Road and Trail Change-In-Use Evaluation Process Program Environmental Impact Report

California Environmental Quality Act Findings of Fact

Prepared by

California State Parks
One Capital Mall, Suite 410
Sacramento, CA 95814
916.445.8870

April 30, 2013

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1 INTRODUCTION

California State Parks (CSP), the lead agency under the California Environmental Quality Act (CEQA), has approved the Road and Trail Change-In-Use Evaluation Process (Process). These CEQA Findings of Fact are prepared in compliance with Section 21081 of CEQA and Section 15091 of the State CEQA Guidelines to support the approval of the Process by CSP. In describing the purpose of Findings, CEQA states that:

> *No public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:*
>
> *(a) The public agency makes one or more of the following findings with respect to each significant effect:*
>
> *(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.*
>
> *(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.*
>
> *(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.*
>
> *(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment. [Public Resources Code Section 21081]*

The Process provides CSP with an objective and consistent evaluation tool to assess change-in-use proposals that modify existing roads and trails. The Process will apply to most State Park units (except Off-Highway Motor Vehicle Recreation units) and will be considered within the broader scope of corridors, connections, and linkages to roads and trails on surrounding federal, regional, county, and city lands. The Process will help CSP Districts consider changes in non-motorized recreational uses on existing CSP roads and trails that best accommodate accessibility and recreational activities appropriate for each road or trail facility.

The Road and Trail Change-in-Use Evaluation Process Program EIR (Program EIR), which was prepared by CSP to evaluate the environmental effects of implementing the Process, has been certified by CSP as being adequate under CEQA. The Program EIR is programmatic in nature and examines the overall environmental effects of the Process; it does not analyze specific, individual change-in-use proposals. CEQA compliance for individual change-in-use proposals will be the responsibility of the CSP District personnel where the proposal is located. Change-in-use proposals that are consistent with the Process will be evaluated for environmental effects in light of the information presented in the Program EIR, in accordance with Section 15168 of the State CEQA Guidelines.

The environmental analysis contained in the Program EIR provides a thorough evaluation of effects on the environment that would or could occur as a result of implementing the Process. Because the EIR identified significant effects that would or could occur as a result of the project, and in accordance with the provisions of the State CEQA Guidelines, CSP hereby adopts these Findings. The two potentially significant effects of implementing the Process will be reduced to a less-than-significant level after mitigation.

Because no significant unavoidable effects on the environment will remain after implementation of the Process with its adopted mitigation measures, a Statement of Overriding Considerations pursuant to State CEQA Guidelines Section 15093 is not needed as part of the approval of the Process.

2 DESCRIPTION OF THE ROAD AND TRAIL CHANGE-IN-USE EVALUATION PROCESS

CSP is implementing the Process to facilitate and make more consistent the review of change-in-use proposals that would add uses to or remove uses from existing recreational roads and trails in the State Park System. The Process will help CSP Districts to consider changes in non-motorized recreational uses on existing CSP roads and trails that best accommodate accessibility and recreational activities appropriate for each road or trail facility. The Process is intended to: implement the CSP Trail Policy; evaluate appropriate proposals for road and trail change-in-use projects in CSP units that can be implemented in a manner that avoids or clearly mitigates potential significant effects on the environment; provide an objective and consistent evaluation tool and process to inform decision-making, while recognizing the diversity of resources and users at each park unit; and, ensure that these objectives are achieved in an open and transparent process.

The Process applies to decisions that are made for the addition or removal of different types of non-motorized uses of a State Park System road or trail. These types of use may include: pedestrian, accessible pedestrian, wheelchair, equestrian, mountain bike, or other unidentified non-motorized uses not currently recognized as potential road and trail use types. The Process can be applied to roads and trails in a manner consistent with unit classifications within State Parks, State Recreation Areas, and State Beaches of the CSP System that are owned and managed by the State. The Process will not apply to motorized recreational vehicle trails and any units operated as State Vehicular Recreation Areas.

The Process will be applied to changes in use proposed by park personnel, other agencies, or user groups for specific roads and/or trails on specific CSP units. In general, project actions that are eligible for approval under the Process could involve modifications within an existing CSP road or trail prism. Construction would be limited to the existing disturbed area of the road or trail prism and adjacent lands. If a proposal qualifies for implementation under the Process, it will be evaluated in light of the information contained in the Program EIR and may be considered a later activity that is within the scope of the analysis in the Program EIR.

Implementation of a change in use may require physical modifications to the proposed road or trail. Potential project actions that may result from a change-in-use project include: reconstruction or maintenance (e.g., repair eroded portions of roads or trails; weed removal) within an existing road or trail prism; installation of speed control or other trail devices for additional user types; rerouting of trail alignments to correct otherwise unsustainable road and trail grades, or to resolve an existing environmental problem; installation of hardened surfaces, such as, but not limited to, aggregate surfacing, rock armoring, wooden boardwalks or puncheons and bridging; closure, decommissioning, and restoration of existing roads and trails; and trailhead, point of access, and parking improvements related to changes in recreational road or trail use.

CSP has two types of project requirements for road and trail change-in-use proposals: Standard Project Requirements (SPRs) and Project Specific Requirements (SPRs). They consist of design, construction, and management actions that CSP incorporates into the project description of change-in-use proposals for the purpose of protection of resources and preventing significant environmental effects.

SPRs are applied to projects statewide at all park units, as required. These requirements were developed from the CSP's Health and Safety Plans, Best Management Practices (BMPs), known regulatory requirements, and the evaluation within the Program EIR. For example, an SPR addressing how to treat the inadvertent discovery of

archeological features is assigned to all projects statewide that include ground-disturbing work. However, for a project that does not require ground disturbance, such as restriping an existing paved area in a parking lot, this SPR would not be necessary and, therefore, not apply to the project. SPRs have been developed for General Construction, Cultural Resources (general, historian, and archaeologist), Natural Resources (general, plants, and wildlife), Aesthetics, Air Quality, Geology and Soils (erosion), Hazards, Hydrology, Traffic, and Noise. SPRs are presented in Section 3.8 of the Draft Program EIR and in Attachment A of these CEQA Findings of Fact. Because SPRs would be applicable at all park units for an array of change-in-use project scenarios, placeholders are provided in several of the SPRs (such as for responsible parties), so that, depending on the location and type of project and associated resource issues, the requirement can be applied to specific projects and enforced by responsible parties.

PSRs are written for, and applied to, proposals based on specific actions unique to a project and/or area that are necessary to complete the project while protecting resources. They are design, construction, and management features developed as part of the Process and incorporated by the appropriate CSP District staff into the description of the change-in-use proposal. A design that avoids a resource specific to a park unit and is not covered by the SPR is an example of a potential PSR. For example, if a project would need to avoid a particular snail species found specifically in the project area, a PSR would call for delay of the road or trail work in the vicinity of discovered snails until they are relocated to a suitable habitat outside of the project area by a CSP-approved, biological monitor.

The Process includes adaptive use management (AUM) as an SPR (GEN-9) designed to monitor and correct, if necessary, user-created trail issues. Adaptive management is a well-established concept used in natural resources management. Adaptive strategies are commonly included in projects affecting natural resources and natural systems, where conditions and effects can change over time, such as ecosystem restoration projects, water resources projects, or, in this case, projects involving on-going recreation use in natural settings. AUM will involve a standard procedure of describing: (1) existing use and resource conditions as a baseline during the preparation of the change-in-use survey at the start of the Process; and, (2) performance standards for maintaining use at levels that do not result in significant effects on the environment. The performance standards would be tailored to each change-in-use proposal and its park unit. They would describe desired use and resource conditions necessary to maintain impacts at less-than-significant levels. All performance standards would relate to use conditions or resources that are observable in the field by CSP staff.

As a result of incorporation of SPRs, including AUM, and PSRs into the description of change-in-use proposals, there are two mitigation measures required to address potentially significant effects on the environment in the Program EIR (for Impacts 4.4-2, Construction-Related Disturbance or Loss of Sensitive Habitats [Jurisdictional Wetlands, Riparian Habitat, and Other Special-Status Natural Communities], and 4.5-1, Construction-Related Disturbance or Loss of Common and Sensitive Aquatic Habitats). Mitigation measures for these impacts include compliance with enforceable regulatory requirements that contain performance standards for the protection of the natural processes and qualities of the affected wetland resources. If an impact would be significant and unavoidable despite the implementation of SPRs, PSRs, and mitigation measures, the project would not qualify for approval using the Process, but rather would require its own independent CEQA compliance process.

