



Fort Ord Regional Trail and Greenway Project, Canyon del Rey/SR 218 Segment

Second Addendum to the Environmental Impact Report

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1 Introduction

This document was prepared in accordance with the California Environmental Quality Act (CEQA) and the *CEQA Guidelines*. It is presented as an addendum to the previously certified Final Environmental Impact Report (EIR) (State Clearinghouse # 2019060053) for the Fort Ord Regional Trail and Greenway Project (FORTAG; Original Project) to address minor changes in the trail alignment. The Transportation Agency for Monterey County (TAMC) was the lead agency for the certified Final EIR and is the lead agency for the environmental review in this Addendum. This is the second EIR Addendum for the project.

This Addendum addresses the proposed modifications as they apply to the previous environmental review document prepared for the Original Project. Section 15164 of the *CEQA Guidelines* defines the function of an EIR Addendum as follows:

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record.

1.1 Background and Purpose of the EIR Addendum

The Final EIR for the Original Project (State Clearinghouse # 2019060053) was certified by TAMC on March 25, 2020. The Final EIR evaluated the environmental effects of the Original Project. The certified Final EIR consists of the Draft EIR, responses to public and agency comments received during the review period, and the revised text to the Draft EIR based on responses to comments and other information. Technical analyses from the certified Final EIR are used or referenced throughout this Addendum. Relevant passages from the certified Final EIR are cited herein, and available for review at the TAMC office at 55-B Plaza Circle, Salinas, California, or online at <http://www.fortag.org/docs.htm>. In conjunction with certification of the Final EIR, TAMC also adopted a mitigation monitoring and reporting program (MMRP) and approved the Original Project.

The certified 2020 EIR addressed the physical environmental effects associated with the FORTAG trail, which includes approximately 28 miles of new paved trail, mostly on the inland side of State Route (SR) 1. The Original Project involved the phased construction of a multi-use trail in northwestern Monterey County, generally encircling the cities of Seaside and Marina and the California State University, Monterey Bay (CSUMB) campus. The FORTAG Trail corridor is organized into seven segments to accommodate design options that meet the specific characteristics of the segments in terms of terrain, road and other infrastructure crossings, and other components needed for that segment. The Trail would accommodate pedestrians and bicyclists of all abilities and equestrians within some segments. Dogs would be allowed on-leash throughout the system. The estimated number of Trail users would be between 1,000 and 3,000 daily, with the highest usage occurring on the CSUMB campus and near the Monterey Bay Coastal Recreation Trail (Coastal Rec Trail). Most of the Trail would be a 12-foot wide paved path with a 2-foot wide unpaved shoulder on both sides, for a total width of 16 feet. Approximately 1.3 miles of the Trail would include a 4- to 8-foot wide side path.

The part of the Trail analyzed in this Addendum is the Canyon Del Rey (CDR)/State Route (SR) 218 segment of the overall FORTAG Trail analyzed in the certified 2020 EIR and in an EIR Addendum, prepared by TAMC in September 2021. The segment as analyzed in the 2020 EIR and as analyzed separately in the 2021 EIR Addendum are summarized below.

Original Project (2020 EIR)

From the southern terminus of the National Monument Loop segment, the CDR/SR 218 segment would meander southward toward South Boundary Road and then southwest toward General Jim Moore Boulevard. The Trail would cross under General Jim Moore Boulevard via a new undercrossing into the Frog Pond Wetland Preserve in Del Rey Oaks. The alignment would follow the existing trail south and then west along the eastern and southern perimeter of Frog Pond before crossing Canyon Del Rey Boulevard (SR 218). Before crossing Canyon Del Rey/SR 218, Trail users would have the option to turn left and cross the roadway via a proposed undercrossing or turn right onto a raised pathway to access Carlton Drive. The raised pathway would maintain gentle grades for Trail users to access Carlton Drive, which is approximately 25 feet higher in elevation than the SR 218 undercrossing. From Canyon Del Rey/SR 218 near the Del Rey Oaks City Hall, the Trail would extend northeast up Carlton Drive to Plumas Avenue. Along Carlton Drive/Highland Street, the Trail would consist of a new multi-use sidewalk on the west side of the road. The sidewalk would be 12-foot wide with a five-foot buffer between the roadway and the sidewalk. At Plumas Avenue, the Trail would extend within a PG&E easement along the south side of Plumas Avenue west toward Del Rey Woods Elementary School and east to the top of Plumas Avenue near General Jim Moore Boulevard. The Trail would cross SR 218 from the Frog Pond Wetland Preserve to the south side of SR 218 through a new undercrossing and continue east on the south side of Del Rey Park, along the existing paved Angelus Way right-of-way, and then through Work Memorial Park to the Safeway Shopping Center. Physical improvements to Angelus Way would consist of wayfinding signage added to Rosita Road and Del Rey Park indicating the Trail route. Adjacent to the Safeway market, the Trail would abut Canyon Del Rey Boulevard/SR 218, crossing Fremont Boulevard within the existing intersection crosswalk.

2021 Project Modifications (2021 EIR Addendum)

TAMC prepared an EIR Addendum in September 2021 for project modifications (2021 Project) that added approximately 154 linear feet to the overall Trail length. These changes placed small portions of the segment alignment outside of the previously analyzed environmental clearance boundary. The project modifications routed the Trail so it traverses north of the tennis courts in Work Memorial Park, adding roughly 27 feet to that portion of the Trail. It also included a minor adjustment to the crossing location on Plumas Avenue, altered the shape of the trail slightly at Canyon Del Rey Boulevard and Carlton Drive, closed right turn lanes at two points on Carlton Drive, and included other small design modifications. In September 2021, TAMC determined that these project modifications would not result in new information of substantial importance that would have new, more severe impacts, new mitigation measures, or new or revised alternatives from what was identified for the Original Project in the certified Final EIR and concluded that the project modifications would not require supplemental environmental review or a Subsequent EIR pursuant to *CEQA Guidelines* Section 15162. The 2021 EIR Addendum was adopted by the TAMC Board of Directors on September 22, 2021.

Modified Project

TAMC is proposing different project modifications to the Canyon Del Rey/SR 218 Segment of the Trail. This modified project is referred to hereafter as the “Modified Project.” A detailed description of the Modified Project is provided in Section 2, *Project Description*, of this Addendum.

1.2 Basis for the Addendum

Once an EIR has been certified and subsequently a project is modified or otherwise changed after certification, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and Sections 15162, 15163 and 15164 of the *CEQA Guidelines*.

Section 15162(a) of the *CEQA Guidelines* provides that a Subsequent EIR is not required unless the following occur:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative

Pursuant to Section 15164(a) of the *CEQA Guidelines*, an Addendum to an EIR may be prepared by the Lead Agency that prepared the original EIR if some changes or additions are necessary, but none of the conditions listed above have occurred that require preparation of a Subsequent EIR. An Addendum must include a brief explanation of the agency’s decision not to prepare a Subsequent EIR and be supported by substantial evidence in the record as a whole (Section 15164[e]). The Addendum to the EIR need not be circulated for public review but it may be included in or attached to the Final EIR (Section 15164[c]). The decision-making body must consider the Addendum to the EIR prior to deciding on the project (Section 15164[d]).

An Addendum to the certified Final EIR for the Original Project is appropriate to address the proposed Modified Project because the proposed modifications to the approved Original Project do not meet the conditions of Section 15162(a) for preparation of a Subsequent EIR. The proposed Modified Project would not result in new or more severe impacts related to 1) substantial changes to the Original Project which requires major revisions to the certified Final EIR; 2) substantial changes to the circumstances under which the Original Project are being undertaken which will require major revisions to the certified Final EIR; or 3) new information of substantial importance showing significant effects not previously examined.

The certified Final EIR and this Addendum to the certified Final EIR serve as informational documents to apprise decision-makers and the public of the potential environmental consequences of approving the Modified Project. This Addendum neither controls nor determines the ultimate decision for approval of the proposed Modified Project, described in Section 2, *Project Description*. The information presented in this Addendum to the certified Final EIR will be considered by the TAMC Board of Directors alongside the certified 2020 Final EIR and 2021 EIR Addendum prior to deciding on the Modified Project.

1.3 Incorporation by Reference

The following documents were used in the preparation of this Addendum and are incorporated herein by reference, consistent with Section 15150 of the *State CEQA Guidelines*.

- Fort Ord Regional Trail and Greenway Project Environmental Impact Report. Transportation Agency for Monterey County. SCH No. 2019060053.
- Addendum No. 1 to the Fort Ord Regional Trail and Greenway Project Environmental Impact Report. Transportation Agency for Monterey County. September 2021.

2 Project Description

As described in Section 1, *Introduction*, the Modified Project consists of minor changes to the CDR/SR 218 segment of the Original Project analyzed in the certified Final EIR, approved by TAMC on March 25, 2020, and the 2021 Project analyzed in the 2021 EIR Addendum.

Although most of the Modified Project would be located within environmental study area¹ analyzed in the certified Final EIR for the Original Project, portions of the alignment that would extend outside the original footprint and/or the environmental study area. As described in the EIR, the FORTAG Trail is mostly on the inland side of SR 1 and involved the phased construction of a multi-use trail in northwestern Monterey County, generally within the jurisdictions of the cities of Del Rey Oaks, Seaside, and Marina and the CSUMB campus. No changes to other Trail segments would occur as part of the Modified Project. Figure 1 illustrates the location of the Trail within the region.

Under the Original Project, the Trail would cross Fremont Boulevard in the existing crosswalk and extend through Work Memorial Park to the east, following a generally straight path. The 2021 EIR Addendum evaluated changes to the Original Project that would reroute the Trail north of the existing tennis courts at the southeast end of Work Memorial Park, and then connect to the western end of Angelus Way. The Trail would travel along the existing paved Angelus Way right-of-way and continue east to the south side of SR 218. The Trail would cross SR 218 through a new undercrossing and continue to the Frog Pond Wetland Reserve. The Trail, a raised boardwalk in this portion along Frog Pond Wetland Preserve, would switchback east toward Carlton Boulevard. Under the Original Project, the Trail would travel northeast up Carlton Avenue to Plumas Avenue and extend within a Pacific Gas and Electric easement on the south side of Plumas Avenue toward Del Rey Woods Elementary School.

Figure 2 shows the 2021 Project alignment in brown and the Modified Project alignment temporary and permanent impacts in pink and yellow, which shows the minor changes to the CDR/SR 218 segment alignment as follows:

- The portion of the Trail that extends from SR 218 into Work Memorial Park would meander as it travels southwest into the park, rather than generally straight as previously proposed, to ensure slopes comply with the Americans with Disabilities Act (ADA). As a result of these alignment changes, grading limits would extend slightly outside of the original environmental clearance area.
- The portion of the Trail adjacent to the tennis courts in Work Memorial Park would be moved from above the existing retaining wall to below the retaining wall, within the maintenance walkway. The existing retaining wall would be replaced with an approximately 220-linear-foot retaining wall up to 7.5 feet in height. Grading, clearing, and grubbing limits would be extended outside of the original environmental clearance area to account for the retaining wall. A simulated view of this portion of the Trail is shown in Figure 4, Photograph 1.
- To accommodate the Trail while minimizing grading, the tennis courts immediately south of the Trail would be rotated and resurfaced, and the fences on the north and west sides of the tennis

¹ The environmental study area includes the CDR/SR 218 segment, beginning at the intersection of Fremont Street and SR 218 and ending at the intersection of Noche Buena Street and Plumas Avenue, plus a 50-foot buffer from the centerline and additional areas where the exact trail alignment is uncertain.

courts would be relocated and replaced. This work would occur within the original environmental clearance area.

