) reduce the likelihood that this butterfly currently inhabits any portion of the project area.

The black legless lizard (*Anniella pulchra nigra*), a State Species of Special Concern, require coastal dune habitats and edges of other adjacent habitats (such as oak woodlands) with very loose, sandy soils with dense vegetative cover and dense leaf litter. They live primarily in the upper soil layers and hunt for invertebrates at the surface, especially amongst dense leaf litter. The dense leaf litter and dense shrub (particular lupines and mock heather) create moist soil conditions that are critical to this lizard's survival. As noted above, there are only scattered occurrences of native coastal dune plants within the project work area, which do not form a dense vegetative cover necessary for this lizard's habitat, and these patches of dune habitat are highly fragmented into small areas by existing parking lots, roads, and golf course. Although the black legless lizard has been found south of Point Pinos in Asilomar State Park, it occurs in much larger expanses of coastal dune habitat with dense native plant cover vegetation. Black legless lizard is not expected to occur at this trail project work area due to lack of suitable habitat.

One other species of local and regional concern, the black oystercatcher (*Haematopus bachmani*) lives year-round and nests in the rocky intertidal areas adjacent to the general project area. Although this shorebird is not currently state or federally listed, it is a USFWS "Bird of Conservation Concern" and the population is being monitored to gather more information on its overall status along the California coast, and its vulnerability to future population declines from both recreational use of coastal areas and climate change induced rising sea levels. Five pairs of black oystercatchers were documented to nest within the Point Pinos coastline in 2016 (comments provided by Lisa Ciani of the Central Coast Black Oystercatcher Project, March 2017). This shorebird forages on invertebrates along the rocky shoreline, and nests in scrapes they make on the ground on "islets" or above the high water mark of rocky intertidal shores between March and through September along the Central Coast (Briefing Paper by Herrick Hanks, California Central Coast Black Oystercatcher Project, March 20, 2017). The black oystercatcher young spend a relatively long time (1-3 ~~years~~ months) learning foraging skills from their parents, do not sexually mature until the age of 4 or 5 years, are relatively long-lived (up to 15 years documented), and their monogamous parents vigorously defend their

territories from year-to-year. Also, the species is confined to the rocky intertidal, a long, linear habitat type. These life history attributes of the oystercatcher make it vulnerable to adjacent human disturbance (e.g., development projects, roads, etc.), as well as loss of required nesting, rearing and foraging habitats from rising sea levels.

Discussion

- a) Special Status Species. *Potentially Significant Unless Mitigation Incorporated*. Two colonies of Tidestrom's lupine (State and Federally-listed species) grow in coastal dune scrub in the westernmost portion of the project area. The City maintains and monitors these colonies as part of mitigation for the Pacific Grove Municipal Golf Course. Trail improvements are proposed in close proximity to this species; mitigation measure BIO-1 identifies measures to avoid adverse impacts to this species. No other special status plant species has been documented from the project area and none were observed during spring/summer site surveys in 2017.

Impact BIO-1: Trail rehabilitation would occur within and/or in close proximity to individuals of Tidestrom's lupine. Plants of this species may be removed by trail rehabilitation, removal of invasive, non-native plant species, and maintenance depending upon the extent of activities in/around the two colonies.

Mitigation Measure BIO-1: To avoid impacts to Tidestrom's lupine the City will incorporate the following measures prior to commencement of all project activities:

- Activities within 50 feet of the two plant colonies shall be kept to the smallest feasible disturbance area. The limits of the work will be demarcated in the field. The City will install flagging, fencing, and other protective measures around the two Tidestrom's lupine colonies that are to be avoided by the project.
 - Invasive, non-native plant species (e.g., ice plant) that occur adjacent to work areas should be removed/controlled to prevent their encroachment into habitat supporting the Tidestrom's lupine. Care will be given to ensure the root systems of Tidestrom's lupine are not dislodged while invasive, non-native plants are hand-pulled. No herbicides will be used.
- b) Riparian and Sensitive Habitat. *Potentially Significant Unless Mitigation Incorporated* The project area does not support any riparian habitat. Although most of the project improvements will occur in non-sensitive ice plant mat, two project features, a beach access trail and a short section of trail between parking area 1 and 2, would occur within dune sedge meadow. Dune sedge meadow is a sensitive natural community as per CDFW. Five beach access trails and three trail sections between parking areas 1 and 4a will traverse coastal dune scrub, an environmentally sensitive habitat.

Impact BIO-2: New trail construction will occur within coastal dune scrub and dune sedge meadow resulting in the removal of native vegetation from these habitats. Approximately 836 square feet of dune sedge meadow and coastal dune scrub will be affected. Mitigation Measure BIO-2 identifies measures to minimize impacts to these habitats during construction and to provide compensatory mitigation.

Mitigation Measure BIO-2. To avoid impacts to coastal dune scrub and dune sedge meadow within the work area, the City will implement the following:

- Prior to construction, orange plastic construction fencing will be constructed at the limits of construction access and the work area so as to prevent impacts to adjacent vegetation.
- For trail work in dune scrub areas, any soil removed during trail construction should be temporarily stockpiled. As the soil likely contains native dune seeds, the upper two inches of soil shall be stockpiled separately from deeper soils and reapplied as the upper soil layer in rehabilitated areas. Stockpiled soil shall be used in the rehabilitated areas. The City will provide post-construction documentation that there is no net loss of coastal dune scrub by implementing habitat restoration of closed trails.
- For trail work in dune sedge meadow, the City shall salvage sod from the dune sedge meadow and relocate the sod to trail areas to be closed. The City will provide post-construction documentation that there is no net loss of dune sedge meadow by implementing habitat restoration of closed trails.

c) Wetlands. No Impact. The project area does not support federally protected wetlands as defined by Section 404 of the Clean Water Act. The project would not alter the flow of any watercourse or significantly affect federally-defined wetlands. Coastal access improvements will occur above the Mean High Water Line (tidal areas) which will be outside regulatory jurisdiction of USACE.

d) Wildlife Movement and Nesting Birds. Potentially Significant Unless Mitigation Incorporated. Construction activities may cause short-term impacts to nesting birds if they are present during construction. The noise from construction may cause nesting birds to abandon eggs or chicks, resulting in their death. The black oystercatcher nests and inhabits the rocky intertidal zone, which is below the proposed project work area, and thus most of the heavy equipment work (which would occur in construction of new parking lots, etc.), will be above and inland of the area critical to oystercatcher breeding and fledging activities. The project does not include any modification or removal of habitat for black oystercatchers (rocky intertidal habitat), and thus will have no long-term effects on this species' nesting or foraging habitat. Any potential impacts to black oystercatchers from this project would be only temporary during construction that may require heavy equipment adjacent to active nests.

Impact BIO-3: Construction activities may cause short-term impacts to nesting birds if they are present during construction. The noise from construction may cause nesting birds to abandon eggs or chicks, resulting in their death.

Mitigation Measure BIO-3. To avoid impacts to nesting birds, the City will implement the following:

- If possible, schedule construction activities involving grading, vegetation stripping, or other involving heavy equipment, outside the migratory bird breeding season, which is August 1 – February 1.
- If construction-related activities must be scheduled during the breeding season, then focused surveys to identify active nests of migratory bird species will be conducted

by a qualified biologist no more than 7 days before heavy equipment construction activities occur in these months.

- If a nest is found during construction, any disruptive work in the immediate area will be halted and construction must be shifted to another area of the project far enough away as to limit disrupting the active nest, the buffer area to be determined by the biologist. The nest will be monitored to determine when chicks have fledged and when it is safe to resume work around the nest site.
- Implement all recommended mitigation measures to replace removal of trees, which may provide nesting habitat for migratory birds.
- Because black oystercatchers breed adjacent to some portions of the Point Pinos Trail project corridor between the months of March through September, and their nesting success could potentially be disrupted by heavy equipment activity adjacent to nest sites, additional monitoring of these birds is recommended. The City shall hire a qualified biologist to confer with the California Central Coast Black Oystercatcher Project biologists to determine if trail or parking lot construction is scheduled to occur adjacent to observed active nests. If so, construction in that buffer area should be postponed until the City's biologist determines that all young have fledged. The City's biologist should also recommend a buffer zone between construction and active oystercatcher nests, if evidence determines it is necessary to avoid impacts to the young.
- Buffer distances for oystercatcher nests should be site specific and at an appropriate distance, as determined by the City's biologist. There are many factors that may affect this bird's selection of nest site unrelated to nearby construction and thus would allow the nesting birds to succeed even during certain construction activities nearby. For example, if the work is located outside of the nesting bird's line of sight (e.g., cliff that obstructs view), crashing waves on nearby rocks that are louder than the construction equipment, and frequent human presence on paths and beaches near the nests that birds become inured to prior to selecting their nest site. The buffer distances should be specified to protect the bird's normal bird behavior to prevent nesting failure or abandonment. The buffer distance recommendation should be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The City's biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer that avoids failure of nests is established.

- e) Conflict with Policies. No Impact. The project would not conflict with area plans or policies. The project includes restoration for degraded habitats through the removal/control of invasive non-native plant species and rehabilitation of closed/removed trails.
- f) Conflict with Plans. No Impact. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional, or State habitat conservation plan that relate to the proposed project area.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

An archeological study was conducted by Holman & Associates for the project area (Holman & Associates, December 2016). This section is derived from that study. The work included a search of relevant records and maps maintained by the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University; a pedestrian reconnaissance of the project area and areas immediately adjacent to the project area; and consultation with Native American contacts with local knowledge.

Most radiocarbon dates obtained from prehistoric contexts in the Monterey Bay region suggest that permanent occupation of the region began about 5,000 to 6,000 Years Before Present (YBP). While it is not entirely clear how population movements affected cultural continuity in the area, it is well established that hunting and gathering, or a combination of hunting and gathering and collecting, was the primary subsistence strategy used by the region's inhabitants up to the beginning of the Spanish colonial presence in 1769. Habitation was likely semi-sedentary with seasonal camps often reflecting climate patterns and seasonal resource availability. The Native Americans who inhabited the San Francisco Bay region, Santa Cruz Mountains, East Bay Hills, and the Monterey Bay area at the time of the 1769 Spanish incursion are now most commonly known as "Ohlones," a name taken from a coastal village between Santa Cruz and Half Moon Bay. Archaeological evidence indicates the ancestral Ohlones arrived in the San Francisco Bay region—depending on location—somewhere around A.D. 500, possibly from the lower Sacramento Valley/Delta, and in the Santa Cruz/Monterey Bay region somewhat later, displacing earlier populations. Anthropologists and the Federal Government labeled these people "Costanoans," from the Spanish "costaños" or coast-dwellers, a linguistic term coined to describe groups speaking related languages, occupying the coast from the Golden Gate to Point Sur and inland to about the crest of the Diablo Range. Natural resources of their home areas provided for nearly all the needs of the aboriginal Ohlone populations. The Ohlones had adapted to and managed their abundant local environment so well that some places were continuously occupied for thousands of years. Compared to modern standards, population density was low; however, the

Monterey Bay area was one of the most densely populated areas of prehistoric California for centuries.

Currently, the best available information indicates that at the time of Spanish colonization the Rumsen Tribe held territory in the vicinity of the Project Area. The Rumsen Tribe was associated with the lower Carmel River Valley including the entire Monterey Peninsula to the north and about as far south as Garrapata State Park.

From 1769 to 1776, three Spanish expeditions to reconnoiter the region for colonization passed through the Central Coast. With the development of the Spanish Presidio at Monterey Bay and the Franciscan mission at Carmel in 1770-1771, and later the missions at Soledad and Santa Cruz (1791), and San Juan Bautista (1797), aboriginal life changed profoundly for the Ohlone. The root cause of change was Spanish religious and political hegemony brought by the Franciscan missionaries and enforcement of their assumed authority by the Spanish military. Religious conversion, adoption of farming practices, lethal illnesses, and intermarriage with other groups also contributed to the disintegration of tribal culture. The effect of Mission Carmel on the Native population was dramatic. By 1792, the *Rumsen* and the five tribes surrounding their territory (*Locuyusta in Calendaruc*, *Ensen*, *Eslanajan*, *Excelen*, and *Sargentaruc*) had all experienced significant absorption into the Mission system.

A review of historical US Geological Survey (USGS) maps shows that the land near the Point Pinos area remained largely undeveloped as of 1913, other than the construction of Point Pinos Lighthouse (1855), Lighthouse Drive, Grove Acre Avenue, and the railroad. By the 1930s and 1940s additional coastal development is evident from the construction of Asilomar Avenue and Sunset Drive as well as numerous east-west connecting streets such as Jewell, Arena, and Pico Avenues. Sparse residential development is clearly underway west of Asilomar by the 1940s, as structures near the Project Area are shown on the 1941 map. Residential development increased in the 1950s and 1960s, but the immediate area has remained relatively undeveloped other than roads and both passive and active recreational amenities.

The records search showed that the entire project area has been surveyed for archaeological resources multiple times and that six prehistoric archaeological resources have been recorded with the project area. These include gathering and occupation sites and gathering and processing sites. Most sites have experienced damage from coastal wave and wind erosion, and foot traffic. In addition to the six sites within the project area, numerous other prehistoric sites are nearby including an off-shore site located on a rocky outcrop northwest of Point Pinos, areas within the Pacific Grove Municipal Golf Course, and sites east of Sunset Drive.

Historical period resources in the vicinity include Point Pinos Light Station (1855), which is listed on the National Register as an individual property. The lighthouse is about 1,200 feet east of the project area at the closest point.

Discussion

- a) Historical Resources. No Impact. No historic sites or structures have been identified, based on prior background studies and investigations, within the project area. No impacts to historic resources will occur.

- b) Archaeological Resources. Potentially Significant Unless Mitigation Incorporated. Six archaeological sites have been identified within the project area, yet all of the project area is considered extremely sensitive for prehistoric archaeological resources. Most feature shell midden, associated with shellfish processing, and are located along the coastal bluff edges, yet midden soils can potentially contain undisturbed features, including human burials.

Most of the sites show evidence of erosion, both from natural processes and human disturbance. Accelerated erosion and soil loss is presently occurring as result of coastal wave and wind erosion. Where trails are located within archaeological sites, ongoing disturbance is also occurring from trail use. Where midden is exposed on the surface on trails, there is also evidence of trampling and further breaking of shell. Where trails follow closely along bluff edges within archaeological sites, there is substantial erosion along the bluff edge. Because there are no designated or improved overlook features at these locations, visitors are trampling the bluff edges. While coastal bluff erosion and retreat is a natural process, trail use and overlooks along actively eroding edges can further accelerate erosion, resulting in greater disturbance and loss of archaeological resources.

Existing visitor use and coastal processes are resulting in disturbance to archaeological resources. The existing parking lots within the project area were previously capped with decomposed granite. In some areas, archaeological sites are located along retreating coastal bluff edges and midden material is evident below the decomposed granite cap. In addition, where existing trails are located within archaeological sites, pedestrian trail use can result in disturbance to midden, which is generally at relatively shallow depths. Where the trail bed is presently entrenched, rainfall accumulates and results in accelerated erosion along the trail alignment. This accelerated erosion can result in greater levels of disturbance to archaeological sites. Continued use of soil surface trails within archaeological sites and allowing entrenched trail beds to remain unrepaired would likely result in continued disturbance to archaeological sites.

The project would reduce this ongoing disturbance by closing informal trails within archaeological sites, stabilizing and capping formal trail segments, and defining and capping overlook areas. Although it is anticipated that these improvements would reduce the level of existing disturbance to archaeological sites, the proposed project could result in impacts to archaeological resources if the project is not sensitively implemented. The project proposes to widen the Coastal Trail segments to 5 feet and cap the surface with 6 to 8 inches of aggregate base material. Entrenched areas would be filled with material to create a stable trail bed prior to installing the aggregate base trail bed. The trail bed would be crowned to avoid future accelerated erosion. Without capping and filling of the entrenched areas within the trail bed, increased trail use on the Coastal Trail segments could result in greater disturbance to archaeological resources than at present. Implementation of Mitigation Measure CULT-1 would reduce the potential impact to archaeological resources to a less-than significant level.

Impact CULT-1: Designation and use of the Coastal Trail and parking areas could result in disturbance to archaeological resources due to ground excavation, trampling, accelerated erosion, and increased trail use. Widening of the existing trail bed could result in exposure, disturbance, or displacement of archaeological features or artifacts.

Mitigation Measure CULT-1: To avoid impacts to archaeological sites, the following measures and the BMPs (Best Management Practices or Standard Project Requirements) listed in Appendix A, as well as measures outlined in Mitigation Measure TRI-1, will be implemented:

- The project shall use specialized construction methods to avoid or minimize impacts to archeological resources. Methods shall be used where there is no or minimal intrusion into known sites or into unknown archaeological soils which might be inadvertently encountered during construction. Examples of such techniques would require that the required thickness of the sub grade for proposed path and parking area be the result of adding culturally sterile fill on top of the existing grade within the project footprint. Also, the number of signs or other new project elements which require ground disturbances for installation shall be extremely limited and shall be installed without concrete footings. Additionally, any drainage plan for new trails and parking areas shall be designed to prevent deleterious runoff or other sources of erosion which would adversely affect the sites over the long term.
- Advanced plans for construction shall be designed to minimize potential impact to cultural resources. Prior to approval, plans should be subject to archaeological plan review for assessment of project impacts and recommendations for mitigation of those impacts where appropriate.
- A qualified archaeologist shall be present for all ground disturbing activities. Please refer to Mitigation Measure TRI-1, which requires presence of a Native American monitor certified by the OCEN be present for all ground disturbance. If potentially significant archaeological resources are discovered, the monitor should be authorized to halt excavation until any finds are property evaluated. The monitor will also be authorized to discontinue monitoring in soils, such as fill, where cultural resources cannot exist.
- ~~If in spite of measures to avoid it, disturbance occurs within a recorded historical resource, a minimum of two single specimen radiocarbon dates should be obtained for each impacted site, if suitable shell specimens are recovered.~~
- If a find is determined to be significant, work may remain halted near the find to permit development and implementation of a reburial data recovery mitigation plan with the concurrence of the Lead Agency, ~~and implemented.~~ The mitigation plan should be designed to reduce project impacts to a less than significant level, as required by CEQA.
- Following completion of the project, a *Preliminary Archaeological Report* should be prepared. ~~If suitable materials are found to warrant special studies, a *Final Comprehensive Technical Report* that includes all analysis will be submitted to the lead agency within six months of the conclusion of the archaeological fieldwork. If suitable materials are not found to warrant special studies, the preliminary report will serve as the final report on the Project.~~ The final report should include a revised site record for each of the sites covered by the monitoring, and new site records for other resources if any are found.
- Cultural materials, including ancestral remains, recovered during the project should be reburied on site ~~processed and curated in a suitable public research facility.~~ If that is not possible, they shall be offered to OCEN.
- A qualified archaeologist shall inspect the location of the trail removal and closures prior to any soil disturbance to confirm the locations where an archaeological

monitor will be required. The archaeological monitor and OCEN monitor will remain on site as warranted in the opinion of the archaeological monitor and OCEN monitor. In the event that a potentially significant cultural deposit is uncovered during construction, all work will be stopped at the specific location of the find until the qualified archaeologist and OCEN monitor can evaluate it. Prior to work resuming at the location, the archaeologist and OCEN monitor will determine the appropriate avoidance, preservation or ~~reburial~~ recovery measures required, in compliance with CEQA. Work shall not resume at the location until the appropriate measures have been implemented as determined by the archaeologist and OCEN monitor.

- For new trail and parking area construction shall specify that all archaeological site boundaries near construction zones be marked by exclusionary fencing during construction. Due the extremely sensitive nature of the entire project area, a qualified archaeological monitor should be present during construction.
- Trail closure and removal measures where the trail bed is stable: Allow trail to revegetate naturally, retain all open areas except at trail entrances. Distribute cut native vegetation at trail entrances for length of approximately 20 feet. Install cable and rod fencing only as needed and avoid installing sign posts within, or in vicinity of, archaeological sites where feasible. Where sign post or similar new features are unavoidable (certainly some will be needed) within an archaeological site, intrusive element shall be pounded into the ground rather than excavated and installed with a concrete base. Pounding would be less of an impact.

- c) Paleontological Resources. Potentially Significant Unless Mitigation Incorporated. The project proposes installation of coastal access steps down the coastal bluffs to provide access to the shoreline/intertidal zone. At some locations, there is ongoing bluff erosion from both visitor use and natural processes. No steps would be installed within the intertidal zone. Paleontological resources may be present within coastal bluffs within the project area. Implementation of **Mitigation Measure CULT-1** will reduce the potential impacts to cultural resources to less-than-significant.
- d) Human Remains. Potentially Significant Unless Mitigation Incorporated. No human remains or burial sites have been documented or are expected to be found in the project area. However, the possibility always exists that human remains may be encountered. Discovery and disturbance of any human remains requires special treatment, per State codes. Incorporation of the following Standard Project Requirement would ensure the potential impacts to human remains would remain less-than-significant.

Mitigation Measure CULT-2. Treatment of previously unidentified human remains.

During project construction, if human remains are discovered, the project applicant and/or its contractor shall cease all work within 25 feet of the find and notify the City of Pacific Grove Planning Division and the county coroner, per California Health and Safety Code Section 7050.5. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours.

VI. GEOLOGY AND SOILS

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

This section is derived from a report prepared by Haro Kasunich and Associates and Timothy Best (June 2017). The project site is located along the Pacific Ocean in Northern Monterey County at the southernmost edge of Monterey Bay. The alignment of the proposed trail is located on a gently sloping uplifted marine terrace fronted by an actively eroding 5 to 20-foot high coastal bluff. The project area is directly exposed to coastal erosion and ocean wave impact, because of its direct exposure to the Pacific Ocean.

The coastal bluff exposes Cretaceous Age granitic bedrock capped by 3 to 10 feet of Pleistocene Age marine terrace deposits of the Ocean View Coastal Terrace and Holocene Age coastal dune sands. A thin sand, cobble and boulder beach intermittently fronts the low coastal bluff. The marine terraces were formed in the last few hundred thousand years when sea level was higher, relative to the land surface, than at present. At that time, the ocean carved a sea cliff comparable to the modern-day cliff. When sea level fell due to the onset of continental glaciation, it left behind a wave-cut bench covered by beach sands, near shore marine deposits, and dune sands. Tectonic uplift has elevated the terrace surfaces to their current position, about 5 to 20 feet above the ocean resulting in the geomorphology seen today.

Differential erosion of the granitic bedrock has created a very scenic craggy shoreline with coves, points, sea stacks and bedrock outcrops that form irregular topographic bumps in the surface of the bedrock platform. In a similar manner, this geomorphology exists in the bedrock under the coastal terrace deposits, resulting in variable thickness of the terrace deposits; which results in differential susceptibility to coastal erosion and bluff recession throughout the project area. At the downcoast end of the study area (towards Asilomar) sand dune deposits mantle the underlying coastal terrace deposits and/or the underlying granite bedrock. A protective beach is largely absent along most of the ocean fronting the project area, and as a result much of the bluff is subjected to wave impact and coastal erosion during high tides and/or periods of high surf. In some areas, the coastal bluff is only a few feet in height, and the slope gradients of the beach seaward of the bluff top areas essentially form a ramp that is very susceptible to wave runoff that overtops the bluff.

In several segments of the project area where oceanfront parking lots presently are located, artificial fill consisting of rip-rap boulders and base rock exists. The rip-rap boulders were imported from the now closed Del Monte Quarry, which used to exist where the Spanish Bay development is presently located in Pebble Beach. The granitic geology and coloration of the boulders is similar to the natural geology of the native granite bedrock found in the project area. The 30-year setback illustrated on the plans assumes the City will continue to maintain the existing rip-rap boulders for shoreline protection. The granitic bedrock consists of hard jointed and fractured granodiorite that is relatively resistant to coastal erosion. The uppermost surface of the granite that underlies the marine terrace deposits is locally highly weathered.

Because protective beaches are largely absent and the upper few feet of bedrock (which is highly weathered) and the overlying relatively weak marine terrace deposits and localized dune deposits are quite low in elevation the coastal bluffs in the project area are susceptible to coastal erosion and have historically been receding. These conditions also mean that the relatively weak earth materials that form the majority of the upper bluff face are subject to wave impact and coastal erosion during periods of high surf. In places, past erosion has been significant enough so that over 850 feet of the bluff has been armored with rock rip rap to protect it from further erosion. Rates of coastal bluff retreat are governed by the ability of large storm waves to attack the bluff and the relative ease with which cliff material can be dislodged, either 1) directly by wave attack, or 2) through secondary processes such as erosion from seawater from wave run-up rushing inland and draining back over the bluff. Sea cliff retreat is a spatially and temporary episodic process, governed by the exposure of the bluff face to wave impact and occurrence of large storms and potentially to seismic disturbances.

The review of aerial photographs found that coastal erosion resulting in 0 to 45 feet of coastal bluff edge recession had occurred over the past 70 years since 1945, with the average being about 10 feet.

The averages annual bluff retreat in 2” to 6”. The review finds the amount of erosion is dependent upon the exposure of the bluff face to wave attack, existence of offshore rocks that dissipate wave energy, bluff height, and strength of the underlying earth materials, and the occurrence of large storms events and potentially to seismic disturbances. Sea level rise will cause faster rates of bluff recession than have occurred historically.

The closest known active faults to the project area the Palo Colorado-San Gregorio Fault, located about 7.1 miles to the southwest; the Monterey Bay Fault complex, located about 1.1 miles to the northeast; and the San Andreas Fault, located about 26.3 miles to the northeast. In addition, the known potentially active faults nearest to the project site are the Cypress Point Fault, located about 3.8 miles to the southwest; and the Chupines Fault, located about 4.2 miles to the northeast. The project area is likely to be shaken by earthquakes of approximate magnitude 7.9, with an average recurrence interval between 138 and 188 years along the North Coast segment of the San Andreas Fault. Earthquakes of magnitude 6 or 7 are also likely along many of the faults within the Monterey Bay area.

Discussion

- a, i) Fault Rupture. *No Impact.* The project site is not located within an Alquist-Priolo Earthquake Fault Zone as designated by the California Geographic Survey. The project area could be subjected to strong seismic ground shaking. The proposed project, however, would not add a structure that would substantially increase loss nor would the project substantially increase the exposure of the public to injury or death should a seismic event occur. There is no impact to people or structures from rupture of an earthquake fault.
- a, ii) Seismic Shaking. *Less than Significant.* The project site could be subjected to strong seismic shaking. The proposed project does not include construction of any structures. The trail and parking area improvements are not expected to result in an increased use of the facilities or substantially increase the exposure of the public to injury or death should a seismic event occur. Thus, the exposure to seismic shaking would be less than significant.
- a, iii) Ground Failure and Liquefaction. *No Impact.* The proposed trail and parking areas are located within dunes and on exposed low coastal terrace/bluff. These areas have a low potential of liquefaction. No impact will occur.
- a, iv) Landslides. *No Impact.* The project site is generally level. Landslides are not anticipated to affect the project site. No impact will occur.
- b) Soil Erosion. *Potentially Significant Unless Mitigation Incorporated.* The project primarily involves capping existing system trails and removal and closure of non-system trails. Capping of existing eroded trail segments would help to address accelerated erosion where it presently exists within the trail bed. New trail construction would involve minimal soil excavation and disturbance. Earth movement for new parking areas would also require only minimal excavation. The project would result in a less-than-significant impact to soil erosion and loss of top soil. Coastal erosion impacts, including associated soil erosion and wave runup impacts are discussed in c). Where future wave runup inundates the trail, soil erosion will occur and future trail maintenance will be required.