Later activities that are consistent with the Process evaluated in the Program EIR will be reviewed in accordance with State CEQA Guidelines Section 15168(c-e). As new site-specific, change-in-use requests are proposed in park units under this Process, CSP will use a written checklist to document the evaluation of the site and the actions proposed to determine whether the environmental effects are covered within the scope of the Program EIR. If the checklist evaluation confirms that no new significant effects would occur and that no additional mitigation measures would be necessary, CSP can determine the project to be within the scope of the Program EIR, and approve the change-in-use proposal under a Notice of Determination (NOD), referencing the Program EIR for CEQA compliance, in accordance with State CEQA Guidelines Section 15168(c)(2). CSP will have

incorporated the applicable SPRs and PSRs into the proposal description prior to conducting the written checklist analysis to determine consistency with the Process and coverage by the Program EIR. Also, for proposals consistent with the Process and within the scope of the Program EIR, CSP will incorporate into the proposal any applicable mitigation measures identified in the Program EIR, in accordance with State CEQA Guidelines Section 15168(c)(3).

The Program EIR may also be used to simplify future environmental documents for change-in-use proposals that are not entirely within the scope of the Program EIR. Information from the Program EIR may also be incorporated by reference in future environmental documents to describe statewide or regional effects that apply to the Process as a whole, or for cumulative impacts related to a change-in-use proposal that requires its own independent EIR or MND.

After completion of CEQA, a construction cost estimate is prepared from the construction work log to establish budgetary costs for implementation of the change-in-use project. A work plan is also prepared to incorporate all construction and permitting aspects of project implementation as identified in the project's CEQA review. The project would then be implemented to include prescribed physical and operational modifications and any prescribed enforcement, patrol development, sign installation, trail seasoning, user education program(s), or other management actions.

Projects pursued through the Process will be subject to other applicable environmental laws and regulations. As CSP moves to comply with laws other than CEQA that require public notice on later activities, they may also reference the Program EIR, stating that the new action is within the scope of the Program EIR, and that it adequately describes the activity for CEQA purposes. Through the Process, CSP will ensure that any new actions comply with the permit, consultation, and application requirements of agencies with jurisdiction.

3 ALTERNATIVES

In accordance with the Section 15126.6 of the State CEQA Guidelines, a range of reasonable alternatives to the project that could feasibly attain the basic project objectives but would avoid or substantially lessen any of the significant effects of the project was addressed in the Draft Program EIR. The purpose of the alternatives analysis is to determine whether or not an alternative to the Road and Trail Change-in-Use Evaluation Process (Process) would feasibly reduce or eliminate significant project impacts, within the basic framework of the objectives.

Because the project is an evaluation process intended to improve the consistency, comprehensiveness, and efficiency of the environmental review of change-in-use proposals, the alternatives analysis is tailored to variations in the process. As a result, the Program EIR includes an evaluation of two alternatives to the Process: No Project Alternative and Complete Impact Avoidance Alternative. Overall, the No Project Alternative could be environmentally similar to the Process, because CSP would require CEQA compliance regardless of whether the process is comprehensive or case-by-case. There is a risk that case-by-case review could be environmentally disadvantageous, compared to the Process, if variability in the application of SPRs and mitigation measures by Districts resulted in differing levels of impact avoidance and mitigation effectiveness; however, careful scrutiny in environmental evaluation of case-by-case reviews would prevent this outcome.. The Complete Impact Avoidance Alternative would achieve the basic objectives of the Process, but the number of projects that may feasibly achieve this alternatives stringent standard of complete significant impact avoidance would be limited, and potentially too few to make this a feasible alternative for CSP. The Complete Impact Avoidance Alternative would be environmentally similar compared to the Process. The difference between the alternatives relates to the approach to reach that outcome, and the relative feasibility of change-in-use proposals to end up without

significant effects, when mitigation measures and AUM can (as in the Process) or cannot (as in the Complete Impact Avoidance Alternative) be used to help attain that goal.

A description of these alternatives is provided below.

3.1 NO PROJECT ALTERNATIVE

A comprehensive evaluation of the No-Project Alternative, as required by Section 15126.6(e) of the State CEQA Guidelines, was included in the Draft Program EIR. Under the No-Project Alternative, when Districts, other agencies, or user groups propose change-in-use projects, they would be reviewed and evaluated without the benefit of the systematic and consistent Process. Road and trail change-in-use proposals would be evaluated for implementation by CSP on an individual, case-by-case basis and subject to independent CEQA processes. Adherence to a comprehensive and consistent set of SPRs would not occur. If Adaptive Use Management (AUM) is employed, its application may vary from one District to another. Any approved change-in-use projects would still be carried out in a manner consistent with all CSP policies, best management practices (BMPs), Trails Handbook, and legal requirements (including accessibility requirements, such as Other Power-Driven Mobility Devices [OPDMD]), which include many features intended to reduce or eliminate potential significant environmental impacts. Recognizing that each project would receive its case-by-case review without the opportunity for consistent application of SPRs, AUM, and mitigation from a Program EIR, the CEQA documentation would likely be repetitive from one project to the next and the potential for variability in mitigation approaches may exist.

The No Project Alternative would not achieve the basic objectives of the Process. A system would not be established to evaluate road and trail change-in-use projects that would require avoidance or mitigation of all significant environmental impacts. Consideration of change-in-use proposals would necessarily be case-by-case. Evaluations of proposals would be naturally variable, depending on the different perspectives of District personnel, so an objective and consistent evaluation tool would be lacking. The environmental review of individual change-in-use proposals would require case-by-case evaluation, repeating analyses of impacts that are similar from one project to the next, along with repeated cumulative analysis, which would require more CSP staff and financial resources than using the Process. The openness and transparency of the case-by-case project evaluation process, while complying with all legal requirements, could also be variable, depending on the nature of the proposal and the approaches of each District.

The No Project Alternative would require case-by-case evaluation of change-in-use proposals without the benefit of consistently applied SPRs and AUM, and mitigation available from the Program EIR. CSP would require compliance with CEQA for all change-in-use proposals equally, regardless of whether it is conducted in a systematic and comprehensive manner or on a case-by-case basis. It is reasonable to conclude, however, that the risk of significant environmental impacts may be greater as a practical matter for case-by-case review, compared to the Process, because change-in-use projects approved through the Process must necessarily avoid or ultimately mitigate significant environmental impacts, while case-by-case CEQA review can allow significant impacts to occur (as permitted by CEQA for unavoidable significant effects, when overriding considerations exist). Independent environmental review conducted by the Districts would necessarily comply with CEQA; however, the type of mitigation recommended in separately prepared environmental documents could vary depending on physical resource conditions and decisions made by District personnel. The primary potential difference in environmental outcomes relates to a District opportunity to accept a change-in-use project when all significant impacts cannot be feasibly avoided or mitigated to a less-than-significant level, which would not occur under the Process.

The types of expected environmental impacts would be the same for change-in-use proposals handled independently under the No Project Alternative as those described for the Process, including the potential for

significant terrestrial biology, aquatic biology, and cultural resources impacts. The approach to reducing potentially significant environmental impacts could vary from one change-in-use proposal to the next, because of potential variations in the applications of SPRs, AUM, and mitigation measures by Districts. For instance, design standards created as a result of the coordinated and systematic consideration of SRPs that maintain soil erosion, stormwater runoff, and stream sedimentation effects at less-than-significant levels may not be applied in the same manner for the design of trails considered individually on a case-by-case basis. These natural and cultural resources impacts could be addressed by project-specific mitigation measures, but they would still be derived on a case-by-case basis, which would diminish consistency in mitigation approach. While the goal of case-by-case review would be to achieve the same mitigation effectiveness as under the comprehensive Process, there would be an inherent effectiveness risk related to variability of mitigation strategies that would need to be avoided by careful scrutiny of each individual project's impacts. Air quality, noise, and greenhouse gas impacts, which are mostly related to construction activities, would occur in a manner that could result in significant environmental impacts, requiring mitigation, instead of avoidance through the application of construction-related SPRs, based on the potential for variable application of SPRs by different Districts.

Overall, the No Project Alternative could be environmentally similar to the Process, because CSP would require CEQA compliance regardless of whether the process is comprehensive or case-by-case. There is a risk that case-by-case review could be environmentally disadvantageous, compared to the Process, if variability in the application of SPRs and mitigation measures by Districts resulted in differing levels of impact avoidance and mitigation effectiveness; however, careful scrutiny in environmental evaluation of case-by-case reviews would prevent this outcome.

Regarding the social issue of the potential for trail use conflict, the No Project Alternative could result in greater risks of conflict between user types, because the process would lack the consistent application of design strategies that help achieve use-appropriate and low-conflict design and the consistently applied open and transparent project evaluation process. Potential for conflict between users of the same type could also increase, compared to the Process, for the same reasons.

Conclusion

The No Project Alternative is not approved, because it would not achieve the basic objectives of the proposed Process regarding implementation of a consistent evaluation approach.