- A perimeter retaining wall, planters, and concrete seating areas would be constructed east of the Trail alongside the existing butterfly garden. New public amenities may include four benches, seat walls, a picnic table, planter boxes with irrigation, and a pergola structure would be constructed in an approximately 84-foot by 25-foot area between the Trail and the proposed perimeter retaining wall. Portions of the retaining wall and some of the public amenities would be located outside of the original environmental clearance area. A simulated view of this portion of the Trail is shown in Figure 4, Photograph 2.
- The portion of the Trail along the western boundary of Frog Pond Wetland Preserve that switchbacks as it travels upslope would be paved, as opposed to a raised boardwalk as previously proposed under the Original Project. Additional grading would be required, and a retaining wall and railings would be constructed alongside the Trail as it travels east and switchbacks west toward Carlton Drive. The retaining wall, which would be 200 linear feet in length and up to 8 feet in height, would require approximately 50 cubic yards of soil excavation. These modifications would occur within the original environmental clearance area. A simulated view of this portion of the Trail is shown in Figure 4, Photograph 3.
- Under the Original Project, a tunnel was proposed for a portion of the Trail crossing under SR 218. The tunnel would have placed a box or arch bore under SR 218 to accommodate the pedestrian pathway. However, the geotechnical, civil, and structural engineering evaluations and studies determined that there is not enough vertical clearance for a tunnel and the sandy soil would not be suitable for traditional tunnel construction methods. As a result, a new undercrossing structure would be constructed, which would require a portion SR 218 to be demolished in order to install a bridge over the pedestrian pathway. As compared to the tunnel design, the undercrossing would provide a more open environment along this portion of the pedestrian pathway. Due to sandy soil conditions, piles are required to support the undercrossing abutments, and due to the soil type and existing high voltage overhead lines, pile driving is the recommended method of construction. These modifications would occur within the original environmental clearance area.
- Pedestrian crossing signs and flashing beacons would be added to the existing pedestrian crossing on SR 218 at the intersection of SR 218 and Carlton Drive to improve pedestrian safety. A marked pedestrian crossing would be constructed across Carlton Drive, parallel to SR 218, to provide access to the Trail from the existing shoulder on the northeast side of SR 218.
- On the northwest side of Carlton Drive, between SR 218 and Work Avenue, paved switchbacks would be installed for ADA compliant access to the Trail along Carlton Drive. The sidewalk would include several switchbacks, pedestrian railings, and landscaping. These modifications would occur within the original environmental clearance area. A simulated view of the paved switchbacks and pedestrian crossings in shown in Figure 4, Photograph 4.

Some components of the Modified Project would be located outside of the environmental clearance boundary, including the curves added to the Trail as it enters Work Memorial Park and portions of the retaining wall and public amenities located between the Trail alignment and the existing butterfly garden. The revised Trail alignment and the original environmental clearance area are shown in Figure 3, with portions of the revised Trail alignment outside of the environmental clearance area also depicted. No other segments of the Trail would be modified from the Original Project.

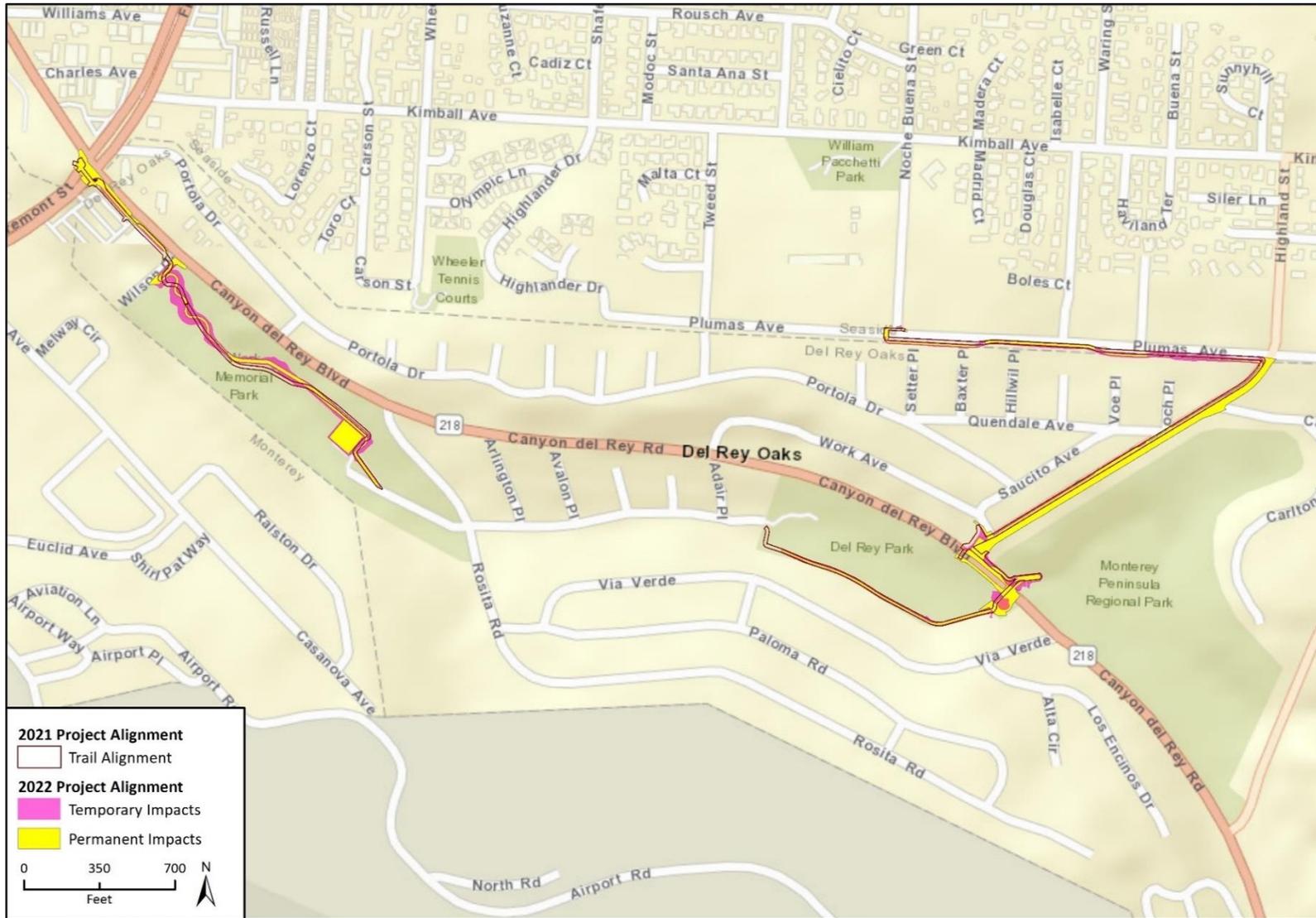
Figure 1 Regional Location with All FORTAG Trail Segments



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 Additional data provided by Alta Planning + Design, 2019.

Fig 2-6 Trail Segments

Figure 2 Modified Project Revised Trail Alignment



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Additional data provided by GHD, 2022.

Fig X Modified Alignment with Impacts

Figure 3 Modified Project Revised Trail Alignment and Original Environmental Clearance Area



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Additional data provided by GHD, 2022.

Fig X Revised Trail Alignment and Env Clearance Area

Figure 4 Simulated Views of Modified Project Trail Features



Photograph 1. Simulated view of the Trail between the rotated tennis courts and reconstructed retaining wall, facing northwest.



Photograph 2. Simulated view of the proposed public amenities at the butterfly garden, facing southeast.



Photograph 3. Simulated view of the Trail switchback at the western corner of Frog Pond Wetland Preserve, facing northwest.



Photograph 4. Simulated view of the Trail and paved pedestrian improvements north of SR 218 and Carlton Drive, facing north.

3 Impact Analysis

A comparative analysis has been undertaken of the potential impacts associated with the proposed Modified Project and those of the approved Original Project analyzed in the certified Final EIR using a CEQA checklist approach. The checklist is consistent with the format, environmental topics, and questions of the checklist used in the certified FORTAG EIR, and that provided in Appendix G of the 2022 *CEQA Guidelines*. The checklist considers the full range of environmental issues subject to analysis under CEQA (in columns), and then poses a series of questions (in rows) aimed at identifying the degree to which the issue as it applies to the Modified Project was analyzed in the certified EIR. The checklist also includes a column identifying whether the proposed Modified Project constitutes new information of substantial importance relative to each environmental issue. The questions posed in each column are described below.

Where was impact analyzed?

This column provides a cross-reference to the portions of the certified Final EIR where information and analyses may be found relative to the environmental issue listed under each topic. The cross-references identified in this column correspond with page numbers and section numbers of the certified Final EIR.

Do proposed changes require major revisions to the certified EIR?

In accordance with Section 15162(a)(1) of the *CEQA Guidelines*, this column indicates whether the proposed Modified Project would involve new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts that, in turn, would require major revisions of the certified EIR.

Do new circumstances require major revisions to the certified EIR?

In accordance with Section 15162(a)(2) of the *CEQA Guidelines*, this column indicates whether changes to the circumstances under which the Modified Project is undertaken or implemented have occurred that would involve new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts that, in turn, would require major revisions of the certified EIR.

Is there any new information resulting in new or substantially more severe significant impacts?

In accordance with Sections 15162(a)(3)(A) and 15162(a)(3)(B) of the *CEQA Guidelines*, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified, shows additional or substantially more severe significant impacts not discussed in the certified EIR.

Do mitigation measures included in the certified EIR address and/or resolve impacts?

In accordance with Sections 15162(a)(3)(C) and 15162(a)(3)(D) of the *CEQA Guidelines*, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified, shows that mitigation measures or alternatives in the certified EIR would now be feasible, or

identifies new mitigation measures or alternatives not in the certified EIR that would reduce significant impacts, but which the applicant declines to adopt.

3.1 Aesthetics

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Have a substantial adverse effect on a scenic vista?	Pages 4.1-28 through 4.1-29	No	No	No	Yes
2.	Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Pages 4.1-30 through 4.1-31	No	No	No	N/A
3.	Substantially degrade the existing visual character or quality of the site and its surroundings?	Pages 4.1-31 through 4.1-34	No	No	No	Yes
4.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Pages 4.1-35 through 4.1-36	No	No	No	Yes

1. *Would the project have a substantial adverse effect on a scenic vista?*
2. *Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*
3. *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*
4. *Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The Modified Project would be in the same area as the Original Project but would make several small changes in the CDR/SR 218 segment as described in Section 2, *Project Description*. Visual changes would occur in the portion of the Trail that traverses Work Memorial Park, the tennis courts and the portion of the Trail that travels alongside the tennis courts and butterfly garden, the portion of the Trail that would switchback north of CDR/SR 218, and the portion at the intersection of CDR/SR 218 and Carlton Boulevard. Retaining walls would be added alongside the tennis courts and butterfly garden. Work for the Modified Project would occur in developed and undeveloped areas outside of the original environmental clearance area, but would generally be within the footprint of the Original Project.

As described in the certified Final EIR, the Trail alignment is not in a State designated scenic highway. The proposed grading, retaining walls, and other project modifications would not degrade scenic vistas because views along the Trail in areas where changes would occur are largely of

residential, commercial, and light industrial development with mature trees. Additional retaining walls, public amenities, and pedestrian facilities would not conflict with the existing visual character along the revised trail alignment as they would be reconstructed to have a similar height or material appearance to existing features. Because the paved Trail would be developed at ground level, it would not be visible from public roadways and it would not impede views of the surrounding community from the park. Thus, Trail modifications would not affect visual quality or views from within the park. Furthermore, as described above, some slopes along the Trail would be modified slightly and some vegetation would be removed to allow for the paved Trail alignment to be developed, but the shape of the hill would not be altered and the vegetation would be maintained as part of the fuel clearance discussed in Section 3.17, *Wildfire*. Finally, the Modified Project would not add new sources or light or glare to the project site from the revised alignment.