Mitigation Measure GEO-1. Minimize Hazards from Wave Run-up During Storms. The proposed improvements shall be designed for appropriate visitor safety relative to erosion and wave activity. The trail and parking will be located inland from the recommended 30-year setback except where Ocean View Boulevard exists within the setback, in which case the trail will be located along the seaward edge of Ocean View Boulevard until the long-term plan is implemented and the road and trail are reduced or relocated outside of the setback. The evaluation of visitor safety shall assume that hazards exist from the existing bluff edge to the setback line. Those hazards may consist of vertical drop-offs, rills and gullies that present tripping or slip and fall risks, and ocean wave impact. The City shall periodically monitor, repair, and maintain the improvements to maintain safe conditions. Appropriate signage shall be installed to warn visitors of hazardous and risky conditions. During some ocean conditions, the trails and associated facilities shall be closed to use until the ocean subsides or maintenance and repairs occur.

- c) Unstable Conditions. Potentially Significant Unless Mitigation Incorporated. Because protective beaches are largely absent, the coastal bluff fronting the project area is subject to coastal erosion to varying degrees from the direct impact of ocean waves attacking the cliff face. Further, because the coastal bluff is low in elevation it is subject to being overtopped by wave runup and wave splash during large storms. When this water drains back over the edge of the bluff and into the ocean it can result in erosion of the bluff edge. Wave erosion is common during storms of moderate to high intensity and is an integral part of the natural coastal process.

Portions of parking areas and roads also collect and concentrate runoff and where this water drains over the bluff edge it results in rilling and gullying to varying degrees. This erosion hazard tends to be greatest along the edge of existing parking areas. In most instances, the erosion from roads and parking areas is not significant but from a trail design standpoint requires additional offset from the edge of the coastal bluff.

Rock rip-rap has been historically placed to reduce ongoing erosion caused by wave action along sections of the project area, particularly in areas that threaten to undermine parking areas and/or Ocean View Boulevard.

The area of the coastal bluff fronting the project area is susceptible to both dune and cliff erosion. The average annual bluff retreat is 2” to 6” with some areas having higher average annual rates. (Haro Kasunich and Associates and Timothy Best. June 2017).

Most of the existing trail segments are located on relatively level to moderate gradient slopes. The proposed project incorporates a minimum setback distance from the bluff edge for the Point Pinos Trail improvements based on the design life of the trail, the desired level of long-term stability, and need to consider visitor expectations of being close to the bluff edge. The plan specifies the trail should be set back far enough to provide a reasonable level of stability and safety using a 30-year trail bluff edge setback for time period from 2017 to 2046. This setback is designed to reduce the risk of coastal erosion damage prior to the year 2047. Implementing this setback will reduce potential impacts of coastal erosion and slope instability on the proposed trail. Implementation of **Mitigation Measure GEO-1** will reduce this impact to less than significant.

- d) Expansive Soils. No Impact. The site supports a high percentage of coarse-grained materials; therefore, expansive soils are not a potential geologic hazard. The proposed project does not include construction of a structure on expansive soils that would create substantial risks to life or property. No impact will occur.
- e) Septic and Wastewater Disposal. No Impact. The proposed project does not include septic tanks or alternative wastewater disposal systems. No impact will occur.

VII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The proposed project would involve trail and parking improvements and habitat restoration within an existing open space. The habitat improvements include revegetating closed trails and removal of invasive, non-native vegetation to enhance sensitive habitat. No heavy equipment would be used for habitat restoration.

The project would include trail construction/improvements to a 0.8-mile long trail. The Coastal Trail improvements would include widening designated trails to 5 feet and capping with aggregate base material. The project would also include construction/reconfiguration of existing roadside turnouts and parking areas, and replacement of signs and beach access steps.

The project does not involve any new sources of stationary or mobile greenhouse gas emissions. Temporary construction activities include delivery of materials from supply sources to the project area and use of mechanized construction equipment.

Discussion

- a) Greenhouse Gas Emissions. No Impact. The proposed project would not generate any new sources of stationary greenhouse gas emissions. The renovated trail and parking areas are not expected to result in a higher level of use as compared to the existing conditions. The number of parking spaces will be similar to the existing condition. There will be no significant

increase in traffic-generated greenhouse emissions. Construction activities would result in minimal, temporary emissions during the construction period. No impact will occur.

- b) Applicable Plans. No Impact. The State of California passed the Global Warming Solutions Act of 2006 (AB 32), which requires reductions of GHG emissions generated within California. The Governor’s Executive Order S-3-05 and AB 32 (Health & Safety Code, § 38501 et seq.) both seek to achieve 1990 emissions levels by the year 2020. Executive Order S-3-05 further requires that California’s GHG emissions be 80 percent below 1990 levels by the year 2050. AB 32 defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrocarbons, perfluorocarbons and sulfur hexafluoride. The California Air Resources Board (CARB) is the lead agency for implementing AB 32. In accordance with provisions of AB 32, CARB completed a statewide Greenhouse Gas (GHG) Inventory that provides estimates of the amount of GHGs emitted to, and removed from, the atmosphere by human activities within California. In accordance with requirements of AB 32, CARB has prepared and updated a “Scoping Plan”, which includes elements for reducing the state’s greenhouse emissions to 1990 levels. The Scoping Plan identifies 18 emissions reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related greenhouse gas targets, vehicle efficiency measures, goods movement, solar roofs program, industrial emissions, high speed rail, green building strategy, recycling, sustainable forests, water and air.

The project does not conflict with any plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions. No impact will occur.

VIII. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located within a natural area of the City of Pacific Grove. No evidence of past development was observed within the project area with the exception of an existing sewer pump station and prior trail and overlook improvements. The project area is adjacent to a golf course and residences (inland of Ocean View Boulevard). A search of the EnviroStor database, maintained by the California Department of Toxic Substances Control, and the GeoTracker database, maintained by the State Water Resources Control Board, found no sites within half a mile of the project site.

Discussion

- a) Use of Hazardous Materials. No Impact. The proposed project does not include the routine transport, use, or disposal of hazardous materials. Project construction requires the use of certain hazardous materials such as fuels and oils; however, any refueling would be minimal and would occur at the construction staging areas. Herbicides may be used to control invasive, non-native plant species, yet such use will be limited to spot/wick applications. There will be no significant hazard to the public or environment through the use of these materials.

- b) Release of Hazardous Materials. No Impact. Project construction would require the use of certain hazardous materials such as fuels and oils for construction equipment. Any fueling would be minimal and would occur at the designated construction staging area. No impact will occur.

- c) Hazardous Emissions. No Impact. No schools are located within one-quarter mile of the project site. The closest school in the Hopkins Marine Station, located southeast of the project site. The project would not result in hazardous emissions or waste impacts on an existing or proposed school. No impact would occur.
- d) Hazardous Materials Site. No Impact. The project site is not included on the California Department of Toxic Substance Control and State Water Resources Control Board list of hazardous materials sites. The project will not create a significant hazard to the public; therefore, no impact will occur.
- e) Location Near Public Airport. No Impact. The project site is not located within two miles of a public airport; therefore, no impact related to exposure to aviation safety will occur.
- f) Location Near Private Airstrip. No Impact. The project site is not located within the vicinity of a private airstrip; therefore, no impact related to exposure to aviation safety will occur.
- g) Emergency Response. No Impact. The project is located within an open space and the proposed trail and parking area work will have no effect on or interfere with implementation of an adopted emergency response or evacuation plans for the area. The City will continue to close beach and vehicular access to portions of Ocean View Boulevard during high wave-run-up events. Project construction will be short-term and will not impact any emergency evacuation routes or plans. No impact will occur.
- h) Wildland Fire Hazard. No Impact. The project is located along the coastline. Construction will not require the use of equipment which could potentially result in a source of ignition for a wildland fire. The project primarily involves capping existing trails and habitat restoration, thus motorized equipment would not be operating in heavy brush or expansive grasslands. No impact will occur.

IX. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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HYDROLOGY AND WATER QUALITY. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding of as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The project area is located along the coastline of Monterey Bay and Pacific Ocean. There are two major drainage basins within the City. The project site straddles both of these basins as the northeasterly portion of the project drains into Monterey Bay and the northwesterly section of the

project drains into the Pacific Ocean. According to the USGS topographic map, there are no watercourses in the project area. A pond (Crespi Pond) is located inland of Ocean View Boulevard within the municipal golf course. Storm water runoff seaward of Ocean View Boulevard drains directly into Monterey Bay or the Pacific Ocean. Runoff from Ocean View Boulevard and neighboring streets is directed into storm drains and underground culverts that discharge into the bay or the ocean. No major groundwater basins are located along this section of coastline. Small seasonal seeps were observed in the project area, where subsurface flow exits onto the coastal bluff face.

The project area lies within the jurisdiction of the Central Coast Regional Water Quality Control Board (CCRWQCB). The Regional Water Board regulates wastewater discharge to surface waters and ground water, storm water discharges from construction, and several other practices that could degrade water quality. The Water Quality Control Plan for the Central Coast Region (Basin Plan) is the Regional Board's master water quality control planning document which designates beneficial water uses and water quality objectives. The Basin Plan does not specifically designate beneficial uses or water quality objectives for the project area. The low elevation areas of the project site (i.e., sandy beach and shore) is located within the 100-year flood zone, as designated by the Federal Emergency Management Agency (FEMA).

In 2011 the State of California, through the California Ocean Protection Council agency, adopted sea level rise projections using the year 2000 as a base line: The data adopted by the State of California at that time indicates 40 to 55 inches of sea level rise should be planned for by 2100. This equates to between 3.4 to 4.6 feet of sea level increase by 2100, with the highest prediction being 6.75 feet using the year 2000 as a base line. More recently, the National Research Council prepared a 2012 report entitled "Sea Level Rise for the Coasts of California, Oregon and Washington: Past, Present and Future". This report stated the following sea level rise projections for areas South of Cape Mendocino using the year 2000 as a base line: This indicates between 1.3 to 5.5 feet of sea level increase by 2100 is predicted.

Discussion

- a) Violation of Waste Discharge Requirements. *No Impact.* The proposed project involves habitat restoration and improvements to parking areas and the coastal trail. The project also includes improvements to surface drainage to reduce bluff erosion. The project requires minimal excavation and soil disturbance. Rehabilitation of existing trail beds with evidence of accelerated erosion would reduce future sedimentation. Staging areas for equipment and delivery/storage of aggregate base would not be located adjacent to the coastal edge or any streams.
- b) Groundwater. *No Impact.* No major aquifers or pre-existing wells exist within the project area. The project would not utilize any groundwater supplies or interfere with groundwater recharge. No impact would occur.
- c) Drainage Patterns or Alteration of Creek. *No Impact.* The proposed project does not involve altering any streams or other water features. Coastal access improvements will occur above the Mean High Water Line. No impact would occur.
- d) Flooding. *No Impact.* Surface runoff from the project site currently percolates into the ground, collects as seasonally ponded water, or flows by sheet flow toward the ocean. The

proposed project does not involve altering any drainage patterns. Improvements to surface drainage are included in the project, such as the use of bio swales.

- e-f) Runoff and Water Quality. *Less than Significant.* The project does not introduce any sources of pollutants that would degrade water quality. Trail improvements would require minimal excavation and soil disturbance during construction. The project would also involve removal and closure of non-system trails, thus resulting in less disturbed soil surface in the future. The project requires implementation of a SWPPP, which will include measures to avoid and minimize any erosion from construction. The project will also be required to implement construction best management practices (BMPs) as outlined in the City's National Pollutant Discharge Elimination Permit issued by the State Water Resources Control Board (NPDES Resolution No. R3-2013-0032 Requirements). Examples of typical construction BMPs include but are not limited to storing materials and equipment to ensure that spills or leaks cannot enter the storm drain system or surface water; developing and implementing a spill prevention and cleanup plan; and installing sediment control devices such as gravel bags to reduce or eliminate sediment and other pollutants from discharging to the drainage system or receiving waters. BMPs are recognized as effective methods to prevent or minimize the potential releases of pollutants into drainages, surface water, or groundwater. Strict compliance with the stormwater pollution prevention plan, coupled with the use of appropriate BMPs, would reduce potential water quality impacts during construction activities to less than significant.

The project would not substantially degrade water quality. Renovation/re-alignment of the parking areas are not expected to substantially alter water quality as the number of parking spaces will be similar to the existing condition and parking (with the exception of new ADA parking spots, will be on pervious surfaces. No significant impact would occur. There are no existing or planned stormwater drainage systems within the project area, other than roadside drains along Ocean View Boulevard. The project involves habitat restoration and improvements to a non-motorized trail system. The project would not result in any additional sources of polluted runoff. No impact would occur.

- g) Flood Hazard. *No Impact.* The project does not propose any housing. No impact will occur.
- h) Impede or Redirect Flood Flows. *Less than Significant.* The project includes installation of a semi-permeable crushed aggregate (trail width 5 feet) over approximately 0.8-mile of trail. The overall impact of this trail surfacing would not result in a substantial increase in the rate or amount of surface runoff such that flooding would result on or off-site. The project also includes removal of approximately 0.49 mile of informal trails. Removal of these compacted trail surfaces would increase the permeability of the soil and reduce runoff along the trail alignments. The project would not result in flooding on or off-site. The effect of the project on surface run-off would be less-than-significant.
- i) Failure of Levee or Dam. *No Impact.* The project would not involve construction of new structures or expose people to flooding as a result of a levee or dam failure.
- j) Seiche, Tsunami, or Mudflow. *Less than Significant.* The project area does not expose people or structures to a significant risk of loss, injury or death from a mudflow or seiche (a

wave that oscillates in lakes, bays, or gulfs as a result of seismic or atmospheric disturbances).

Tsunamis (seismic sea waves) are long period waves that are typically caused by underwater disturbances (landslides), submarine slumps, such as those found in Monterey Canyon, volcanic eruptions, or seismic events. Areas that are highly susceptible to tsunami inundation tend to be located in low-lying coastal areas such as tidal flats, marshlands, and former bay margins that have been artificially filled but are still at or near sea level. The potential for flood damage at the Point Pinos project site due to a tsunami would be minimal; however, a tsunami may temporarily inundate beaches, and warning systems are in place to evacuate trail or beach users. Coastal access structures (steps) to provide access to the beach and rocky intertidal zone could potentially be affected by a tsunami. Due to the anticipated limited amount of use, no increased beach access, and warning systems, the potential impact of exposure of people to a risk of loss, injury or death involving a tsunami would be less-than-significant.

X. LAND USE AND PLANNING

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The proposed project is located within the City’s coastal zone. The coastal zone is divided into seven planning areas; the proposed project is located within Areas IV-A and IV-B.

The City’s LCP/LUP was certified in 1989; however, an Implementation Plan was not certified. As such, the Coastal Commission retained responsibility for reviewing and issuing Coastal Development permits (CDP) for its jurisdiction area. The City is currently working on a new LCP/IP and when it is certified, the City will have review and permit authority for applications for proposed development in most areas of the coastal zone. However, the coastal commission will retain permanent jurisdiction (also known as “original jurisdiction”) even after LCP certification over developments on tidelands, submerged lands, and public trust lands.

The ~~western~~ eastern portion of the proposed project, from Marine Gardens Park to Asilomar Avenue, is located within Planning Area IV-A. The planning area only includes lands on the ocean side of Ocean View Boulevard. The eastern portion of the proposed project is located in Planning Area IV-B. This area extends from Asilomar Avenue to the projects terminus at Asilomar State Beach. The Planning Area includes land on the ocean side of Sunset Drive (proposed project area) as well as the Point Pinos Lighthouse, the Coast Guard Facilities, the city's former sewer treatment plant, Crespi Pond (a wetland feature), the Naval Reserve Center, the National Oceanic and Atmospheric Administration (NOAA) Southwest Fisheries Science Center, and a portion of the Pacific Grove Golf Links, all of which are located on what is referred to as the Point Pinos Reserve.

The proposed project will be part of the California Coastal Trail (CCT). This trail will eventually travel the coast from Oregon to Mexico. Long envisioned as a statewide goal, the CCT has also been recognized by the federal government as California's Millennium Legacy Trail. In 2001, the State legislature directed the Coastal Conservancy, in consultation with the California Coastal Commission and State Parks, to further coordinate the development of the trail and prepare a report to the legislature. The Coastal Conservancy is partnering with the City for the Point Pinos Trail project.

The land use designation for the project area is northern and southernmost parcels within the project area is Open Space - Recreation (OS-R).

Discussion

- a) Divide Established Community. No Impact. The project site is located within an existing open space. No impact to an established community would occur as a result of the project.
- b) Conflict with Local Plans. No Impact. The project includes habitat restoration, protection of sensitive plant species, and improvements to pedestrian trails. The General Plan includes a goal and supporting guidelines to "restore, protect, and maintain special status plant species and their habitat through active resource management programs." The project will result in moving the trail closer to Ocean View Boulevard, which will allow for a larger area of restored native habitat to be protected and managed. The proposed project is consistent with the City's general plan goal to establish a safe and continuous coastal pedestrian trail. Designing the trail and parking areas to address coastal retreat is consistent with new LCP policies. The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. No impact will occur.
- c) Conflict with Habitat Conservation Plan or Natural Community Conservation Plans. No Impact. There are presently no habitat conservation plans or natural community conservation plans for the project area. No impact will occur.

XI. MINERAL RESOURCES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The State Surface Mining and Reclamation Act requires the State Geologist to classify mineral areas in the state, and the State Mining and Geology Board to designate mineral deposits of regional or statewide significance. Pacific Grove is designated as MRZ-3, with undetermined mineral resource significance. According to the City General Plan, no mineral resources are known from the project site.

Discussion

- a) Loss of Known Mineral Resource. No Impact. The project would not result in the loss of availability of a known mineral resource. No impact will occur.
- b) Loss of Locally Important Mineral Resource. No Impact. The project site has not been identified as a locally-important mineral resource recovery site in the City of Pacific Grove General Plan. No impact will occur.

XII. NOISE

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project area is located in an urban setting seaward of Ocean View Boulevard, within the City of Pacific Grove. The Pacific Grove Municipal Golf Course lies across the street from the project and residential properties are located across the street between Asilomar Avenue and Coral Street. Ambient noise levels within the project site are primarily affected by ocean waves along the coastline and traffic along Ocean View Boulevard. There are no airports or private airstrips within the vicinity of the project site.

Discussion

- a) Exposure to Noise in Excess of Standards. No Impact. The project would not generate noise levels in excess of standards established in the local General Plan. No impact will occur.
- b) Exposure to or Generation of Vibration. No Impact. Construction of the project would not require the use of explosives, pile driving, or other equipment which would generate excessive ground borne vibration or ground borne noise levels. No impact will occur.
- c) Permanent Increase in Noise. No Impact. Trail use and use of parking lots would not result in a permanent increase in ambient noise levels. No impact would occur.
- d) Construction Noise. Less than Significant. Initial project construction would result in a temporary or periodic increase in ambient noise levels in the project vicinity. Construction would occur during daylight hours only. The temporary periodic increase ambient noise levels associated with project construction would be less than significant.
- e-f) Aircraft Noise. No Impact. The project is not located within an area covered by an airport land use plan or within two miles of a public airport or public use airport. The project is not

located within the vicinity of a private airstrip. No impact related to exposure to aircraft noise will occur.

XIII. POPULATION AND HOUSING

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located within a natural area of the City. There is no housing within the project boundaries. The population of the city is approximately 15,700, based on the 2015 census.

Discussion

- a) Population Growth. No Impact. The project includes habitat restoration and trail improvements. The project does not include new homes, businesses, extension of roads, or other infrastructure, other than improvements to existing roadside vehicular parking. No growth inducing impacts would occur as a result of the project. No impact would occur.
- b-c) Housing. No Impact. The project site is existing open space. No housing exists on the site. The project would not displace any population. No impact will occur.

XIV. PUBLIC SERVICES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The City provides emergency and law enforcement services within the project area. Fire protection and ocean rescue services are provided by the Pacific Grove Fire Department from a fire station at 600 Pine Avenue. Police protection is provided by the Pacific Grove Police Department, located at 580 Pine Street. Schools in the vicinity include Hopkins Marine Station (operated by Stanford University), located over one mile southeast of the project area and Lighthouse Elementary School, a neighborhood school (operated by the Pacific Grove Unified School District), located approximately one mile south of the project site. The project site is immediately adjacent to the City’s Shoreline Park, which extends from Hopkins Marine Station to Asilomar Avenue. Other public utilities include the City Clean Water Facility (wastewater treatment plant), located inland of Ocean View Boulevard, an abandoned sewer pump station, and a sewer force main located beneath Ocean View Boulevard.

Discussion

a) Public Services. No Impact. The project includes habitat restoration, removal and closure of non-system trails, and improvements to the existing trail segments and parking. The project would not include an expansion of recreational facilities or any new uses. No impact to public services would occur. Temporary construction activities could result in a potential increase in the risk of ignition for a wildland fire. This potential wildland fire risk would result in a less-than-significant impact on fire protection services. The project would not result in the need for additional law enforcement services. No impact would occur.

The project does not impact existing schools or require additional schools or personnel. No impact would occur.

The project would improve the existing trail system within the City open space by providing stable trail surfaces, stairs to coastal resources, and improved vehicular parking areas. No adverse impacts to parks would occur as a result of the project. No impact would occur.

The project would not impact any other public facilities. No impact would occur.

XV. RECREATION

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The City Public Works Department is responsible for maintenance of parks and grounds of all City properties, including structure repairs, lawn and tree maintenance, and amenities repair (Pacific Grove 1994). There are 28 community and neighborhood parks and eight recreational facilities in the City. The closest park to the Point Pinos Coastal Trail project site Marine Gardens Park, located at the eastern terminus of the trail project. Another nearby park is Esplanade Park, located near Shell Avenue, approximately 0.5 mile ~~west~~ east of the project site.

The ~~western~~ eastern portion of the proposed project, from Marine Gardens Park to Asilomar Avenue, supports a continuous path that provides pedestrian access. Access to a small beach near the foot of Acropolis Street is possible by descending the rocky bluff. Parking is unrestricted in this area. There are pullouts on the seaward side of Ocean View Boulevard between Acropolis and Coral Streets and between Asilomar Avenue and Acropolis Street. The combined capacity for these two pullouts is estimated to be about 31 cars. Picnic facilities are located at the Asilomar Avenue pullout. There is a Class III (shared right-of-way) bicycle route in this area. Striping and signs have not been provided. Unrestricted bay views are available from Ocean View Boulevard, and from the paths and auto pullout areas.

In Planning Area IV-B, (Asilomar Avenue to Asilomar State Beach) pedestrian access is provided along foot paths and to the pocket beaches. Parking in the pullouts in this area is haphazard, with some vehicles parked at the very edge of the bluff. Combined capacity of the three pullouts and two roadside parking areas in this section is estimated to be 59 cars.

The project area has various signage, some identify the Marine Refuge (at Ocean View Boulevard pullout at the foot of Asilomar Avenue) and others provide directional and interpretive information, such as information on wildlife and the John Denver crash site memorial.

The Coastal Act places high priority on protecting and maximizing recreation and visitor serving land uses.

The most popular user activities within the project area are scenic nature viewing, photography, walking, visits to pocket beaches, and fishing. There are currently no restroom facilities or other visitor serving facilities within the project area; however, one restroom is located nearby at the Pacific Grove Municipal Golf Course.

Discussion

- a) Increased Recreational Use and Deterioration of Facilities. *No Impact.* The project would designate approximately 0.8-mile of trail as a Coastal Trail segment. The project would also close and remove approximately 2,610 linear feet (0.49 mile) of informal trails. Improvement of trailheads at vehicle turnouts and improved trail surfaces may attract more visitors to hike along the trails; however, this increase is not anticipated to be a substantial increase that would result in accelerated deterioration. The closure of eroded, informal trails, capping of the Coastal Trail segments, and improvements to vehicular parking areas would help to address existing physical deterioration of the project area. Temporary closure of existing trails will be required during construction of Coastal Trail and parking improvements. The impact would be less-than-significant. The proposed project is not expected to attract additional visitors to the project vicinity; therefore, it is not expected to increase the use of existing parks and recreational facilities.

- b) Recreational Facility Impacts. *No Impact.* The proposed project, including the Coastal Trail, parking improvements, and trail removal, may have an adverse impact on biological resources (coastal dune scrub, dune sedge meadow), cultural resources, geology, and hydrology and water quality. The City's implementation of Mitigation Measures for Biological Resources, Cultural Resources, Geology and Soils, and Hydrology and Water Quality would reduce the adverse impacts to a less-than-significant level. The City's implementation of Specific and Standard Project Requirements would also ensure potential impacts to these resources remain less-than-significant.

XVI. TRANSPORTATION AND TRAFFIC

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporate	Less Than Significant Impact	No Impact
TRANSPORTATION AND TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities (e.g. bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project area is accessed regionally via Lighthouse Avenue-Central Avenue and Highway 68. Ocean View Boulevard provides a continuous two-lane drive that parallels the shoreline within the project area. Other key circulation roadways in the Coastal Zone area include Sunset Avenue, Central Avenue and Asilomar Avenue.

Monterey-Salinas Transit (MST) provides transit service to Pacific Grove. MST Routes 1 and 2 provide service to Pacific Grove, with Route 1 providing service to the project area, with a stop at the Point Pinos Lighthouse. Service is provided on one-hour intervals on weekdays and weekends.

The Coastal Zone contains the southernmost section of the Monterey Bay Sanctuary Scenic Trail (MBSST). The Monterey Bay Sanctuary Scenic Trail provides a public trail along the shoreline of the Monterey Bay National Marine Sanctuary extending between Pacific Grove and the Pajaro River, located at the northern Monterey County border. Within the project area the segment of the MBSST from Marine Gardens Park to Asilomar Avenue is a Class III bikeway. From Asilomar Avenue to Asilomar State Beach (an onward to Seventeen Mile Drive) Ocean View Boulevard is striped with Class II bike lanes. A Class II bikeway provides a separate, striped bike lane on the outside of each travel lane.