3.2 COMPLETE IMPACT AVOIDANCE ALTERNATIVE

As an alternative to the Process, which allows for potentially significant effects that can be mitigated to less than significant, the purpose of this alternative is to consider whether the project objectives could be met while achieving complete avoidance of significant adverse environmental effects. The Process included the opportunity for compensatory mitigation measures where SPRs and PSRs could not avoid a significant environmental effect or reduce it to less-than-significant levels and the use of AUM to address uncertainties about potential environmental effects. Under the Complete Impact Avoidance Alternative, when Districts, other agencies, or user groups propose change-in-use projects, they would be reviewed and evaluated using a more stringent set of SPRs than the Process that necessitate complete avoidance of significant environmental impacts. Change-in-use proposals would be evaluated for implementation by CSP using this more stringent, Road and Trail Change-in-use Process, including its SPRs and PSRs that would require avoidance of impacts all sensitive habitats, wildlife impacts, water quality impacts, and other environmental effects. The concept of this alternative also would not rely on AUM to respond to unanticipated environmental effects, because the need for AUM is based on uncertainties that significant effects may emerge that require a new management response. Any approved change-in-use projects would still be carried out in a manner consistent with all CSP policies, best management practices (BMPs), Trails Handbook, and legal requirements (including accessibility requirements,

such as OPDMD), which include many features intended to reduce or eliminate potential significant environmental impacts.

The Complete Impact Avoidance Alternative could achieve many of the basic objectives of the Process, but the number of change-in-use proposals that could attain complete avoidance of significant impacts without mitigation measures and AUM would be limited. It is possible that very few change-in-use proposals could be implemented under this alternative process, because existing trails often encounter or otherwise affect streams, sensitive habitats, sloped areas, or other sensitive resources. A system could be established to identify road and trail change-in-use projects that would avoid significant environmental impacts; however, this would be more challenging and perhaps infeasible in many cases, because of the need to recognize uncertainties regarding some potential for impacts (which would be resolvable through mitigation measures and AUM under the Process). Consideration of change-in-use proposals could be facilitated with the potential for streamlining of some environmental reviews where significant environmental impacts could be avoided or mitigated. An objective and consistent evaluation tool could be established with different SPRs that reflect the goal of avoiding all significant impacts. The openness and transparency of the project evaluation process could also be established, similar to the approach for the Process. In summary, although the Complete Impact Avoidance Alternative would achieve the basic objectives of the project for the road and trail change-in-use projects that meet the stringent standard of complete significant impact avoidance, the number of projects that may feasibly achieve that standard would be limited, and potentially too few to make this a feasible alternative for CSP.

The Complete Impact Avoidance Alternative would, by its definition, result in the prevention of any significant or potentially significant environmental impacts without the use of mitigation measures or AUM. This would be accomplished by the application of more stringent SPRs and PSRs. Projects that involved a potentially significant environmental effect requiring consideration of mitigation would be disqualified from approval under the alternative process. A District could still pursue such a change-in-use project, but would do so under an individual project CEQA review. Because of the stringent standard inherent in the alternative, it is reasonable to conclude that there would be an absence of significant environmental impacts under this alternative process.

The range of types of expected environmental impacts would be more limited for the change-in-use proposals approved under this alternative process, compare to those described for the Process. For instance, while projects evaluated under the Process may include the potential for significant terrestrial biology, aquatic biology, water quality, and cultural resources impacts, under the alternative process, projects could only be approved if they avoid those significant or potentially significant impacts. While under the Process, unanticipated environmental impacts related to changing trail use patterns and number of users visiting a change-in-use project trail could be monitored through an AUM strategy, with appropriate management responses in keeping with the goal of creating separate trails or replacement trails, projects approved under the alternative process would need to clearly avoid changes in use levels and patterns that could affect environmental conditions.

In the final outcome of the environmental consequences of change-in-use projects, the Complete Impact Avoidance Alternative and the Process would be environmentally similar, because both processes ultimately lead to less-than-significant environmental effects. The difference between the alternatives relates to the approach to reach that outcome, and the relative feasibility of change-in-use proposals to end up without significant effects, when mitigation measures and AUM can (as in the Process) or cannot (as in this alternative process) be used to help attain that goal.

Regarding the social issue of the potential for trail use conflict, there would be no difference between the Process and this alternative process. Potential for conflict between users of the same type would not change, compared to the Process.

Conclusion

The Complete Impact Avoidance Alternative is not approved, because it does not have environmental advantages over the proposed Process and the feasibility of achieving complete avoidance of significant without the use of mitigation measures and AUM would be uncertain. Also, it could substantially limit the usability of the alternative process in circumstances where significant impacts may occur, which would hinder achievement of the basic project objectives regarding statewide application.

4 CEQA SECTION 21081 FINDINGS

CSP has reviewed the Final Program EIR for the Process, consisting of the Responses to Comments on the Draft Program EIR and revised sections of the Draft Program EIR. CSP has also reviewed the Monitoring Mitigation and Reporting Program and considered the public record on the project (references provided in Chapter 10, "References," in the Draft Program EIR and Chapter 4, "References" in the Final Program EIR).

Pursuant to Public Resources Code Section 21081, for each significant effect identified in the Draft Program EIR, CSP must make one or more of the findings. CSP hereby makes the following findings regarding the significant effects of the proposed project, pursuant to Public Resources Code Section 21081 and Section 15091 of the State CEQA Guidelines.

CSP has defined the approach to implementing mitigation measures for the Process by the Mitigation Monitoring and Reporting Program (MMRP). The Mitigation Measures avoid or mitigate to a less-than-significant level all significant environmental impacts. Section 21081.6 of the Public Resources Code requires that when a public agency is making the findings, as directed by State CEQA Guidelines Section 15091(a)(1) and Section 21081(a) of the Public Resources Code, the public agency shall adopt a Mitigation Monitoring and Reporting Program for the changes that it has either required of the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. CSP hereby adopts the MMRP, and commits proponents of qualifying change-in-use projects to full and complete implementation of the Mitigation Measures set forth therein. These Mitigation Measures are binding and enforceable obligations with which future proponents must comply.

4.1 TERRESTRIAL BIOLOGICAL RESOURCES

Potentially Significant Effect: Construction-Related Disturbance or Loss of Sensitive Habitats (Jurisdictional Wetlands, Riparian Habitat, and Other Special-Status Natural Communities) [Impact 4.4-2)

Under the Process, project-related construction activity and the disturbance or removal of sensitive habitats will be minimized by compliance with SPRs for Natural Communities (SPRs BIO-7 through BIO-12). While SPRs will avoid and protect most sensitive habitats, the potential for removal of riparian and wetland vegetation and the placement of fill into waters of the United States may not be entirely avoided. This impact is **potentially significant.**

Finding

Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant effects on the environment. This mitigation will reduce the potentially significant effects of the project to a less-than-significant level.

Facts in Support of Finding

State Parks adopted the following mitigation measure that will reduce to less-than-significant levels the project's impacts related to potential for removal of riparian and wetland vegetation and the placement of fill into waters of the United States waters of the United States, including wetlands.

Mitigation Measure 4.4-2. Delineate Waters of the United States and Obtain Authorization for Fill and Required Permits.

Prior to the start of any construction activity that could affect waters of the United States, including wetlands, despite implementation of SPRs, a delineation of waters of the United States that would be affected by project implementation will be conducted by a qualified biologist through the formal Section 404 wetland delineation process. The delineation will be submitted to and verified by the appropriate District of U. S. Army Corps of Engineers (USACE). If, based on the verified delineation, it is determined that fill of waters of the United States would result from implementation of the project, authorization for such fill will be secured from the appropriate District of USACE through the Section 404 permitting process. The amount of wetlands or other Waters of the United States that would be removed or disturbed during project implementation will be quantified and replaced or restored/enhanced in accordance with USACE and federal regulations. Habitat restoration, enhancement, and/or replacement will be at a location and by methods agreeable to USACE as determined during the permitting processes for CWA Section 404. In coastal areas, the California Coastal Commission and/or counties with an approved Local Coastal Plan have regulatory authority over some activities in Environmentally Sensitive Habitat Areas (e.g., coastal wetlands).

In addition, any project that would divert, obstruct, or change the natural flow or bed, channel, or bank of any river, stream, or lake that supports wildlife resources is subject to regulation by CDFW under Sections 1600 et seq. of the California Fish and Game Code. If any project under the Process would result in such an effect (e.g., stream-crossing projects that would remove riparian vegetation), CSP will obtain a Lake or Streambed Alteration Agreement from CDFW and implement all terms required for permit compliance. Because the regulatory processes and requirements of the Clean Water Act, Section 404, and California Fish and Game Code, Section 1600 et seq., include performance criteria for compensating affected habitat (e.g., no net loss of wetland habitat value), it is reasonable to expect that compliance with these laws and regulations would mitigate potentially significant effects to wetland and riparian habitats to a **less-than-significant level.**

Explanation Regarding Reduction of the Potentially Significant Effect

Statutory and regulatory provisions of Section 404 of the Clean Water Act and Section 1600 et seq. of the California Fish and Game Code include mitigation requirements that will be reasonably expected to result in less than significant effects to wetlands, streams, lakes, and associated habitats. The requirements are enforceable by the U. S. Army Corps of Engineers (for Section 404) and California Department of Fish and Wildlife (CDFW, formerly California Department of Fish and Game, for Section 1600). With the attainment of permits and authorizations related to these laws and regulations, a change-in-use proposal will be required to include actions that prevent or compensate for any potential significant effects to covered habitats, habitat values, and natural processes. The enforceable mandates and performance standards included in these laws and regulations will, therefore, result in less-than-significant environmental effects.