As with the Original Project, the Modified Project would be subject to mitigation measures relative to aesthetics impacts, as follows:

- AES-1: Design Structures to be Visually Unobtrusive
- AES-3: Amenity Design
- AES-4: Install Dark Sky-Compliant Lighting Prior to Operation

Based on the above analysis, the Modified Project would result in no new or more severe impacts to aesthetics beyond those identified in the previously certified Final EIR.

3.2 Agriculture and Forestry Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Pages 4.2-15 through 4.2-17	No	No	No	Yes
2.	Conflict with existing zoning for agricultural use or a Williamson Act contract?	Page 4.2-17	No	No	No	N/A
3.	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))?	Pages 4.2-18 through 4.2-20	No	No	No	N/A
4.	Result in the loss of forest land or conversion of forest land to non-forest use?	Pages 4.2-18 through 4.2-20	No	No	No	N/A
5.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Pages 4.2-18 through 4.2-20	No	No	No	Yes
6.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	Pages 4.2-20 through 4.2-24	No	No	No	Yes

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
7.	Involve agricultural operations that could adversely affect trail users, which may result in conflicts with agricultural operations?	Pages 4.2-24 through 4.2-25	No	No	No	N/A

1. *Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
2. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
5. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

As described in the certified Final EIR, the Original Project would mostly be constructed away from agricultural operations, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. The rerouting of the Trail as part of the CDR/SR 218 segment north of the tennis courts would occur in a developed park, along a vegetated hillside that is surrounded by residential and light industrial development. There are no agricultural uses in the vicinity of the CDR/SR 218 segment. Similarly, the other Trail revisions under the Modified Project would be in areas with existing residential and other development, and not near land designated as Farmland of Local Importance (California Department of Conservation 2022).

As stated in the certified Final EIR, the Original Project would occur, at most, along perimeters of crop fields in other segments of the Trail north of the CDR/SR 218 segment, and would not result in conversion of entire agricultural parcels. Thus, the Original Project would not require rezoning or conflict with existing zoning for agricultural use. The CDR/SR 218 segment does not include any nearby farmland and would not require that farmland be rezoned to implement the Modified Project.

The Modified Project includes minor alterations to the alignment that extend slightly beyond the boundaries of the footprint analyzed in the Final EIR, but these areas do not include lands under Williamson Act contract (California Department of Conservation 2019). The Modified Project would have no impact on Williamson Act contact lands, consistent with the Original Project. While mitigation was required to reduce impacts to agriculture under the Original Project, because there is no Farmland within the vicinity of the Modified Project area these mitigation measures would not apply to the Modified Project.

Impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would result in no new or more severe impacts on agricultural resources beyond those identified in the previously certified Final EIR for the Original Project.

3. *Would the project 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))?*
4. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
5. *Would the project involve other changes in the existing environment which due to their location or nature could result in conversion of forest land to non-forest land?*

As described in the certified Final EIR, there is no land zoned for forest or timber use within the footprint of the Original Project and thus the Original Project would not conflict with designated forestry or timberland resources. The Modified Project would be primarily within the corridor analyzed in the Original Project except for a small portion of the alignment near the tennis courts and butterfly garden, and other areas where the Modified Project would occur outside of the previously identified environmental study area would occur on paved surfaces and would not require tree removal. Therefore, the Modified Project would also have less than significant impacts on forest land, consistent with the Original Project.

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3.3 Air Quality

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Conflict with or obstruct implementation of the adopted Monterey Bay Air Resources District's air quality plan?	Pages 4.3-14 through 4.3-15	No	No	No	N/A
2.	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)?	Pages 4.3-15 through 4.3-17	No	No	No	N/A
3.	Expose sensitive receptors to substantial pollutant concentrations?	Pages 4.3-17 through 4.3-18	No	No	No	N/A
4.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Pages 4.3-18 through 4.3-19	No	No	No	Yes

1. Would the project conflict with or obstruct implementation of the applicable air quality plan?

As noted in the certified Final EIR, a project would conflict with or obstruct implementation of the Monterey Bay Air Resources District's (MBARD) *Air Quality Management Plan (AQMP)* if it is inconsistent with the population growth assumptions included in the AQMP (MBARD 2017). As described in the certified Final EIR, the Original Project does not contain a residential component and would increase residential population in the area. No direct growth impacts are expected to result from the Original Project. As a minor design change, the Modified Project would not generate, directly or indirectly, additional population growth, similar to the Original Project in the certified Final EIR. Therefore, the Modified Project would not conflict with or obstruct the implementation of any MBARD plans. As the Modified Project would not conflict with or obstruct the implementation of applicable air quality plans, impacts would be less than significant, as they were for the Original Project. The Modified Project would not result in new or more severe impacts related to conflicts with applicable air quality plans beyond those identified in the previously certified Final EIR for the Original Project.

2. *Would the project 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)?*

The Trail design changes associated with the Modified Project would require the same or minimally additional construction activities, including additional grading for curves in the Trail in Work Memorial Park, replacement of the retaining wall north the tennis courts, rotation and resurfacing of the tennis courts, public amenities near the butterfly garden, installation of an undercrossing in place of a tunnel beneath SR 218, and other improvements. Modified Project components would incrementally decrease the length of the Trail; however, the overall construction activities would be similar to those proposed in the Original Project and analyzed in the certified Final EIR.

As shown in Table 4.3-4 on page 4.3-16 of the certified Final EIR, construction of the Original Project would result in a maximum of 42 pounds per day of diesel particulate matter (PM₁₀) emissions, which is well below the 82 pounds per day significance threshold set by MBARD. The operation of construction equipment necessary for the pedestrian crossings and the potential retaining wall would be minimal and would not contribute to an exceedance of the 82-pounds-per-day threshold for PM₁₀. MBARD has not established significance thresholds for other criteria pollutants, but as the additional construction activities required under the Modified Project would be minimal, pollutant emissions would be commensurate with the Original Project. There would be no operational emissions generated by the Modified Project as the number of Trail users would be the same as the Original Project. Impacts would be less than significant, and the Modified Project would result in no new or more severe impacts related to air quality impacts and criteria pollutant emissions beyond those identified in the previously certified Final EIR for the Original Project.

3. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

The Modified Project would implement minor design changes to the alignment analyzed in the certified Final EIR, but the revised alignment would not expose sensitive receptors to new sources of pollutants. As described above, the Modified Project would result in the same operational emissions as the Original Project, and construction emissions would be similar to the Original Project. No new emissions sources have been constructed near the CDR/SR 218 Trail segment since certification of the Final EIR in March 2020. Therefore, the Modified Project would result in no new or more severe impacts related to exposure of sensitive receptors to air pollution beyond those identified in the previously certified Final EIR for the Original Project.

4. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The Modified Project would result in no new or more severe impacts related to other emissions, including odors, beyond those identified in the previously certified Final EIR for the Original Project. As discussed in the Final EIR for the Original Project, construction of the Modified Project would require the use of heavy equipment which has the potential to result in temporary odors from diesel construction equipment exhaust. However, these odors would be intermittent and temporary and would cease upon completion, and odors would disperse with distance. Overall, project construction would not generate other emissions, such as those leading to odors, affecting a substantial number of people. Furthermore, the Modified Project would be subject to Mitigation Measure AQ-4, Install Dog Waste Facilities, which would promote retrieval and disposal of dog waste by Trail users thus reducing odors. Therefore, the Modified Project would generate no other

emissions or new odors or affect groups of people beyond those analyzed in the certified EIR for the Original Project.

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3.4 Biological Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	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?	Pages 4.4-34 through 4.4-50	No	No	No	Yes
2.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Pages 4.4-51 through 4.4-55	No	No	No	Yes
3.	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?	Pages 4.4-55 through 4.4-57	No	No	No	N/A
4.	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?	Page 4.4-57	No	No	No	N/A

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
5.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Page 4.4-58 through 4.4-59	No	No	No	N/A
6.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Page 4.4-59 through 4.4-61	No	No	No	N/A

In April 2020, TAMC prepared a Natural Environment Study (NES) for the Original Project, which described the existing biological environment and how the Original Project may affect that environment. In January 2023, a NES Addendum was prepared to address minor changes in the Trail alignment and design that could impact biological resources not previously analyzed in the 2020 NES. As discussed in the NES Addendum (Rincon Consultants 2023a), the Modified Project would meander through Work Memorial Park rather than generally straight as previously proposed, which would extend grading limits outside of the original environmental clearance area. This project modification would result in different impacts compared to those previously addressed in the 2020 NES.

The NES Addendum concluded that the following additional modifications part of the Modified Project would not significantly change impacts to biological resources: a larger retaining wall at Work Memorial Park and resurfacing of the tennis courts; public amenities such as benches at the existing butterfly garden; paved switchbacks at the Frog Pond; the undercrossing at State Route 218 and the Frog Pond and associated demolition and reconstruction; pedestrian crossing signs and beacons at Carlton Drive; and paved switchbacks along Carlton Drive within developed areas (Rincon Consultants 2022). Therefore, the following analysis will primarily focus on potential additional impacts due to additional grading in Work Memorial Park.

1. *Would the project 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?*

In the certified Final EIR, four special status plant species were identified in the project study area for the entire FORTAG alignment, and 38 more have the potential to occur but were not directly observed. As concluded in the NES Addendum, no special status species are expected to occur in the Modified Project area that were not previously discussed in the certified Final EIR and the 2020 NES (Rincon Consultants 2022).

Mitigation measures identified in the certified Final EIR to reduce or avoid impacts to these biological resources would also be required for the Modified Project as part of implementation of the entire Original Project. These mitigation measures include:

- Mitigation Measure 1(b) Implement Special Status Plant Species Avoidance, Minimization, and Mitigation
- Mitigation Measure BIO-1(c) Prepare Habitat Mitigation and Monitoring Plan
- Mitigation Measure BIO-1(d) Conduct Special Status Wildlife Pre-Construction Surveys
- Mitigation Measure BIO-1(e) Conduct Nesting Bird Pre-Construction Surveys
- Mitigation Measure BIO-1(f) Implement Biological Resources Avoidance and Minimization
- Mitigation Measure BIO-1(g) Implement California Tiger Salamander Compensatory Mitigation
- Mitigation Measure BIO-1(h) Provide Worker Environmental Awareness Program
- Mitigation Measure BIO-1(i) Perform Biological Monitoring
- Mitigation Measure BIO-1(j) Implement Wildlife Avoidance and Minimization

With implementation of the required mitigation measures listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified Final EIR. Therefore, the Modified Project would not result in new or more severe impacts on special-status species beyond those identified in the previously certified Final EIR for the Original Project.

2. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The certified Final EIR for the Original Project identified substantial adverse effects on riparian habitat or other sensitive natural communities that may be impacted by the Trail, including in the CDR/SR 218 segment. While most of the changes that would occur under the Modified Project would be in developed areas and no vegetation removal would occur, the Modified Project would permanently impact 0.01 acre (approximately 435 square feet) of arroyo willow riparian habitat due to slope fill in Work Memorial Park. However, as indicated in the 2020 NES, compensatory mitigation that provides for a suitable replacement ratio for all permanent impacts to jurisdictional areas and other sensitive community types would be required ensure no net loss of habitat. Therefore, the Modified Project would not result in substantially more severe impacts, and no additional mitigation is required with the implementation of the measures included in the NES (Rincon Consultants 2022). Furthermore, as with the Original Project, the Modified Project would be subject to mitigation measures if sensitive habitats are observed as part of the Modified Project as follows:

- Mitigation Measure BIO-2(a) Implement Sensitive Natural Community Avoidance Measures
- Mitigation Measure BIO-2(b) Develop and Implement a Biological Resources Mitigation and Management Plan for Impacts to Biological Resources Resulting from Trail Construction and Operation
- Mitigation Measure BIO-2(c) Implement Best Management Practices during Construction
- Mitigation Measure BIO-2(d) Implement Invasive Weed Prevention and Management Program

With implementation of the required mitigation measures listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified Final EIR. The Modified Project would not result in new or more severe impacts on riparian habitat and sensitive natural communities beyond those identified in the previously certified Final EIR for the Original Project.

3. *Would the project 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?*

The certified Final EIR identified wetlands and waters in the study area along the CDR/SR 218 segment under the Original Project. An emergent wetland is located between Canyon Del Rey Creek and SR 218 at Work Memorial Park. As part of the NES Addendum, a jurisdictional delineation was conducted at Work Memorial Park in areas where grading would extend past the limits of previously studied areas. As concluded in the NES Addendum, the Modified Project would impact approximately 0.14 acre of freshwater emergent wetland in Work Memorial Park. However, the 2020 NES includes avoidance and minimization measures (AM-1 through AM-10) in Chapter 4, *Discussion of Jurisdictional Waters*, which would reduce impacts to the freshwater emergent wetland to the extent feasible. Additionally, compensatory mitigation that provides for a suitable replacement ratio for all permanent impacts to jurisdictional areas and other sensitive community types would be required ensure no net loss of habitat. No further mitigation would be required with the implementation of measures included in the 2020 NES and Final EIR, as well as the acquisition of applicable permits including the United States Army Corps of Engineers 404 permit, 401 certification from the Regional Water Quality Control Board, and Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife, and all conditions contained therein (Rincon Consultants 2022).

Furthermore, as with the Original Project, the Modified Project would be subject to mitigation measures if wetland areas are observed as part of the Modified Project as follows:

- Mitigation Measure BIO-3(a) Conduct Jurisdictional Delineation for Canyon Del Rey/SR 218 Segment
- Mitigation Measure BIO-3(b) Perform Restoration Impacts to Waters and Wetlands

As discussed above, the NES Addendum included completion of a jurisdictional delineation for the Modified Project, which is the Canyon Del Rey/SR 218 Segment. With implementation of the required mitigation measures listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified Final EIR. The Modified Project would not result in new or more severe impacts on wetlands beyond those identified in the previously certified Final EIR for the Original Project.

4. *Would the project 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?*

The Modified Project would involve several minor project modifications, including a larger retaining wall at Work Memorial Park and resurfacing of the tennis courts; public amenities such as benches at the existing butterfly garden; paved switchbacks at the Frog Pond; the undercrossing at State Route 218 and the Frog Pond and associated demolition and reconstruction; pedestrian crossing signs and beacons at Carlton Drive; and paved switchbacks along Carlton Drive within developed

areas. These are slight modifications of the portion of the CDR/SR 218 segment in Work Memorial Park as analyzed in the certified Final EIR. This portion of the Trail would not interfere with a wildlife movement corridor because the Trail location is not within a wildlife movement corridor and wildlife would be able to pass over the Trail and continue to circumnavigate the retaining wall behind the tennis court, as the new retaining wall would not substantially change existing conditions with the current retaining wall. As noted in the certified Final EIR, the Trail does not represent a significant physical barrier to wildlife movement and Trail usage and the speed of pedestrian travel would not be expected to deter overall wildlife movement across the Trail. Furthermore, the Trail is not located between two or more critical habitat areas or within a linkage connecting two or more critical habitat areas. Thus, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR, and the Modified Project would result in no new or more severe impacts to wildlife movement beyond those identified in the previously certified Final EIR for the Original Project.

5. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
6. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The Modified Project would not alter the design of the Original Project in a way that would conflict with any local policies, ordinances, or an adopted Habitat Conservation Plan. The altered Trail alignment would not be within a Habitat Conservation Plan or Natural Community Conservation Plan. Consistent with the Original Project, impacts would be less than significant. The Modified Project would result in no new operational activities that were not previously analyzed in the certified Final EIR, the Modified Project would have no new or more severe impacts related to local policies or ordinances protecting biological resources.

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3.5 Cultural Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Pages 4.5-16 through 4.5-21	No	No	No	Yes
2.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Pages 4.5-21 through 4.5-23	No	No	No	Yes
3.	Disturb any human remains, including those interred outside of formal cemeteries?	Page 4.5-23	No	No	No	Yes

1. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*
2. *Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?*
3. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

In March 2020, TAMC prepared a Historic Property Survey Report (HPSR) including an Archaeological Survey Report (ASR) for the Original Project, which evaluated how the Original Project may affect cultural and archaeological resources within the project area. In January 2023, a HPSR Addendum was prepared to address minor changes in the Trail alignment and design that could impact cultural and archaeological resources not previously analyzed in the 2020 HPSR. To support the HPSR Addendum (Rincon Consultants 2023b), a pedestrian survey was completed for the Modified Project areas not subject to previous study limits and revised consultation letters were distributed to Native American tribes and other interested parties in December 2022. The HPSR Addendum concludes that previous cultural resources studies for the Original Project, including the 2020 HPSR, remain valid for the Modified Project. Therefore, the Modified Project would not result in additional impacts to cultural resources.

Cultural resources are site-specific, and the Modified Project would involve modifications that would involve changes in ground disturbing activities in the CDR/SR 218 segment. As described in Section 2, *Project Description*, the Modified Project would include a paved walkway along Frog Pond instead of a raised boardwalk as proposed under the Original Project, and pile driving would no longer be required in this area. However, the undercrossing beneath SR 218 included in the Modified Project, instead of the tunnel as proposed under the Original Project, would require pile

driving and a greater depth of excavation. However, this area has already been subject to ground disturbance associated with the paved roadway. Similar to the Original Project, most areas of the Modified Project have undergone previous ground disturbance or been subject to prehistoric and archaeological cultural resources surveys. Construction of the Modified Project would involve surface excavation, similar to the Original Project, for the Trail, tennis court rotation and resurfacing, replacement retaining wall, and the switchback along the Frog Pond area. As with the Original Project and identified in the certified Final EIR, construction activities associated with the Modified Project would have the potential to unearth or impact previously unidentified prehistoric or archaeological cultural resources. Mitigation identified in the certified Final EIR would be implemented to reduce or avoid impacts to potentially unknown cultural resources required for the Original Project would also be required for the Modified Project. Consistent with the Original Project, implementation of the following would be required to reduce impacts related to cultural resources to less than significant.

- Mitigation Measure CUL-1 Conduct Archaeological Monitoring during Construction

With implementation of the required mitigation measure listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would not result in new or more severe impacts on cultural resources or human remains beyond those identified in the previously certified Final EIR for the Original Project.

3.6 Energy

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Page 4.6-9 through 4.6-10	No	No	No	N/A
2.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Page 4.6-10 through 4.6-11	No	No	No	N/A

- 1. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- 2. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The certified Final EIR noted that construction phases for the Original Project could generate increased energy consumption from construction equipment using fossil fuels. Table 4.6-1 reported estimated gallons of diesel and gasoline for all phases of construction. The Modified Project would make minor changes to the Original Project within the CDR/SR 218 segment by modifying a portion of the Trail within Work Memorial Park, relocating and reconstructing the existing tennis courts, installing public amenities near the butterfly garden, changing the shape of the trail on either side of Canyon del Rey/SR 218, constructing a pedestrian undercrossing beneath SR 218, and adding an at-grade pedestrian crossing on SR 218. The scope of construction for the Modified Project would be increased compared to the Original Project, as more energy would be consumed during construction of the SR 218 undercrossing, grading for the paved switchbacks near Frog Pond, and other project modifications. However, as discussed in the Final EIR, California regulations (13 CCR 2449(d)(3), 2485) limit idling from both on-road and off-road diesel-powered equipment. Also, construction contractors would have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. Fuel use would be limited to the amount necessary for project completion. Impacts would continue to be less than significant, as analyzed in the certified Final EIR. The Modified Project would not result in new or more severe impacts on energy consumption beyond those identified in the previously certified Final EIR for the Original Project.

The Final EIR concluded that neither TAMC, the Association of Monterey Bay Area Governments, nor any of the local jurisdictions through which the Trail would pass have adopted renewable energy or energy efficiency plans that would apply to the Original Project. All jurisdictions are required to

comply with the California Green Building Code (CALGreen) that mandates all permitted residential and non-residential construction to recycle or salvage 65 percent minimum of nonhazardous construction materials. The Materials Recovery Facility in Marina has a recycling and reuse program that helps contractors and builders to meet or exceed the CALGreen requirements. The Original Project would comply with the edicts of CALGreen. Because the Modified Project would occur in the same area and under the same jurisdictions, this would be true for the Modified Project as well. The Modified Project would not result in conflicts with State or local renewable energy plans beyond those identified in the previously certified Final EIR for the Original Project.

3.7 Geology and Soils

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:					
	a. 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?	Page 4.7-17 through 4.7-19	No	No	No	Yes
	b. Strong seismic ground shaking?	Pages 4.7-17 through 4.7-19	No	No	No	Yes
	c. Seismic-related ground failure, including liquefaction?	Pages 4.7-19 through 4.7-20	No	No	No	Yes
	d. Landslides?	Pages 4.7-19 through 4.7-20	No	No	No	Yes
2.	Result in substantial soil erosion or the loss of topsoil?	Pages 4.7-21 through 4.7-22	No	No	No	N/A
3.	Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	Pages 4.7-19 through 4.7-20	No	No	No	Yes
4.	Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Page 4.7-22	No	No	No	N/A

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
5.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Pages 4.7-22 through 4.7-25	No	No	No	Yes
6.	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Pages 4.7-22 through 4.7-24	No	No	No	Yes

1.a. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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?*

1.b. *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Potential risks and susceptibility to earthquakes and seismicity is site-specific and related to proximity of the Trail alignment to faults. The Modified Project would be in the same general area as the Original Project with minor modifications. Therefore, the proximity to known earthquake faults and the potential for fault rupture, seismic ground shaking, liquefaction, and landslides described for the Original Project in the certified EIR would also apply to the Modified Project, which would not increase the number of structures or add any residents on along the Trail alignment. In addition, the undercrossing beneath SR 218 would be required to comply with California Department of Transportation (Caltrans) Seismic Design Criteria, which outlines design requirements to minimize the risk of infrastructure failure due to seismic activity. Therefore, the Modified Project would not increase the number of people or structures potentially exposed to seismic risks compared to the Original Project. Consistent with the Original Project, implementation of the following would be required to reduce impacts related to seismic ground failure and landslides to less than significant:

- Mitigation Measure GEO-1 Conduct Design-level Geotechnical Investigation and Implement Recommendations

With implementation of mitigation, the Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

- 1.c *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- 1.d *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*
- 3. *Would the project be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?*

Geologic units and soil types are site-specific. The Modified Project would be in the same general area as the Original Project with minor modifications and additional public and pedestrian amenities. Mitigation Measure GEO-1, Conduct Design-level Geotechnical Investigation and Implement Recommendations, as described in the certified EIR for the Original Project, would be required for the Modified Project and would determine if unstable soils are present in this area. As with the Original Project, implementation of the mitigation would render impacts less than significant. The Modified Project would not result in new or more severe impacts related to unstable or expansive soils beyond those identified in the previously certified Final EIR for the Original Project.