The following transportation information is ~~form~~ from the City's Local Program Update Report (EMC Planning Group, 2015). Generally, the transportation system in the project area operates well, but there are areas where congested conditions occur, particularly on weekends when recreation and tourist activity is high. The Coastal Zone sits at the fringe of the Monterey Peninsula such that a large percentage of the traffic on the Coastal Zone road network is recreation and tourist related and not weekday commuter or business related. Ocean View Boulevard and Sunset Avenue are scenic drives and are intended for recreational travel. The views presented along these routes can encourage leisurely driving, which can cause isolated conditions of delayed travel for some motorists.

Within Planning Area IV-A, Ocean View Boulevard is a two-lane arterial. Parking is allowed on both sides of Ocean View Boulevard and at pullouts between Acropolis and Coral Streets, and between Asilomar Avenue and Acropolis Street. These pullouts provide parking for an estimated 90 vehicles. There is no parking space designated for use by persons with disabilities in this section of the project area. No sidewalks are provided along Ocean View Boulevard within the project area. A continuous network of foot-paths is located on the seaward side of Ocean View Boulevard and these foot-paths provide a pedestrian connection between Area III and Area IV-B. Bike lanes are not striped on Ocean View Boulevard in Area IV-A and this segment of road operates as a Class III bikeway. IV-A is not directly served by MST Transit. Transit Route 1 circulates on Del Monte Boulevard between Asilomar Avenue and Sea Palm Avenue-Moss Street. Del Monte Avenue is approximately 600 feet to 800 feet inland from Ocean View Boulevard at various points along the transit route. No significant traffic operational issues were observed in Area IV-A, based on observations of parking demand conducted on September 6, 2014 (EMC planning Group, 2015)

Within Planning Area IV-B, Ocean View Boulevard between Asilomar Boulevard and Lighthouse Avenue is a two-lane collector. Striped bike lanes are provided on each side of the roadway. Along this segment of roadway, there are four segments of wide shoulder on the ocean side of Ocean View Boulevard that are utilized for parking. In addition, there are three pullout areas for parking. Asilomar Avenue between Ocean View Boulevard and Lighthouse Avenue is a two-lane collector. No sidewalks are provided on this roadway. Perpendicular parking is provided on this roadway near the entrance to the Point Pinos Lighthouse and near the entrance to the Pacific Grove Municipal Golf Course. Lighthouse Avenue between Ocean View Boulevard and Asilomar Avenue is two-lanes wide and a sidewalk is provided on the north side of the roadway. Parking is provided on the shoulder of Ocean View Boulevard and in three pullouts located on the ocean side of Ocean View Boulevard. In addition, parking is provided on Asilomar Avenue at the entrance to the Lighthouse and near the

entrance to the municipal golf course. Informal, non-continuous foot-paths are located on the ocean side of Sunset Avenue in Area IV-B. No sidewalks are located along Sunset Avenue. For some segments of Sunset Avenue, pedestrian circulation is accomplished using the shoulder of Sunset Avenue. Bike lanes are striped on Sunset Avenue and this segment of road operates as a Class II bikeway. Transit service is available to this portion of the project area via MST Transit Route 1, which circulates on Asilomar Avenue between Lighthouse Avenue and Del Monte Avenue. No significant traffic operational issues were observed in Area IV-B during mid-afternoon observations of parking demand conducted on September 6, 2014, 11 vehicles were observed parked along the shoulder of Ocean View Boulevard or in the shoulder turnouts and 40 vehicles were parked in the pullouts. It is estimated that the parking utilization during the observed time was approximately 50 percent.

Discussion

- a) Conflict with Plans. *No Impact.* The project is consistent with City plans and policies for bicycle/pedestrian trail access along the coastline. The plan is also consistent with the LCP which address coastal retreat (i.e., relocation of Ocean View Boulevard triggered by sea level rise).

- b) Traffic and Transportation. *Less than Significant.* The proposed short-term plan includes improvements to existing pedestrian-only trails in the Point Pinos project area, modifications to existing parking areas, and construction of new parking areas. Vehicular traffic will continue to utilize all of Ocean View Boulevard, from Asilomar Avenue westward to Lighthouse Avenue. In the long-term plan, the parking areas in the center portion of the project area will be removed and Ocean View Boulevard will be closed to vehicles between Asilomar Avenue and the Lighthouse Avenue (except for vehicles servicing the wastewater treatment plant). Public traffic will be re-routed onto Asilomar Avenue from the east and onto Lighthouse Avenue from the west. The project does not include any improvements or modifications to these two roadways. Closure of this section of Ocean View Boulevard is consistent with the City's LCP policies to remove public features from the coastal erosion zone when sea level rise reaches a set threshold. The proposed project does not conflict with any applicable transportation/traffic plan, ordinance or policy.

The project does not propose expansion of existing recreational facilities. The overall trail mileage would be reduced as a result of the project. No new recreational uses are proposed. The proposed project would not result in a substantial increase in vehicle trips other than minimal traffic effects during construction. The additional vehicle trips required for the construction crew and delivery of materials would not substantially increase congestion or lower standards of service during the temporary construction period. The proposed project would not result in a substantial increase in traffic congestion. No impact to traffic or congestion plans would occur in the short-term plan.

In the long-term plan, the closure of a portion of Ocean View Boulevard will require vehicles to use Asilomar Avenue and Lighthouse Avenue as the primary thoroughfare. Vehicular use will increase on these roadways; however, the City's traffic engineer has indicated that the level of service for these roadways will not be significantly impacted. Traffic impacts will be less than significant.

- c) Air Traffic. No Impact. The proposed project would not result in any change in air traffic patterns. No impact will occur.
- d) Creation of Hazards. No Impact. The proposed project does not include any roadway improvements which would substantially increase traffic hazards. As per standard practice the City’s traffic engineer will review project construction plan and require project revisions if any traffic hazards are identified.
- e) Emergency Access. No Impact. The short-term plan would have no impact on emergency access. No impact would occur. In the long-term plan, emergency vehicles will be able to utilize the service road along the former Ocean View Boulevard; therefore, there will be no significant impact on emergency services.
- f) Parking Capacity. Less than Significant. The proposed project would not conflict with any alternative transportation policies, plans, or programs. No significant impact would occur. With the short-term plan, there will be a small net reduction (less than 10%) in available parking due to the project, although the number of RV parking areas will be reduced. Parking supply may be temporarily decreased more significantly during construction of the project improvements. The long-term plan reduces parking approximately 37% from current levels, from approximately 110 spaces to approximately 69 spaces, but improved bus and passenger drop-off zones will partially compensate for this loss. The project supports the goals, plans, and policies of the City pertaining to protecting bicycle and pedestrian access along the coastline.

XVII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
Would the project result in substantial change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a-b) Tribal Cultural Resources. Potentially Significant Unless Mitigation Incorporated. CEQA (Public Resources Code section 21974) defines a “tribal cultural resource” as either of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: a) Included or determined to be eligible for inclusion in the California Register of Historical Resources, b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

Based on the evaluations and testing of recorded archaeological sites within or in proximity to the project sites, ~~no~~ the sites meet the definition of historical and archaeological resources. See subsection V for further discussion of historical and archaeological resources.

An AB 52 consultation letter was sent to the OCEN tribe on November 28, 2016 and the tribe responded on December 5, 2016 requesting consultation. The City initiated consultation with OCEN Tribal Chair Louise Ramirez on the proposed project; meetings (to date) occurred in March and July 2017.

Mitigation Measure TRI-1 Treatment of previously unidentified Tribal Cultural Resources.

During project construction, a Native American monitor certified by the Ohlone/Costanoan-Esselen Nation (OCEN) will be present for all ground disturbance. If any tribal cultural resources are found, the project applicant and/or its contractor shall cease all work within 50 feet of the discovery and immediately notify the City of Pacific Grove Planning Division. The OCEN-certified Native American monitor will contact the OCEN Tribal Chair and in consultation with the City and an archeologist evaluate the finds and recommend appropriate mitigation measures for the inadvertently discovered tribal cultural resource. The City shall consider the mitigation recommendations and agree on implementation of the measure(s) that are feasible and appropriate. Such measures may include reburial of any ancestral remains, avoidance, preservation in place, excavation, documentation, or other appropriate measures.

XVIII. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The proposed project involves improvements to existing trails, overlooks, and parking within the open space seaward of Sunset Avenue. There are presently no potable water or wastewater services within the trail project area. One toilet facility is located on the inland side of Ocean View Boulevard amid the Municipal Golf Course. Trash receptacles are provided at the trail access points. The receptacles are serviced by the City.

Discussion

- a) Wastewater Discharge. No Impact. The proposed project does not include any new wastewater services or facilities. No conflicts or impacts to wastewater treatment requirements would occur.
- b) Wastewater Treatment Facilities. No Impact. The proposed project does not require construction of new water or wastewater treatment facilities or the expansion of an existing facility.
- c) Stormwater Drainage Facilities. No Impact. No new stormwater facilities would be required for the proposed project. The Coastal Trail segments would be capped with aggregate base and crowned to allow for sheet flow off of the trail surfaces. Pedestrian stairs would be

installed to reach some pocket beaches. No culverts would be installed. No impact would occur.

d-e) Water Supply and Wastewater. No Impact. The proposed project will not result in the need for additional water services. No impact will occur.

f-g) Solid Waste Disposal. No Impact. The proposed project would not result in a significant increase in wastewater and solid waste. One toilet presently within the Municipal Golf Course exists near the project area. The restroom facility is serviced by the City. The project would not generate additional demand for wastewater or solid waste services. No impact would occur.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Degradation of Environment. Potentially Significant Unless Mitigation Incorporated. The proposed project was evaluated for the potential effects on the quality of the environment, fish and wildlife species, plant communities, and historic and prehistoric resources. As discussed under the Biological Resources section, the project will have the potential to impact individual special status plant species and nesting birds, potentially significant impacts that can avoided/minimized with implementation of mitigation measures and project BMPs. However, the identified impacts will not substantially reduce habitat, will not cause a fish or

wildlife population to drop below self-sustaining levels, will not threaten to eliminate a plant or animal community, and will not reduce or restrict the range of rare or endangered plant or animal species. As discussed under the Cultural Resources section, the project would have the potential to disturb archaeological sites which provide examples of California pre-history. However, impacts can be avoided with implementation of mitigation measures and project BMPs. The project will not result in elimination of important examples of major periods of California history or prehistory.

- b) Cumulative Impacts. *Less than Significant.* There are no other currently proposed projects at Point Pinos. The California State Parks Department is implementing a trail rehabilitation project for an existing trail segment at Asilomar State Beach and Conference Center, which is located to the south of the Point Pinos project site. project trails. The Asilomar project contains the sensitive plant and animal species; however, since the Point Pinos project does not impact these species, there will be no potential cumulative biological impacts. The two projects may result in cumulative impacts to cultural resources during trail construction. However, the proposed project impacts can be mitigated to a less-than-significant level and will not be cumulatively considerable.
- c) Adverse Impacts to Human Beings. *No Impact.* No significant environmental effects have been identified that would have direct or indirect adverse effects on human beings. No impact will occur.

4. RESPONSES TO COMMENTS ON DRAFT IS/MND

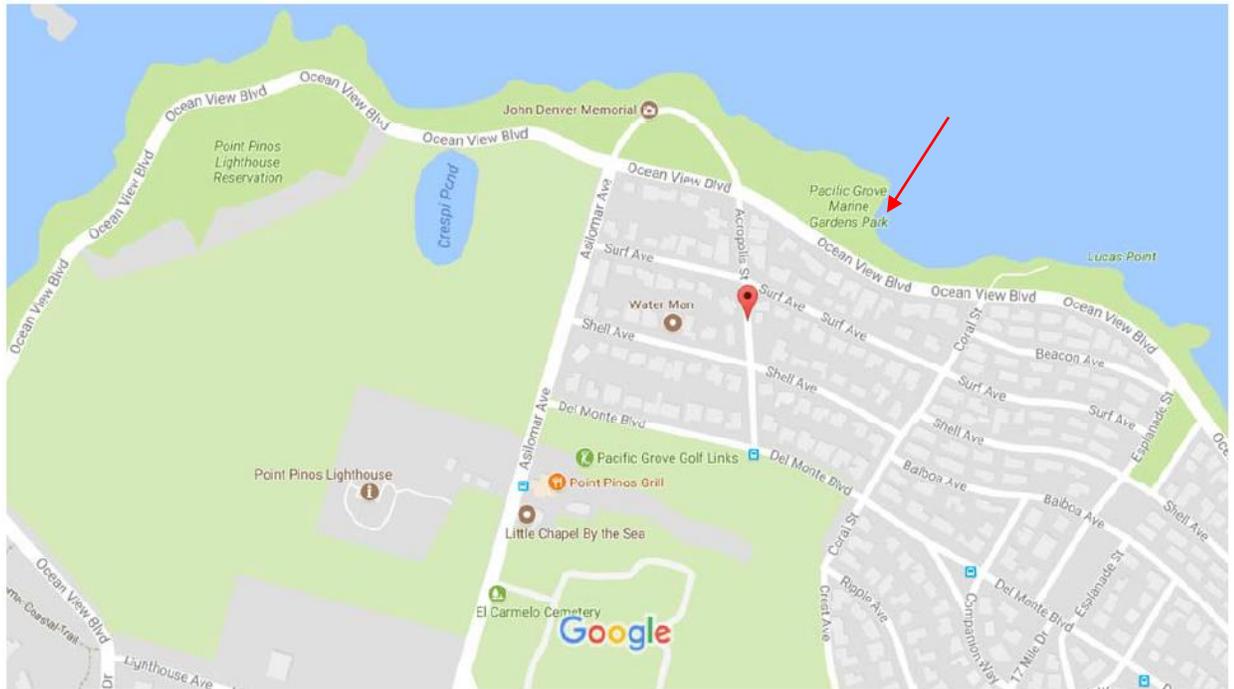
Lisa Ciani #1

1. The IS/MND states on page 11, under Project Alternatives that the preferred project plan is presented in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). This plan has been available for public review on the City's website since June 2017 and is prominently listed on the internet by searching "Point Pinos Coastal Trail Plan." This plan depicts the trail alignment, parking areas, ADA parking areas, beach access locations, and other plan features that are addressed in the IS/MND. No change to or recirculation of the IS/MND is warranted.
2. Page 12. Reference to Appendix A containing maps was a typographical error. It has been revised to state "Appendix A of the Point Pinos Coastal Trail Study and Plan includes maps which depict the trail alignment, parking areas, ADA parking areas, and beach access locations and cross-sections of the proposed project, and Appendix A of the IS/MND includes Trail Parking Area Construction, Trail and Parking Area Closure and Habitat Restoration Best Management Practices."
3. The maps depicting the trail alignment, parking areas, ADA parking areas, beach access locations, and other plan site features are contained in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), which was the subject of the IS/MND review. This document has been available for public review on the City's website since June 2017, and therefore, copies of all the maps and figures from that report were not included in the IS/MND.
4. Comment noted. The IS/MND contains only a narrative description of the project features. The visual representation of the plan is presented in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), which is available to the public to review.
5. The IS/MND clearly states the project is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). This plan is available on the City's web site alongside the posting of the IS/MND. Sufficient information has been presented to the public for review and comment of the proposed project. No change or circulation of the IS/MND is warranted.

Lisa Ciani #2

6. Comment noted. The IS/MND clearly states the project is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). This document has been available for public review on the City's website since June 2017, and therefore, copies of all the maps and figures from that report were not included in the IS/MND. Sufficient information has been presented to the public for review and comment of the proposed project. No change or circulation of the IS/MND is warranted.
7. Reference to Appendix A containing maps was a typographical error. It has been revised to state "Appendix A of the Point Pinos Coastal Trail Study and Plan includes maps which depict the trail alignment, parking areas, ADA parking areas, and beach access locations and cross-sections of the proposed project, and Appendix A includes Trail Parking Area Construction, Trail and Parking Area Closure and Habitat Restoration Best Management Practices."

8. The narrative description of the project area was intended to portray the extent of the project area to the reader and public who may want to locate the site using mapping platforms. Since the number of cross streets entering Ocean View Boulevard is limited in the project area, the use of the locational feature “Marine Gardens Park” was selected as a simple locational feature that is depicted on Google Maps, a commonly used mapping and locational tool.
9. Comment noted. As depicted on the Project Plan in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), the project starts east of Acropolis Street. It begins at the area called Marine Gardens Park (see arrow on Google map, below); this locational reference was used as there is no cross-street to reference.



10. Page 59. Reference to “western portion of proposed project, from Marine Gardens Park to Asilomar Avenue” was a typographical error. Text has been revised to the “eastern portion”. See response to comment #8 above regarding use of Marine Gardens Park.
11. Page 65. Reference to “Esplanade Park, located near Shell Avenue, approximately 0.5 mile west of the project site” was a typographical error. Text has been revised to be “0.5 mile east of the project site”.
12. The IS/MND was not intended to withhold information. The IS/MND contains only a narrative description of the project features. The visual representation of the plan is presented in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), which has been available for public review on the City’s web site since June 2017.
13. See corrections to typographic errors on locational features in response to comment #10 and 11, above. See rationale for using locational features, such as Marine Gardens Park, in response to comment #8, above.

Lisa Ciani #3

14. Comment noted.
15. The location of potential vegetation restoration areas is depicted on The Project Plan and Long-Term Plan in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). The exact location of restoration will be determined upon preparation of more detailed design plans; however, MM BIO-1 requires the project have no net loss of coastal dune scrub.
16. The exact native plant species to be used for restoration will be determined upon preparation of more detailed design plans.
17. The exact square footage of ice plant to be removed will be determined upon preparation of more detailed design plans. As depicted on the Project Plan, the Long-Term Plan, and the Habitat Map, most of the project improvements will occur in areas currently supporting ice plant.
18. The exact distance beyond the edges of new trail where ice plant will be removed will be determined upon preparation of more detailed design plans.
19. Based on the Project Plan and Long-Term Plan in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), the majority of the trail east of Asilomar Avenue and the John Denver Memorial is proposed within barren areas (within previous parking lots surfaced with decomposed granite). One section will traverse ice plant mat, it is not known at this time if this area also supports poison oak. The extent of poison oak and any impact to this native plant will be determined upon preparation of more detailed design plans.
20. The exact distance beyond the edges of new trail where ice plant will be removed will be determined upon preparation of more detailed design plans. The exact configuration of restoration will be determined upon preparation of more detailed design plans; however, MM BIO-1 requires the project have no net loss of coastal dune scrub.
21. The City will be responsible for maintaining this area. There may be a one year or longer contractor maintenance period, and the City may solicit volunteer assistance. The specific details of these arrangements are not part of the scope of the IS/MND
22. The Project Plan and Long-Term Plan, as contained in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017) is sufficient to evaluate potential impacts from the project. Mitigation measures have been identified to avoid or reduce impacts to a less than significant level. Detailed design plans and construction activities will incorporate the mitigation measures.
23. Comment noted. Title of Figure 2, has been revised to Land Habitat Use Sensitivity Map.
24. The City (as the lead agency) is responsible for ensuring that implementation of mitigation measures occurs in accordance with the MMRP. The lead agency may delegate certain work to qualified biologists; however, the City retains responsibility for its implementation.
25. Comment noted. The project intends to minimize impacts to native plant species (including poison oak, a common, non-sensitive species that can be a component of coastal dune scrub) while implementing the project. Impact BIO-2 states project construction will impact some areas that support native species. MM BIO-2 stipulates the City will provide mitigation for any impacts in the form of native plant restoration such that there is no net loss of native coastal scrub, a sensitive habitat. The City will be securing a Coastal Development Permit from the California Coastal Commission wherein the Commission which can address their

- concerns on the potential removal of poison oak and their need/request for any additional mitigation for this non-sensitive native species.
26. Comment noted. Page 38. Reference to “black oystercatcher young spend a relatively long time (1-3 years) learning foraging...” was a typographical error. It has been revised to state “black oystercatcher young spend a relatively long time (1-3 months) learning foraging.....”.
27. Comment noted. Page 41, MM BIO-3 addresses implementation of mitigation measures to replace removed trees; however, according to the Project Plan and Long-Term Plan, no trees will be removed.
28. Comment noted. MM CULT -1, CULT-2 and TRI-1 complement each other. As outlined in MM CULT-1, third bullet, a qualified monitoring archaeologist will be present on site for all ground disturbing activities. In MM TRI-1, a Native American monitor certified by OCEN will be present for all ground disturbance. Therefore, both monitors will be on site for all ground disturbances. Text has been added to MM CULT-1 to clarify this:
Mitigation Measures CULT-1: To avoid impacts to archaeological sites, the following measures and the BMP’s (Best Management Practices or Standard Project Requirements) listed in Appendix A), as well as measures outlined in Mitigation Measure TRI-1, will be implemented:
Bullet 3 will be revised to clarify a Native American monitor certified by OCEN will be present for all ground disturbance.
- A qualified archaeologist shall be present for all ground disturbing activities. Please refer to Mitigation Measure TRI-1, which requires presence of a Native American monitor certified by the OCEN be present for all ground disturbance.
29. MM CULT-1, eighth bullet, addresses the potential for a significant cultural resource to be uncovered during construction. This bullet is intended to address the find of a resource that has not been previously recorded and is discovered during construction. If this occurs “all work will be stopped at the specific location” and both the monitoring archaeologist and OCEN monitor will evaluate the discovery. If the resource is deemed to be a previously unidentified Tribal Cultural Resources (as per MM TRI-1), then all construction work within 50 feet of the discovery will cease as outlined in MM TRI-1. MM CULT-2 addresses the find on previously unidentified human remains. If such a resource is found, all work will cease within 25 feet. After the monitoring archaeologist and OCEN monitor evaluate the discovery, if the resource is deemed to be a previously unidentified Tribal Cultural Resources (as per MM TRI-1), then the buffer will be increased to 50 feet of the discovery as outlined in MM TRI-1.
30. MM CULT -1 and MM TRI-1 complement each other. As outlined in MM CULT-1, third bullet, a qualified monitoring archaeologist will be present on site for all ground disturbing activities. In MM TRI-1, a Native American monitor certified by OCEN will be present for all ground disturbance. Therefore, both monitors will be on site for all ground disturbances.
31. The qualified monitoring archaeologist and the Native American monitor certified by OCEN will determine the exact thickness of the soil cap (range of 3-6”) to protect the underlying resource. As stated in Response 30, above, both monitors will be on site for all ground disturbances.
32. See Response 30, above.

33. The temporary irrigation system will follow guidelines to avoid disturbing cultural resources. An above-ground temporary irrigation system (drip and/or sprinkler) would not require excavation/digging and would meet the required guidelines.
34. Page 70. Reference to “no sites meet the definition of historical and archaeological resources was a typographical error. It has been revised to state “Based on the evaluations and testing of recorded archaeological sites within or in proximity to the project site, the sites meet the definition of historical and archaeological resources”. These resources are described in Subsection V.
35. Comment noted. The need for the City’s periodic closure of parking lots and repair of features after large storm events is addressed in MM GEO-1.
36. Comment Noted. Cumulative Impacts, Page 73. Reference to “The Asilomar project contains the sensitive plant and animal species; however, since the Point Pinos project does not, there will be no potential cumulative biological impacts” was a typographical error. It should be revised to state “The Asilomar project contains the sensitive plant and animal species; however, since the Point Pinos project does not impact these species, there will be no potential cumulative biological impacts”
37. Comment noted. Cumulative Impact Discussion. A significant impact may occur if the proposed project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but are significant when viewed together. The projects considered in the vicinity included the recently approved Asilomar Trail (as mentioned in the IS/MND); however, the IS/MND also considered other actions, such as the Great Tidepool Project. Both the Asilomar Trail project and the Great Tidepool project are for habitat restoration and protection purposes. These restoration/protection projects are expected to result in beneficial impacts to environmental resources and the project impacts were less than significant, or are reduced to less than significant levels with the incorporation of mitigation measures. The other project considered in proximity to the Pt. Pinos Coastal Trail is the repair of a 31-foot-long, 5-foot-tall section of seawall located across from 701 Ocean View Boulevard. The project is located approximately 1 mile southeast of the Pt. Pinos Coastal Trail project. The project received a Coastal Development Permit (CDP) from the CA Coastal Commission in August 2017. The CDP includes measures to avoid and minimize impacts to environmental resources, such as construction period requirements, restrictions on intertidal access, avoidance of impacts to sensitive bird species, and other measures such that impacts are less than significant.
38. Comment noted. Plans were not removed from the IS/MND. Please refer to Response to Comment #1.
39. Please refer to Response to Comment #1.

Lisa Ciani #4

40. Section XV. Recreation. The IS/MND is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). This plan outlines the process used to develop the proposed project and how varying concerns on conservation of the natural resource, pedestrian access and recreation uses were evaluated to reach the proposed project. Please refer to Response 9 regarding the reference to Marine Gardens Park.

41. The Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017) outlines the selection of the proposed vertical access points, which took into account public comments on access points and other project features. The location of vertical access points is depicted on The Project Plan and Long-Term Plan in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), which has been available for public review since June 2017. The IS/MND is based on this plan.
42. Comment noted. These issues were taken into account during the preparation of the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), and the selection of the Project Plan and Long-Term Plan, upon which the IS/MND is based.
43. The location of vertical access points to beaches is depicted on the Project Plan and Long-Term Plan in the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). The use of steps and ramps at select access points will be determined upon preparation of more detailed design plans.
44. Page 57 presents a sufficient discussion on runoff and water quality. The project will be subject to a SWPPP which will include measures to avoid or minimize any erosion from construction and to control runoff. Measures to control runoff will be depicted on the more detailed design plans.
45. The City followed standard procedures for posting and notification of the availability of an environmental document for review.
46. The IS/MND is not missing any substantive information. The IS/MND clearly states the project is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), a plan which has been available on the City's web site alongside the posting of the IS/MND. Sufficient information has been presented to the public for review and comment of the proposed project. No change or circulation of the IS/MND is warranted, nor does the project meet the CEQA threshold for an EIR.

Anthony Ciani #1

47. The IS/MND is not incomplete or inadequate. The IS/MND clearly states the project is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017), a plan which has been available on the City's web site alongside the posting of the IS/MND. No change or circulation of the IS/MND is warranted, nor does the project meet the CEQA threshold for an EIR.
48. The California Environmental Quality Act (CEQA) does not require the detailed project scope, plans and specifications for environmental review. Environmental review for significant public projects typically is based on approximate 30% level of plan development, as was the case with the Point Pinos Coastal Trail Study and Plan. The environmental document then provides mitigations measures which must be reflected in the detailed plans.
49. See response to comment 47. A submittal Checklist and the associated documents are not required for environmental review. The IS/MND project is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). This plan which has been available on the City's web site alongside the posting of the IS/MND. The plan includes a site plan (Project Plan and Long-Term Plan), plan segments, elevations, cross-sections, as well as the layout of the proposed trail, parking and circulation, ADA parking, beach access locations, and other

plan features. The plan also includes project alternatives that were considered. These plan features are addressed in the IS/MND. No change or circulation of the IS/MND is warranted.