4.2 AQUATIC BIOLOGICAL RESOURCES

Significant Effect: Construction-Related Disturbance or Loss of Common and Sensitive Aquatic Habitats [Impact 4.5-1].

Under the Process, the disturbance or removal of common and sensitive aquatic habitats as a result of construction will be minimized by compliance with SPRs for aquatic resources (SPRs BIO-4 and BIO-5, BIO-7 through 12, BIO-39, BIO-41, BIO-46, BIO-48 through BIO-51, BIO-53 through BIO-55, and BIO-60 through BIO-62).

While SPRs will avoid and protect most aquatic habitats, the potential for disturbance or removal of some aquatic habitats (including waters of the U.S.), riparian and wetland vegetation, and streambeds and/or banks may not be entirely avoided. Any impact to aquatic habitat will require oversight and approval from one or more agencies that regulate the use and protection of aquatic resources. This impact is **potentially significant**.

Finding

Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant effects on the environment. This mitigation will reduce the potentially significant effects of the project to a less-than-significant level.

Facts in Support of Finding

State Parks adopted the following mitigation measure that will reduce to less-than-significant levels the project's impacts short-term construction related disturbance or loss of common and sensitive aquatic habitats, including wetlands and other waters of the United States and designated Critical Habitat.

Mitigation Measure 4.5-1. Consult with Appropriate Resource Agencies and Obtain Authorization for Impacts and Required Permits.

Prior to the start of any construction activity that could affect aquatic habitat, after implementation of SPRs, CSP will consult with appropriate Federal, State, and/or local agencies. Depending on the type of aquatic habitat and regulatory status, these agencies may include USACE (Section 404 of the CWA), U. S. Environmental Protection Agency USEPA, Section 404[b][1] of the CWA), RWQCB (Section 401 of the CWA), U. S. Fish and Wildlife Service (USFWS, Section 7 or 10 of the Federal Endangered Species Act [FESA]), National Marine Fisheries Service (NMFS, Section 7 or 10 of the FESA), and CDFW (California Fish and Game Code 2081, which is the California Endangered Species Act [CESA]). In coastal areas, the California Coastal Commission (CCC) and/or counties with an approved Local Coastal Plan have regulatory authority over some activities in Environmentally Sensitive Habitat Areas. Additional resource avoidance and protection measures may be identified and required through consultation with the appropriate agencies. If required, the amount of aquatic habitat that would be removed or disturbed during project implementation will be replaced or restored/enhanced in accordance with the appropriate regulations, outcome of agency consultation, and any permit requirements.

A delineation of waters of the United States that would be affected by project implementation will be conducted by a qualified biologist through the formal Section 404 wetland delineation process as described in Mitigation Measure 4.4-2 (Delineate Waters of the United States and Obtain Authorization for Fill and Required Permits) in Section 4.4, Terrestrial Biological Resources.

Explanation Regarding Reduction of the Potentially Significant Effect

Statutory and regulatory provisions of Sections 401 and 404 of the Clean Water Act, Sections 7 or 10 of FESA, and Section 2081 et seq. of the California Fish and Game Code include mitigation requirements that will be reasonably expected to result in less than significant effects to aquatic resources and associated habitats. The requirements are enforceable by the U. S. Army Corps of Engineers (for Section 404), USEPA (for Section 404[b][1]), RWQCB (for Section 401), USFWS and/or NMFS (for FESA), and CDFW (for CESA). Also, projects in the coastal zone will be subject to mitigation requirements associated with a coastal development permit under the California Coastal Act, as enforced by the CCC. With the attainment of permits and authorizations related to these laws and regulations, a change-in-use proposal will be required to include actions that prevent or compensate for any potential significant effects to covered aquatic species, habitats, habitat values, and natural processes. The enforceable mandates and performance standards included in these laws and regulations will, therefore, result in less-than-significant environmental effects.

5 CONCLUSION

The Final Program EIR concludes that the Process, with the incorporation of SPRs, PSRs, and mitigation measures, and with consideration of alternatives, will not create any significant unavoidable effects to the environment. The mitigation measures listed in conjunction with each of the findings set forth above, as implemented through the MMRP, will eliminate or reduce to a less-than-significant level, all potentially significant environmental impacts.

6 REFERENCES

For complete lists of references used in preparing the EIR, see Chapter 10, “References,” in the Draft Program EIR and Chapter 4, “References” in the Final Program EIR.

Attachment A

Standard Project Requirements

Because SPRs will be applicable at all park units for an array of change-in-use project scenarios, placeholders are provided in several of the SPRs (such as for responsible parties), so that, depending on the location and type of project and associated resource issues, the requirement can be applied to specific projects and associated responsible parties**.**

GEN-1: Prior to the start of on-site construction work, a **[insert who]** will consult with the contractor and project manager to identify all resources that must be protected.

GEN-2: At the discretion of **[insert who]**, mechanized vehicles on **[insert discipline]** resource sites will be restricted to a short-term use of low-ground pressure vehicles only. All such vehicles must enter and exit the area via the same route of travel (by backing up). Vehicles are strictly prohibited from turning on the surface of site(s).

GEN-3: Prior to the start of on-site construction work, a CSP-qualified **[insert discipline]** Resources Specialist will train construction personnel in **[insert discipline]** Resource identification and protection procedures.

GEN-4: Prior to the start of on-site construction work, and at the discretion of a **[insert who]**, a **[insert who]** will flag and/or fence all **[insert discipline or resource]** with a buffer of **[insert distance]** for avoidance during on-site construction activities. The **[insert who]** will remove the fencing from around the Environmentally Sensitive Area after project completion.

GEN-5: Prior to any earthmoving activities, a CSP-qualified **[insert who]** will approve all subsurface work, including the operation of heavy equipment within **[insert distance]** of the identified Environmentally Sensitive Area.

GEN-6: Prior to the start of **[insert type]** work, **[insert who]** will notify the **[insert Office name and who]** or **[insert alternative Office name and who]** a minimum of three weeks in advance, unless other arrangements are made, to schedule **[insert discipline or resource]** monitoring.

GEN-7: A CSP qualified **[insert who]** will monitor all ground-disturbing phases of this project at his/her discretion.

GEN-8: The **[insert who]** will post information signs near project areas with restricted access or closures lasting longer than 3 months. The signs will include the following information:

- Explanation for and description of the project; and
- Anticipated completion date.

GEN-9: District staff will employ Adaptive Use Management as a strategy to avoid significant effects on the environment. It involves a standard procedure of defining (1) use levels and use and resource conditions as a baseline during the preparation of the Change-in-Use Survey at the start of the Process and (2) performance standards for maintaining use at levels that do not result in significant effects on the environment. The performance standards will be tailored to each change-in-use proposal and its park unit. They will describe desired use and resource conditions necessary to maintain impacts at less-than-significant levels. All performance standards will relate to use conditions or resources that are observable in the field by park staff.

AESTHETICS AND VIEWS STANDARD PROJECT REQUIREMENTS

AES-1 Projects will be designed to incorporate appropriate scenic and aesthetic values of the CSP unit, including the choices for: specific building sites, scope and scale; building and fencing materials and colors; use of compatible aesthetic treatments on pathways, retaining walls or other ancillary structures; location of and materials used in parking areas, campsites and picnic areas; development of appropriate landscaping. The CSP unit scenic and aesthetic values will also consider views into the park from neighboring properties.

AES-2 **[insert who]** will store all project-related materials outside of the viewshed of **[insert name of street/place/building]**.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS STANDARD PROJECT REQUIREMENTS

Dust Control Measures

AQ-1: No more than 1.0 acre of ground disturbance (e.g., earth moving, grading, excavation, land clearing) will occur in any single day.

AQ-2: Prior to any ground disturbance, including grading, excavating, and land clearing, sufficient water must be applied to the area to be disturbed to minimize fugitive dust emissions.

AQ-3: Unpaved areas subject to vehicle travel and areas subject to mechanical grading, excavation, land clearing, or other forms of ground disturbance will be stabilized by being kept wet, treated with a chemical dust suppressant, or covered. Exposed areas will not be overwatered such that watering results in runoff. Unpaved areas subject to vehicle travel could also be stabilized through the effective application of gravel or through watering.

AQ-4: Suitable vegetative ground cover will be established on exposed, disturbed surfaces through seeding and watering as soon as possible, except for areas intended to be used as trails or for parking or staging. If a vegetated ground cover is not suitable to the area then this requirement does not apply.

AQ-5: Storage piles and disturbed areas not subject to vehicular traffic must be stabilized by being kept wet, treated with a chemical dust suppressant, or covered when material is not being added to or removed from the pile.

AQ-6: The speed of construction-related trucks, vehicles, and equipment traveling on unpaved areas will be limited to 15 miles per hour (mph).