- 2. *Would the project result in substantial soil erosion or the loss of topsoil?*

The Modified Project would be in the same area as the Original Project. The Modified Project would involve similar construction and operational activities as the Original Project. The Modified Project would include the Trail meandering through Work Memorial Park, rotation and resurfacing of the tennis courts, public amenities, construction of the undercrossing beneath SR 218, a paved switchback trail near Frog Pond, and other surface pedestrian improvements which would require additional grading and retaining walls. While slope modifications would be required for the Modified Project, revegetation would occur at the time of construction to prevent soil erosion and loss of topsoil. Therefore, the Modified Project would not result in increased potential for soil erosion. The Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

- 4. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?*

As indicated in the Final EIR, the Original Project would not exacerbate the existing risk to life or property because the native and fill soils underlying the proposed alignment are generally non-expansive, and the Trail would not require the import of expansive soils. As the Modified Project would be constructed using the same methods as those proposed for the Original Project, the Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

- 5. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

As with the Original Project, septic tanks or alternative wastewater disposal systems would not be utilized for the Modified Project. Therefore, no geological impact due to wastewater disposal systems would occur. The Modified Project would not result in new or more severe impacts related

to septic tanks or wastewater disposal beyond those identified in the previously certified Final EIR for the Original Project.

6. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

As indicated in the Final EIR, the Original Project alignment has high sensitivity for paleontological resources as the soils in the project alignment are of the type with high potential to preserve scientifically significant fossils. As described in Section 2, *Project Description*, the Modified Project would involve construction of an undercrossing beneath SR 218, instead of the tunnel as proposed under the Original Project. Construction of the undercrossing would require pile driving and a greater depth of excavation than what was analyzed under the Original Project. Additionally, the Modified Project would involve a paved switchback portion of the Trail by Frog Pond instead of the raised boardwalk as proposed under the Original Project, which would require additional grading. The increased grading under the Modified Project may increase the potential to uncover paleontological resources during construction. However, Mitigation Measure GEO-5, Implement Paleontological Resources Mitigation, would also be required for the Modified Project as part of implementation of the entire Original Project. Therefore, the Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

3.8 Greenhouse Gas Emissions

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Pages 4.8-12 through 4.8-13	No	No	No	N/A
2.	Conflict with any applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases?	Pages 4.8-13 through 4.8-14	No	No	No	N/A
3.	Exacerbate the adverse effects or impair the ability of jurisdictions to respond to adverse effects of climate change, including the risk of loss, injury, or death as a result of projected sea level rise, storm flooding, or fire risk?	Pages 4.8-14 through 4.8-15	No	No	No	N/A

- 1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- 2. Would the project conflict with any applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases?*

As described in the certified Final EIR, construction of the Original Project would generate a one-time construction related contribution of 2,632 metric tons of greenhouse gas (GHG) emissions over an 18-month period, measured as carbon dioxide equivalent (CO₂e). Construction GHG emissions would be temporary for the duration of construction. Operational emissions for the Original Project were found to be insignificant as no new parking facilities would be implemented and no new vehicle trips generated by Trail use within the region. Furthermore, the Trail would increase active transportation opportunities, contributing to an overall reduction in GHG. Construction of the Modified Project would involve additional construction efforts associated with the SR 218 undercrossing and the paved switchback near Frog Pond, which would involve additional GHG emissions. As described in the certified Final EIR, construction of the Original Project would result in the one-time contribution of approximately 0.05 percent of annual regional GHG emissions. The Modified Project would result in a nominal increase in GHG emissions and would similarly represent a negligible proportion of regional GHG emissions. The Modified Project would not change the operational GHG emissions relative to the Original Project as there would be no new vehicle trips and the number of estimated Trail users would not change. The Modified Project would involve

similar operational uses as the Original Project and would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the Modified Project would result in no new or more severe impacts related to GHG emissions beyond those identified in the previously certified Final EIR for the Original Project.

The Original Project was found to be consistent with the 2017 CARB Scoping Plan and with the 2040 AMBAG Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The Modified Project would only make minor changes in the Trail design and would be consistent with the most recent iteration of the MTP/SCS (the 2045 MTP/SCS). Therefore, the Modified Project would not result in new or more severe impacts related to consistency with state or regional plans beyond those identified in the previously certified Final EIR for the Original Project.

3. *Would the project exacerbate the adverse effects or impair the ability of jurisdictions to respond to adverse effects of climate change, including the risk of loss, injury, or death as a result of projected sea level rise, storm flooding, or fire risk?*

As indicated in the Final EIR, the Original Project alignment was found to have a less than significant impact to the risks associated with climate change. Implementation of the Trail would not include any structures for human occupancy and would not make any changes to the existing landscape that would increase the risk of exposure to people or structures from impacts associated with climate change-related sea level rise. Similarly, the CDR/SR 218 segment would not result in the displacement of residents due to storm flooding. The Modified Project would not introduce structures for human occupancy nor make changes to the existing landscape that would increase the risk of exposure to people or structures from impacts associated with climate change-related sea level rise or storm flooding.

The Final EIR found that the Original Project would not result in increased water use or impacts to the availability or accessibility of water resources for fire response. Routine maintenance would reduce vegetation that could fuel wildfires. Similarly, the Modified Project would be designed and maintained in the same manner as the Original Project and no new impacts would result. The Modified Project would only make minor changes in the Trail design and would therefore not result in new or more severe impacts related to climate change-induced sea level rise, storm flooding, or fire risk beyond those identified in the previously certified Final EIR for the Original Project.

3.9 Hazards and Hazardous Materials

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Pages 4.8-25 through 4.8-26	No	No	No	Yes
2.	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?	Page 4.8-17 through Page 4.8-20 and 4.8-26 through 4.8-27	No	No	No	Yes
3.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Appendix A	No	No	No	N/A
4.	Be located on a site that is included on a list of hazardous material 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?	Pages 4.8-20 through 4.8-25	No	No	No	N/A
5.	For a project located in 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?	Appendix A	No	No	No	N/A

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Appendix A	No	No	No	N/A
7. 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?	Pages 4.8-27 through 4.8-28	No	No	No	N/A

In April 2020, TAMC prepared an Initial Site Assessment (ISA) for the Original Project, which described the Original Project’s potential to result in significant impacts related to hazards and hazardous materials sites. In January 2023, an ISA Addendum was prepared to address minor changes in the Trail alignment and design that could result in impacts related to hazardous materials not previously analyzed in the 2020 ISA. The ISA Addendum (Rincon Consultants 2023c) included a regulatory database report to determine if the Modified Project would result in impacts not already identified by the 2020 ISA. As concluded in the ISA Addendum, the findings of the 2020 ISA remain valid and no significant effects related to hazardous materials would be expected under the Modified Project.

1. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
2. *Would the project 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?*

The Modified Project would not change the operational uses of the Original Project, which consists of a multi-use trail. The Modified Project would be in the same general area as the Original Project and would include pedestrian improvements and public amenities. Therefore, the Modified Project would not create a new significant hazard. Compliance with regulations pertaining to the transport, handling, and disposal of hazardous materials would be mandatory and minimize impacts of upset or hazards, regardless of the potential implementation of the Modified Project or Original Project. Impacts would be less than significant. The Modified Project would not result in new or more severe impacts related to hazards and hazardous materials beyond those identified in the previously certified Final EIR for the Original Project.

3. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The certified Final EIR found that the Original Project would not result in substantial exposure to hazardous emissions within 0.25 mile of a school as Trail uses would not involve hazardous materials. Construction would involve very small use of hazardous materials, but construction activities would be required to comply with federal and State laws that limit or reduce the consequences of hazardous materials use and accidental spills. The Modified Project would generally involve the same construction methods and the same operational conditions relative to hazardous materials in proximity to schools and throughout the entire alignment. As the Modified Project involves only minor Trail redesign, it would not result in new or more severe impacts related to hazardous emissions or materials beyond those identified in the previously certified Final EIR for the Original Project.

4. *Would the project be located on a site that is included on a list of hazardous material 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?*

As described in the certified Final EIR, potential hazards along the Trail alignment include soil contaminants, exposure to asbestos and/or lead-based paint, and chemicals associated with agriculture. The Modified Project only applies to the CDR/SR 218 segment, and this segment is outside the areas where mitigation measures relative to hazardous materials sites apply. Some modifications would be outside the footprint at the Original Project within the CDR/SR 218 segment, but there are no new or additional hazard sites identified and the alignment would not be situated closer to any known hazard sites. It would also involve similar construction and operational activities as the Original Project. Therefore, the Modified Project would not be exposed to the hazards associated with hazardous materials sites, as noted in the certified Final EIR. Therefore, the Modified Project would not result in new or more severe impacts related to hazardous materials sites beyond those identified in the previously certified Final EIR for the Original Project.

5. *For a project located in 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?*

As described in the certified Final EIR, the CDR/SR 218 segment is within two miles of the Monterey Regional Airport but recreational users along this would not be exposed to safety hazards as the Trail alignment is outside that airport's safety zone. The Modified Project would be in the same general area as the Original Project and would include public amenities and pedestrian improvements. These alterations would not place Trail users in closer proximity to the airport than the Original Project. Therefore, the Modified Project would not result in new or more severe impacts related to safety hazards pertaining to airports or private airstrips beyond those identified in the previously certified Final EIR for the Original Project.

6. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The Final EIR stated that the Original Project would not substantially alter any roadways such that emergency evacuations would be impaired. As described in Section 2, *Project Description*, the Modified Project would involve construction of an undercrossing beneath SR 218, which would

require a portion of SR 218 to be temporarily demolished. Closure of SR 218 could interfere with emergency operations and evacuations.

Closure of SR 218 during construction of the undercrossing would require preparation of a traffic control plan as work would occur within the (Caltrans) right-of-way. The traffic control plan would be developed to maintain site access during project construction, and would be reviewed and approved prior to construction. Additionally, the temporary closure of SR 218 would not restrict access to areas surrounding the demolished portion. Surrounding neighborhoods and areas currently accessible via SR 218 would be accessible via Rosita Road, Paloma Road, Via Verde, and Work Avenue, which bypass the portion of SR 218 that would be demolished during construction of the undercrossing. The traffic control plan would identify specific construction detour routes during demolition and reconstruction of SR 218. Therefore, the project would not impede emergency access surrounding the portion of SR 218 that would be temporarily closed during construction.

Similarly, the Modified Project would alter some pedestrian features near roadways, but these alterations would not interfere with evacuation plans as exits from the neighborhoods along Canyon del Rey Boulevard and Plumas Avenue would remain in place. Therefore, the Modified Project would result in no new or more severe impacts related to emergency access beyond those identified in the previously certified Final EIR for the Original Project.

7. *Would the project 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?*

Wildfire impacts are discussed in Section 3.17, *Wildfire*.