Anthony Ciani #2

50. Comment noted. The current Point Pinos Coastal Trail Project boundaries were defined with the full participation and agreement of the California Coastal Conservancy. The project area defined by the Coastal Conservancy in its' December 3, 2015 report and action was preliminary and general and was not a condition of the grant and is not relevant to the current IS/MND.
51. See response to comment 50.
52. Lead Agency and Responsible Agencies: Comment noted. The scope of work does not include rock and rip-rap revetments. Responsible and trustee agencies received the Notice of Intent and IS/MND, as distributed by the State Clearinghouse. No comments were received from any resource agencies.
53. Section 2.3 Other Environmental Factors Potentially Affected. Items with potentially significant impacts are not included in this listing. These items are presented in Section 2.2 Potentially Significant Impacts. Section 2.3 are for topics that were considered, yet were determined to have either less-than significant impacts or no impacts, as outlined in the checklist.
54. Comment noted. The specific meeting arrangements for achieving the required mitigations are not typically detailed in an IS/MND. The City may elect to include such a coordination meeting as part of the construction specifications.
55. Comment noted. Mitigation Measure BIO-3 recommends scheduling construction to avoid the migratory bird breeding season; however, limiting the work period between August and February may conflict with other project scheduling requirements, including winter-period grading restrictions that may be imposed by permitting agencies (i.e., RWQCB); therefore, measures are outlined to ensure the project avoids impacts to nesting birds if construction work needs to occur during the breeding season.
56. Comment noted. Ground squirrels are acknowledged as occurring on site (page 34). This is an existing issue and not a project impact. Elimination of these burrowing native animals is not recommended in the Point Pinos Coastal Trail Study and Plan. The City has an existing program to discourage visitors from feeding these animals, and the relocation of parking areas away from the rocky shoreline where the squirrels tend to burrow is expected to reduce the propensity for people to feed them.
57. Comment noted, concur that the rocky shoreline is not formed by frequent pounding of storm-driven waves. Text has been clarified to state "the rocky shoreline is subject to frequent pounding of storm-driven waves".
58. Comment noted. The project includes measures to restore the natural setting, as presented in Project Plan and Long-Term Plan. This include removal of asphalt and concrete and other measures as practical to restore the shoreline to a more natural condition. The revetments and sewer pipeline a were pre-existing and the project is not required to mitigate these features as project impacts.

59. Comment noted. See response to comment 58. The project does not propose any change to the existing revetments, but will move public access away from them and include measures to facilitate their transition into a more natural condition.
60. Comment noted. Preservation of drainage, including small swales that carry drainage through the project site from Ocean View Boulevard and other areas will be considered in the more detailed design plans.
61. The project is in compliance with the City LCP/LUP.
62. Potential impacts to nesting birds along the shoreline, as well as other areas adjacent to the work area, such as Crespi Pond, from construction noise is addressed in the IS/MND under MM BIO-2. The project does not anticipate the use of drones, nor will construction equipment result in significant vibration. The project does not include any piling-driving, or other similar work that would result in significant ground vibration.
63. The Point Pinos Coastal Trail Study and Plan identifies parking and coastal access which can be used for a myriad of recreational users. The Project Plan and Long-Term Plan show coastal access points for recreational users. The project is not expected to cause potential conflicts between recreational uses.
64. The Project Plan and Long-Term Plan show the location of the trail near the Crespi Pond area, relative to the storm wave run-up. Existing parking areas will be reconfigured to take into account wave run-up as well as coastal retreat. The proposed project is not expected to have an adverse impact on special events held at the Municipal Golf Course.
65. The IS/MND states the project is based on the Point Pinos Coastal Trail Study and Plan (TrailPeople, June 2017). This plan, which has been available on the City's web site alongside the posting of the IS/MND, contains maps and plans to adequately depict the location of project features. No additional adverse impacts to aesthetic or natural resources will occur from the project, as per Response 58 and 62.

Don Roberson

66. Comments noted. City concurs that project area and adjacent shoreline areas provide sea watching and bird watching opportunities and habitat for several bird species. The proposed project will not result in adverse impacts to nesting birds or bird diversity. MM BIO-2 includes measures to avoid impacts to nesting birds, including the black oystercatcher, during construction.

Ohlone/Costanoan -Esselen Nation

67. Comment noted. The project intends to avoid excavation in all areas where cultural resources could potentially remain. The only anticipated excavation is removal of a berm next to a ditch that was created during the construction of a parking area, and removal of existing rocks that have in areas of relocated parking. Areas supporting cultural resources will be capped with clean soil/materials which will avoid damage to the resource. Disturbance to the cultural resources will be avoided. Where existing trails or parking areas are identified for closure and rehabilitation and the area has existing exposed cultural resources, the areas will be capped with clean soil/material and the area revegetated with native coastal scrub vegetation. This will provide protection of the resource and an improvement to the existing condition.

68. Comment noted. The Archaeology report prepared and submitted to the City in spring 2017 was previously provided to OCEN. Another copy will be submitted to OCEN. It is standard archaeological procedure, and a requirement of the California Historic Resources System (CHRIS) that maintains data on archaeological resources, that site-specific resource maps and information are not made available to the public. The archaeologist's recommendation, which has been adopted in the cultural resources mitigations and the project plans, is that the underlying soils of the entire project area will be assumed to potentially have significant cultural resources.
69. OCEN will be included in mitigation and recovery program, as specified in MM TRI-1 and as clarified in MM CULT-1, as presented below. As requested by OCEN, MM CULT-1, bullet 4 has been revised as follows:

- ~~If in spite of measures to avoid it, disturbance occurs within a recorded historical resource, a minimum of two single specimen radiocarbon dates should be obtained for each impacted site, if suitable shell specimens are recovered.~~

As requested by OCEN, MM CULT-1, bullet 5 has been revised as follows:

- If a find is determined to be significant, work may remain halted near the find to permit development and implementation of a ~~data recovery mitigation~~ reburial plan with the concurrence of the Lead Agency ~~and OCEN, and implemented.~~ The mitigation plan should be designed to reduce project impacts to a less than significant level, as required by CEQA.

As requested by OCEN, MM CULT-1, bullet 6 has been revised as follows:

- Following completion of the project, a *Preliminary Archaeological Report* should be prepared. ~~If suitable materials are found to warrant special studies, a *Final Comprehensive Technical Report* that includes all analysis will be submitted to the lead agency within six months of the conclusion of the archaeological fieldwork. If suitable materials are not found to warrant special studies, the preliminary report will serve as the final report on the Project.~~ The final report should include a revised site record for each of the sites covered by the monitoring, and new site records for other resources if any are found.

As requested by OCEN, MM CULT-1, bullet 8 has been revised as follows:

- A qualified archaeologist and OCEN monitor (see Mitigation Measure TRI-1) shall inspect the location of the trail removal and closures prior to any soil disturbance to confirm the locations where an archaeological monitor will be required. The archaeological monitor and OCEN monitor will remain on site as warranted in the opinion of the archaeological monitor and OCEN monitor. In the event that a potentially significant cultural deposit is uncovered during construction, all work will be stopped at the specific location of the find until the qualified archaeologist and OCEN monitor can evaluate it. Prior to work resuming at the location, the archaeologist and OCEN monitor will determine the appropriate avoidance, preservation or reburial ~~recovery~~ measures required, in compliance with CEQA. Work shall not resume at the location until the appropriate measures have been implemented as determined by the archaeologist and OCEN monitor.

70. MM TRI-1 includes measures for reburial of any ancestral remains, if found. As requested by OCEN, MM CULT-1, bullet 7 has been revised as follows:

- Cultural materials, including ancestral remains, recovered during the project should be reburied on site. If that is not possible, they shall be offered to OCEN processed and curated in a suitable public research facility.

71. See response to Comment #70, above.

72. MM TRI-1 states a Native American monitor certified by OCEN will be present for all ground disturbance. Therefore, a qualified archaeologist monitor and OCEN monitor will be on site for all ground disturbances. MM CULT-1, bullet 3 will be revised to clarify a Native American monitor certified by OCEN will be present for all ground disturbance.

- A qualified archaeologist shall be present for all ground disturbing activities. Please refer to Mitigation Measure TRI-1, which requires presence of a Native American monitor certified by the OCEN be present for all ground disturbance.

73. MM TRI-1 states a Native American monitor certified by OCEN will be present for all ground disturbance. MM CULT-1, eighth bullet, is intended to address the find of a resource that has not been previously recorded and is discovered during construction. If this occurs “all work will be stopped at the specific location” and both the monitoring archaeologist and OCEN monitor will evaluate the discovery. If the resource is deemed to be a previously unidentified Tribal Cultural Resources (as per MM TRI-1), then all construction work within 50 feet of the discovery will cease as outlined in MM TRI-1. MM CULT-2 addresses the find on previously unidentified human remains. If such a resource is found, all work will cease within 25 feet. After the monitoring archaeologist and OCEN monitor evaluate the discovery, if the resource is deemed to be a previously unidentified Tribal Cultural Resources (as per MM TRI-1), then the buffer will be increased to 50 feet of the discovery as outlined in MM TRI-1.

74. Comment noted.

75. Comment noted. The project intends to avoid all excavation in cultural lands. Areas supporting cultural resources will be capped with clean soil/materials which will avoid damage to the resource. Disturbance to the cultural resources will be avoided. Where existing trails or parking areas are identified for closure and rehabilitation and the area has existing exposed cultural resources, the areas will be capped with clean soil/material and the area revegetated with native coastal scrub vegetation. This will provide protection of the resource and an improvement to the existing condition.

76. Concur. The City will confer with MLD and obtain consent prior to any testing of native American human remains or associated grave goods, as expressed in MM TRI-1.

5. REFERENCES AND PREPARERS

5.1 References

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5.2 List of Preparers

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APPENDIX A

Trail and Parking Area Construction, Trail and Parking Area Closure and Habitat Restoration Best Management Practices

APPENDIX A
POINT PINOS COASTAL TRAIL PROJECT

PROJECT CONSTRUCTION, TRAIL CLOSURE, AND HABITAT RESTORATION BEST MANAGEMENT PRACTICES

NEW TRAIL CONSTRUCTION, INCLUDING BEACH ACCESS			
Site Conditions			Trail and Parking Lot Construction Best Management Practices
Archaeological Site	Sensitive Habitat¹	Eroded Coastal Edge	
Yes	Yes or No	Yes or No	<p>Construction practices include:</p> <ul style="list-style-type: none"> • Demarcate trail and parking areas to avoid colony of Tidestrom’s lupine • Align trail and parking areas to minimize native vegetation removal; remove vegetation to surface of soil; install limit of work construction period fencing • For trail construction or parking improvements within existing parking lot areas with decomposed granite or similar surface, determine limits of existing fill and allowable depth to decompact/ lightly scarify surface without encountering archaeological resource; lightly scarify to receive additional cap material, if needed • For trail construction or new parking areas within areas with native soil, apply imported, weed-free soil or decomposed granite to cap archaeological resource prior to trail or parking lot construction. • Incorporate drainage features in/around soil cap, as needed, yet without excavation into the archaeological resource • Install cable and rod fencing only as needed • Within, or in vicinity of, archaeological sites, pound sign posts or other structures (stair supports, etc.) into ground rather than doing excavation/concrete base • Have archaeologist on-site for cultural resource monitoring
No	Yes	Yes or No	<p>Construction practices include:</p> <ul style="list-style-type: none"> • Demarcate trail to avoid colony of Tidestrom’s lupine • Align trail and parking areas to minimize native vegetation removal; install limit of work construction period fencing, where applicable, salvage sod within dune sedge meadow and saltgrass flat and transplant to adjacent suitable area or to closed trail section. • Install cable and rod fencing only as needed
No	No	Yes or No	<p>Trail construction practices include:</p> <ul style="list-style-type: none"> • Install cable and rod fencing only as needed

APPENDIX A
POINT PINOS COASTAL TRAIL PROJECT

Archaeological Site	Sensitive Habitat ¹	Gullying	Trail Closure Best Management Practices
Yes	Yes or No	Yes	<p>Trail closure and removal practices include:</p> <ul style="list-style-type: none"> • Within entrenched areas, decompact/ lightly scarify trail bed using hand tools, yet not into archaeological resource • Where archaeological resource is exposed, fill entrenched areas with imported weed-free soil to cap archaeological sites (3-6") • Distribute cut native vegetation (from new trail construction areas) at trail entrances for length of approximately 20 feet to visually "close" the trail. • Apply seed of native plant species to closed trail surface; apply erosion control and straw wattles as appropriate • Install cable and rod fencing only as needed • Avoid installing sign posts within, or in vicinity of, archaeological sites where feasible. If signs are used, pound into ground surface rather than excavation for concrete footing • Have archaeologist on-site for cultural resource monitoring
No	Yes or No	No	<p>Trail closure and removal practices include:</p> <ul style="list-style-type: none"> • Distribute cut native vegetation (from new trail construction areas) at trail entrances for length of approximately 20 feet to visually "close" the trail. • Apply seed of native plant species to closed trail surface; apply erosion control and straw wattles as appropriate • Remove non-native vegetation along trail corridor, if applicable • Install cable and rod fencing only as needed • Allow trail to revegetate naturally

APPENDIX A
POINT PINOS COASTAL TRAIL PROJECT

Archaeological Site	Sensitive Habitat ¹	Habitat Restoration Best Management Practices
Yes	Yes or No	<p>Habitat restoration practices include:</p> <ul style="list-style-type: none"> • Within compacted areas, decompact/ lightly scarify trail bed using hand tools, yet not into archaeological resource • For habitat restoration within existing parking lot areas with decomposed granite or similar surface, determine allowable depth to decompact/ lightly scarify surface without encountering archaeological resource; lightly scarify to receive additional cap material (12-24") • For habitat restoration within areas with native soil, apply imported, weed-free soil to cap archaeological resource (3-6") • Apply hydroseed and/or hand-applied native seed to restoration areas; apply erosion control and straw wattles as appropriate • Remove invasive, non-native vegetation, if applicable • Install cable and rod fencing only as needed • Avoid installing sign posts within, or in vicinity of, archaeological sites where feasible • Have archaeologist on-site for cultural resource monitoring
No	Yes or No	<p>Habitat restoration practices include:</p> <ul style="list-style-type: none"> • Apply seed and/or container stock native plant species to restoration areas; apply erosion control and straw wattles as appropriate • Remove invasive, non-native vegetation, if applicable • Install cable and rod fencing only as needed • Install temporary irrigation system

¹ Sensitive habitat is coastal bluff scrub, dune sedge meadow, and salt grass flat. Sensitive habitat also pertains to colony of Tidestrom's lupine in western corner of project site.

APPENDIX B

Special Status Species Lists

APPENDIX B

POINT PINOS COASTAL TRAIL PROJECT

Table B-1. List of Special Status Plant Species Evaluated for Potential to Occur in the Vicinity of the Pt. Pinos Coastal Trail Project Area

Species	Status	Habitat Type Plant Characteristics	Closest Known Occurrence(s) Observed on Site?
Monterey Quadrangle			
Hickman's onion (<i>Allium hickmanii</i>)	List 1B.2 State: None Fed: None	Openings in forest, woodlands, or chaparral, grassland Sandy damp ground and vernal swales; blooms April - May	Veterans Memorial Park and Presidio of Monterey. Not recorded from project area.
Hooker's manzanita (<i>Arctostaphylos hookeri</i> <i>ssp. hookeri</i>)	List 1B.2 State: None Fed: None	Sandy soils, maritime chaparral/oak woodland mosaic Evergreen shrub	Presidio of Monterey. Not observed or recorded from project area.
Sandmat manzanita (<i>Arctostaphylos pumila</i>)	List 1B.2 State: None Fed: None	Closed cone forest, Sandy soils, maritime chaparral, dunes Evergreen shrub	Fort Ord, Monterey Airport. Not observed or recorded from project area.
Coastal dunes milk-vetch (<i>Astragalus tener var. titi</i>)	List 1B.1 State: E Fed: E	Coastal bluff scrub, moist sandy depressions on bluffs or dunes; blooms April – May	Along 17-mile Drive near Ocean Road. Not observed within project area.
Johnny nip paintbrush (<i>Castilleja ambigua ssp.</i> <i>insalutata</i>)	List 1B.1 State: None Fed: None	Coastal bluff scrub Blooms May - August	1903 record from between Point Pinos and Pacific Grove No recent observation in project area; potential habitat
Monterey spineflower (<i>Chorizanthe pungens var.</i> <i>pungens</i>)	List 1B.2 State: None Fed: T	Sandy soils, maritime chaparral Annual; blooms May – August	Record from near Pt. Pinos, CNDDDB occurrence #4 Not observed within project area; potential habitat; known from Pacific Grove Golf Course and Asilomar SB
Jolon clarkia (<i>Clarkia jolonensis</i>)	List 1B.2 State: None Fed: None	Dry grasslands Annual; blooms April - July	Historic collection (1893) and observation (1903) from “near Pt. Pinos”, CNDDDB Occurrence #13 Species unlikely to be present based on a lack of suitable habitat.
San Francisco collinsia (<i>Collinsia multicolor</i>)	List 1B.2 State: None Fed: None	Close cone pine forest, coastal scrub on decomposed shale/mudstone Annual; blooms March - May	Pacific Grove (1903). Not observed within project area.
Seaside birds-beak (<i>Cordylanthus rigidus ssp.</i> <i>littoralis</i>)	List 1B.1 State: E Fed: None	Dry slopes, grasslands, closed cone forests; coastal scrub; sandy substrate Annual; blooms May - September	Fort Ord, Monterey Airport. Not recorded from project area.

APPENDIX B

POINT PINOS COASTAL TRAIL PROJECT

Table B-1. List of Special Status Plant Species Evaluated for Potential to Occur in the Vicinity of the Pt. Pinos Coastal Trail Project Area

Species	Status	Habitat Type Plant Characteristics	Closest Known Occurrence(s) Observed on Site?
Hutchinson's larkspur (<i>Delphinium hutchinsoniae</i>)	List 1B.2 State: None Fed: None	Broadleaf upland forest, coastal prairie, coastal scrub; usually moist slopes Annual; blooms April – May	CNDDDB Occ. #9 - 1949 collection from near Asilomar and Pt. Pinos Lighthouse.
Umbrella larkspur (<i>Delphinium umbraculorum</i>)	CNPS: List 1B.3 State: None Federal: None	Broadleaf upland forest, mesic sites on clay	Tassajara Road area Not recorded in project area
Eastwoods goldenbush (<i>Ericameria fasciculata</i>)	List 1B.1 State: None Fed: None	Sandy openings in maritime chaparral, pine forests, coastal scrub Perennial shrub; blooms Jul – Oct.	Carmel (1913); Morse Reserve in Del Monte Forest. Not observed within project area.
Pinnacles buckwheat (<i>Eriogonum nortonii</i>)	List 1B.3 State: None Fed: None	Chaparral, valley and foothill grassland; sandy openings often after burns Perennial shrub; blooms May-June.	Head of Gibson Creek; Palo Corona Regional Park; E of Carmel Highlands. Not observed within project area.
Menzies wallflower (<i>Erysimum menziesii</i> ssp. <i>menziesii</i>)	List 1B.1 State: E Fed: E	Sandy soils, coastal dunes Biennial, blooms May - June	Dunes by golf course at Pt. Pinos CNDDDB Occurrence #1 Not documented within project area; potential habitat; known from Pacific Grove Golf Course and Asilomar SB
Fragrant fritillary (<i>Fritillaria liliacea</i>)	List 1B.2 State: None Fed: None	Coastal scrub, grasslands near coast Perennial bulb; blooms February - April	Pebble Beach area (1931). Not observed within project area.
Sand gilia (<i>Gilia tenuiflora</i> ssp. <i>arenaria</i>)	List 1B.2 State: T Fed: E	Coastal dunes, coastal chaparral Annual herb; blooms April – June	Moss Beach, Del Monte Dunes, Sand City, Ft. Ord, Marina Dunes, Asilomar Not observed within project area; potential habitat.
Gowen cypress (<i>Hesperocyparis goveniana</i>)	List 1B.2 State: None Fed: T	Closed cone pine forest; coast terraces, usually in sandy soil Evergreen tree	Pt. Lobos along N side of Gibson Creek, E of Hwy 1. Not observed within project area.
Monterey cypress (<i>Hesperocyparis macrocarpa</i>)	List 1B.2 State: None Fed: None	Closed cone pine forest; coast terraces, usually on granitic soils Evergreen tree	Northern portion of Pt. Lobos State Reserve. Planted specimens in project area; not part of native stand.

APPENDIX B

POINT PINOS COASTAL TRAIL PROJECT

Table B-1. List of Special Status Plant Species Evaluated for Potential to Occur in the Vicinity of the Pt. Pinos Coastal Trail Project Area

Species	Status	Habitat Type Plant Characteristics	Closest Known Occurrence(s) Observed on Site?
Kellogg's horkelia (<i>Horkelia cuneata ssp. sericea</i>)	List 1B.1 State: None Fed: None	Closed cone forest, coastal scrub, chaparral Perennial; blooms April - June	Carmel Mission, Asilomar, Del Monte area Not observed within project area.
Beach layia (<i>Layia carnosa</i>)	List 1B.1 State: E Fed: E	Coastal dunes Annual herb; blooms April – June	Sand hills at Pt. Pinos CNDDDB Occurrence #4 (1962) No recent records from project area; potential habitat; known from Asilomar SB
Tidestom's lupine (<i>Lupinus tidestomii</i>)	List 1B.1 State: E Fed: E	Coastal dunes Annual herb; blooms April – May	Dunes at golf course at Pt. Pinos, CNDDDB Occurrence #1 Documented from southern end of project area (2 colonies recorded in 2014); larger colonies known from Pacific Grove Golf Course and Asilomar SB.
Carmel Valley bush-mallow (<i>Malacothamnus palmeri var. involucratus</i>)	List 1B.2 State: None Fed: None	Chaparral on rock outcrops or steep rocky road cuts, talus Perennial; blooms June - December	Carmel Valley, 2 miles from Hwy 1. Not observed within project area.
Santa Lucia bush mallow (<i>Malacothamnus palmeri var. palmeri</i>)	List 1B.2 State: None Fed: None	Chaparral, dry talus slopes Deciduous shrub; blooms May - Oct	Carmel (1985) Not observed within project area
Marsh microseris (<i>Microseris paludosa</i>)	List 1B.2 State: None Fed: None	Closed cone pine forest, scrub, woodland, grassland Annual, blooms May - June	Pt. Lobos State Reserve (1978), Del Monte Forest, Veterans Memorial Park Not observed within project area
Northern curly-leaved monardella (<i>Monardella sinuata ssp. nigrescens</i>)	List 1B.2 State: None Fed: None	Closed cone pine forest, scrub, woodland, grassland, sandy soils Annual, blooms May - June	1932 record from Asilomar Not observed in project area
Woodland woollythreads (<i>Monolopia gracilens</i>)	List 1B.2 State: None Fed: None	Grassy sites, in openings; sandy to rocky soils. Often seen on serpentine after burns but may have only weak affinity to serpentine. 100-1200 m.	1897 collection from Monterey Not expected in project area
Monterey pine (<i>Pinus radiata</i>)	List 1B.1 State: None Fed: None	Closed cone pine forest Evergreen tree	Pt. Lobos State Reserve Not observed within project area

APPENDIX B

POINT PINOS COASTAL TRAIL PROJECT

Table B-1. List of Special Status Plant Species Evaluated for Potential to Occur in the Vicinity of the Pt. Pinos Coastal Trail Project Area

Species	Status	Habitat Type Plant Characteristics	Closest Known Occurrence(s) Observed on Site?
Yadon's rein orchid (<i>Piperia yadonii</i>)	List 1B.1 State: None Fed: E	Closed cone pine forest, scrub, coastal bluff scrub Annual, blooms May - June	Washington Park and Along 17 Mile Dr, Veterans Memorial Park, Pt. Lobos, Carmel. Potential habitat within project area
Hickman's cinquefoil (<i>Potentilla hickmanii</i>)	List 1B.1 State: E Fed: E	Closed cone pine forest, scrub, meadows and seeps, streams Annual, blooms April - August	17-mile Drive, S of Bird Rock parking lot; Pacific Grove on road to Cypress Point. Not observed within project area
Pine rose (<i>Rosa pinetorum</i>)	List 1B.2 State: None Fed: None	Closed cone pine forest Perennial, blooms May - June	1906 record from near Pt. Pinos Lighthouse; last observed in 2000 Not observed within project area
Saline clover (<i>Trifolium hydrophilum</i>)	List 1B.2 State: None Fed: None	Marshes and swamps, valley and foothill grassland, vernal pools. Annual, blooms May - June	1907 record from Pacific Grove, Moss Landing Not observed within project area
Pacific Grove clover (<i>Trifolium polyodon</i>)	List 1B.1 State: R Fed: None	Closed cone pine forest Annual, blooms May - June	Pebble Beach riding stables, 17-Mile Drive near Ocean Road; S of Seal Rock Creek Not observed within project area
Monterey clover (<i>Trifolium trichocalyx</i>)	List 1B.1 State: E Fed: E	Closed cone pine forest Annual, blooms April - June	Morse Botanical Reserve; Huckleberry Hill Not observed within project area
Surrounding Quadrangles (Marina, Seaside, Soberanes Point, Mt. Carmel)			
Vernal pool bent grass (<i>Agrostis lacuna-vernalis</i>)	List 1B.1 State: None Fed: None	Vernal pools Annual, blooms May - June	Ft. Ord Not expected within project area
Little Sur manzanita (<i>Arctostaphylos edmundsii</i>)	CNPS: List 1B.2 State: None Federal: None	Coastal bluff scrub, sandy terraces Evergreen shrub	In the vicinity of Garrapata Creek, N of bridge along Highway 1. Recorded from near Gate 19; observed east of existing trail near Gate 19.
Toro manzanita (<i>Arctostaphylos montereyensis</i>)	List 1B.2 State: None Fed: None	Sandy soils, maritime chaparral/oak woodland mosaic Evergreen shrub	Monterey Airport; Ft. Ord Not observed within project area.