AQ-7: All trucks or light equipment hauling soil, sand, or other earthen materials on public roads to or from the site will be covered or required to maintain at least two feet of freeboard.

AQ-8: Off-road construction equipment and on-road haul trucks leaving the park will be cleaned onsite to prevent silt, mud, and dirt, from being released or tracked off-site, as dictated by controlling agencies.

AQ-9: All visible dust, silt, or mud tracked-out on to public paved roadways as a result of construction-related activities will be removed at the conclusion of each construction work day, or a minimum of every 24 hours for continuous construction operations. Wet sweeping or a High Efficiency Particulate Air (HEPA) filter equipped vacuum device will be used for removal of track-out from paved roadways and paved parking areas.

AQ-10: Excavation, grading, land clearing, other mechanical ground disturbance, and demolition activities will be suspended when sustained winds exceed 15 miles per hour (mph) and/or instantaneous gusts exceed 25 mph.

AQ-11: Where a change-in-use results in vehicle travel on unpaved roads and other unpaved services, signs shall be posted limiting vehicle travel to 15 mph.

AQ-12: Construction-related ground disturbance activities will not be performed in areas identified as "moderately likely to contain naturally occurring asbestos" according to maps and guidance published by the California Geological Survey (CGS), formerly the California Department of Conservation Division of Mines and Geology. This determination would be based on a CGS publication titled *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos* (Churchill and Hill 2000), or whatever more current guidance from CGS exists at the time the change-in-use project is evaluated. Any NOA-related guidance provided by the applicable local air district shall also be followed. Some air districts may require that a site-specific investigation be performed by a qualified geologist, including the collection of soil and rock samples, to determine whether NOA is present. If a site-specific investigation identifies the presence of NOA, then an Asbestos Dust Control Plan will be developed and implemented in accordance with Section 93105 of the California Health and Safety Code.

AQ-13: New trail or road alignments and new parking areas will not be located in areas identified as "moderately likely to contain naturally occurring asbestos" according to maps and guidance published by the California Geological Survey (CGS), formerly the California Department of Conservation Division of Mines and Geology, unless a site-specific investigation performed by a Registered Geologist confirms that NOA-containing rock or dirt is not exposed at the surface of the trail. Alternatively, any trail or road alignments and parking areas that are not located over areas where NOA is exposed at the surface will be covered with an appropriate material, depending on the intended use of the trail, that would prevent entrainment of asbestos-containing dust into the air. Possible methods of covering NOA-containing material on the surface include paving and graveling with non-NOA-containing gravel.

Exhaust Emissions Control Measures

AQ-14: Operation of large diesel- or gasoline-powered construction equipment (i.e., greater than 50 horsepower [hp]) will not exceed 16 equipment-hours per day, where an equipment-hour is defined as one piece of equipment operating for one hour. (daily CAPs, TACs, GHGs)

AQ-15: All diesel- and gasoline-powered equipment will be properly maintained according to manufacturer's specifications, and in compliance with all State and federal emissions requirements. Maintenance records will be available at the construction site for verification.

AQ-16: Haul truck trips to and from the site will be limited to 20 one-way trips per day. This includes trips for hauling gravel, materials, and equipment to and from the site.

AQ-17: The maximum number of construction worker-related commute trips for any change-in-use project at a park will not exceed 60 one-way worker commute trips per day.

AQ-18: No open burning of removed vegetation will be performed. All removed vegetative material will be either chipped on site or taken to an appropriate recycling site, biomass power plant, or if a site is not available, a licensed disposal site.

Mobile-Source Emissions Related Measures

TRAN-1: In cases where addition of a use is proposed for trails within urban areas or immediately accessible by urban populations such that the new park users could meaningfully utilize the trails before or after normal weekday business hours (8 am to 5 pm), a designated CSP District staff person will, prior to implementing the change in use, first review the local jurisdiction's General Plan for guidance on level of service (LOS) changes, or Caltrans standards if the affected facilities are part of a state highway. If it is determined that (or uncertain whether) project traffic could potentially result in unacceptable LOS of local traffic facilities, CSP will coordinate with the applicable jurisdiction(s) that operate/maintain the traffic facilities in the vicinity of the trail heads and associated parking areas to determine the maximum number of peak hour trips that could be generated by the proposed additional use that would not cause significant adverse local traffic effects. If CSP demand projections identify an increase in visitation that would generate peak hour, weekday trips that exceed the maximum number of trips identified by the applicable agency, the proposed additional use would be disqualified from the proposed process and would require individual CEQA analysis, including project-specific traffic analysis. In addition, following implementation of the proposed additional use **[insert who]** will include follow-up consultation with the applicable agency as part of the Adaptive Use Management process to consider the actual traffic levels generated by the additional trail use and the LOS of the affected transportation facilities. If the increased trips generated by the additional trail users are found to exceed original projections and are also found to be causing an exceedance of applicable LOS standards, **[insert who]** will implement a management response to resolve the exceedance, in consultation with the applicable agency. Measures in the management response will include (but will not be limited to) public education actions to encourage visitation during non-peak traffic periods, restriction of the timing of certain types of trail use during peak traffic periods, altering the point(s) of access to transfer project-related traffic from impacted roadways/intersections to less constrained roadways/intersections, coordination with local transit operators to increase access to the trail, coordination with the local transportation department regarding improved bicycle connectivity (for addition of bicycle use), or a combination of these measures.

TRAN-4: **[insert who]** will assess parking capacity prior to implementing a proposed change in use. After implementation of the change in use, CSP staff will monitor parking levels as part of the Adaptive Use Management process. If monitoring indicates an exceedance of parking capacity (i.e., increased use of undesignated on-street parking or increased illegal parking due to overflow of parking lot facilities), the **[insert who]** will implement a management response to resolve the parking capacity issue. Measures in the management response may include, but would not be limited to re-designing parking facilities (including minor parking lot expansions in areas where environmental resources will not be affected), installing parking meters and/or applying time limits, working with local transportation departments to increase nearby off-site parking availability, directing users to other existing lots, and/or working with local transit operators to increase transit to the trail facility. CSP District personnel will determine which actions are feasible at the park unit.

TRAN-5: Prior to initiating construction activities the construction manager will have a Construction Traffic Management Plan (CTMP), prepared by a qualified professional, that will provide measures to reduce potential traffic obstruction or service level degradation at affected traffic facilities. The scope of the CTMP will depend on the type, intensity, and duration of the specific construction activities associated with each qualifying change-in-use project under the Process. Measures included in the CTMP could include (but are not be limited to) construction signage, flaggers for lane closures, construction schedule and/or delivery schedule restrictions, etc. The CTMP will be submitted to the local Public Works Department.

TERRESTRIAL BIOLOGICAL RESOURCES STANDARD PROJECT REQUIREMENTS

General Biological Resource Standard Project Requirements

BIO-1: Prior to the start of on-site construction activities, **[insert who]** will determine the minimum area required to complete the work and define the boundaries of the work area on the project drawings and with flagging or fencing on the ground, as appropriate.

BIO-2: Prior to the start of on-site construction activities, a qualified biologist will train on-site construction personnel on the identification and life history of the pertinent sensitive species, work constraints, and any other pertinent information related to the species.

BIO-3: All construction will be consistent with the State Parks Trail Handbook guidelines.

BIO-4: Prior to the start of on-site construction activities, qualified biologists will conduct preconstruction surveys of the project area subject to construction disturbance for sensitive biological resources, to ensure that potential impacts to sensitive resources are avoided or minimized. These surveys and avoidance/minimization measures are described under separate topics below for sensitive natural communities, vegetation, terrestrial wildlife, and aquatic resources.

BIO-5: At the discretion of **[insert who]**, project activities will be monitored to ensure that impacts to sensitive biological resources are avoided or minimized.

BIO-6: Reports will be submitted to California State Parks for all biological surveys and monitoring activities conducted.

Natural Community Standard Project Requirements

BIO-7: Prior to the start of on-site construction activities or establishment of a realignment route, a qualified biologist will survey the project area for sensitive natural communities. Sensitive natural communities or habitats are those of special concern to resource agencies or those that are afforded specific consideration, based on Section 404 of the Clean Water Act (CWA) and other applicable regulations. This concern would be due to locally or regionally declining status of these habitats, or because they provide important habitat to common and special-status species. Many of these communities are tracked in the California Natural Diversity Database (CNDDB). Appendix I summarizes CNDDB occurrences of sensitive natural communities in ecoregions where State Parks units are located.

BIO-8: Projects will be designed to avoid direct or indirect effects on all sensitive natural communities to the maximum extent practicable.

BIO-9: Projects will avoid or minimize impacts to federally protected wetlands to the extent practicable by conducting work in upland areas.

BIO-10: Natural wetland habitat such as marsh, riparian, and vernal pools will not be filled by stream-crossing construction projects. Equipment will remain on existing road or trail alignments to the maximum extent practicable. Equipment could travel off road or trail only when no other alternative is available and after the project inspector and District's Senior Environmental Scientist have reviewed the route.