3.10 Hydrology and Water Quality

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Pages 4.10-19 through 4.10-23	No	No	No	Yes
2.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of this basin?	Pages 4.10-23 through 4.10-25	No	No	No	N/A
3.a.	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 that would result in substantial erosion or siltation on- or off-site?	Pages 4.10-25 through 4.10-27	No	No	No	Yes
3.b.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Pages 4.10-25 through 4.10-27	No	No	No	Yes

Transportation Agency for Monterey County
Fort Ord Regional Trail and Greenway Project, Canyon del Rey/SR 218 Segment

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
3.c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner that would 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?	Page 4.10-28	No	No	No	Yes
3.d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	Page 4.10-28	No	No	No	Yes
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Page 4.10-29	No	No	No	N/A
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Pages 4.10-30 through 4.10-31	No	No	No	Yes

1. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The Final EIR found that the Original Project could increase pollutant discharges to waters of the State in the CDR/SR 218 segment where the project alignment would occur adjacent to water features. In general, stormwater would flow from the surface of the new paved Trail segments to the adjacent, unpaved greenway areas alongside the proposed Trail. Furthermore, design features on the north side of the CDR/SR 218 undercrossing would sheet flow off the sides to the unpaved vegetated area below the elevated footings. The Modified Project would include several modifications, including construction of an undercrossing beneath SR 218 and construction of a paved switchback near Frog Pond. It would also add pedestrian crossings and ADA-compliant curbs

and slightly alter the shape of the Trail. None of these features would substantially change the stormwater flow from what was described for the Original Project.

Similar to the Original Project, a stormwater pollution prevention plan (SWPPP) would be required for construction of the Modified Project. The SWPPP would include best management practices (BMP) to prevent soil erosion and resultant sedimentation of streams and surface waters during construction. The SWPPP would also contain BMPs to prevent leaking of pollutants such as oil, grease, and chemicals from construction equipment from discharging to surface waters or groundwater. With mandatory implementation of the SWPPP and associated BMPs, construction of the Modified Project would not violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.

Finally, the Modified Project would be subject to mitigation measures as follows:

- Mitigation Measure HYD-1(a) Prepare Accidental Spill Control Plan and Conduct Environmental Training Prior to Construction
- Mitigation Measure HYD-1(b) Maintain Vehicles and Equipment During Construction
- Mitigation Measure HYD-1(c) Conduct Design-level Drainage Analysis Prior to Construction and Implement Identified Measures to Minimize Runoff during Construction
- Mitigation Measure HYD-1(d) Prepare Stormwater Control Plan Prior to Construction and Implement Identified Stormwater Control Measures

With implementation of these measures, the Modified Project would not result in new or more severe impacts related to water quality beyond those identified in the previously certified Final EIR for the Original Project.

2. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of this basin?*

The Final EIR concluded the Original Project would not substantially deplete groundwater supplies or interfere with groundwater recharge. Water demand during construction would be divided among the various jurisdictions in the Trail alignment and would not generate water demand in excess of existing supplies. During operation, the Original Project would not generate water demand. The Modified Project would result in a few design changes to the Trail alignment that would not alter water demand during construction or create water demand during operation.

The Final EIR found that the Original Project could interfere with groundwater recharge by introducing 0.6 square mile of impervious surfaces. Compared to the more than 800 square miles of storage capacity of the Salinas Valley Groundwater Basin, which underlies the entire project alignment, this new impervious surface area from the Trail would not affect the infiltration potential on adjacent lands. The Modified Project would not substantially alter the amount of impervious surfaces and would not result in new or substantially more severe significant impacts beyond those previously identified for the Original Project in the certified Final EIR.

- 3.a. *Would the project 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 that would result in substantial erosion or siltation on- or off-site?*
- 3.c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner that would 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?*

The Original Project would result in a minor alteration of the existing drainage patterns. The Original Project could increase the amount of total annual runoff in the region, which could result in increased erosion and sediment transport off site. The Modified Project would not contribute to increased runoff due to implementation of more impervious surfaces in the project alignment as the design changes would minimally affect Trail length. However, the Modified Project would be subject to Mitigation Measures HYD-1(c) and HYD-1(d), as described above, to reduce runoff.

With implementation of these measures, the Modified Project would not result in new or more severe impacts related to erosion and runoff from altered drainage patterns beyond those identified in the previously certified Final EIR for the Original Project.

- 3.b. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- 3.d. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The Final EIR found that the Original Project CDR/SR 218 segment would be within a 100-year flood hazard area. However, the EIR also found that Trail improvements would not substantially alter drainage patterns in the 100-year floodplain as all surface waters would continue to flow into Canyon Del Rey Creek, Laguna Grande, Roberts Lake, and Frog Pond through the existing stormwater system or natural geographic features that support the surrounding developed land uses for these water features. No on-site or off-site flooding would occur nor would existing drainage patterns change due to project implementation. The Modified Project would result in minor design modifications to the Trail alignment that would not change the conditions described for the Original Project in the Final EIR. Furthermore, similar to the Original Project, the Modified Project would be subject to Mitigation Measures HYD-1(c) and HYD-1(d), described above. Therefore, the Modified Project would not have new or more severe impacts related to runoff beyond those identified in the previously certified Final EIR for the Original Project.

- 4. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The Original Project would not include the construction of housing or commercial or industrial structures and would not increase the permanent risk of inundation by tsunami or seiche for people who would live or work within the project corridor. Furthermore, the CDR/SR 218 corridor already supports recreational activities, and project implementation could increase the people using the area for recreation. Nonetheless, exposure of persons to pollutants released by inundation caused

by tsunami or seiche would be temporary and limited to the duration of Trail use throughout the CDR/SR 218 segment. The Modified Project would not increase Trail users and would not introduce residences or businesses. Therefore, the Modified Project would have no new or more severe impacts related to flood hazard areas or inundation beyond those identified in the previously certified Final EIR for the Original Project.

5. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The Original Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, as the Trail would implement only a small amount of impervious surface compared to the total impervious area of developed Monterey County. Implementation of the Original Project would only result in minor changes to the water quality and quantity of surface waters and recharge rates of groundwater throughout the project corridor. The Modified Project would include a paved switchback near Frog Pond, instead of a raised boardwalk as proposed under the Original Project, and a slightly longer Trail length as the Trail would meander through Work Memorial Park. These modifications would add an incremental amount of impervious surface compared to the Original Project. Furthermore, similar to the Original Project, the Modified Project would be subject to Mitigation Measures HYD-1(a) through HYD-1(d) to reduce the project impacts on hydrology and water quality by ensuring the amount, rate, and water quality of on-site and off-site stormwater runoff would be largely preserved to those levels that occur currently throughout the project corridor. Therefore, as with the Original Project, the Modified project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, with implementation of mitigation, the Modified Project would not result in new or more severe impacts related to flood hazard areas or inundation beyond those identified in the previously certified Final EIR for the Original Project.

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3.11 Land Use and Planning

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Physically divide an established community?	Page 4.11-16	No	No	No	N/A
2.	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?	Page 4.11-16 through 4.11-47	No	No	No	N/A

1. *Would the project physically divide an established community?*

The Original Project would not divide an established community, but would improve connections between the former Fort Ord, Monterey Peninsula, and Salinas Valley communities through the provision of pedestrian/bicycle trails as an active transportation alternative. The Modified Project would be in the same area as the Original Project and would include public amenities and pedestrian improvements. The Modified Project would include redesign of some project features, but would not substantially change the overall Trail alignment. The Modified Project would not physically divide an established community as access to the neighborhoods along Canyon del Rey Boulevard, Plumas Avenue, and Carlton Drive would remain in place. The Modified Project would not result in new or more severe impacts related to dividing established communities beyond those identified in the previously certified Final EIR.

2. *Would the project 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?*

The findings of the certified EIR indicate that Original Project would be consistent with applicable land use plans and zoning codes, with implementation of mitigation measures provided throughout the EIR. The Modified Project would involve the same operational uses and activities included in the Original Project and analyzed in the certified EIR. Modifications include a slightly revised alignment, additional grading, retaining walls, and public amenities. Therefore, the operation of the Modified Project would also be consistent with the applicable land use plans and zoning codes, and the Modified Project would result in no new or more severe impacts related to consistency with applicable land uses plans, ordinances, and policies beyond those identified in the previously certified Final EIR for the Original Project.

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3.12 Noise

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Exposure of persons to or generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Pages 4.12-9 through 4.12-11	No	No	No	Yes
2.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Pages 4.12-11 through 4.12-13	No	No	No	N/A
3.	For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise?	Page 4.12-13	No	No	No	N/A

- Would the project result in exposure of persons to or generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The Final EIR found that the Original Project could expose persons to or generate excessive noise during construction, including from heavy equipment, augers, and pile drivers. The Original Project would be subject to the following in the vicinity of Frog Pond:

- Mitigation Measure N-1, Implement Noise-Reducing Measures for Pile Driving or Drilling Activities.

The Modified Project would be in the same area as the Original Project and would redesign some features, including public amenities near the tennis courts, a larger undercrossing of SR 218, and a switchback near Frog Pond. Because the Modified Project would include a paved switchback instead of a raised boardwalk as proposed under the Original Project, pile driving would no longer be required in this area. However, the paved switchback would require additional grading, which could generate additional construction noise. Further, the undercrossing beneath SR 218 included in the Modified Project would require pile driving. Potential impacts related to pile driving were analyzed for the Original Project in the Final EIR as pile driving was anticipated to be required for construction of overcrossings in the Northern Loop and CSUMB Loop North segments, as well as for construction

of the raised pathway in the CDR/SR 218 segment. The Final EIR included Mitigation Measure N-1, Implement Noise-Reducing Measures for Pile Driving or Drilling Activities, which prohibits pile driving or drilling activities during the night and provides a list of options for construction contractors to implement to reduce noise levels to 85 dBA or below at 50 feet from the project site. This mitigation measure has been revised to clarify that it applies to the SR 218 undercrossing rather than a raised pathway, as shown below. Added text is underlined and deleted text shown in ~~strikethrough~~.

N-1 Implement Noise-Reducing Measures for Pile Driving or Drilling Activities

Pile driving or drilling activities shall not be permitted at night. During all pile driving or drilling activities, which are a possibility for construction of overcrossings in the Northern Loop and CSUMB Loop North segments and for construction of the ~~raised pathway~~ SR 218 undercrossing in the Canyon Del Rey/SR 218 segment, the construction contractor shall employ a combination of the following noise-reducing measures to the extent necessary to reduce noise levels to 85 dBA or below at 50 feet from the project site. Noise monitoring shall occur once daily during normal pile driving or drilling activities to confirm that the standard has been met. If the noise level exceeds 85 dBA, the monitor shall notify the construction contractor, who shall cease pile driving or drilling until additional measures are implemented to reduce noise levels to 85 dBA, with subsequent monitoring.

1. Equipment with the potential to exceed 85 dBA at 50 feet shall be located as far from nearby noise-sensitive receptors as possible.
2. Any construction equipment that would be required during pile driving or drilling activity shall be properly maintained and have manufacturer-approved or recommended sound abatement means on air intakes, combustion exhausts, heat dissipation vents, and the interior surfaces of engine hoods and power train enclosures.
3. If feasible and determined to be an effective option, install temporary noise barriers around the perimeter of pile driving or drilling equipment operation to minimize construction noise.

In addition to these noise-reducing measures, the construction contractor shall provide written notification to residences within 700 feet of pile driving or drilling activities at least three weeks prior to all pile driving or drilling activities. The notification shall inform residents of the estimated start date, times and duration of pile driving or drilling activities.

With compliance with this measure, construction of the Modified Project would not generate noise exceeding local standards.

The Modified Project would not result in an increase in operational activities along the Trail alignment. In addition, the revised trail alignment would not bring trail users closer to any substantial sources of operational noise. Therefore, there would be no change to operational noise as compared to the Original Project.

Additionally, the Modified Project would not shift vehicle trips closer to sensitive noise receivers or increase the volume of traffic generated by the project, as the Modified Project would not result in an increase in Trail users. Impacts would be less than significant, consistent with impacts of the Original Project, as identified in the certified Final EIR. The Modified Project would not result in new or substantially more severe significant impacts related to conflict with applicable noise standards or permanent increases in ambient noise levels beyond those identified in the previously certified Final EIR for the Original Project.