APPENDIX B

POINT PINOS COASTAL TRAIL PROJECT

Table B-1. List of Special Status Plant Species Evaluated for Potential to Occur in the Vicinity of the Pt. Pinos Coastal Trail Project Area

Species	Status	Habitat Type Plant Characteristics	Closest Known Occurrence(s) Observed on Site?
Pajaro manzanita (<i>Arctostaphylos pajaroensis</i>)	List 1B.1 State: None Fed: None	Sandy soils, maritime chaparral/oak woodland mosaic Evergreen shrub	Prunedale; Ft. Ord Not observed within project area.
Congdon's tarplant (<i>Centromadia parryi</i> ssp. <i>congdonii</i>)	List 1B.1 State: None Fed: None	Moist grasslands, alkaline depressions Annual; blooms July - October	Laguna Seca Area. Not observed within project area.
Hospital Canyon larkspur (<i>Delphinium californicum</i> ssp. <i>interius</i>)	CNPS: List 1B.2 State: None Federal: None	In wet, boggy meadows, openings in chaparral and in canyons.	Carmel Valley Not expected in project area
Sand-loving wallflower (<i>Erysimum ammophilum</i>)	List 1B.2 State: None Fed: None	Sandy soils, maritime chaparral; coastal dunes; scrub Biennial, blooms May - June	Ft. Ord; Naval Postgraduate School; Seaside; Asilomar; 17-mile Drive Not observed within project area.
Santa Lucia bedstraw (<i>Galium clementis</i> ````)	CNPS: List 1B.3 State: None Federal: None	Lower montane coniferous forest, upper montane coniferous forest.	Los Padres NF Not expected in project area
Point Reyes horkelia (<i>Horkelia marinensis</i>)	List 1B.2 State: None Fed: None	Coastal dunes, coastal prairie, coastal scrub. Perennial; blooms April - June	Near Highway 1, Marina Potential within project area.
Contra Costa goldfields (<i>Lasthenia conjugens</i>)	List 1B.1 State: None Fed: E	Valley and foothill grassland, vernal pools, alkaline playas, cismontane woodland. Perennial; blooms April - June	Ft. Ord Not expected within project area.
Carmel Valley malacothrix (<i>Malacothrix saxatilis</i> var. <i>arachnoidea</i>)	List 1B.2 State: None Fed: None	Chaparral, rocky areas Deciduous shrub; blooms May - Oct	Carmel Valley Road. Not observed within project area.
Hooked popcorn flower (<i>Plagiobothrys uncinatus</i>)	List 1B.2 State: None Fed: None	Chaparral, woodlands and grasslands on sandstone outcroppings, often burned areas Annual; blooms April - May	Recorded from Hastings Reserve, approx. 3 miles SE of project. Not observed within project area.
Santa Cruz microseris (<i>Stebbinsoseris decipiens</i>)	List 1B.2 State: None Fed: None	Coastal scrub, chaparral, prairie near coast; loose disturbed soils Annual; blooms April - May	Known from Laureles Grade, Highway 68 No suitable habitat; not observed during surveys
Santa Cruz clover (<i>Trifolium buckwestiorum</i>)	List 1B.1 State: E Fed: E	Moist grassland. Gravelly margins. Annual; blooms April - June	Laguna Seca, Tarpay Flats Not expected within project area

CNPS Status:

APPENDIX B

POINT PINOS COASTAL TRAIL PROJECT

List 1B: These plants (predominately endemic) are rare through their range and are currently vulnerable or have a high potential for vulnerability due to limited or threatened habitat, few individuals per population, or a limited number of populations. List 1B plants meet the definitions of Section 1901, Chapter 10 of the CDFG Code.

Federal and State Status:

T: Designated as a threatened species by the federal government or the California Fish and Game Commission

E: Designated as an endangered species by the federal government or the California Fish and Game Commission

Table B-2. Special Status Wildlife Species and Potential Occurrence in the Vicinity of the Pt. Pinos Coastal Trail Project Area.

SPECIES	STATUS ¹	HABITAT	POTENTIAL OCCURRENCE ON SITE
Invertebrates			
Monarch butterfly (<i>Danaus plexippus</i>)	*	Eucalyptus, acacia and pine trees groves provide winter habitat when they have adequate protection from wind and nearby source of water and nectar	Unlikely, trees present lack wind protection and surrounding areas lack suitable nectar plants.
Smith's blue butterfly (<i>Euphilotes enoptes smithi</i>)	FE	Coastal dunes, coastal scrub and sage scrub with host plant of buckwheat present	Habitat patches too small and isolated to support a population of this species.
Fish			
Steelhead (<i>Oncorhynchus mykiss</i>)	FT, CSC	Perennial creeks and rivers with gravels for spawning.	No suitable habitat on site.
Amphibians			
California tiger salamander (<i>Ambystoma californiense</i>)	FT, ST	Ponds, vernal pools for breeding, grasslands with burrows for upland habitat	No suitable habitat on site.
California red-legged frog (<i>Rana draytonii</i>)	FT, CSC	Riparian, marshes, estuaries and ponds with still water at least into June.	No suitable habitat on site.
Reptiles			
Western pond turtle (<i>Actinemys marmorata</i>)	CSC	Creeks and ponds with water of sufficient depth for escape cover, and structure for basking; grasslands or bare areas for nesting.	No suitable habitat on site.
Black legless lizard (<i>Anniella pulchra nigra</i>)	CSC	Sand dunes with native vegetation	Habitat patches too small and isolated to support a population of this species.
Birds			
Black oystercatcher (<i>Haematopus bachmani</i>)	**	Rocky intertidal for both foraging and nesting	Known to nest in intertidal areas adjacent to vicinity of project area
Ashy storm-petrel (<i>Oceanodroma homochroa</i>)	CSC	Nests in colonies on off-shore islands in crevices under loose rocks or caves	No habitat on site.
California brown pelican (<i>Pelecanus occidentalis californicus</i>)	FP	Nests on coastal islands, winter coastal visitor along Central coast	May perch on nearshore rocks occasionally, forage in ocean. No nesting known in Monterey County.
Western snowy plover	FT, CSC	Nests on sandy beach, shores of salt ponds	None, no suitable habitat on site.

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POINT PINOS COASTAL TRAIL PROJECT

Table B-2. Special Status Wildlife Species and Potential Occurrence in the Vicinity of the Pt. Pinos Coastal Trail Project Area.

SPECIES	STATUS ¹	HABITAT	POTENTIAL OCCURRENCE ON SITE
<i>(Charadrius alexandrinum nivosus)</i>			
Western burrowing owl <i>(Athene cunicularia hypugea)</i>	CSC	Grasslands with short grass and burrows.	No suitable habitat on site.
Black swift <i>(Cypseloides niger)</i>	CSC	Nests in small colonies on cliffs behind or adjacent to waterfalls and along sea bluffs	No suitable habitat on this site.
Mammals			
Monterey dusky-footed woodrat <i>(Neotoma fuscipes Luciana)</i>	CSC	Scrub, forest, and riparian habitats	No suitable habitat on site.

¹ Key to status:

- FE = Federally listed as endangered species
- FT = Federally listed as threatened species
- ST = State listed as threatened species
- CSC = California species of special concern
- FP = Fully protected species under CDFG Code
- * = Protected under County Local Coastal Plan
- ** = Species of local and regional interest; actively monitored local population to gather additional information on status

APPENDIX C

Mitigation Monitoring and Reporting Program

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POINT PINOS COASTAL TRAIL PROJECT

MITIGATION AND MONITORING REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
BIOLOGICAL RESOURCES				
<p>Mitigation Measure BIO-1: Avoid Tidestrom’s Lupine. To avoid impacts to Tidestrom’s lupine the City will incorporate the following measures prior to commencement of all project activities:</p> <ul style="list-style-type: none"> ▪ Activities within 50 feet of the two plant colonies shall be kept to the smallest feasible disturbance area. The limits of the work will be demarcated in the field. The City will install flagging, fencing, and other protective measures around the two Tidestrom’s lupine colonies that are to be avoided by the project. ▪ Invasive, non-native plant species (e.g., ice plant) that occur adjacent to work areas should be removed/controlled to prevent their encroachment into habitat supporting the Tidestrom’s lupine. Care will be given to ensure the root systems of Tidestrom’s lupine are not dislodged while invasive, non-native plants are hand-pulled. No herbicides will be used. 	City of Pacific Grove	City of Pacific Grove	Prior to and during construction	
<p>Mitigation Measure BIO-2 Minimize Impacts to Sensitive Habitats. To avoid impacts to coastal dune scrub and dune sedge meadow within the work area, the City will implement the following:</p> <ul style="list-style-type: none"> ▪ Prior to construction, orange plastic construction fencing will be constructed at the limits of construction access and the work area so as to prevent impacts to adjacent vegetation. 	City of Pacific Grove	City of Pacific Grove	Prior to and during construction	

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<ul style="list-style-type: none"> ▪ For trail work in dune scrub areas, any soil removed during trail construction should be temporarily stockpiled. As the soil likely contains native dune seeds, the upper two inches of soil shall be stockpiled separately from deeper soils and reapplied as the upper soil layer in rehabilitated areas. Stockpiled soil shall be used in the rehabilitated areas. The City will provide post-construction documentation that there is no net loss of coastal dune scrub by implementing habitat restoration of closed trails. 				
<p>Mitigation Measure BIO-3. Avoid Impacts to Nesting Birds. To avoid impacts to nesting birds, the City will implement the following:</p> <ul style="list-style-type: none"> ▪ If possible, schedule construction activities involving grading, vegetation stripping, or other involving heavy equipment, outside the migratory bird breeding season, which is August 1 – February 1. ▪ If construction-related activities must be scheduled during the breeding season, then focused surveys to identify active nests of migratory bird species will be conducted by a qualified biologist no more than 7 days before heavy equipment construction activities occur in these months. ▪ If a nest is found during construction, any disruptive work in the immediate area will be halted and construction must be shifted to another area of the project far enough away as to limit disrupting the active nest, the buffer area to be determined by the biologist. The nest will be monitored to 	City of Pacific Grove	City of Pacific Grove	Prior to and during construction	

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<p>determine when chicks have fledged and when it is safe to resume work around the nest site.</p> <ul style="list-style-type: none"> ▪ Implement all recommended mitigation measures to replace removal of trees, which may provide nesting habitat for migratory birds. ▪ Because black oystercatchers breed adjacent to some portions of the Point Pinos Trail project corridor between the months of March through September, and their nesting success could potentially be disrupted by heavy equipment activity adjacent to nest sites, additional monitoring of these birds is recommended. The City will hire a qualified biologist to confer with the California Central Coast Black Oystercatcher Project biologists to determine if trail or parking lot construction is scheduled to occur adjacent to observed active nests. If so, construction in that buffer area should be postponed until the City’s biologist determines that all young have fledged. The City’s biologist should also recommend a buffer zone between construction and active oystercatcher nests, if evidence determines it is necessary to avoid impacts to the young. ▪ Buffer distances for oystercatcher nests should be site specific and at an appropriate distance, as determined by the City’s biologist. There are many factors that may affect this bird’s selection of nest site unrelated to nearby construction and thus would allow the nesting birds to succeed even during certain construction activities nearby. For example, if the work is located outside of the nesting 				

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<p>bird’s line of sight (e.g., cliff that obstructs view), crashing waves on nearby rocks that are louder than the construction equipment, and frequent human presence on paths and beaches near the nests that birds become inured to prior to selecting their nest site. The buffer distances should be specified to protect the bird’s normal bird behavior to prevent nesting failure or abandonment. The buffer distance recommendation should be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The City’s biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer that avoids failure of nests is established.</p>				
CULTURAL RESOURCES				
<p>Mitigation Measure CULT-1: Avoid impacts to Archaeological Sites. To avoid impacts to archaeological sites, the following measures and the BMPs (<u>Best Management Practices</u> or Standard Project Requirements) listed in Appendix A, <u>as well as measures outlined in</u></p>	<p>City of Pacific Grove</p>	<p>City of Pacific Grove</p>	<p>Prior to and during construction</p>	

APPENDIX C

POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<p><u>Mitigation Measure TRI-1</u>, will be implemented:</p> <ul style="list-style-type: none"> ▪ The project shall use specialized construction methods to avoid or minimize impacts to archeological resources. Methods shall be used where there is no or minimal intrusion into known sites or into unknown archaeological soils which might be inadvertently encountered during construction. Examples of such techniques would require that the required thickness of the sub grade for proposed path and parking area be the result of adding culturally sterile fill on top of the existing grade within the project footprint. Also, the number of signs or other new project elements which require ground disturbances for installation shall be extremely limited and shall be installed without concrete footings. Additionally, any drainage plan for new trails and parking areas shall be designed to prevent deleterious runoff or other sources of erosion which would adversely affect the sites over the long term. ▪ Advanced plans for construction shall be designed to minimize potential impact to cultural resources. Prior to approval, plans should be subject to archaeological plan review for assessment of project impacts and recommendations for mitigation of those impacts where appropriate. ▪ A qualified archaeologist shall be present for all ground disturbing activities. <u>Please refer to Mitigation Measure TRI-1, which requires presence of a Native American monitor certified by the OCEN be present for all ground</u> 				

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<p><u>disturbance</u>. If potentially significant archaeological resources are discovered, the monitor should be authorized to halt excavation until any finds are properly evaluated. The monitor will also be authorized to discontinue monitoring in soils, such as fill, where cultural resources cannot exist.</p> <ul style="list-style-type: none"> ▪ If in spite of measures to avoid it, disturbance occurs within a recorded historical resource, a minimum of two single specimen radiocarbon dates should be obtained for each impacted site, if suitable shell specimens are recovered. ▪ If a find is determined to be significant, work may remain halted near the find to permit development and implementation of a <u>reburial</u> data recovery mitigation plan with the concurrence of the Lead Agency, and implemented. The mitigation plan should be designed to reduce project impacts to a less than significant level, as required by CEQA. ▪ Following completion of the project, a <i>Preliminary Archaeological Report</i> should be prepared. If suitable materials are found to warrant special studies, a <i>Final Comprehensive Technical Report</i> that includes all analysis will be submitted to the lead agency within six months of the conclusion of the archaeological fieldwork. If suitable materials are not found to warrant special studies, the preliminary report will serve as the final report on the Project. The final report should include a revised site record for each of the sites covered by the monitoring, and new 				

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<p>site records for other resources if any are found.</p> <ul style="list-style-type: none"> ▪ Cultural materials, <u>including ancestral remains</u>, recovered during the project should be <u>reburied on site processed and curated in a suitable public research facility</u>. <u>If that is not possible, they shall be offered to OCEN.</u> ▪ A qualified archaeologist shall inspect the location of the trail removal and closures prior to any soil disturbance to confirm the locations where an archaeological monitor will be required. The archaeological monitor <u>and OCEN monitor</u> will remain on site as warranted in the opinion of the archaeological monitor <u>and OCEN monitor</u>. In the event that a potentially significant cultural deposit is uncovered during construction, all work will be stopped at the specific location of the find until the qualified archaeologist <u>and OCEN monitor</u> can evaluate it. Prior to work resuming at the location, the archaeologist <u>and OCEN monitor</u> will determine the appropriate avoidance, preservation or <u>reburial recovery</u> measures required, in compliance with CEQA. Work shall not resume at the location until the appropriate measures have been implemented as determined by the archaeologist <u>and OCEN monitor</u>. ▪ For new trail and parking area construction shall specify that all archaeological site boundaries near construction zones be marked by exclusionary fencing during construction. Due the extremely sensitive nature of the entire project area, a qualified archaeological monitor should be present during construction. 				

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<ul style="list-style-type: none"> ▪ Trail closure and removal measures where the trail bed is stable: Allow trail to revegetate naturally, retain all open areas except at trail entrances. Distribute cut native vegetation at trail entrances for length of approximately 20 feet. Install cable and rod fencing only as needed and avoid installing sign posts within, or in vicinity of, archaeological sites where feasible. Where sign post or similar new features are unavoidable (certainly some will be needed) within an archaeological site, intrusive element shall be pounded into the ground rather than excavated and installed with a concrete base. Pounding would be less of an impact. 				
<p>Mitigation Measure CULT-2. Treatment of Previously Unidentified Human Remains. During project construction, if human remains are discovered, the project applicant and/or its contractor shall cease all work within 25 feet of the find and notify the City of Pacific Grove Planning Division and the county coroner, per California Health and Safety Code Section 7050.5. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours.</p>	City of Pacific Grove	City of Pacific Grove	During construction	
GEOLOGY AND SOILS				
<p>Mitigation Measure GEO-1. Minimize Hazards from Wave Run-up During Storms. The proposed improvements shall be designed for appropriate visitor safety relative to erosion and wave activity. The trail and parking will be located inland from the recommended 30-</p>	City of Pacific Grove	City of Pacific Grove	Prior to, during construction,	

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
<p>year setback except where Ocean View Boulevard exists within the setback, in which case the trail will be located along the seaward edge of Ocean View Boulevard until the long-term plan is implemented and the road and trail are reduced or relocated outside of the setback. The evaluation of visitor safety shall assume that hazards exist from the existing bluff edge to the setback line. Those hazards may consist of vertical drop-offs, rills and gullies that present tripping or slip and fall risks, and ocean wave impact. The City shall periodically monitor, repair, and maintain the improvements to maintain safe conditions. Appropriate signage shall be installed to warn visitors of hazardous and risky conditions. During some ocean conditions, the trails and associated facilities shall be closed to use until the ocean subsides or maintenance and repairs occur.</p>			and after construction	
TRIBAL CULTURAL RESOURCES				
<p>Mitigation Measure TRI-1. Treatment of Tribal Cultural Resources. During project construction, a Native American monitor certified by the Ohlone/Costanoan-Esselen Nation (OCEN) will be present for all ground disturbance. If any tribal cultural resources are found, the project applicant and/or its contractor shall cease all work within 50 feet of the discovery and immediately notify the City of Pacific Grove Planning Division. The OCEN-certified Native American monitor will contact the OCEN Tribal Chair and in consultation with the City and an archeologist evaluate the finds and recommend appropriate mitigation measures for the inadvertently discovered tribal cultural resource. The City shall consider the mitigation recommendations and agree</p>	City of Pacific Grove	City of Pacific Grove	Prior to and during construction	

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POINT PINOS COASTAL TRAIL PROJECT

Mitigation Measures	Party Responsible for Implementation	Agency Responsible for Monitoring	Monitoring Timeline	Monitoring Compliance Record (Name/Date)
on implementation of the measure(s) that are feasible and appropriate. Such measures may include reburial of any ancestral remains, avoidance, preservation in place, excavation, documentation, or other appropriate measures.				

APPENDIX D

Comment Letters Submitted in Response to the Draft IS/MND



Lisa Ciani #1

Daniel Gho <dgho@cityofpacificgrove.org>

Fwd: Point Pinos Coastal T rail Project IS/MND--INCOMPLETE--Public Comment #1

1 message

Lisa Ciani <lisa.ciani@gmail.com>
To: Daniel Gho <dgho@cityofpacificgrove.org>

Wed, Nov 8, 2017 at 4:14 PM

Dan,

Here is my first comment letter.

Lisa Ciani

Begin forwarded message:

From: Lisa Ciani <lisa.ciani@gmail.com>
Subject: Point Pinos Coastal T rail Project IS/MND--INCOMPLETE
Date: November 7, 2017 at 11:32:57 AM PST
To: Daniel Gho <dgho@cityofpacificgrove.org>, Ben Harvey <citymanager@cityofpacificgrove.org>, Bill Kampe <bkampe@cityofpacificgrove.org>
Cc: "Duff, Tim@SCC" <Tim.Duff@scc.ca.gov>, Christine.Asiata@OPR.CA.GOV, Randy Anderson <randy@trailpeople.net>, Brian O'Neill <Brian.O'Neill@coastal.ca.gov>, "Kevin@Coastal Kahn" <Kevin.Kahn@coastal.ca.gov>

Dan Gho, Mr. Harvey, and Mayor Kampe:

1 The current IS/MND document for the Point Pinos Coastal Trail Project fails to provide plan drawings of the proposed trail project for the public to comment on. I request that a new IS/MND for the Point Pinos Coastal Trail Project be issued after correcting the omission of maps depicting the trail alignment, parking areas, ADA parking areas, and beach access locations. The Project Description states, in part, on pages 11-12:

2 "Project Description. The proposed project is development of a 5-foot wide decomposed granite (DG) surfaced coastal trail to connect from the existing curb side trail near Acropolis Street west to the Great Tidepool site, a distance of approximately 0.8 mile.... Appendix A includes maps which depict the trail alignment, parking areas, ADA parking areas, and beach access locations."

3 However, the maps are not included in the Table of Contents, and there is NO MAP of the TRAIL ALIGNMENT, PARKING AREAS, ADA PARKING AREAS, and BEACH ACCESS LOCATIONS in Appendix A, or anywhere in the IS/MND. (Appendix A is "Project Construction, Trail Closure, and Habitat Restoration Best Management Practices".) The only maps in the IS/MND document are those in Figures 1-5 on pages 16-20, and they do not show the proposed trail alignment or any other components of the trail project. At first glance it might appear that Figures 4 and 5 are trail maps, but those are actually "Habitat Maps", and the red line on those maps is the "erosion setback line", not the proposed trail. What happened to the Appendix A that had the maps for the trail project?

If you look at Asilomar State Park's recent IS/MND for their 0.5 mile trail project, they provide an overview map plus 5 maps showing the trail segments with accompanying photos. The public needs to be able to see the project in order to understand and comment on the project itself.

4 I attended all the Point Pinos Trail Committee meetings, so I have an idea of what's missing and I know those maps were being completed. It is impossible for the public to comment in a meaningful way about the proposed trail, changes in the parking, and beach access locations without a visual representation, particularly in light of the vague, confusing, and inaccurate descriptions provided in the IS/MND.

5 A new, complete IS/MND needs to be issued for the Point Pinos Coastal Trail Project to include maps/plans that depict the project sufficiently to allow for meaningful public comment. And a new public review period needs to be instituted when that document is available.

11/9/2017

City of Pacific Grove Mail - Fwd: Point Pinos Coastal Trail Project IS/MND--INCOMPLETE--Public Comment #1

Thank you,
Lisa Ciani

November 8, 2017

To: Daniel Gho, Public Works Director

From: Lisa Ciani

Re: Point Pinos Trail Project IS/MND, Project Description—Public Comment #2
(Public Comment #1 was my November 7, 2017, 11:32 am email)

6

This comment gives more detail about the limited, confusing, and inaccurate information that the MND provides about the location of the project, in addition to the absence of maps and site plans that are needed in order to understand the plan.

I again request that this IS/MND for the Point Pinos Coastal Trail Project be reissued, because it does not provide plan drawings for the public to comment on. The description states on pages 11-12:

Project Description. The proposed project is development of a 5-foot wide decomposed granite (DG) surfaced coastal trail to connect from the existing curb side trail near Acropolis Street west to the Great Tidepool site, a distance of approximately 0.8 mile.... Appendix A includes maps which depict the trail alignment, parking areas, ADA parking areas, and beach access locations.

7

However, no such maps are included in the IS/MND.

8

The verbal descriptions of the project are non-specific, variable, and largely unidentifiable. They confuse east and west, and refer repeatedly to “Marine Gardens Park”, which does not exist on any maps or the City’s website, as a point of reference. All these location descriptions and any others in the IS/MND need to be corrected.

Sample descriptions:

9

- *“The coastal trail will connect from the existing curb side trail near Acropolis Street west to the Great Tidepool site.”* (Introduction, page 1, and Project Description, page 11)

NOTE:

How “near” to Acropolis Street is the beginning of the proposed trail, and does it start to the east or west of Acropolis?

Does the project address the damaged steps at the west (toward the Pacific Ocean) end of the wall at Coral Street Beach, as was discussed at the last Trail Committee meeting?

10

- *“The western portion of the proposed project, from Marine Gardens Park to Asilomar Avenue, is located within Planning Area IV-A.”* (Land Use and Planning section, page 59)

NOTE: Where is Marine Gardens Park? It is not on the City’s Parks webpage. There is no map in the IS/MND indicating Marine Gardens Park. The only thing with a similar name is Pacific Grove Marine Gardens State Marine Conservation Area, which runs along the coast (in the water) from Lovers Point to a little east (toward Monterey) of Asilomar Avenue. That does not help clarify the “park” as a point of reference in describing the trail location. And the following description on the same page indicates that the above description is actually describing the eastern portion of the project, not the western portion.

- *“The eastern portion of the proposed project...extends from Asilomar Avenue to the projects [sic] terminus at Asilomar State Beach.”* (Land Use and Planning, page 59)

NOTE: This sounds like the western portion, not the eastern portion. So, the previous description must be the eastern portion, not the western portion.

- *“The closest park to the Point Pinos Coastal Trail project site [sic] Marine Gardens Park, located at the eastern terminus of the trail project. Another nearby park is Esplanade Park, located near Shell Avenue, approximately 0.5 mile west of the project site.*

“The western portion of the proposed project, from Marine Gardens Park to Asilomar Avenue....”
(Recreation section, page 65)

NOTE: This makes no sense. Again, Marine Gardens Park is not on the City’s maps. It’s described here as the eastern terminus of the project, and also, contradicting that, as the beginning of the western portion of the project. And Esplanade Park, which is actually east (toward Monterey) from the previously described location of the trail, is described here as being west of the project site.

11

The project “description” fails to provide descriptive information that allows the public to understand the basic location of the project and its components. The IS/MND appears to have been prepared in a way that withholds information from the public regarding the planned trail alignment, reconfiguration of parking lots and street-side parking, and location of beach access stairs, and it confuses the basic description of where the project starts and ends.

12

Please correct all the confusing and inaccurate location descriptions, and provide site plans and maps necessary for understanding of the project. Otherwise, it would seem that this IS/MND is supposed to cover anything the Public Works Department decides to do, without stating that in so many words.

13

Thank you,
Lisa Ciani

November 9, 2017

To: Daniel Gho, Public Works Director

From: Lisa Ciani

Re: Point Pinos Trail Project IS/MND, Mitigations—Public Comment #3

These comments deal with the Biological Resources, Cultural Resources, Tribal Cultural Resources, Geology and Soils, and Mandatory Findings of Significance.

Section IV. Biological Resources:

Related to Biological Resources, the IS/MND needs to address the following:

- 14 1. Local native plant experts maintain that the PG coastline is not like coastal bluff habitats to the north, or south, so replanting with native plants that are grown from nearby seed sources is biologically important.
- 15 2. The IS/MND needs to provide a description of the locations where habitat restoration will take place.
- 16 3. The IS/MND needs to provide a description of the native plant species that will be used in the habitat restoration.
- 17 4. There is no indication of how much invasive ice plant will be removed. The habitat restoration description is very general:
“Closure of user-made trails, removal of invasive, non-native plant species, and revegetation of coastal dune and bluff scrub would benefit coastal biological resources, such that the project results in a net benefit to sensitive habitat.” (Page 12)
 - 18 • How far beyond the edges of the trail bed where new trail is being constructed will the ice plant be removed?
 - 19 • Will the City be placing new trails where there is poison oak mixed in with the ice plant extending from east of the John Denver parking lot all the way to Coral Street beach? *
 - 20 • And how far beyond the edges of the user-made trails that are being closed will the ice plant be removed? Will the native plant restoration be done in a narrow corridor adjacent to large areas of ice plant?
 - 21 • What is the City’s plan for maintenance of the plant restoration areas to prevent crowding out of new native vegetation by ice plant, New Zealand spinach, and other invasive non-natives?
 - 22 • This IS/MND cannot evaluate impacts to the environment without plan drawings.
- 23 5. Figure 2 on page 17, the Land Habitat Sensitivity map from the City’s LUP, is mistakenly labelled “Land Use Sensitivity Map”.
- 24 6. In Appendix C, regarding mitigation measures for Biological Resources, the Party Responsible for Implementation should be a qualified biologist, not the City of Pacific Grove. This requires correction.
- 25 *NOTE: The description of the Ice Plant Mat on page 33 does not mention the presence of substantial amounts of poison oak in the ice plant from the east entrance to the parking lot at John Denver memorial site to east of the east entrance to the parking lot between Coral Street beach and Acropolis

Street. The presence of poison oak was called to the attention of the public by the Public Works Director in April 2015 on the City's LCP Community Walk to discuss erosion issues. He explained that the Coastal Commission does not permit removal of poison oak because it is a native plant. This prohibition should be addressed in the MND, as the continued presence of large amounts of poison oak there was confirmed on April 18 on an informal community walk to investigate options for vertical beach access along the proposed trail.