BIO-11: Trail or road alignments will be designed to avoid or minimize effects on riparian habitats. Disturbance to riparian areas and habitat for aquatic- or riparian-dependent species will be minimized by aligning crossings perpendicular to and in narrow riparian areas to the extent feasible,

and incorporating elevated crossing features such as boardwalks and bridge crossings in riparian areas and sensitive meadows.

BIO-12: Signage, fencing, planting, or other features will be used to discourage users from leaving trails and roads and entering wetland, riparian, meadow, and other sensitive habitats; any fencing will be designed to avoid interference with hydrology and wildlife movement. This measure will contribute to minimizing potential impacts to sensitive plant species/communities that occur adjacent to roads and trails.

Vegetation Standard Project Requirements

BIO-13: A qualified biologist will conduct focused pre-construction surveys for special-status plant species with potential to be affected by a project. Species with potential to be affected and requiring pre-construction surveys will be determined based on the species' distribution and known occurrences relative to the project area and the presence of suitable habitat for the species in or near the project area. CNDDB provides records of occurrences of special-status species in the ecoregions where State Parks units are located. In addition to CNDDB records, other data sources will additionally be used to determine sensitive biological resources with potential to occur in a specific project area, including reconnaissance surveys, the California Native Plant Society's (CNPS's) online *Inventory of Rare and Endangered Plants*, U.S. Fish and Wildlife Service species lists, CSP data and input from CSP biologists, other local CSP or other professional knowledge, and relevant environmental documents and reports. Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the project, and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified biologist).

BIO-14: No special-status plant species will be cut, pruned, pulled back, removed, or damaged in any way. Special-status plant species include those in the following categories: 1) listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (FESA) or candidates for possible future listing; 2) listed or candidates for listing under the California Endangered Species Act (CESA); 3) considered by CDFW to be "rare, threatened or endangered in California" (California Rare Plant Ranks of 1A, presumed extinct in California; 1B, considered rare or endangered in California and elsewhere ; and 2, considered rare or endangered in California but more common elsewhere); 4) listed as rare under the California Native Plant Protection Act; 5) considered a locally significant species by CDFW or CNPS; or 6) otherwise meets the definition of rare or endangered under CEQA Guidelines §15380(b) and (d).

BIO-15: If special-status plant species are located within the project area, they will be avoided and protected by establishing a non-disturbance buffer zone around the plants with high-visibility fencing prior to construction. The appropriate size and shape of the buffer zone will be determined by a qualified biologist. Construction personnel will be instructed to keep project activities out of the fenced areas. A qualified biologist will periodically inspect the fencing to ensure that the fence is intact and impacts are being avoided.

BIO-16: Dust Control Measures (AQ-1 through AQ-11) listed under Air Quality and Greenhouse Gas Emissions Standard Project Requirements will be employed during all construction activities.

BIO-17: Erosion Control Measures (GEO-1 through GEO-9) listed under Geology and Soils Standard Project Requirements will be employed to avoid runoff of sediments, vehicle fluids, and other liquids into special plant communities.

BIO-18: All projects will be designed to minimize the removal of all native trees. Specifically, projects will be designed to retain and protect trees 24 inches diameter-at-breast-height (DBH) or greater to the

maximum extent practicable. Limbs of these trees will be removed if required for access or safety considerations. Trees smaller than 24 inches DBH will be retained whenever practicable. Equipment operators will be required to avoid striking retained trees to minimize damage to the tree structure or bark.

BIO-19: The roots of retained trees will be avoided during excavation or other construction activities to the maximum extent practicable. Any trenching in a "structural root zone" will be completed by hand; no roots larger than **[insert diameter size]** in diameter will be cut or damaged.

BIO-20: No ground disturbance or staging will be allowed within **[insert number]** times the DBH of retention trees, unless approved in advance by a qualified biologist, forester, or certified arborist.

BIO-21: A **[insert who]** will be present during all ground-disturbing activities within the **[insert quantitative area]** of retained trees.

BIO-22: Project areas will be monitored and maintained by **[insert who]** for up to **[insert time period],** including regular watering and replacement planting, as necessary to assure an approximately **[insert percentage]** survival rate.

BIO-23: All herbicides will be handled, applied, and disposed of in accordance with the MSDS Fact Sheet and all local, State, and federal laws.

BIO-24: To maintain genetic integrity, only plant stock collected within the **[insert area name]** will be used for re-vegetation in the project area.

BIO-25: The percolation testing will be conducted at a minimum distance of **[insert quantitative distance]** of any significant tree over **[insert number]** DBH.

BIO-26: The design of road and trail alignments will consider desired snag retention needs for wildlife.

BIO-27: Construction activities that could spread invasive plants and noxious weeds will be subject to the following actions:

- Construction operators will ensure that clothing, footwear, and equipment used during construction is free of soil, seeds, vegetative matter or other debris or seed-bearing material before entering the park or from an area with known infestations of invasive plants and noxious weeds.
- All heavy equipment will be pressure washed prior to entering the park or from an area with known infestations of invasive plants and noxious weeds. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect park resources.
- All earth-moving equipment, gravel, fill, or other materials will be weed free.

BIO-28: Install signage that informs the public about protecting sensitive vegetation, and identifies noxious weed and invasive plant species and issues in the project area. Signage containing information about sensitive plant species in the project area and how to avoid disturbing them while using the path and related facilities, and noxious weed and invasive plant species and how they are spread, will be installed at key trailheads and other locations, as applicable and relevant.

Terrestrial Wildlife Standard Project Requirements

BIO-29: A qualified biologist will conduct pre-construction surveys for special-status wildlife species with potential to be directly or indirectly affected by a project, within **[insert distance]** of the project area. Species with potential to be affected and requiring pre-construction surveys will be determined based on the species' distribution and known occurrences relative to the project area and the presence of suitable habitat for those species in or near the project area. Appendix I summarizes CNDDB occurrences of special-status species in the ecoregions where State Parks units are located. In addition to CNDDB records, other data sources will additionally be used to determine sensitive biological resources with potential to occur in a specific project area, including reconnaissance surveys, U.S. Fish and Wildlife Service species lists, CSP data and input from CSP biologists, other local CSP or other professional knowledge, and relevant environmental documents and reports. For species subject to survey protocols that have been developed and accepted, survey timing and methodology will follow the protocol requirements or guidelines. The survey will be conducted no more than **[insert number]** days prior to the beginning of construction. Surveys for a special-status species with potential to occur in the project area may not be required if presence of the species is assumed.

BIO-30: All Projects will be designed to avoid take of wildlife species listed or proposed for listing under the federal Endangered Species Act (FESA), candidates for possible future listing under the FESA, wildlife species listed or candidates for listing under the California Endangered Species Act (CESA), and species designated as Fully Protected under the California Fish and Game Code. For other special-status wildlife species (e.g., species of special concern), project impacts will be avoided to the maximum extent practicable.

BIO-31: Project activities that could affect a special-status wildlife species will be scheduled to avoid the breeding season and/or other sensitive life-history periods of the species (e.g., breeding, hibernation, denning, etc.), as determined by a qualified biologist.

BIO-32: If work is required during the breeding or other sensitive life-history period of a special-status species that could be affected, impacts will be avoided or minimized by establishing non-disturbance buffers around the nests, dens, roosts, or other activity centers (depending on the species). The appropriate size and shape of the buffer zone will be determined by a qualified biologist, based on potential effects of project-related habitat disturbance, noise, dust, visual disturbance, and other factors. No project activity will commence within the buffer area until a qualified biologist confirms that the nest, den, or other activity center is no longer active/occupied. Monitoring of the activity center by a qualified biologist during and after construction activities will be required.

BIO-33: For projects within the range of marbled murrelet or northern spotted owl (e.g., in USFS Ecological Sections Central California Coast, Klamath Mountains, Northern California Coast, Northern California Coast Ranges, Southern California Coast, and Southern Cascades); if work must occur during the breeding season, the USFWS's *"Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California"* (dated July 31, 2006) will be used by a qualified biologist to allow limited construction activities that do not create noise disturbance above ambient levels.

If limited activities are allowed during the **[insert species name] [insert what breeding, nesting, etc.]** season, work activities will not begin until **[insert number]** hours after sunrise and will cease **[insert number]** hours before sunset each day.

BIO-34: If individuals or other recent signs of special-status species are observed within **[insert distance]** of the project area, a qualified biologist will be present on the site to monitor during construction activities.

BIO-35: If special-status species are known to occur in the project area, immediately prior to the start of work each day, a qualified biologist will conduct a visual inspection of the construction zone and adjacent areas, as appropriate.