2. *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

The Original Project would generate groundborne vibration and noise only during construction phases. Table 4.12-3 in the Final EIR offers the typical vibration levels for construction equipment that would be used during construction of the project. A vibration level of 72 VdB is the threshold established by the Federal Transit Authority for residential structures where people normally sleep.

The Modified Project include a switchback from the SR 218 undercrossing to Carlton Drive, through a portion of the Frog Pond Wetland Preserve, instead of an elevated walkway, which would require additional grading but would not require pile driving. However, the Modified Project would include an undercrossing beneath SR 218 instead of a tunnel, which would require pile driving. As discussed above under item (1), potential impacts related to pile driving were analyzed for the Original Project in the Final EIR for this segment. However, the pile driving was anticipated to occur for the raised pathway, and not the SR 218 undercrossing.

As discussed on page 4.12-12 of the Final EIR, vibration levels of 0.10 inches per second in terms of peak particle velocity (in/sec PPV) would be perceptible to receptors and would be considered a potentially significant impact to residences. Vibration from pile driving would naturally reduce to below 0.10 in/sec at a distance of approximately 85 feet. The nearest sensitive receptors to the Modified Project where pile driving would occur are approximately 150 feet northwest and 250 feet south; therefore, vibration from pile driving would reduce to a less than perceptible level.

Additionally, the Final EIR included Mitigation Measure N-1, Implement Noise-Reducing Measures for Pile Driving or Drilling Activities. This mitigation measure has been revised to clarify that it applies to the SR 218 undercrossing, as shown above under item (1).

There would be no new sources of groundborne vibration resulting project construction. Impacts for the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would not result in new or more severe construction noise impacts beyond those identified in the previously certified Final EIR for the Original Project.

3. *For a project located in 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?*

The Modified Project would be in the same area as the Original Project and would involve redesign some project features. As described in the certified Final EIR, the Trail alignment would be within two miles of the Monterey Municipal Airport. However, the alignment changes proposed for the Modified Project would not bring the Trail any closer to the airport than the Original Project. As with the Original Project, the Modified Project is not in the 60 dBA CNEL airport noise impact contours. The Modified Project would be exposed to similar airport noise impacts as the Original Project. Therefore, consistent with the Original Project and findings of the certified EIR, the Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

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3.13 Public Safety and Services

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:						
1.	Result in substantial adverse physical impacts associated with the provision of 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:					
a.	Emergency transport, fire protection, or police protection?	Pages 4.13-13 through 4.13-17	No	No	No	Yes
b.	Schools or libraries?	Page 4.13-17	No	No	No	N/A
c.	Parks?	Pages 4.13-17 through 4.13-18	No	No	No	N/A
d.	Healthcare facilities?	Page 4.13-18	No	No	No	N/A

1.a. Would the project result in substantial adverse physical impacts associated with the provision of 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 emergency transport, fire protection, or police protection?

As described in the certified Final EIR, the Original Project would introduce a new, 28-mile multi-purpose trail in northwestern Monterey County. Trail users may include local residents, workers and students, in addition to tourists and local recreators, but would not result in a permanent increase in the local population. In addition to people using the trails for recreation, there could also be transient or unhoused people resting, loitering, or camping illegally on the Trail. The increased human activity from Trail users, including bicyclists and pedestrians using at-grade road crossings and potentially transient or unhoused people loitering and illegally camping throughout the project corridor, including the undercrossing at SR 218, could result in additional calls for emergency, fire and/or police protection services. The Modified Project would include public amenities and improvements to increase pedestrian safety and accessibility, but would not increase Trail users over those anticipated by the Original Project. Thus, the Modified Project would not result in increased emergency services calls over those anticipated for the Original Project.

The Final EIR found that implementation of the Original Project would also not result in a change in emergency access throughout the project corridor. The Modified Project would involve construction

of an undercrossing, which would require demolishing a portion of SR 218. Closure of SR 218 during construction could result in temporary impacts to emergency access, and additional impacts would occur from the Modified Project. Closure of SR 218 during construction of the undercrossing would require preparation of a traffic control plan as work would occur within the Caltrans right-of-way. Traffic control plans would be developed to maintain site access during project construction, and would be reviewed and approved prior to project construction. Additionally, the temporary closure of SR 218 would not restrict access to areas surrounding the demolished portion. Surrounding neighborhoods and areas currently accessible via SR 218 would be accessible via Rosita Road, Paloma Road, Via Verde, and Work Avenue, which bypass the portion of SR 218 that would be demolished during construction of the undercrossing. The traffic control plan would identify specific construction detour routes during demolition and reconstruction of SR 218. Therefore, the project would not impede emergency access surrounding the portion of SR 218 that would be temporarily closed during construction.

In operation, the closure of the right turns on Carlton Street and additional pedestrian improvements at the intersection of Carlton Street and CDR/SR 218 would not restrict access to the neighborhoods between Canyon del Rey Boulevard and Plumas Avenue and thus would not impede emergency access. The Modified Project would result in no new or more severe impacts to emergency transport beyond those identified in the previously certified Final EIR for the Original Project.

The Final EIR found that implementation of the Original Project would not result in the need for additional fire protection staff or resources, and there would be no need for new or altered facilities to provide fire protection services; neither would the Original Project result in substantial changes in access throughout the project corridor. Similarly, the Modified Project would not result in new or more severe impacts to fire protection services beyond those identified in the previously certified Final EIR for the Original Project because the Modified Project would not increase the number of Trail users.

For the Original Project, the Final EIR concluded that increased human activity along the project corridor, including the potential for more transient/unhoused persons loitering or trespassing onto adjacent lands, could result in additional calls for police protection or law enforcement service. Because the Modified Project involves only minor design changes and would not increase the number of Trail users, the conclusions for the Original Project relative to police services would also apply to the Modified Project. While the proposed Trail would not result in an increase in permanent population in the project corridor or an increase in Trail users, its use may result in an increase in calls to law enforcement and an increased need for police protection services in the local neighborhoods if transient persons were to loiter or trespass onto adjacent lands in violation of the law, to the same degree as that concluded in the certified 2020 EIR. Additionally, as with the Original Project, the Modified Project would be required to implement Mitigation Measure PS-1, Ensure Adequate Police Monitoring and Safety Provisions for Each Portion of the FORTAG Alignment. The Modified Project would not result in new or more severe impacts to police protection beyond those identified in the previously certified Final EIR for the Original Project.

1.b. Would the project result in result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools or libraries?

The Final EIR found that implementation of the Original Project would not result in the need for additional schools or libraries as there would be no increase in permanent population related to development of the Trail. Because the Modified Project involves only minor design changes and would not result in an increase in population, the conclusions for the Original Project relative to schools and libraries would also apply. The Modified Project would not result in new or more severe impacts to schools or libraries or require construction of new facilities beyond those identified in the previously certified Final EIR for the Original Project.

1.c. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for parks?

The Original Project would introduce a new multi-purpose trail and trail users through the cities of Marina, Seaside, Monterey Del Rey Oaks, and unincorporated Monterey County, providing improved access to local parks and recreational amenities, including picnic areas, playgrounds, nature areas and existing trails. An estimated 1,000 to 3,000 users per day would access FORTAG once the alignment is fully constructed and operational; however, this population would largely include local user groups, including workers, residents, and students. The project would not result in an increase in the permanent population of Monterey County. No new park facilities would be necessary based on implementation of the Original Project. Because the Modified Project involves minor design changes and would not result in an increase in population, the conclusions for the Original Project relative to parks would still apply. The Modified Project would not result in new or more severe impacts to parks or require construction of new facilities beyond those identified in the previously certified Final EIR for the Original Project.

1.d. Would the project result in result in substantial adverse physical impacts associated with the provision of 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 healthcare facilities?

The Original Project would not result in an increase in the permanent population that would need health care services, and thus would not result in the need for new health care facilities or the expansion of existing facilities. However, there would be an increase in Trail users along the proposed alignment, including bicyclists, walkers, runners, hikers, and general recreators, which could result in an increase in injuries and/or medical emergencies because of users being in areas that are not currently accessed easily. These injuries and/or medical emergencies would be treated by the existing health care facilities in the county, including the local hospitals or urgent care facilities. However, bicyclists currently utilizing local roadways in the region around the project corridor are often near high-speed vehicular traffic would have the opportunity to utilize the FORTAG alignment instead, thereby improving safety and decreasing the likelihood of a bicycle-vehicle collision (see Impact T-3 in Section 4.14, *Transportation*, of the certified Final EIR). The Modified Project would not result in additional Trail users. Therefore, the Modified Project would not increase the demand for healthcare facilities compared to the Original Project analyzed in the

certified Final EIR. The Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

3.14 Transportation

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?	Pages 4.14-10 through 4.14-12	No	No	No	N/A
2.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Pages 4.14-12 through 4.14-13	No	No	No	N/A
3.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	Pages 4.14-13 through 4.14-14	No	No	No	N/A
4.	Result in inadequate emergency access?	Pages 4.14-14 through 4.14-15	No	No	No	N/A

1. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?*

The Original Project would not conflict with any programs, plans, ordinances, or policies addressing the circulation system within Monterey County or the cities in which the Trail alignment would be situated. Furthermore, the EIR concluded that the Trail would improve connectivity and provide amenities that support regional planning goals and policies. Because the Modified Project involves minor design changes to the CDR/SR 218 segment, the conclusions for the Original Project relative to conflict with regional and local transportation planning would still apply. The Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

2. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

The Final EIR concluded the Original Project would not conflict with *CEQA Guidelines* Section 15064.3 as it would increase active transportation and would not generate increased VMT. Because the Modified Project involves minor design changes and would not change the number of Trail users, the conclusions for the Original Project regarding the generation of VMT would also apply to the Modified Project. Therefore, the Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

3. *Would the project substantially increase hazards due to a geometric design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

As described in Impact T-3 of the certified Final EIR, the Original Project would not include geometric design features that would create hazards. The Modified Project would increase safety features with the addition of pedestrian crossings at SR 218 and Carlton Avenue to improve Trail access. Curb ramps would be constructed to meet current ADA requirements. These new features would not create hazards but would rather improve safety. Thus, impacts of the Modified Project would be consistent with impacts of the Original Project as identified in the certified Final EIR. The Modified Project would not result in new or more severe hazards beyond those identified in the previously certified Final EIR for the Original Project.

4. *Would the project result in inadequate emergency access?*

The Final EIR found that implementation of the Original Project would also not result in a change in emergency access throughout the project corridor. The Modified Project would involve construction of an undercrossing, which would require demolishing a portion of SR 218. Closure of SR 218 during construction could result in temporary impacts to emergency access, and additional impacts would occur from the Modified Project.

Closure of SR 218 during construction of the undercrossing would require preparation of a traffic control plan as work would occur within the Caltrans right-of-way. Traffic control plans would be developed to maintain site access during project construction, and would be reviewed and approved prior to project construction. Additionally, the temporary closure of SR 218 would not restrict access to areas surrounding the demolished portion. Surrounding neighborhoods and areas currently accessible via SR 218 would be accessible via Rosita Road, Paloma Road, Via Verde, and Work Avenue, which bypass the portion of SR 218 that would be demolished during construction of the undercrossing. The traffic control plan would identify specific construction detour routes during demolition and reconstruction of SR 218. Therefore, the project would not impede emergency access surrounding the portion of SR 218 that would be temporarily closed during construction.