Page 38, 40-41:

NOTE: The recognition of the need for mitigations to protect breeding/nesting Black Oystercatchers is very important. The discussion of these shorebirds' needs seems very good. Herrick Hanks, the California Central Coast Black Oystercatcher Project leader has been away since the MND came to public attention, and won't return before the end of the public review period to be consulted to confirm the accuracy of the contents related to Black Oystercatchers.

One correction that is clearly needed:

"The black oystercatcher young spend a relatively long time (1-3 years) learning foraging skills from their parents..."

26 NOTE: This should be corrected to read, "...spend a relatively long time (generally 1-3 months) learning foraging skills from their parents...."

Page 40-41:

"Mitigation Measure BIO-3. To avoid impacts to nesting birds, the City will implement the following:...

- Implement all recommended mitigation measures to replace removal of trees, which may provide nesting habitat for migratory birds."

27 NOTE: Does this mitigation indicate trees will be removed as part of this project? Where does the IS/MND say that? That would clearly be a negative impact, and in conflict with City and Coastal Commission policies. If trees are to be removed, that needs to be recognized in the MND as a significant impact, because I believe the only trees in the area are Monterey Cypress, a protected native tree.

Sections V and XVII. Cultural Resources/Tribal Cultural Resources:

NOTES:

28 1) There is inconsistency within the Cultural Resources mitigations, and between the Cultural Resources mitigations and Tribal Cultural Resources mitigations, regarding the buffer to be required from resources discovered during the work. These should be brought into consistency in the Cultural Resources and Tribal Cultural Resources sections, and also in Appendix A and Appendix C.

Pages 45-46, 70-71:

29

There is significant inconsistency in the mitigations for the impact of uncovering archaeological/tribal resources:

- on page 45 (Mitigation Measure CULT-1, bottom of page), it says “all work will be stopped at the specific location of the ‘find’”;
- on page 46 (Mitigation Measure CULT-2. Treatment of previously unidentified human remains), it says “cease all work within 25 feet of the ‘find’”;
- on pages 70-71 (Mitigation Measure TRI-1 Treatment of previously unidentified Tribal Cultural Resources), it says “cease all work within 50 feet of the discovery”.

30

- 2) It also needs to be made clear in both Cultural Resource and Tribal Cultural Resource sections, as well as in Appendix A (Project Construction, Trail Closure, and Habitat Restoration Best Management Practices), pages A-1, A-2, and A-3, and Appendix C (Mitigation and Monitoring Reporting Program), pages C-5, C-6, C-7, C-8, and C-9, that BOTH a qualified archaeologist AND a Native American monitor need to be present during ground disturbing work or preparation. Both monitors should be present during the capping of an exposed cultural resource (see #3) as well. Both monitors should be mentioned wherever one is currently mentioned in both Cultural and Tribal Cultural sections in order to avoid giving the impression that only one is needed.

31

- 3) The Best Management Practice (BMP) on page A-2 of Appendix A, regarding a 3”-6” cap, needs to be discussed in the Cultural Resource and Tribal Cultural Resource sections of the MND, for clear understanding of that BMP and the determination of the exact depth of the cap. The BMP states, “Where archaeological resource is exposed, fill entrenched areas with imported weed-free soil to cap archaeological sites (3-6”).” Please add an explanation of this BMP to the Cultural Resource and Tribal Cultural Resource sections, including the criteria for determining the depth (thickness) of the fill. And specify that both a qualified archaeologist and Native American monitor will be present to confirm that the fill is applied according to agreed upon specifications.

32

- 4) The Mitigation and Monitoring Reporting Program (Appendix C) needs to be corrected to show that the “Party Responsible for Implementation” of the mitigations for Cultural/Tribal Cultural resources will be a qualified archaeologist AND a Native American monitor, not the City of Pacific Grove as is stated. This requires correction.

33

- 5) In Appendix A, on page A-3, the BMP is “Install temporary irrigation system”. How would that be done without disturbing tribal cultural resources? Elsewhere it states that digging will be avoided.

34

- 6) Page 70 does not make sense. First, the heading of the second column is labelled “Less Than Significant Unless Mitigation Incorporated”. And item a) is indicated as “No Impact”. But the Discussion states that both a) and b) are “Potentially Significant Unless Mitigation Incorporated” (as the second column is labelled everywhere else in the MND).

The Discussion goes on to say: “Based on the evaluations and testing of recorded archaeological sites within or in proximity to the project sites, no sites meet the definition of historical and archaeological resources. See subsection V for further discussion of historical and archaeological resources.” This

statement seems to be inaccurate on its own, and in the context of the other information on this page. In part b) above that, it states correctly, "In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe." I believe this page needs a number of corrections to make sense.

Please correct the inconsistencies and omissions that I have pointed out above.

Section VI. Geology and Soils:

35 The "Setting" and "Discussion" should make it clear that for years, the parking lots at Pt Pinos are closed off multiple times each winter due to large storm surf, and repairs are required to reduce deep potholes due to the fill material being poorly compacted over cavities in the underlying riprap and between the underlying granite formations. And at times the road around Point Pinos from Asilomar Avenue (and sometimes from Esplanade) to Lighthouse Avenue must be closed to all vehicular traffic.

Section XIX. Mandatory Findings of Significance:

36 Page 73, b: "Cumulative Impacts. Less than Significant. *There are no other currently proposed projects at Point Pinos.* The California State Parks Department is implementing a trail rehabilitation project for an existing trail segment at Asilomar State Beach and Conference Center, which is located to the south of the Point Pinos project site. *project trails. [sic] The Asilomar project contains the sensitive plant and animal species; however, since the Point Pinos project does not, there will be no potential cumulative biological impacts. The two projects may result in cumulative impacts to cultural resources during trail construction. However, the proposed project impacts can be mitigated to a less-than-significant level and will not be cumulatively considerable*".

NOTES:

There are serious inaccuracies in the above description.

37 First, saying there is "no other currently proposed project at Point Pinos" may be accurate, but there are several projects underway or soon to be undertaken in both directions. There is a trail construction project currently at the Great Tidepool Dune Restoration site, immediately adjacent to the Point Pinos Trail Project to the south, in addition to the Asilomar Coast Trail Managed Retreat and Restoration Project just south of that which may be starting soon. To the east, there is a retaining wall repair project at Naiad Street, with several more armoring projects between Naiad and Esplanade Park for which the City has had engineering plans for almost a year. There's also a "manual irrigation" project being carried out very early in the morning between Moss Street and Marine Street, using sprinklers, that has flooded the trails twice in the last few weeks. Both times, I arrived after the water had been turned off. The first time, I called the City because a sprinkler head was malfunctioning, sending a steady stream of water onto the trail at the bluff edge. (My inquiry after the second flooding incident two weeks ago has not received a response from the Public Works administrator I was directed to.) The City is not monitoring this ill-advised irrigation program responsibly. Temporary irrigation is planned for the Point Pinos Trail Project according to the Habitat Restoration BMP on page A-3. The cumulative impacts of all these shoreline projects may, or may not, be less than significant. There is no way to confirm the impacts of the Point Pinos Trail Project given the lack of information that has been provided in this IS/MND.

Second, in any case, the Point Pinos Trail Project *does have sensitive plant and animal species* as identified in the biology report. The errors in this section need to be corrected.

38

I have one more comment letter to submit, regarding Recreation, but I'd like to make clear here that I do not agree with the determination of the IS/MND that this project has less than significant impacts. Since the maps/plans for the project have been removed from the appendices, the public does not have the opportunity to review what's actually being planned at Point Pinos. What the public is able to review is only the mitigations, without the project details to see what's being mitigated, so the project cannot be evaluated as a whole.

39

There was a draft plan presented at the "public workshop" in May, and a subsequent draft available online on the City's Public Works webpage in June. There is no way to know if the undated June plan is the plan the City will follow. It does not appear to be. The descriptions of the project in the IS/MND do not match the Plan at the east end, and appear to be purposely confusing, since there are clear descriptions in the plan. The draft plan says the east end of the trail is "approximately half way between Acropolis Street and Coral Street" (page 23), and the maps in the plan show the east end of the trail project at the west end of Coral Street beach, as discussed at the Trail Committee meeting. Why were the plans removed from this IS/MND document which states that the trail alignment, parking, and beach access maps are in Appendix A? Why is the public being kept in the dark?

The conclusions of this IS/MND cannot be considered reliable.

Thank you for the opportunity to comment,
Lisa Ciani

November 9, 2017

To: Daniel Gho, Public Works Director

From: Lisa Ciani

Re: Point Pinos Trail Project IS/MND, Mitigations—Public Comment #4

Section XV. Recreation:

40 The Trail Project, as presented here, provides very little information for the public regarding the balancing of public access and recreation, safety issues, and resource conservation. In the current Asilomar Coast Trail Managed Retreat and Restoration Project, there is clear explanation, including maps, and photographs to provide the information needed for the public to evaluate the measures being taken for conservation by means of resiliency and retreat balanced with public access and recreation. The priority for the waterfront lands should balance conservation of the natural resources, pedestrian access, and recreational uses. The IS/MND studiously avoids discussion of criteria for finding the balance in the Recreation section. And it continues to refer to the Marine Gardens Park.

41 In support of the City's trail planning efforts, and in response to the discovery that the beach access locations were determined by the City months before the Trail Committee was convened, without any public input, an informal group walked the length of the trail route on April 18, 2017. The group consisted of 4 members of the Point Pinos Trail Committee and 9 other community members, knowledgeable in the conservation and management of natural and cultural resources, recreational uses and land use policies. The goal was to evaluate, in the field, the proposed vertical access points identified in the Point Pinos Coastal Trail Project draft plan prepared by TrailPeople, consultants for the City of Pacific Grove and the California Coastal Conservancy. The group's detailed report with maps was shared with the consultants and the City on May 2. (Their report and accompanying maps will be emailed along with this comment.) It is not known the extent to which the recommendations were incorporated into the Trail Project, since the Project plan is not part of the IS/MND for the Trail Project.

42 In most cases, the interval of the vertical access-ways should be based upon the potential capacity of the resources, i.e., the number of people who can safely use the area served without harming natural and cultural resources, or without resulting in a conflict between competing types of recreational uses, including passive uses. Only safe vertical access-ways to the pocket beaches and rock outcroppings from the primary (lateral) coastal trail, parking areas, and prominent vista points, should be considered. The primary coastal trail and vertical access points should not invite the general public to obvious or known hazardous areas (rocky outcroppings backed by vertical bluffs, rip rap or revetments with treacherous cavities, etc.). The foredunes and the natural shoreline should be protected and restored without additional armoring.

43 It is not clear whether some stairs to beaches will be built on riprap as originally designed, which seems highly susceptible to damage and needlessly expensive. A limited number of beach access stairs or paths should be provided, and only where it is safe, and where it is unlikely that they will be impacted by storm surf. It is not possible to comment on the location of beach access stairs because no plans have been provided.

44

I also believe the water quality discussion and mitigation should be expanded to address run-off further.

45

The City has apparently deliberately kept the plans for the trail quiet until the last week of the public review period, and only notified the 290 people on the email list for the City Manager's Weekly Summary two weeks after the beginning of the public review period. The members of the Point Pinos Trail Committee were not informed of the availability of the IS/MND. The Beautification and Natural Resources Commission was not notified at their monthly meeting on October 17, their first and only meeting during the public comment period—even though the Public Works Director attended the meeting for its duration. Was the California Coastal National Monument/BLM notified of the availability of the IS/MND? They had a member on the Trail Committee, and they had expressed their interest in being informed about the trail plans because of their jurisdiction immediately adjacent to the beaches accessed from the trail.

46

Due to the significant amount of substantive information missing from this IS/MND, I continue to request that this IS/MND be resubmitted to the public with the missing trail project maps restored to the document, and with a new public review period provided. It would be most appropriate to correct it to be an EIR.

Thank you for the opportunity to comment,
Lisa Ciani



Ocean View Blvd

VA - 5

VA - 4

VA - 3

VA - 2

VA - 1

VERTICAL ACCESS POINTS

EXHIBIT "A"
MAP NO. 1

**EXHIBIT "A"
MAP NO. 2**

**VERTICAL
ACCESS POINTS**





Point Pinos

EXHIBIT "A"
MAP NO. 3

VA - 9

VERTICAL ACCESS
POINTS

John Denver Memorial

CRESPI
POND

PROPOSED
PARKING
PROPOSED
STOP SIGNS

Asilomar Ave

Surf Ave

Acropolis

EXHIBIT "A"
MAP NO. 4

VERTICAL ACCESS POINTS



VA - 9

VA - 10

PROPOSED
PARKING

PROPOSED
STAIRS
VA - 11

Denver Memorial

Ocean View Blvd

Asilomar Ave

Surf Ave

Shell Ave

Acropolis St

Google

Coral St

Pacific Grove
Marine
Gardens Park

Anthony A. Ciani 220 Walnut Street Pacific Grove, California 93950
ARCHITECTURE - PLANNING - HISTORIC PRESERVATION - COASTAL CONSULTANT

November 7, 2017

City of Pacific Grove
210 Sunset Avenue
Pacific Grove, CA 93950
Attn: David Gho, Director of Public Works

RE: COMPLIANCE WITH CEQA - POINT PINOS COASTAL TRAIL PROJECT, INITIAL STUDY & MITIGATED NEGATIVE DECLARATION, DRAFT September 2017,

Dear Mr. David Gho,

47
Section 4.2, List of Preparers on page 75 of the "Point Pinos Coastal Trail Project" Initial Study and Mitigated Negative Declaration (IS & MND), credits David Gho, Director of Public Works among others. As a member of the citizen committee that contributed its knowledge and information toward a design for this project, I was familiar with it up to the point before a final design was prepared. I was disappointed to learn this IS/MND had not been given a more inclusive public notice. I look forward to reviewing the project, but as it has been prepared, the MND is incomplete and inadequate to review and analyze due to the lack of essential and substantive information. Specifically, it lacks *"the maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts."* In conformance with CEQA Guidelines Section 15147.

I strongly urge the City of Pacific Grove to address this matter seriously in order to comply with the California Environmental Quality Act (CEQA) § 21003 (b) which requires:

"Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public."

Relevant to this point, please consider the following provisions of the CEQA Guidelines:

Section 15146. DEGREE OF SPECIFICITY

The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy. (Underlining added for emphasis)

Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21003, 21061, and 21100, Public Resources Code. Formerly Section 15147.

November 7, 2017
David Gho, Director of Public Works
City of Pacific Grove
RE: "Point Pinos Coastal Trail Project" IS & MND
Page 2

Section 15147. TECHNICAL DETAIL

The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.
(Underlining added for emphasis)

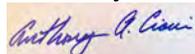
Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21003, 21061, and 21100, Public Resources Code.

48 This project is the first step to implement a master plan for development including specific improvements that require understanding by the decision-makers of the lead agency (City of Pacific Grove), and responsible agencies (California Coastal Commission, California Regional Water Quality Control Board), to consider the effects, both individual and collective, of all activities involved in the project. In order for the affected agencies and other parties to make meaningful and useful comments regarding this project, the entire scope of work must be fully described in writing and with the plans and specifications, etc. that are normally required for a development in the City of Pacific Grove.

49 In this case the City, needs to submit a fully completed "City of Pacific Grove Submittal Checklist" and all of the items required, in order to have a full understanding of the project in specific terms, which is the standard practice for all development projects in the City. The Point Pinos Trail Project – IS & MND does not include the most basic of those documents, such as a site plan, specific plan segments, elevations, cross sections, and details indicating the layout of the proposed trails, parking and circulation, grading and landscaping, stairways, etc., and project alternatives.

Therefore, I request and insist, that the subject IS & MND be revised and amended, and for the public review period to be extended accordingly, in order to include the substantive project plans, details and specifications to provide adequate comprehension of the project, and its potential environmental effects, mitigation measures, and all reasonable alternatives.

Sincerely,



Anthony A. Ciani

Cc: California State Clearing House, OPR

Anthony A. Ciani 220 Walnut Street Pacific Grove, California 93950
ARCHITECTURE - PLANNING - HISTORIC PRESERVATION - COASTAL CONSULTANT

November 9, 2017

City of Pacific Grove
210 Sunset Avenue
Pacific Grove, CA 93950
Attn: Daniel Gho, Director of Public Works

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

Dear Mr. Gho,

As you know, I was on the citizen advisory committee for this project, therefore, I am familiar with the goals and intent. However, the lack of site plans depicting the final proposed alignment of the pedestrian trail and various parking layouts, which are the primary features to be constructed excludes an informed comment by me and other interested parties. I understand that despite requests for you to re-vise and republish the **INITIAL STUDY & MITIGATED NEGATIVE DECLARATION** (IS & MND) with the minimum technical illustrations, and extend the public review period for a reasonable time, you have declined those requests. Therefore, I must strongly oppose the project at this phase.

As written the document descriptions, proposed findings of potential environmental effects and suggested mitigation measures is confusing, incomplete, inaccurate, inadequate and fails to identify key issues and how to treat those issues. Below, please find an outline of my comments regarding the statements in written document, section-by-section, which I have italicized:

***Project Overview.** The coastal trail will connect from the existing curb side trail near Acropolis Street west to the Great Tidepool site, a distance of approximately 0.8 mile.*

My Comment: The description here and elsewhere in the IS & MND does not accurately describe the physical boundaries of the project that was approved by the California Coastal Conservancy (Conservancy). It fails to include the entire and true extent of the work in the project that was authorized by the Conservancy, and specified in the City of Pacific Grove's Point Pinos Trail Improvements Project Report, dated August 12, 2012 explicitly depicted on the Project Area Map on page 4 [See copy below], and Appendix, Exhibit #2 Segments 12, 13, and 14 on pages 22 & 23.

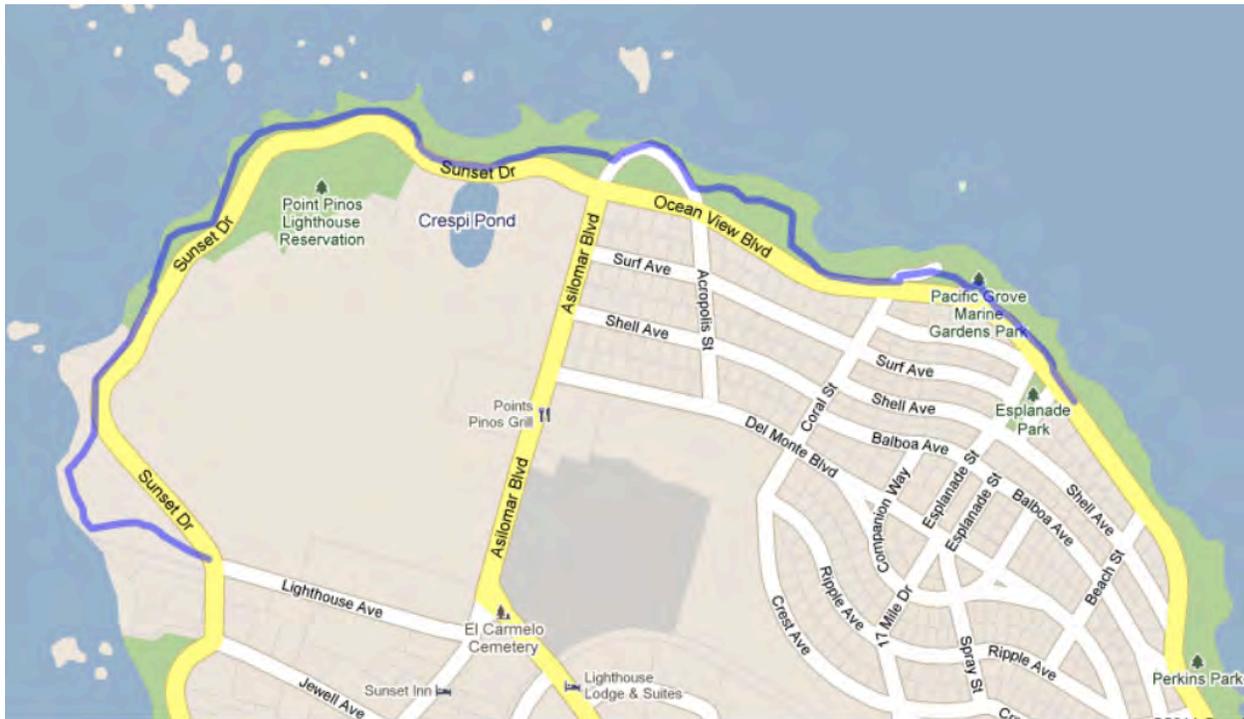
November 9, 2017

Dan Gho, Public Works Director

City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
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Project Area Map -Point Pinos Trail Improvements Project Report, City of Pacific Grove, dated August 12, 2012 Described as: **“The proposed project is seaward of Ocean View Boulevard along the Point Pinos coastline.”. And, ‘The east end is at Ocean View Boulevard and Esplanade (36.633826,- 121.924).”**

THUS, the IS & MND description is either wrong and needs to be corrected with maps such as this one; or there has been a substantive and material change in the scope of the project that must be accounted for and explained.

On December 3, 2015 the Conservancy authorized the disbursement of \$150,000 for the POINT PINOS COASTAL TRAIL IMPROVEMENTS, Project No. 15-019-01; specifically, for **“the preparation of designs and permit and environmental documents to complete the trail from the Great Tide Pool Area around Point Pinos to Esplanade Street. This area has abundant parking and an informal network of unimproved trails. However, because a formal trail system has not been integrated into and between the parking areas, user conflicts exist between pedestrians and vehicles (Exhibit 3).”** Source: CONSERVANCY, Staff Recommendation, December 3, 2015 POINT PINOS COASTAL TRAIL IMPROVEMENTS Project No. 15-019-01] Page 3.

November 9, 2017

Dan Gho, Public Works Director

City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
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Page 3

Exhibit 1: Site Map



Source: Coastal Conservancy Dec. 3, 2015 Report – Site Map

November 9, 2017
Dan Gho, Public Works Director
City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
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51 Clearly, the proposed project's written description should extend to the coordinates mentioned in the parent report's description and as illustrated in the site maps and diagrams in the City's and Conservancy's authorized project. Otherwise, the subject IS & MND needs to account for this error and the discrepancy, including an audit of the State and City funds. Without this clarification, the omission of maps, site and detailed plans that missing from those mentioned Appendix, insinuates this CEQA review is something less than candid.

It is also curious that the References on MND pages 74 and 75 fail to include the California Coastal Conservancy, and its 2015 report that is the source of funds for most of this project; and, the California Coastal Act of 1976 that governs development in the project area.

1.3 Public Review Process Lead Agency & Responsible Agencies:

- *California Regional Water Quality Control Board ((Storm Water Pollution Prevention Plan, SWPPP)*
- *California Coastal Commission (Coastal Development Permit)*

52 **My Comment:** Due to the location, the scope of work includes rock and Rip Rap Revetments, previously requiring review and approval of the

- State Lands Commission, (Pacific Grove Shoreline Restoration Project, 1986) Specifically, improvements at Point Pinos.
- State Fish and Wildlife, Pacific Grove Marine Gardens State Marine Conservation Area (SMCA)
- Federal Fish and Wildlife, Monterey Bay Marine Sanctuary
- Army Corps of Engineers, (Pacific Grove Shoreline Restoration Project, 1986) Specifically, improvements at Point Pinos.
- Office for Coastal Management, NOAA per 15 C.F.R. Section 930 (Pacific Grove Shoreline Restoration Project, 1986) Specifically, improvements at Point Pinos, and
- California Coastal Conservancy, review and approve for consistent with Chapter 9, sections 31400 et. seq. of Division 21 of the Public Resources Code, regarding coastal access.

Therefore, these agencies should be properly notified of the work and request a determination of their interest and jurisdiction for the project and potential impacts on coastal and marine resources.

November 9, 2017

Dan Gho, Public Works Director

City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

Page 4

Skipping to MND *Section 32. Environmental Factors Potentially Affected.*

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

My Comment: The following “environmental factors” were omitted, but should have been included due to the location of the project:

- Aesthetics
- Air Quality
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Land Use and Planning
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

2.2 Potentially Significant Impacts

Based on the IS and supporting environmental analysis provided in this document, the proposed project would result in significant or potentially significant impacts to biological and cultural resources.

Mitigation Measure BIO-2 Minimize Impacts to Sensitive Habitats.

The City will provide post-construction documentation that there is no net loss of coastal dune scrub by implementing habitat restoration of closed trails.

The City will provide post- construction documentation that there is no net loss of dune sedge meadow by implementing habitat restoration of closed trails.

My Comment: Mitigation measures should include a **pre-construction meeting** with **all** all consultants (Biology, Archaeology, etc. and the contractors, and inspectors

November 9, 2017

Dan Gho, Public Works Director

City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

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associated with the project to outline the issues and contact information to address issues that may come up during construction.

Mitigation Measure BIO-3. Avoid Impacts to Nesting Birds.

If possible, schedule construction activities involving grading, vegetation stripping, or other involving heavy equipment, outside the migratory bird breeding season, which is August 1 – February 1.

Because black oystercatchers breed adjacent to some portions of the Point Pinos Trail project corridor between the months of March through September, and their nesting success could potentially be disrupted by heavy equipment activity adjacent to nest sites, additional monitoring of these birds is recommended. The City will hire a qualified biologist to confer with the California Central Coast Black Oystercatcher Project biologists to determine if trail or parking lot construction is scheduled to occur adjacent to observed active nests. If so, construction in that buffer area should be postponed until the City's biologist determines that all young have fledged. The City's biologist should also recommend a buffer zone between construction and active oystercatcher nests, if evidence determines it is necessary to avoid impacts to the young.

Buffer distances for oystercatcher nests should be site specific and at an appropriate distance, as determined by the City's biologist.

My Comment: In order to “avoid impacts to nesting birds”, delete the phrase, “If possible”, in the first sentence, and change the word, “should”, to shall. Also, the term “City’s biologist” shall be replaced with “a qualified biologist” throughout the MND Document.