BIO-36: If a special-status species is found on the project site, work in the vicinity of the animal will be delayed until the species moves out of the site on its own, or is temporarily relocated by a qualified biologist. To prevent trapping of special-status species, all holes and trenches will be covered at the close of each working day with plywood or similar materials, or will include escape ramps constructed of earth fill or wooden planks; all pipes will be capped. A qualified biologist, or other staff trained by a qualified biologist will inspect trenches and pipes for special-status species at the beginning of each workday. If a trapped animal is discovered, they will be released in suitable habitat at least **[insert quantitative distance]** from the project area.

BIO-37: Project activities will not remove any trees equal to or greater than **[insert number]**-inches DBH unless first inspected by a qualified biologist and determined to be unsuitable as breeding habitat for special-status bird or other species.

BIO-38: For projects within suitable habitat of the range of Alameda whipsnake (e.g., in USFS Ecological Sections Central California Coast, Central California Coast Ranges, or Great Valley), an exclusion fence will be placed near the grading limit for the duration of the grading and construction, and removed within 72 hours of completion of work, to prevent Alameda whipsnake from entering the project site and no monofilament plastic will be used for erosion control. In addition, SPR BIO-29 and BIO-36 require pre-project surveys and the covering and inspection of all holes and trenches at the close of each working day. If Alameda whipsnake is found within the fenced area, work in the vicinity will be delayed until the species moves out of the site on its own, or is relocated by a qualified biologist (SPR BIO-36).

Aquatic Biological Resources Standard Project Requirements

BIO-39: A qualified biologist will conduct an aquatic (and associated uplands) habitat assessment and pre-project surveys for special-status aquatic species (if suitable habitat is present) with potential to be directly or indirectly affected by a project, within **[insert distance]** of the project area. Species with potential to be affected and requiring pre-construction surveys will be determined based on the species' distribution and known occurrences relative to the project area and the presence of suitable habitat for those species in or near the project area. Appendix I summarizes CNDDB occurrences of special-status species in the ecoregions where State Parks units are located. In addition to CNDDB records, other data sources will be used to determine sensitive aquatic resources with potential to occur in a specific project area including reconnaissance surveys; U.S. Fish and Wildlife Service, National Marine Fisheries Service, and California Department of Fish and Game species lists, CSP data and input from CSP biologists, other local CSP or other professional knowledge, and relevant environmental documents and reports. For species subject to survey protocols that have established and accepted survey timing windows and methodologies, qualified biologists will follow the protocol requirements or guidelines. The survey will be conducted within **[insert number]** calendar days prior to the beginning of construction. Surveys for a special-status aquatic species with potential to occur in the project area may not be required if presence of the species is assumed. If any species are located, they will be avoided to the maximum extent practicable.

BIO-40: Project activities will occur during the non-breeding season and/or migration period, as determined by a qualified biologist. If work is required during the breeding, spawning, or migration season, as determined by a qualified biologist, a qualified biologist will conduct a survey to determine if the special-status species occurs within **[insert distance]** of the project area. The survey will be conducted no more than **[insert number]** calendar days prior to the beginning of construction.

BIO-41: Construction activities in close proximity to potential **[insert species name]** habitat will be limited to the dry season to avoid specific periods of animal activity (e.g., breeding, larval/juvenile development, etc.).

BIO-42: If individuals or other recent signs of special-status species are observed within **[insert distance]** of the project area, a qualified biologist will be present on site to monitor activities during the construction period.

BIO-43: If special-status aquatic species are known to occur in the vicinity of the project area, a qualified biologist will conduct surveys for **[insert species]** within the project area and up to **[insert number]** feet outside the project boundaries immediately prior to the start of project-related activities each day.

BIO-44: If **[insert species name]** is found on the project site, work in the vicinity of the animal will be delayed until the species moves out of the site on its own accord, or is temporarily relocated by **[insert agency name - approved or -permitted]** biologist.

BIO-45: To prevent trapping of special-status aquatic species that spend a portion of their lives in terrestrial habitats (e.g., salamanders, frogs, snakes, turtles), all holes and trenches will be covered with plywood or similar materials at the close of each working day, or escape ramps will be constructed of earth fill or wooden planks; all pipes will be capped. A qualified biologist, or other staff trained by a qualified biologist will inspect trenches and pipes for special-status species at the beginning of each workday. If a trapped animal is discovered, they will be released (by a qualified biologist) in suitable habitat at least **[insert quantitative distance]** from the project area.

BIO-46: All stream crossings will be designed to convey the 100-year, 24-hour storm event. All perennial stream crossings that are part of the project will be designed to maintain both upstream and downstream fish passage. Pedestrian bridges across stream habitats will be designed **[in consultation with appropriate resource agency(ies)]** in a manner that does not impede stream flow and ensures year-round passage of anadromous and other aquatic species through the area.

BIO-47: Culverts or other stream crossings will not create barriers to upstream or downstream passage for aquatic-dependent species (e.g., bottomless culverts with natural bed material).

BIO-48: If water drafting becomes a necessary component of the proposed project, drafting sites will be planned to avoid adverse effects to special-status aquatic species and associated habitat, in-stream flows, and depletion of pool habitat. Screening devices will be used for water drafting pumps, and pumps with low entry velocity will be used to minimize removal of aquatic species, including juvenile fish, amphibian egg masses and tadpoles, from aquatic habitats.

BIO-49: Avoid vegetation removal that could reduce shaded areas and increase stream temperatures.

BIO-50: Project activities within or across drainages and streams will occur when the drainages are dry, unless it is not feasible to do so, in which case the following requirements will be applied.

- Construction will be minimized, and avoided to the extent feasible, during the wet season to prevent excessive siltation and sedimentation. However, during the wet season, no construction activities will occur within or immediately adjacent to known breeding habitats of special-status aquatic species. For any project requiring a permit from USACE, RWQCB, CDFW, NMFS, USFWS, CCC, or other agency for potential impacts to aquatic and wetland resources restrictions,

construction timing, BMPs, and other protective measures will be developed and specified in consultation with the agencies during the permitting process.

- If water is present during construction, breeding, spawning, migration, and larval development periods of special-status species will be avoided.

- If water is present during construction, disturbance to pools and other stream habitats (e.g., runs, glides, riffles) with cobble-sized substrate and adjacent to stream banks will be minimized. In particular, rocks will not be collected from in-water environments from **[insert X month through X month]** month to avoid disturbing breeding activities, egg masses, and/or larvae/juveniles of special-status amphibians, reptiles, and fish species.

BIO-51: Appropriate BMPs will be implemented for construction within **[insert distance]** of aquatic habitats. Erosion control measures will be implemented to prevent sedimentation from adversely affecting aquatic features that potentially support special-status species including **[insert who]**. Appropriate BMPs will be developed and implemented to avoid water and wind related erosion and subsequent degradation of water quality, and will include sediment catchments and basins to intercept runoff from disturbed slopes.

BIO-52: If **[insert what]** are located within **[insert distance]** feet of the project area, no construction will occur within **[insert distance]** of the **[insert what]** during the **[insert what]** season, as determined by a qualified biologist.

BIO-53: Ground disturbance activities will not occur within close proximity **[insert distance]** to **[insert species name]** breeding habitats.

BIO-54: Staging areas will be located outside of sensitive habitats, and at least **[insert distance]** from vernal pools, **[insert distance]** from seasonal wetlands, **[insert distance]** from ponds, **[insert distance]** from streams, **[insert distance]** from riparian habitat, and at least **[xx feet]** from intertidal areas and other aquatic habitats known to have seasonal inhabitants (e.g., migrating birds, grunion runs).

BIO-55: Exclusionary fencing will be installed around all Environmentally Sensitive Areas (under the supervision of an approved biologist) as an initial construction task. Exclusion fencing, flagging, staking, and signage shall be placed to limit encroachment by construction personnel and equipment into sensitive aquatic habitats without affecting public access routes.

BIO-56: Construction activities within and adjacent to stream drainages or other aquatic habitats will be minimized, and avoided to the extent feasible, during the wet season to prevent excessive siltation and sedimentation. However, during the wet season, no construction activities will occur within or immediately adjacent to known breeding habitats of special-status aquatic species. For any project requiring a permit from USACE, RWQCB, CDFW, NMFS, USFWS, CCC, or other agency for potential impacts to aquatic and wetland resources restrictions, construction timing, BMPs, and other protective measures will be developed and specified in consultation with the agencies during the permitting process.

BIO-57: No refueling of construction related equipment will take place within **[xx feet]** of aquatic habitats. Use of protective measures such as booms will be considered in coastal areas and estuaries to control accidental spills of contaminants and/or sediments (from dredged material) outside of construction areas.

BIO-58: Monitor construction activities near stream drainages and other aquatic habitats and riparian areas. Construction activities near water courses and riparian areas will be monitored daily (by an approved biologist) to ensure these areas are not impacted by the project. Monitoring will include checking silt fences, erosion and sediment control BMPs, and environmentally sensitive area fencing to make sure they are functioning properly.

BIO-59: A buffer zone of **[insert distance as determined by the appropriate resource agency]** will be established around vernal pools and other sensitive aquatic habitats that have documented occurrences of **[insert species name]** to minimize potential indirect impacts. If listed species are absent, a buffer zone of **[xx feet]** will be established to protect these habitats.