Similar to the Original Project, the Modified Project may feature emergency call boxes providing a direct link to emergency services and mile markers to assist in location. Therefore, the Modified Project would not result in new or more severe impacts related to inadequate emergency access beyond those identified in the previously certified Final EIR for the Original Project.

3.15 Tribal Cultural Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?	Pages 4.15.5 through 4.15-6	No	No	No	Yes
2.	Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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?	Pages 4.15.5 through 4.15-6	No	No	No	Yes

- 1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?*
- 2. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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?*

The Final EIR for the Original Project found that implementation could cause a substantial adverse change to previously unknown or unidentified tribal cultural resources and that Mitigation Measure TCR-1, Native American Monitoring, would be required to reduce impacts. The Modified Project would similarly include ground disturbing activities, and Native American monitoring for ground-disturbing activities in construction areas for the SR 218 undercrossing, the paved switchback near Frog Pond, and other areas in accordance with Mitigation Measure TCR-1 would ensure impacts to

TCR would remain less than significant. The Modified Project would result in no new or more severe impacts related to Tribal Cultural Resources beyond those identified in the previously certified Final EIR for the Original Project.

3.16 Utilities and Service Systems

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Require or result in the construction of a new or expanded water or wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	Pages 4.16-6 through 4.16-8	No	No	No	N/A
2.	Result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Pages 4.16-6 through 4.16-8	No	No	No	N/A
3.	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?	Pages 4.16-6 through 4.16-8	No	No	No	N/A
4.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Pages 4.16-8 through 4.16-9	No	No	No	N/A
5.	Not comply with federal, state, and local statutes and regulations related to solid waste?	Pages 4.16-8 through 4.16-9	No	No	No	N/A

1. *Would the project require or result in the construction of a new or expanded water or wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?*
2. *Would the project result in insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*
3. *Would the project 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?*

The Final EIR determined the Original Project would not require or result in relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, and that it would not generate demand for water or wastewater treatment in excess of existing supplies. The Modified Project would not result in new operational activities not analyzed previously in the certified Final EIR because the Modified Project would not increase Trail users. Accordingly, compared with the Original Project, the Modified Project would not generate increased volumes of wastewater, or wastewater containing substantially more or different levels of potential contaminants and pollutants. The Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

4. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
5. *Would to project comply with federal, state, and local statutes and regulations related to solid waste?*

The Final EIR found that the Original Project would not generate solid waste in excess of local landfill capacity and would comply with all applicable regulations. The Modified Project would not generate additional solid waste compared to the Original Project because the Modified Project would have similar construction and operational activities as the Original Project. The Modified Project would not result in an increase in Trail users. Therefore, the Modified Project would not result in new or more severe impacts related to landfill capacity or regulations pertaining to solid waste beyond those identified in the previously certified Final EIR for the Original Project.

3.17 Wildfire

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:						
1.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	Pages 4.17-17 through 4.17-18	No	No	No	N/A
2.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Pages 4.17-19 through 4.17-21	No	No	No	Yes
3.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Pages 4.17-19 through 4.17-21	No	No	No	Yes
4.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Pages 4.17-19 through 4.17-21	No	No	No	Yes
5.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Pages 4.17-21 through 4.17-22	No	No	No	N/A

1. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

While the Final EIR found that some of the Original Project would be in areas classified as Very High Fire Hazard Severity zones, implementation of the project would not impair the execution of adopted emergency response or evacuation plans and impacts would be less than significant. The CDR/SR 218 segment occurs in areas classified as Moderate, High, and Very High Fire Hazard

Severity zones, but the portion of the alignment involved in the Modified Project is outside these zones and in an area classified as “Urban/Unzoned” (see Figure 4.17-1, Fire Hazard Severity Zones, in the Final EIR) (TAMC 2020). Thus, the Modified Project would not result in new operational activities not analyzed previously in the certified Final EIR. Accordingly, the Modified Project would not result in new or more severe impacts related to emergency response or evacuation plans beyond those identified in the previously certified Final EIR for the Original Project.

2. *Would the project be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
3. *Would the project be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
4. *Would the project be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The Final EIR found that the Original Project would be in areas classified as Very High Fire Hazard Severity zones and concluded that TAMC and the underlying jurisdictions in which the Trail segments would be situated would be responsible for maintenance and operation of the Trail segments, including adherence with Monterey County’s fuel modification standards. Furthermore, the CDR/SR 218 segment occurs in areas classified as Moderate, High, and Very High Fire Hazard Severity zones, but the portion of the alignment involved in the Modified Project is outside these zones and in an area classified as “Urban/Unzoned” (see Figure 4.17-1, Fire Hazard Severity Zones, in the Final EIR) (TAMC 2020). The Modified Project would similarly be subject to the standards that apply to the Original Project, and both the Original Project and the Modified Project would be required to implement Mitigation Measure GEO-1, as discussed in Section 3.7, *Geology and Soils*, to determine necessary slope stabilization to prevent post-fire landslides. With adherence to these measures, the Modified Project would not result in new or more severe impacts related to wildfire risks caused by the project or exposure of people or structures to significant risk from flooding or landslides due to post-fire slope instability beyond those identified in the previously certified Final EIR for the Original Project.

5. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The Original Project would increase the presence of people in areas designated as High and Very High Fire Hazard Severity zones, but the Final EIR determined that implementation of the Trail would not involve the installation of structures that people would occupy. The CDR/SR 218 segment occurs in areas classified as Moderate, High, and Very High Fire Hazard Severity zones, but the portion of the alignment involved in the Modified Project is outside these zones and in an area classified as “Urban/Unzoned” (see Figure 4.17-1, Fire Hazard Severity Zones, in the Final EIR) (TAMC 2020). While persons using the Trail could be exposed to risk of loss, injury, or death if a wildfire event began while they were on the Trail and without access to a vehicle to use for evacuation. Nonetheless, the Final EIR found that proximity to roadways, lack of impediments to

accessing those roadways, the relative infrequency of wildfires, and the transient nature of recreational trail use would reduce potential exposure to wildfire risk to low. The Modified Project would not result in new operational activities or increase the number of Trail users. Accordingly, the Modified Project would not result in new or more severe impacts related to risk of loss, injury, or death involving wildland fire beyond those identified in the previously certified Final EIR for the Original Project.

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3.18 Effects Found Not to Be Significant

Under the Final EIR, effects to the following CEQA issue areas were found not to be significant.

- **Mineral Resources** issue areas 1 and 2:
 - 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?
 - 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?
- **Population and Housing** issue areas 1 and 2:
 - Induce substantial unplanned 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)
 - Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere
- **Recreation** issue areas 1 and 2:
 - 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
 - Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Because the Modified Project would implement minor design changes and include additional public and pedestrian amenities, the effects would be consistent with the Original Project and the findings of the Final EIR would also apply here. Accordingly, the Modified Project would result in no new or more severe impacts related to emergency response or evacuation plans beyond those identified in the previously certified Final EIR for the Original Project.

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3.19 Cumulative Impacts

As described above in Sections 3.1 through 3.17, the Modified Project would result in no new or more severe direct or indirect impacts beyond those identified in the previously certified Final EIR for the Original Project. In addition, no new reasonably foreseeable future projects have been identified within proximity to the project site that were not previously considered in the cumulative impact analysis for each section of the certified Final EIR. Therefore, the cumulative contribution of the Modified Project impacts would be the same as or less than analyzed in the certified EIR for the Original Project. Therefore, no new or more severe cumulative impacts would result from the Modified Project beyond those identified in the certified EIR for the Original Project.

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4 Other CEQA Required Discussions

The Modified Project would not substantially change the discussion and findings presented for the Original Project in Section 5, *Other CEQA Required Discussions*, of the certified Final EIR. These other required discussions include significant and unavoidable impacts, growth inducing effects, irreversible environmental effects, and energy effects. As described above in Sections 3.1 through 3.19 above, the Modified Project would not result in new or more severe direct, indirect, or cumulative impacts beyond those identified in the previously certified Final EIR for the Original Project. Therefore, the Modified Project would also not result in new or more severe significant and unavoidable impacts, growth inducing effects, irreversible environmental effects, or energy effects beyond those previously discussed in the certified Final EIR.

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5 Comparison of Alternatives

The Modified Project would not significantly change the alternatives analysis and comparison of alternatives in the certified Final EIR. As described in Section 3, *Impact Analysis*, of this Addendum, the Modified Project would not result in new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project. Therefore, the potential impacts of the Modified Project are within the scope of the impact comparison among the alternatives already considered in the certified Final EIR. As no new or more severe impacts have been identified because of the Modified Project, it would not require comparison of any new alternatives or alternatives that are considerably different from or inconsistent with those already analyzed in the certified Final EIR. These alternatives include the following:

- Alternative 1 - No Project Alternative
- Alternative 2 - Increased Use of Existing Roadways Alternative
- Alternative 3 - Substitute Crossing Alternative
- Alternative 5 - Frog Pond Wetland Preserve Northerly Alignment Alternative
- Alternative 6 - South of Frog Pond Caltrans Right-of-Way Alignment Alternative

As the Modified Project would not introduce new or increased impacts, no additional alternatives or further comparison of alternatives are required.

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6 Conclusion

As established in the discussions above regarding the potential effects of the Modified Project, substantial changes are not proposed to the Original Project nor have substantial changes occurred that would require major revisions to the certified Final EIR prepared for the Original Project. Impacts beyond those identified and analyzed in the certified Final EIR would not be expected to occur because of the Modified Project. Overall, the proposed modifications to the Original Project that constitute the Modified Project would not result in new information of substantial importance that would have new, more severe impacts, new mitigation measures, or new or revised alternatives from what was identified for the Original Project in the certified Final EIR. Therefore, TAMC concludes that the analyses and conclusions reached in the Final EIR certified on March 25, 2020 remain valid. As such, the Modified Project would not result in conditions identified in *CEQA Guidelines* Section 15162, and supplemental environmental review or a Subsequent EIR is not required for the proposed modifications to the project. Again, it should be noted that the Modified Project would be subject to all previously applicable mitigation measures from the certified Final EIR for the Original Project, as discussed above. The MMRP adopted for the Original Project would apply to the Modified Project. Based on the analysis above, this Addendum to the previously certified EIR for the project has been prepared in accordance with Section 15164 of the *CEQA Guidelines*.

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7 References and Preparers

7.1 References

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- _____. 2022. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed October 2022).
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- Rincon Consultants, Inc. 2023a. Addendum to the Natural Environment Study for the Fort Ord Regional Trail and Greenway (FORTAG) Canyon Del Rey/State Route 218 Segment Project. Letter prepared for Laura Riccardelli, Caltrans District 5 Environmental, San Luis Obispo, California. January 13, 2023.
- _____. 2023b. Addendum to the Historic Property Survey Report/Archaeological Survey Report for the Fort Ord Regional Trail and Greenway (FORTAG) Canyon Del Rey/State Route 218 Segment Project. Letter prepared for Laura Riccardelli, Caltrans District 5 Environmental, San Luis Obispo, California. January 19, 2023.
- _____. 2023c. Addendum to the Initial Site Assessment for the Fort Ord Regional Trail and Greenway (FORTAG) Canyon Del Rey/State Route 218 Segment Project. Letter prepared for Lindsey Van Parys, PE QSD/P, GHD Inc. Sacramento, California. January 5, 2023.
- Transportation Agency for Monterey County (TAMC). 2020. Fort Ord Regional Trail and Greenway Project Final Environmental Impact Report. Salinas, CA. March 2020.

7.2 List of Preparers

This EIR Addendum was prepared by Rincon Consultants, Inc. under contract to GHD. Persons and firms involved in data gathering, analysis, project management, and quality control include:

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