Additional Comment regarding Biological Impacts: Rodents, primarily squirrels are an invasive source of erosion to the soil that also degrades the archaeological resources that require mitigation measures that will safely eliminate the problem without damaging the natural and cultural resources.

November 9, 2017

Dan Gho, Public Works Director

City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

Page 6

- Geology and Soils Mitigation Measure GEO-1. Minimize Hazards from Wave Run-up During Storms.** The proposed improvements shall be designed for appropriate visitor safety relative to erosion and wave activity. The trail and parking will be located inland from the recommended 30-year setback except where Ocean View Boulevard exists within the setback, in which case the trail will be located along the seaward edge of Ocean View Boulevard until the long-term plan is implemented and the road and trail are reduced or relocated outside of the setback. The evaluation of visitor safety shall assume that hazards exist from the existing bluff edge to the setback line. Those hazards may consist of vertical drop-offs, rills and gullies that present tripping or slip and fall risks, and ocean wave impact. The City shall periodically monitor, repair, and maintain the improvements to maintain safe conditions. Appropriate signage shall be installed to warn visitors of hazardous and risky conditions. During some ocean conditions, the trails and associated facilities shall be closed to use until the ocean subsides or maintenance and repairs occur.*

My Comment: First, the MND Section 3.1.9 physical description of the setting, “Point Pinos is at the very southern end of Monterey Bay and is characterized by its rugged rocky shoreline formed by frequent pounding by storm-driven waves,” erroneously attributes the rocky shoreline formation to storm-driven waves. In fact; “The area's **geology** encompasses the last 80 million years. The oldest rocks exposed here were formed during the **Cretaceous Period** of the **Mesozoic Era**, when the **dinosaurs** still roamed the earth and **pterodactyls** dominated the sky. The area forms part of the **Salinian Block**, a sliver of **continental crust** caught up in the **transform boundary** between the **Pacific** and **North American Plates**”. [Source: Greene, H.G. *“III. Geology and Tectonics”*. Monterey Bay National Marine Sanctuary Site Characterization Project. Retrieved 16 April 2010. Wikipedia].

The true nature of the environmental setting is important to understanding the ongoing impacts due to the rip rap revetments to the habitat ecology, recreational uses, public safety, and the aesthetics quality of the environmental setting.

November 9, 2017
Dan Gho, Public Works Director
City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

Page 7

2.3 Other Environmental Factors Potentially Affected

Less-than-significant impacts were identified for the following issues:

My Comment: I disagree with this statement; see my comment below. No impacts were identified for the following subjects that may result in adverse impacts to the environment and have been not adequately addressed by the draft MND:

1)Aesthetics (scenic vistas, scenic resources, visual character of surrounding area)

My Comment: The Draft MND correctly identifies the setting and project location as a highly scenic area, however, it attributes this to only be due to views toward the sea. The public's variety of recreational uses takes them onto the beach and into the sea. The overall scenic quality includes the setting as seen from areas of the sea and beaches.

The visually quality of shoreline has been degraded by past construction of revetments, parking lots, other facilities such as a sewer outfall that is still present at Pt. Pinos, and ongoing repairs. Moreover, as viewed from above, the parking lots at Pt. Pinos substantially diminish the beauty of the natural setting. Look at Asilomar Sate Park beaches and bluffs for a direct comparison. At Asilomar, one sees the sea and beaches as part of the natural foreground of granite bluffs, sand dunes and native plants.

Therefore, the project could have direct and cumulative impacts on the scenic quality unless it restores the natural setting. The fugitive rocks from the revetment and misguided dumping of concrete and asphalt debris as well as, the sewer pipes must be removed from the beach as a mitigation measure to restore those areas to be safe and scenic.

2) Geology and Soils (expansive soils, lateral spreading, soil suitability for

November 9, 2017

Dan Gho, Public Works Director

City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

Page 8

septic systems)

59 **My Comment:** Same as my comment regarding the aesthetics, plus the revetments are unstable and have migrated onto the scenic, natural beaches. They are a know hazard to public access and safety. They represent a public liability.

3) Hazards and Hazardous Materials

My Comment: Same as Aesthetics and geology above.

4) Hydrology and Water Quality (*groundwater, alteration of creek, failure of levee or dam, mudflow*)

60 **My Comment:** There are visible small water ways (creeks and streams) that drain from inland locations across trails, bluffs and beaches. They contribute to the ecology and plant types. The project needs to address those areas.

5) Land Use and Planning

61 **My Comment:** Done improperly, this project could prejudice the implementation of the LCP LUP.

6) Noise (*noise standards, vibration, aircraft noise*)

62 **My Comment:** Vibration from drones and heavy construction equipment may disturb the birds along the shoreline and at Crespi Pond wetland. Additional mitigation measures are required to avoid impacts to those habitats

6) Recreation

63 **My Comment:** The variety of recreational uses is poorly defined and provisions to accommodate those needs to be addressed. Where do the SCUBA divers, surfers, etc., park and access the sea? The potential conflicts between recreational uses has not been addressed.

7) Transportation/Traffic (*parking capacity, air traffic, hazards*)

November 9, 2017

Dan Gho, Public Works Director
City of Pacific Grove

**RE: POINT PINOS COASTAL TRAIL PROJECT - INITIAL STUDY & MITIGATED
NEGATIVE DECLARATION, DRAFT September 2017, COMMENTS**

Page 9

64

My Comment: Parking and circulation due storm wave run up events or special events at the adjacent golf course have not been adequately addressed, including impacts on the shoreline access and Crespi Pond wetland Habitat.

65

In summary, the Draft MND needs to add the pertinent maps and plans to depict the location and alignment of the trail, parking and vertical access-ways to the adjacent beaches and tide-pool areas, including the entire length of the project from the Great Tide Pool to Esplanade Park. It should be revised to correct the inaccurate statements and to address the additional adverse impacts to the aesthetic and natural resources, etc.

Sincerely,

Anthony A. Ciani



Don Roberson

Daniel Gho <dgho@cityofpacificgrove.org>

Pt. Pinos hiking trail concepts

4 messages

Don Roberson <creagrus@montereybay.com>

Wed, Nov 8, 2017 at 2:16 PM

To: dgho@cityofpacificgrove.org, Blake Matheson <gypaetusbarbatus1@gmail.com>

Dear Daniel Gho,

I've been a resident of Pacific Grove since 1979 when I moved there because Pt. Pinos was my favorite birding spot in the world. Prior to P.G. residency, I had been birding Pt. Pinos on my travels across California since 1972. So I have 45 years of enjoying and surveying birds at Pt. Pinos. I bought a home within walking distance of the Point in 1983.

I just learned of the proposed P.G. hiking trail yesterday, and have had only the briefest of time to scroll through your 103 page document. I was disappointed in the biology section of the discussion because it totally overlooked the important of Pt. Pinos to birds and birders on a national, continental, and even a global scale.

Pt. Pinos is world famous for its sea-watching. With the Monterey Bay canyon just offshore, the diversity of seabirds that can be seen from land is as diverse here as almost anywhere on earth. Over 230 species have been recorded by birders while sea-watching at the Point. When adds birds seen at Crespi Pond and the cypresses on the golf course or around the maintenance yard, the total species diversity at Pt. Pinos exceeds 330 species -- virtually unmatched by any other single same-sized location in North America.

An overview is covered on my web site at <http://creagrus.home.montereybay.com/MTYsitesPtPinos.html> and a second page linked there provides a history of birding at Pt. Pinos

I am among the primary authorities on bird distribution and seasonality in Monterey County. My books -- Monterey Birds (1985) and Monterey Birds, 2d ed (2002) -- are available in all the local libraries and still on sale on Fishermans Wharf and Elkhorn Slough Reserve. I was also the lead editor the Atlas of the Breeding Birds of Monterey County (1993). I was a member of P.G. Museum committee (appointed by the mayor back in the 1990s); my wife has served on the City's Crespi Pond Committee; and I was the lead investigator of the initial Black Oystercatcher breeding study in 2012 (now jointly undertaken annually with BLM). I am pleased to see the concern for Black Oystercatcher breeding success is a part of the planning document.

66

However, so much is left out about the pure magnitude of bird diversity at Pt. Pinos that I am concerned that planning has not adequately considered impacts on either (a) the behavior, timing, seasonality, and survival of migrants at the Point (especially threatened Neotropical migrants) or (b) the access to excellent sites for viewing seabirds or surveying migrant passerines by birders at the Point. The study does not mention the local Monterey Audubon's "Pt. Pinos Seawatch", now in its third year as a dawn-to-dusk survey of migrant seabirds from 1 Nov-15 Dec each year. [A link on the website above provides a lot more information about the formal Seawatch].

As noted, I live close to Pt. Pinos. Is there any chance you could meet me at the Point in the near future so I could show you specific locations about which there are concerns, with the thought of possible modifications if any might be appropriate?

I'm available at this email, or during the day at my office [920-3242], or my cell [277-2307].

I look forward to meeting with you at your convenience.

Sincerely, Don Roberson
[282 Grove Acre](#), P.G.

p.s. I'm sharing a copy of this email with Blake Matheson, president of Monterey Audubon. I did my time on the local Audubon Board back in the 1980s and i1990s, but am now retired from those positions.

Daniel Gho <dgho@cityofpacificgrove.org>

Wed, Nov 8, 2017 at 2:31 PM

To: Don Roberson <creagrus@montereybay.com>

Cc: Blake Matheson <gypaetusbarbatus1@gmail.com>

Don,

Thank you for your comments. I am assuming you want to put these into the record as part of the CEQA document, that will then take into account your concerns?

Daniel Gho
City of Pacific Grove Public Works Director
[831-648-5722](tel:831-648-5722)

[Quoted text hidden]

Don Roberson <creagrus@montereybay.com>
To: Daniel Gho <dgho@cityofpacificgrove.org>

Wed, Nov 8, 2017 at 2:46 PM

Sure, that's fine. But I thought it might help your understand if, for example, you visited the Pt. Pinos Seawatch currently underway until 15 Dec, or if I can highlight for you in person the specific sites and locations of importance to migrant birds. I could do that by marking up a map -- but was told that today was the last day for comments. And my email was about all the time I had today.

Thanks, Don

Daniel Gho <dgho@cityofpacificgrove.org>
To: Don Roberson <creagrus@montereybay.com>

Wed, Nov 8, 2017 at 3:21 PM

Thank you Don. I may reach out as the project progress to met with you in the field. I guarantee that this project will not disrupt any nesting or migratory birds, but will only enhance the the overall experience of Point Pinos.

Daniel Gho
City of Pacific Grove Public Works Director
[831-648-5722](tel:831-648-5722)

On Wed, Nov 8, 2017 at 2:46 PM, Don Roberson <creagrus@montereybay.com> wrote:

Sure, that's fine. But I thought it might help your understand if, for example, you visited the Pt. Pinos Seawatch currently underway until 15 Dec, or if I can highlight for you in person the specific sites and locations of importance to migrant birds. I could do that by marking up a map -- but was told that today was the last day for comments. And my email was about all the time I had today.

Thanks, Don

Ohlone/Costanoan-Esselen Nation



Previously acknowledged as
The San Carlos Band of
Mission Indians
The Monterey Band
And also known as
O.C.E.N. or Esselen Nation
P.O. Box 1301
Monterey, CA 93942

www.ohlonecostanoanesselenation.org.

November 8, 2017

Re: Point Pinos Coastal Trail Project – OCEN Tribal Monitor to be on site. Project site has been recorded to contain six (6) Prehistoric archaeological resources

Saleki Atsa,

Ohlone/Costanoan-Esselen Nation is a historically documented previously recognized tribe. OCEN is the legal tribal government representative for over 600 enrolled members of Esselen, Carmeleno, Monterey Band, Rumsen, Chalon, Soledad Mission, San Carlos Mission and/or Costanoan Mission Indian descent of Monterey County. Though other indigenous people may have lived in the area, the area is the indigenous homeland of our people. Included with this letter please find a territorial map by Taylor 1856; Levy 1973; and Milliken 1990, indentifying Tribal areas.

67

Ohlone/Costanoan-Esselen Nation objects to all excavation in known cultural lands, even when they are described as previously disturbed, and of no significant archaeological value. Please be advised that it is our first priority that our ancestor’s remains be protected and undisturbed. We desire that all sacred burial items be left with our ancestors on site or as culturally determined by OCEN. All cultural items returned to Ohlone/Costanoan-Esselen Nation. We ask for the respect that is afforded all of our current day deceased, by no other word these burial sites are cemeteries, respect for our ancestors as you would expect respect for your deceased family members in today’s cemeteries. **Our definition of respect is no disturbance.**

During AB52 Consultation OCEN requested:

OCEN's Tribal leadership desires to be provided with:

68

Archaeological reports/surveys, including subsurface testing, and presence/absence testing.
None received

69

OCEN request to be included in mitigation and recovery programs.
Mitigation Measure CULT-1 does not include OCEN

70

Reburial of any of our ancestral remains.

Placement of all cultural items.

71

Clearly stated in Mitigation Measure CULT-1; Cultural materials recovered during the project should be processed and curated in a suitable public research facility.

72

And that

A Native American Monitor of Ohlone/Costanoan-Esselen Nation, approved by the OCEN Tribal Council is used within our aboriginal territory.

Mitigation Measure CULT-1 does not include OCEN or an OCEN Monitor. In addition it is written that; if a find is determined to be significant, work may remain halted near the find to permit development and implementation of a data recovery mitigation plan with the concurrence of the Lead Agency, and implemented. There is no recovery plan to work with OCEN. Mitigation Measure states only that an Archaeologist or Archaeological monitor be present.

73

OCEN request that both the Cultural Resources and Tribal Resources sections list and continue to list that an OCEN Tribal Monitor be present on site. OCEN also request that the Cultural Resources and Tribal Resources section agree to stop work for 50 feet of discovery not 25 feet for Cultural and 50 feet for Tribal Resources.

74

This project is listed to record six (6) prehistoric archaeological resources. In addition to the six sites within the project area, numerous other prehistoric sites are nearby including an off-shore site located on a rocky outcrop northwest of Point Pinos, area within the Pacific Grove Municipal Golf Course, and sites east of Sunset Drive.

75

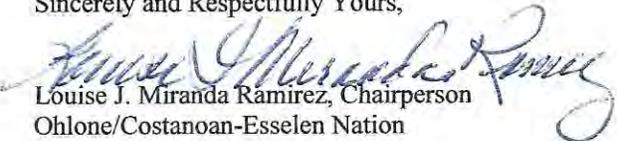
IMPACT CULT-1 page 44 – Designation and use of the Coastal Trail and parking areas could result in disturbance to archaeological resources due to ground excavation, trampling, accelerated erosion, and increased rail use. Widening of the existing trail bed could result in exposure, disturbance, or displacement of archaeological features or artifacts.

76

Third parties, e.g. archaeologist, cannot authorize the destructive or non-destructive testing of Native American human remains or associated grave goods without the MLD's consent.

At the monthly consultation meeting with the City of Pacific Grove and OCEN we discussed that Cultural Resources and Tribal Cultural Resources do not reflect each other, it was my understanding that these sections would be changed. I continue to believe that there is not meaningful consultation with the City of Pacific Grove. I find that no matter how many times we request the same items over and over the City of Pacific Grove chooses to exclude our request. Please feel free to contact me at (408) 629-5189. Nimasianexelpasaleki. Thank you

Sincerely and Respectfully Yours,


Louise J. Miranda Ramirez, Chairperson
Ohlone/Costanoan-Esselen Nation
(408) 629-5189

Cc: OCEN Tribal Council
Native American Heritage Commission
Frank Lienert
Katie Sanchez

POINT PINOS COASTAL TRAIL PROJECT

City of Pacific Grove

Initial Study and Mitigated Negative Declaration



City of Pacific Grove
300 Forest Avenue
Pacific Grove, CA 93950

Draft
September 2017

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developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The City's biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer that avoids failure of nests is established.

Cultural Resources

Mitigation Measure CULT-1: Avoid impacts to Archaeological Sites. To avoid impacts to archaeological sites, the following measures and the BMPs (Standard Project Requirements) listed in Appendix A will be implemented:

- The project shall use specialized construction methods to avoid or minimize impacts to archeological resources. Methods shall be used where there is no or minimal intrusion into known sites or into unknown archaeological soils which might be inadvertently encountered during construction. Examples of such techniques would require that the required thickness of the sub grade for proposed path and parking area be the result of adding culturally sterile fill on top of the existing grade within the project footprint. Also, the number of signs or other new project elements which require ground disturbances for installation shall be extremely limited and shall be installed without concrete footings. Additionally, any drainage plan for new trails and parking areas shall be designed to prevent deleterious runoff or other sources of erosion which would adversely affect the sites over the long term.
- Advanced plans for construction shall be designed to minimize potential impact to cultural resources. Prior to approval, plans should be subject to archaeological plan review for assessment of project impacts and recommendations for mitigation of those impacts where appropriate.
- A qualified archaeologist shall be present for all ground disturbing activities. If potentially significant archaeological resources are discovered, the monitor should be authorized to halt excavation until any finds are properly evaluated. The monitor will also be authorized to discontinue monitoring in soils, such as fill, where cultural resources cannot exist.
- If in spite of measures to avoid it, disturbance occurs within a recorded historical resource, a minimum of two single specimen radiocarbon dates should be obtained for *each* impacted site, if suitable shell specimens are recovered.
- If a find is determined to be significant, work may remain halted near the find to permit development and implementation of a data recovery mitigation plan with the concurrence of the Lead Agency, and implemented. The mitigation plan should be designed to reduce project impacts to a less than significant level, as required by CEQA.
- Following completion of the project, a *Preliminary Archaeological Report* should be prepared. If suitable materials are found to warrant special studies, a *Final Comprehensive Technical Report* that includes all analysis will be submitted to the lead agency within six months of the conclusion of the archaeological fieldwork. If suitable materials are not found to warrant special studies, the preliminary report will

serve as the final report on the Project. The final report should include a revised site record for each of the sites covered by the monitoring, and new site records for other resources if any are found.

- Cultural materials recovered during the project should be processed and curated in a suitable public research facility.
- A qualified archaeologist shall inspect the location of the trail removal and closures prior to any soil disturbance to confirm the locations where an archaeological monitor will be required. The archaeological monitor will remain on site as warranted in the opinion of the archaeological monitor. In the event that a potentially significant cultural deposit is uncovered during construction, all work will be stopped at the specific location of the find until the qualified archaeologist can evaluate it. Prior to work resuming at the location, the archaeologist will determine the appropriate avoidance, preservation or recovery measures required, in compliance with CEQA. Work shall not resume at the location until the appropriate measures have been implemented as determined by the archaeologist.
- For new trail and parking area construction shall specify that all archaeological site boundaries near construction zones be marked by exclusionary fencing during construction. Due the extremely sensitive nature of the entire project area, a qualified archaeological monitor should be present during construction.
- Trail closure and removal measures where the trail bed is stable: Allow trail to revegetate naturally, retain all open areas except at trail entrances. Distribute cut native vegetation at trail entrances for length of approximately 20 feet. Install cable and rod fencing only as needed and avoid installing sign posts within, or in vicinity of, archaeological sites where feasible. Where sign post or similar new features are unavoidable (certainly some will be needed) within an archaeological site, intrusive element shall be pounded into the ground rather than excavated and installed with a concrete base. Pounding would be less of an impact.

Mitigation Measure CULT-2. Treatment of Previously Unidentified Human Remains.

During project construction, if human remains are discovered, the project applicant and/or its contractor shall cease all work within 25 feet of the find and notify the City of Pacific Grove Planning Division and the county coroner, per California Health and Safety Code Section 7050.5. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours.

Geology and Soils

Mitigation Measure GEO-1. Minimize Hazards from Wave Run-up During Storms. The proposed improvements shall be designed for appropriate visitor safety relative to erosion and wave activity. The trail and parking will be located inland from the recommended 30-year setback except where Ocean View Boulevard exists within the setback, in which case the trail will be located along the seaward edge of Ocean View Boulevard until the long-term plan is implemented and the road and trail are reduced or relocated outside of the setback. The evaluation of visitor safety shall assume that hazards exist from the existing bluff edge to the setback line. Those hazards may consist of vertical drop-offs, rills and gullies that present tripping or slip and fall risks, and ocean wave impact. The City shall periodically monitor, repair, and maintain the improvements to maintain safe conditions. Appropriate signage shall be installed to warn visitors of hazardous and risky conditions. During some ocean

conditions, the trails and associated facilities shall be closed to use until the ocean subsides or maintenance and repairs occur.

Tribal Cultural Resources

Mitigation Measure TRI-1. Treatment of Tribal Cultural Resources. During project construction, a Native American monitor certified by the Ohlone/Costanoan-Esselen Nation (OCEN) will be present for all ground disturbance. If any tribal cultural resources are found, the project applicant and/or its contractor shall cease all work within 50 feet of the discovery and immediately notify the City of Pacific Grove Planning Division. The OCEN-certified Native American monitor will contact the OCEN Tribal Chair and in consultation with the City and an archeologist evaluate the finds and recommend appropriate mitigation measures for the inadvertently discovered tribal cultural resource. The City shall consider the mitigation recommendations and agree on implementation of the measure(s) that are feasible and appropriate. Such measures may include reburial of any ancestral remains, avoidance, preservation in place, excavation, documentation, or other appropriate measures.

2.3 Other Environmental Factors Potentially Affected

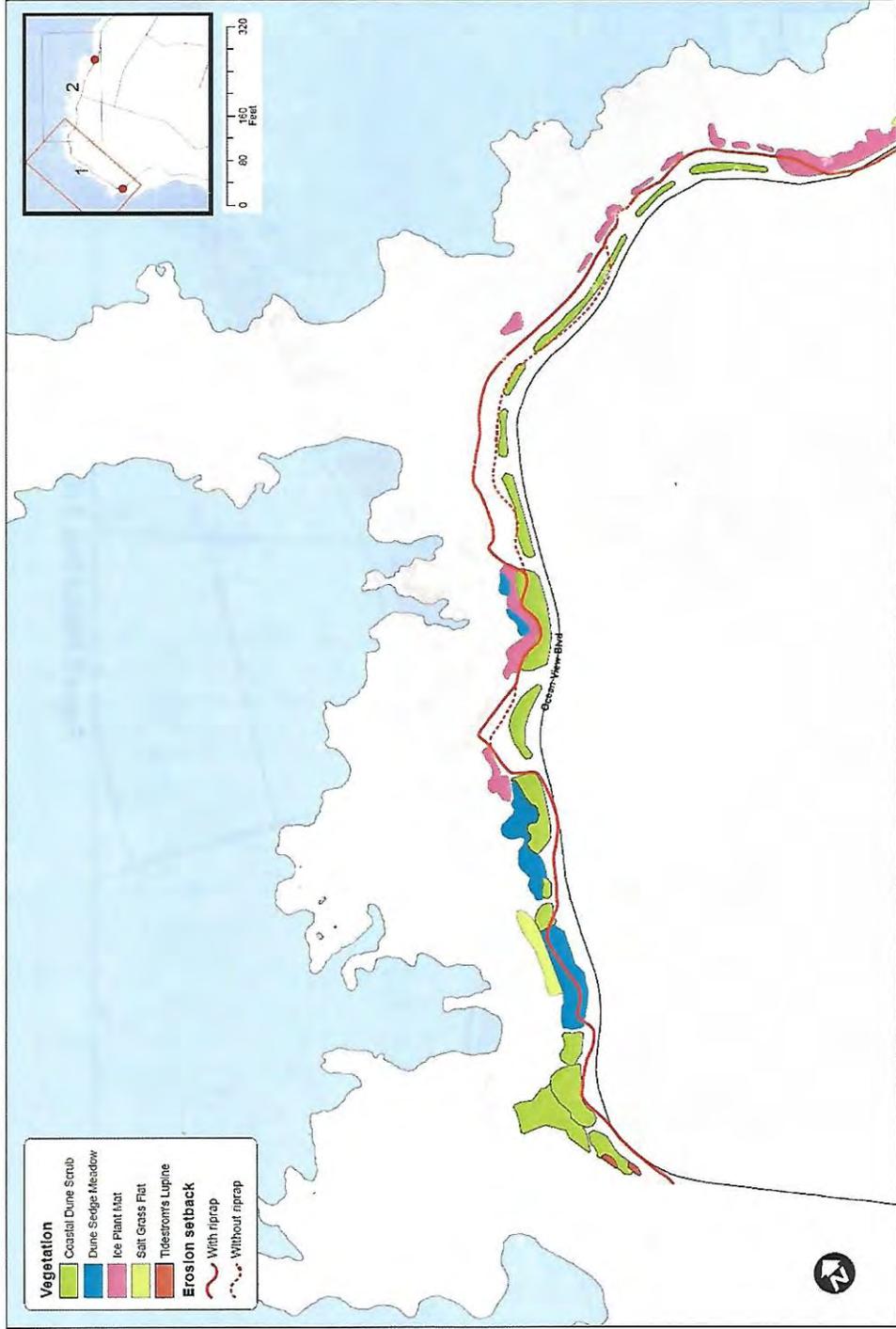
Less-than-significant impacts were identified for the following issues:

- Aesthetics (degradation of visual character of the areas)
- Air Quality (emissions)
- Biological Resources (conflicts with local plans)
- Cultural Resources (historical resources,)
- Geology and Soils (seismic and geologic hazards, soil erosion,)
- Hydrology and Water Quality (water quality, flood hazard, stormwater drainage, seiche, tsunami,)
- Noise (construction)
- Transportation/Traffic (construction traffic)

No impacts were identified for the following issues:

- Aesthetics (scenic vistas, scenic resources, visual character of surrounding area)
- Agriculture and Forestry Resources
- Air Quality (conflicts with plans, odors)
- Biological Resources (fault rupture, sensitive habitats, wetlands, nesting birds)
- Cultural Resources (historical resources)
- Geology and Soils (expansive soils, lateral spreading, soil suitability for septic systems)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality (groundwater, alteration of creek, failure of levee or dam, mudflow)
- Land Use and Planning
- Mineral Resources
- Noise (noise standards, vibration, aircraft noise)
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic (parking capacity, air traffic, hazards)

POINT PINOS COASTAL TRAIL PROJECT IS/MND
 CITY OF PACIFIC GROVE
 DRAFT, SEPTEMBER 2017



Pacific Grove Pt Pinos Trail Improvements

Figure 4. Habitat Map, 1 of 2

POINT PINOS COASTAL TRAIL PROJECT IS/MND
 CITY OF PACIFIC GROVE
 DRAFT, SEPTEMBER 2017

Pacific Grove Pt Pinos Trail Improvements
 919 First Street, Suite 1
 Berkeley, CA 94510
 (707) 205-1370
 www.trailpeople.net
 TrailPeople
 Date: 1/23/2017 Time: 8:25:41 PM Sheet: 2/2 P:\Pinos_plan_set_2page

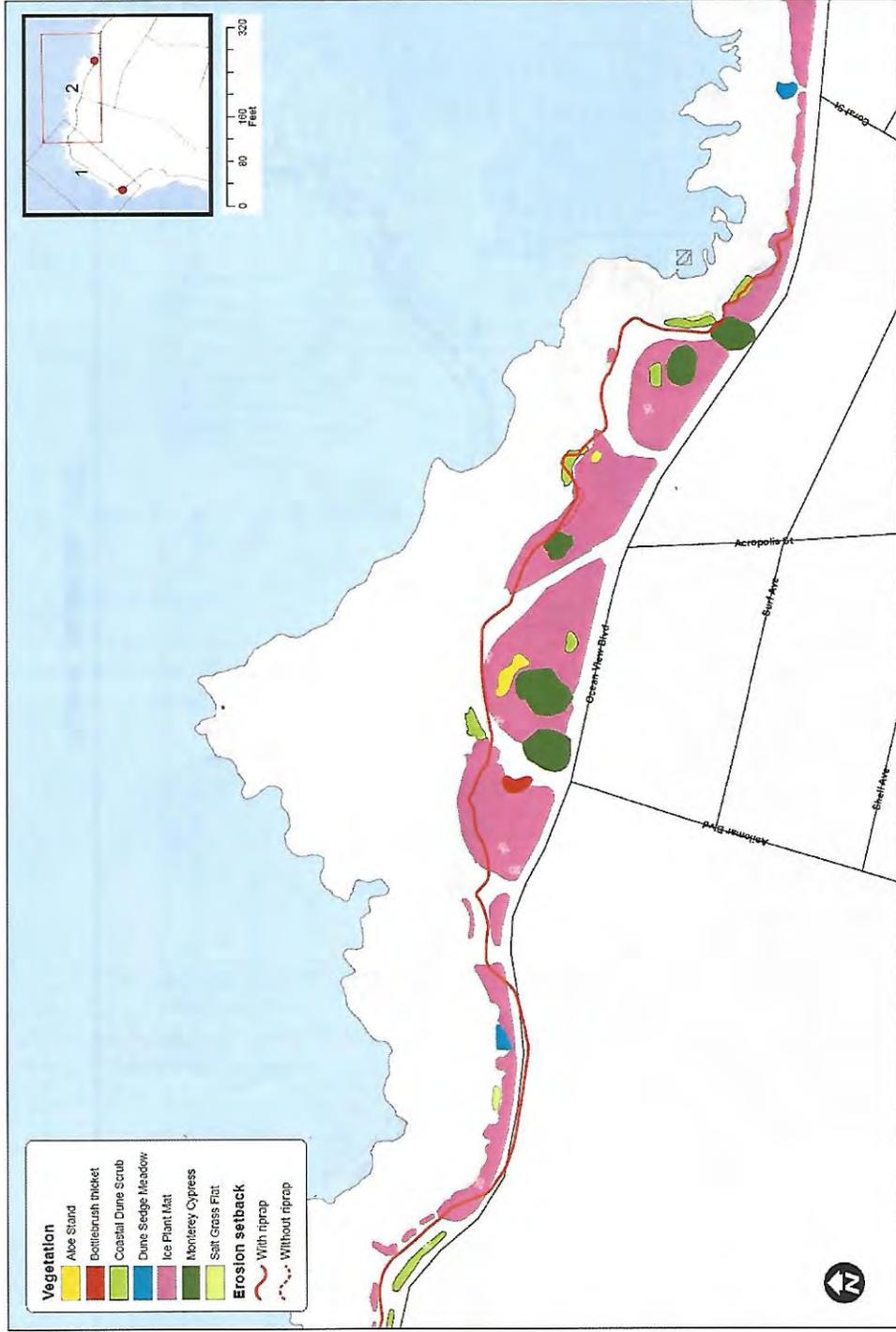


Figure 5. Habitat Map, 2 of 2

FIGURE 6 SITE PHOTOS



Figure 6A. View of coastal dune scrub between Ocean View Boulevard and Pacific Ocean and road edge parking, in southwestern portion of project area, looking northerly.



Figure 6B. Informal trail access to beach and rocky shore, looking northerly from Ocean View Boulevard.



Figure 6C. View of rocky shore and parking area, with rip-rap edge.



Figure 6D. Existing trail, with ice plant mat on left and central dune scrub on right.



Figure 6E. Rocky edge with ice plant mat and eroded edge, adjacent to parking area.



Figure 6F. View of Monterey cypress and trail near Acropolis Street.

biologist. The nest will be monitored to determine when chicks have fledged and when it is safe to resume work around the nest site.

- Implement all recommended mitigation measures to replace removal of trees, which may provide nesting habitat for migratory birds.
- Because black oystercatchers breed adjacent to some portions of the Point Pinos Trail project corridor between the months of March through September, and their nesting success could potentially be disrupted by heavy equipment activity adjacent to nest sites, additional monitoring of these birds is recommended. The City shall hire a qualified biologist to confer with the California Central Coast Black Oystercatcher Project biologists to determine if trail or parking lot construction is scheduled to occur adjacent to observed active nests. If so, construction in that buffer area should be postponed until the City's biologist determines that all young have fledged. The City's biologist should also recommend a buffer zone between construction and active oystercatcher nests, if evidence determines it is necessary to avoid impacts to the young.
- Buffer distances for oystercatcher nests should be site specific and at an appropriate distance, as determined by the City's biologist. There are many factors that may affect this bird's selection of nest site unrelated to nearby construction and thus would allow the nesting birds to succeed even during certain construction activities nearby. For example, if the work is located outside of the nesting bird's line of sight (e.g., cliff that obstructs view), crashing waves on nearby rocks that are louder than the construction equipment, and frequent human presence on paths and beaches near the nests that birds become inured to prior to selecting their nest site. The buffer distances should be specified to protect the bird's normal bird behavior to prevent nesting failure or abandonment. The buffer distance recommendation should be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The City's biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer that avoids failure of nests is established.

- e) Conflict with Policies. No Impact. The project would not conflict with area plans or policies. The project includes restoration for degraded habitats through the removal/control of invasive non-native plant species and rehabilitation of closed/removed trails.
- f) Conflict with Plans. No Impact. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional, or State habitat conservation plan that relate to the proposed project area.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

An archeological study was conducted by Holman & Associates for the project area (Holman & Associates, December 2016). This section is derived from that study. The work included a search of relevant records and maps maintained by the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University; a pedestrian reconnaissance of the project area and areas immediately adjacent to the project area; and consultation with Native American contacts with local knowledge.

Most radiocarbon dates obtained from prehistoric contexts in the Monterey Bay region suggest that permanent occupation of the region began about 5,000 to 6,000 Years Before Present (YBP). While it is not entirely clear how population movements affected cultural continuity in the area, it is well established that hunting and gathering, or a combination of hunting and gathering and collecting, was the primary subsistence strategy used by the region's inhabitants up to the beginning of the Spanish colonial presence in 1769. Habitation was likely semi-sedentary with seasonal camps often reflecting climate patterns and seasonal resource availability. The Native Americans who inhabited the San Francisco Bay region, Santa Cruz Mountains, East Bay Hills, and the Monterey Bay area at the time of the 1769 Spanish incursion are now most commonly known as "Ohlones," a name taken from a coastal village between Santa Cruz and Half Moon Bay. Archaeological evidence indicates the ancestral Ohlones arrived in the San Francisco Bay region—depending on location—somewhere around A.D. 500, possibly from the lower Sacramento Valley/Delta, and in the Santa Cruz/Monterey Bay region somewhat later, displacing earlier populations. Anthropologists and the Federal Government labeled these people "Costanoans," from the Spanish "costaños" or coast-dwellers, a linguistic term coined to describe groups speaking related languages, occupying the coast from the Golden Gate to Point Sur and inland to about the crest of the Diablo Range. Natural resources of their home areas provided for nearly all the needs of the aboriginal Ohlone populations. The Ohlones had adapted to and managed their abundant local environment so well that some places were continuously occupied for thousands of years. Compared to modern standards, population density was low; however, the

Monterey Bay area was one of the most densely populated areas of prehistoric California for centuries.

Currently, the best available information indicates that at the time of Spanish colonization the Rumsen Tribe held territory in the vicinity of the Project Area. The Rumsen Tribe was associated with the lower Carmel River Valley including the entire Monterey Peninsula to the north and about as far south as Garrapata State Park.

From 1769 to 1776, three Spanish expeditions to reconnoiter the region for colonization passed through the Central Coast. With the development of the Spanish Presidio at Monterey Bay and the Franciscan mission at Carmel in 1770-1771, and later the missions at Soledad and Santa Cruz (1791), and San Juan Bautista (1797), aboriginal life changed profoundly for the Ohlone. The root cause of change was Spanish religious and political hegemony brought by the Franciscan missionaries and enforcement of their assumed authority by the Spanish military. Religious conversion, adoption of farming practices, lethal illnesses, and intermarriage with other groups also contributed to the disintegration of tribal culture. The effect of Mission Carmel on the Native population was dramatic. By 1792, the *Rumsen* and the five tribes surrounding their territory (*Locuyusta in Calendaruc*, *Ensen*, *Eslanajan*, *Excelen*, and *Sargentaruc*) had all experienced significant absorption into the Mission system.

A review of historical US Geological Survey (USGS) maps shows that the land near the Point Pinos area remained largely undeveloped as of 1913, other than the construction of Point Pinos Lighthouse (1855), Lighthouse Drive, Grove Acre Avenue, and the railroad. By the 1930s and 1940s additional coastal development is evident from the construction of Asilomar Avenue and Sunset Drive as well as numerous east-west connecting streets such as Jewell, Arena, and Pico Avenues. Sparse residential development is clearly underway west of Asilomar by the 1940s, as structures near the Project Area are shown on the 1941 map. Residential development increased in the 1950s and 1960s, but the immediate area has remained relatively undeveloped other than roads and both passive and active recreational amenities.

The records search showed that the entire project area has been surveyed for archaeological resources multiple times and that six prehistoric archaeological resources have been recorded with the project area. These include gathering and occupation sites and gathering and processing sites. Most sites have experienced damage from coastal wave and wind erosion, and foot traffic. In addition to the six sites within the project area, numerous other prehistoric sites are nearby including an off-shore site located on a rocky outcrop northwest of Point Pinos, areas within the Pacific Grove Municipal Golf Course, and sites east of Sunset Drive.

Historical period resources in the vicinity include Point Pinos Light Station (1855), which is listed on the National Register as an individual property. The lighthouse is about 1,200 feet east of the project area at the closest point.

Discussion

- a) Historical Resources. No Impact. No historic sites or structures have been identified, based on prior background studies and investigations, within the project area. No impacts to historic resources will occur.

- b) Archaeological Resources. Potentially Significant Unless Mitigation Incorporated. Six archaeological sites have been identified within the project area, yet all of the project area is considered extremely sensitive for prehistoric archaeological resources. Most feature shell midden, associated with shellfish processing, and are located along the coastal bluff edges, yet midden soils can potentially contain undisturbed features, including human burials.

Most of the sites show evidence of erosion, both from natural processes and human disturbance. Accelerated erosion and soil loss is presently occurring as result of coastal wave and wind erosion. Where trails are located within archaeological sites, ongoing disturbance is also occurring from trail use. Where midden is exposed on the surface on trails, there is also evidence of trampling and further breaking of shell. Where trails follow closely along bluff edges within archaeological sites, there is substantial erosion along the bluff edge. Because there are no designated or improved overlook features at these locations, visitors are trampling the bluff edges. While coastal bluff erosion and retreat is a natural process, trail use and overlooks along actively eroding edges can further accelerate erosion, resulting in greater disturbance and loss of archaeological resources.

Existing visitor use and coastal processes are resulting in disturbance to archaeological resources. The existing parking lots within the project area were previously capped with decomposed granite. In some areas, archaeological sites are located along retreating coastal bluff edges and midden material is evident below the decomposed granite cap. In addition, where existing trails are located within archaeological sites, pedestrian trail use can result in disturbance to midden, which is generally at relatively shallow depths. Where the trail bed is presently entrenched, rainfall accumulates and results in accelerated erosion along the trail alignment. This accelerated erosion can result in greater levels of disturbance to archaeological sites. Continued use of soil surface trails within archaeological sites and allowing entrenched trail beds to remain unrepaired would likely result in continued disturbance to archaeological sites.

The project would reduce this ongoing disturbance by closing informal trails within archaeological sites, stabilizing and capping formal trail segments, and defining and capping overlook areas. Although it is anticipated that these improvements would reduce the level of existing disturbance to archaeological sites, the proposed project could result in impacts to archaeological resources if the project is not sensitively implemented. The project proposes to widen the Coastal Trail segments to 5 feet and cap the surface with 6 to 8 inches of aggregate base material. Entrenched areas would be filled with material to create a stable trail bed prior to installing the aggregate base trail bed. The trail bed would be crowned to avoid future accelerated erosion. Without capping and filling of the entrenched areas within the trail bed, increased trail use on the Coastal Trail segments could result in greater disturbance to archaeological resources than at present. Implementation of Mitigation Measure CULT-1 would reduce the potential impact to archaeological resources to a less-than significant level.

Impact CULT-1: Designation and use of the Coastal Trail and parking areas could result in disturbance to archaeological resources due to ground excavation, trampling, accelerated erosion, and increased trail use. Widening of the existing trail bed could result in exposure, disturbance, or displacement of archaeological features or artifacts.

Mitigation Measure CULT-1: To avoid impacts to archaeological sites, the following measures and the BMPs (Standard Project Requirements) listed in Appendix A will be implemented:

- The project shall use specialized construction methods to avoid or minimize impacts to archeological resources. Methods shall be used where there is no or minimal intrusion into known sites or into unknown archaeological soils which might be inadvertently encountered during construction. Examples of such techniques would require that the required thickness of the sub grade for proposed path and parking area be the result of adding culturally sterile fill on top of the existing grade within the project footprint. Also, the number of signs or other new project elements which require ground disturbances for installation shall be extremely limited and shall be installed without concrete footings to avoid disturbance. Additionally, any drainage plan for new trails and parking areas shall be designed to prevent deleterious runoff or other sources of erosion which would adversely affect the sites over the long term.
- Advanced plans for construction shall be designed to minimize potential impact to cultural resources. Prior to approval, plans shall be subject to archaeological plan review for assessment of project impacts and recommendations for mitigation of those impacts where appropriate.
- A qualified archaeologist shall be present for all ground disturbing activities. If potentially significant archaeological resources are discovered, the monitor should be authorized to halt excavation until any finds are properly evaluated. The monitor will also be authorized to discontinue monitoring in soils, such as fill, where cultural resources cannot exist.
- If in spite of measures to avoid it, disturbance occurs within a recorded historical resource, a minimum of two single specimen radiocarbon dates should be obtained for *each* impacted site, if suitable shell specimens are recovered.
- If a find is determined to be significant, work may remain halted near the find to permit development and implementation of a data recovery mitigation plan with the concurrence of the Lead Agency, and implemented. The mitigation plan should be designed to reduce project impacts to a less than significant level, as required by CEQA.
- Following completion of the project, a *Preliminary Archaeological Report* should be prepared. If suitable materials are found to warrant special studies, a *Final Comprehensive Technical Report* that includes all analysis will be submitted to the lead agency within six months of the conclusion of the archaeological fieldwork. If suitable materials are not found to warrant special studies, the preliminary report will serve as the final report on the Project. The final report should include a revised site record for each of the sites covered by the monitoring, and new site records for other resources if any are found.
- Cultural materials recovered during the project should be processed and curated in a suitable public research facility.
- A qualified archaeologist shall inspect the location of the trail removal and closures prior to any soil disturbance to confirm the locations where an archaeological monitor will be required. The archaeological monitor will remain on site as warranted in the opinion of the archaeological monitor. In the event that a potentially significant cultural deposit is uncovered during construction, all work will be stopped at the specific location of the find until the qualified archaeologist can evaluate it. Prior to

work resuming at the location, the archaeologist will determine the appropriate avoidance, preservation or recovery measures required, in compliance with CEQA. Work shall not resume at the location until the appropriate measures have been implemented as determined by the archaeologist.

- For new trail and parking area construction shall specify that all archaeological site boundaries near construction zones be marked by exclusionary fencing during construction. Due the extremely sensitive nature of the entire project area, a qualified archaeological monitor should be present during construction.
- Trail closure and removal measures where the trail bed is stable: Allow trail to revegetate naturally, retain all open areas except at trail entrances. Distribute cut native vegetation at trail entrances for length of approximately 20 feet. Install cable and rod fencing only as needed and avoid installing sign posts within, or in vicinity of, archaeological sites where feasible. Where sign post or similar new features are unavoidable (certainly some will be needed) within an archaeological site, intrusive element shall be pounded into the ground rather than excavated and installed with a concrete base. Pounding would be less of an impact.

c) Paleontological Resources. Potentially Significant Unless Mitigation Incorporated. The project proposes installation of coastal access steps down the coastal bluffs to provide access to the shoreline/intertidal zone. At some locations, there is ongoing bluff erosion from both visitor use and natural processes. No steps would be installed within the intertidal zone. Paleontological resources may be present within coastal bluffs within the project area. Implementation of **Mitigation Measure CULT-1** will reduce the potential impacts to cultural resources to less-than-significant.

d) Human Remains. Potentially Significant Unless Mitigation Incorporated. No human remains or burial sites have been documented or are expected to be found in the project area. However, the possibility always exists that human remains may be encountered. Discovery and disturbance of any human remains requires special treatment, per State codes. Incorporation of the following Standard Project Requirement would ensure the potential impacts to human remains would remain less-than-significant.

Mitigation Measure CULT-2. Treatment of previously unidentified human remains.

During project construction, if human remains are discovered, the project applicant and/or its contractor shall cease all work within 25 feet of the find and notify the City of Pacific Grove Planning Division and the county coroner, per California Health and Safety Code Section 7050.5. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours.

XVII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
<p>Would the project result in substantial change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a-b) Tribal Cultural Resources. Potentially Significant Unless Mitigation Incorporated. CEQA (Public Resources Code section 21974) defines a “tribal cultural resource” as either of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: a) Included or determined to be eligible for inclusion in the California Register of Historical Resources, b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

Based on the evaluations and testing of recorded archaeological sites within or in proximity to the project sites, no sites meet the definition of historical and archaeological resources. See subsection V for further discussion of historical and archaeological resources.

An AB 52 consultation letter was sent to the OCEN tribe on November 28, 2016 and the tribe responded on December 5, 2016 requesting consultation. The City initiated consultation with OCEN Tribal Chair Louise Ramirez on the proposed project; meetings (to date) occurred in March and July 2017.

Mitigation Measure TRI-1 Treatment of previously unidentified Tribal Cultural Resources. During project construction, a Native American monitor certified by the Ohlone/Costanoan-Esselen Nation (OCEN) will be present for all ground disturbance. If any tribal cultural resources

are found, the project applicant and/or its contractor shall cease all work within 50 feet of the discovery and immediately notify the City of Pacific Grove Planning Division. The OCEN-certified Native American monitor will contact the OCEN Tribal Chair and in consultation with the City and an archeologist evaluate the finds and recommend appropriate mitigation measures for the inadvertently discovered tribal cultural resource. The City shall consider the mitigation recommendations and agree on implementation of the measure(s) that are feasible and appropriate. Such measures may include reburial of any ancestral remains, avoidance, preservation in place, excavation, documentation, or other appropriate measures.

XVIII. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The proposed project involves improvements to existing trails, overlooks, and parking within the open space seaward of Sunset Avenue. There are presently no potable water or wastewater services

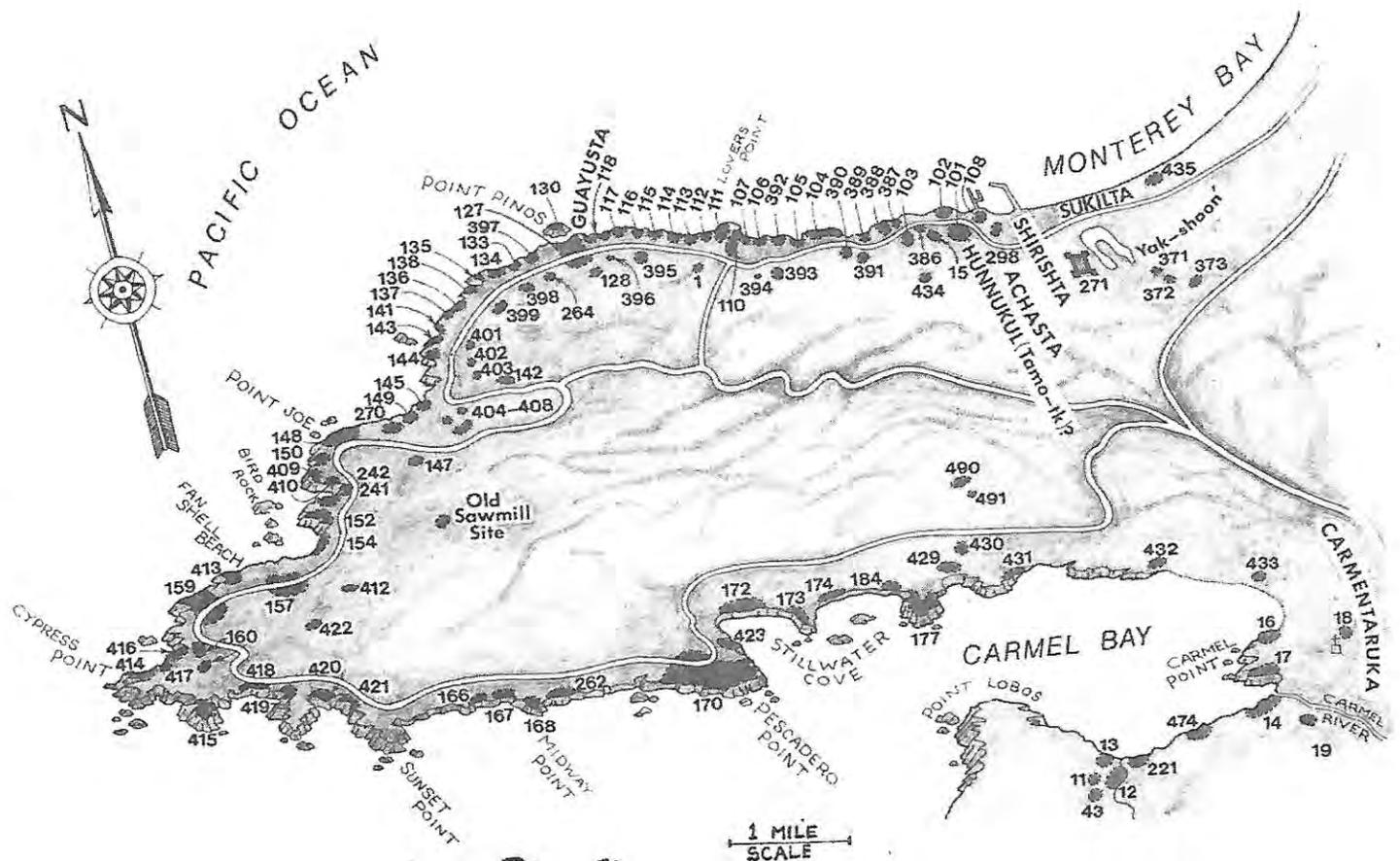
within the trail project area. One toilet facility is located on the inland side of Ocean View Boulevard amid the Municipal Golf Course. Trash receptacles are provided at the trail access points. The receptacles are serviced by the City.

Discussion

- a) Wastewater Discharge. No Impact. The proposed project does not include any new wastewater services or facilities. No conflicts or impacts to wastewater treatment requirements would occur.
- b) Wastewater Treatment Facilities. No Impact. The proposed project does not require construction of new water or wastewater treatment facilities or the expansion of an existing facility.
- c) Stormwater Drainage Facilities. No Impact. No new stormwater facilities would be required for the proposed project. The Coastal Trail segments would be capped with aggregate base and crowned to allow for sheet flow off of the trail surfaces. Pedestrian stairs would be installed to reach some pocket beaches. No culverts would be installed. No impact would occur.
- d-e) Water Supply and Wastewater. No Impact. The proposed project will not result in the need for additional water services. No impact will occur.
- f-g) Solid Waste Disposal. No Impact. The proposed project would not result in a significant increase in wastewater and solid waste. One toilet presently within the Municipal Golf Course exists near the project area. The restroom facility is serviced by the City. The project would not generate additional demand for wastewater or solid waste services. No impact would occur.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



*Archaeological Sites & Indian Place Names
of The Monterey Peninsula*

A Brief Description of Sites from Monterey to Carmel

- Site Numbers below 385—U.C. Archaeological Survey—Numbers 385 and above were numbered by the Monterey County Archaeological Society.
- Mnt-101; Kroeber A; Gifford 1; Golomshtok 3; Hill 7; Wood IV-9; Fisher 1. Army Presidio around the Serra Monument. El Castillo footings and midden tested in 1967. Artifacts, burials.
- Mnt-102; Fisher 2; Golomshtok 4.
Area at base of present breakwater in Monterey, built over and disturbed.
- Mnt-103; Fisher 3.
South side of Drake Avenue at Foam Street, New Monterey. Occupation and burial site; dark shell midden. Projectile points found. Destroyed.
- Mnt-104; Fisher 4.
On the east side of Cabrillo Point, Pacific Grove. Most of the site is on the seaward side of the Hopkins Marine Laboratory. Pilling states that it is on the ocean cliff at the northeast end of the main building. Dark shell midden. Chinese village here from 1850's to 1906. Site intact. All reports on Pacific Grove sites are by Pilling in 1949.
- Mnt-105; Fisher 5.
Foot of 3rd Street, Pacific Grove; shell midden. Disturbed.
- Mnt-106; Fisher 6.
Foot of 5th Street, Pacific Grove; shell midden. Disturbed.
- Mnt-107; Fisher 7 and 8.
Between foot of Monterey Ave. and 12th Streets, along the shore of Berwick Park, P.G. Tested by S. Broadbent in 1951. Test area between rock outcrop and Cypress tree. Projectile points, abalone blanks, steatite labret. Intact.
- Mnt-108; Custom House midden north of the building between Monterey wharf. Site of original raising of the American flag in 1846. Depth of midden 60 inches. Excavated by Beardsley, 1946. Two burials, artifacts.
- Mnt-109; Fisher 9.
First block from ocean, between 12th and 13th streets, in Greenwood Park. A small site on the north bank of the creek which runs through the park. Occupation. May be part of Mnt-107. Intact.
- Mnt-110; Fisher 10.
Foot of Fountain Ave. Shell and occupation. The remnant destroyed within the past three years.
- Mnt-111; Fisher 11; Hill 8.
Lover's Point. Mortars, projectile points, hammerstones, pestles. Disturbed.
- Mnt-112; Fisher 12; Hill 9.
Foot of 17th Street. Now destroyed.