BIO-60: For projects that require a CDFW Streambed Alteration Agreement, BMPs identified in the agreement will be developed and implemented.

BIO-61: If permanent stream crossings are necessary, crossing areas will be stabilized using appropriate techniques and materials **[as specified by the appropriate resource agency]**.

BIO-62: To avoid indirect construction-related impacts to aquatic habitats, BMPs will be implemented to minimize soil disturbance. Where soil disturbance is necessary, stabilization techniques (including the use of silt fences, check dams, fiber rolls or blankets, gravel bag berms, geotextiles, plastic covers, erosion control blankets/mats, covering of exposed areas with mulch, and temporary vegetation or permanent seeding) will be implemented.

CULTURAL AND PALEONTOLOGICAL RESOURCES STANDARD PROJECT REQUIREMENTS

CUL-1: If forest thinning activities are required within a culturally sensitive area, downed timber and other forest debris will be removed by aerial suspension; no portion of logs, slash or debris will be dragged across the surface.

CUL-2: Prior to the start of on-site construction work, the **[insert who]** will notify the Cultural Resources Supervisor, unless other arrangements are made in advance, a minimum of three weeks to schedule a Cultural Resources Specialist to monitor work, as necessary, to ensure that pre-approved removal and reconstruction of historic fabric will occur in a manner consistent with the Secretary of the Interior's Standards for Treatment of Historic Properties.

CUL-3: Before, during, and after construction, a **[insert who]** will photo-document all aspects of the project and will add the photos to the historical records (archives) for the park.

CUL-4: Prior to the start of on-site construction work, and to the extent not already completed, a **[insert who]** will map and record all cultural features (archaeological and built environment) within the proposed Area of Potential Effects (APE) to a level appropriate to the Secretary of the Interior's Standards.

CUL-5: Prior to the start of on-site construction work, and to the extent not already completed, a **[insert who]** will review geologic maps and literature and recommend whether a survey for and related professional-level report on paleontological resources within the project area is warranted.

CUL-6: In project area that contains particular sediments suitable for fossil preservation of significant paleontological resources, **[insert who]** will review and approve monitoring by a qualified paleontologist or geologist of earthmoving activities, including but not limited to grading, excavation or trenching, but generally excluding monitoring of drilling activities.

CUL-7: If anyone discovers potential paleontological resources during project construction or ground-disturbing activities, work within 100-feet of the find will be temporarily halted, the CSP State Representative will be notified immediately, and work will remain halted until a qualified paleontologist or geologist evaluates the significance of the find and recommends appropriate salvage or further mitigation procedures.

Historian's Standard Requirements

CUL-8: All historic work on built environment resources will comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

Historic character will be retained and preserved; where safe, original materials that still maintain structural integrity will be retained; and where replacement is required, materials and features will be replaced "in kind."

A qualified historian familiar with the project site's cultural/historic resources will monitor all construction activities at his/her discretion. All historic resources uncovered during the project will be recorded in place with a photograph and/or drawing showing any new or recovered material and archived, at the discretion of the monitor.

Upon completion of the project, **[insert who]** will record any modifications to historic buildings or structures, or alterations of historic fabric on as-built drawings.

Archaeologist's Standard Requirements

CUL-9: Prior to the start of any ground-disturbing activities, a qualified archaeologist will complete preconstruction testing to determine specific avoidance areas within the proposed APE that contains known significant or potentially significant archaeological resources.

If necessary, a qualified Cultural Resources Specialist will prepare a research design, including appropriate trenching and/or preconstruction excavations.

Based on preconstruction testing, project design and/or implementation will be altered, as necessary, to avoid impacts to significant archaeological resources or reduce the impacts to a less than significant level, as determined in consultation with a CSP-qualified archaeologist.

CUL-10: **[Insert who]** will manually remove or flush cut vegetation to avoid ground-disturbing activities; removal of roots will not be allowed.

CUL-11: In an APE considered highly sensitive for the discovery of buried archaeological features or deposits, including human remains, **[insert who]** will review and approve monitoring by a CSP-qualified Cultural Resources Specialist of any subsurface disturbance, including but not limited to grading, excavation or trenching.

CUL-12: **[insert who]** will review and approve monitoring of subsurface disturbance by a Native American monitor.

CUL-13: If anyone discovers previously undocumented cultural resources during project construction or ground-disturbing activities, work within 50 to 100 feet of the find will be temporarily halted, the CSP State Representative will be notified immediately, and work will remain halted until a qualified Cultural Resources Specialist or archaeologist evaluates the significance of the find and determines

and implements the appropriate treatment and disposition in accordance with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

- If ground-disturbing activities uncover cultural artifacts or features (including but not limited to dark soil containing shellfish, bone, flaked stone, groundstone, or deposits of historic ash), when a qualified Cultural Resources Specialist is not onsite, **[insert who]** will contact the CSP State Representative immediately and **[insert who]** will temporarily halt or divert work within the immediate vicinity of the find until a qualified Cultural Resources Specialist or archaeologist evaluates the find and determines and implements the appropriate treatment and disposition of the find.

- If feasible, **[Insert who]** will modify the project to ensure that construction or ground-disturbing activities will avoid the unanticipated discovery of a significant cultural resources (historical resources) upon review and approval of a **[insert who]**.

CUL-14: In the event anyone discovers human remains or suspected human remains, work will cease immediately within 100 feet of the find and the project manager/site supervisor will notify the appropriate CSP personnel. The human remains and/or funerary objects will not be disturbed and will be protected by covering with soil or other appropriate methods. The CSP Sector Superintendent (or authorized representative) will notify the County Coroner, in accordance with Section 7050.5 of the California Health and Safety Code, and the Native American Heritage Commission; the superintendent will also notify the local Tribal Representative). If a Native American monitor is onsite at the time of the discovery, the monitor will notify his/her affiliated tribe or group. The local County Coroner will make the determination of whether the human bone is of Native American origin.

If the Coroner determines the remains represent Native American interment, the Native American Heritage Commission will be consulted to identify the most likely descendant and appropriate disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC Section 5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the place of discovery prior to determination.

If it is determined the find indicates a sacred or religious site, the site will be avoided to the maximum extent practicable. Formal consultation with the State Historic Preservation Officer and review by the Native American Heritage Commission, as well as appropriate Tribal Representatives, will occur as necessary to define additional site mitigation or future restrictions.

CUL-15: Prior to the start of on-site construction work, the District will determine if the project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes (36 CFR Part 68). Any construction that could affect a cultural landscape will comply with the Secretary of the Interior's Standards.

General Standard Project Requirements

GEN-3: Prior to the start of on-site construction work, a CSP-qualified **[insert discipline]** Resources Specialist will train construction personnel in **[insert discipline]** Resource identification and protection procedures.

GEN-4: Prior to the start of on-site construction work, and at the discretion of a **[insert who]**, a **[insert who]** will flag and/or fence all **[insert discipline or resource]** with a buffer of **[insert distance]** for

avoidance during on-site construction activities. The **[insert who]** will remove the fencing from around the Environmentally Sensitive Area after project completion.

GEN-5: Prior to any earthmoving activities, a CSP-qualified **[insert who]** will approve all subsurface work, including the operation of heavy equipment within **[insert distance]** of the identified Environmentally Sensitive Area.

GEN-6: Prior to the start of **[insert type]** work, **[insert who]** will notify the **[insert Office name and who]** or **[insert alternative Office name and who]** a minimum of three weeks in advance, unless other arrangements are made, to schedule **[insert discipline or resource]** monitoring.

GEOLOGY, SOILS AND MINERALS STANDARD PROJECT REQUIREMENTS

Construction General Permit and SWPPP Measures

GEO-1: Prior to the start of construction involving ground-disturbing activities totaling 1 acre or more, CSP will direct the preparation of a Stormwater Pollution Prevention Plan (SWPPP) by a Qualified Stormwater Pollution Plan Developer (QSD) for CSP approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities.

Construction-Related Measures

GEO-2: All construction, improvement, modification, or decommissioning of trails, and conversion of roads-to-trails, will be consistent with CSP BMPs, Departmental Operations Manuals (DOMs), and Trail Handbook guidelines.

GEO-3: A qualified geologist will review road decommissioning and road-to-trail conversion sites during change-in-use project planning to determine if any geologic or soil conditions exist that require additional assessment or alteration of prescriptions. If unique features do exist, a licensed geologist will conduct a geologic assessment/investigation.

GEO-4: Heavy equipment operators will be cautioned to minimize their exposure to unstable slopes that may occur naturally or result from the earthmoving process. Inspectors will continually evaluate slope geometry and caution operators if unstable conditions are indicated.

GEO-5: Prior to the start of on-site construction activities, CSP staff will determine the minimum area required to complete the work and define the boundaries of the work area on project drawings.

GEO-6: All construction activities will be suspended during heavy precipitation events (i.e., at least 1/2-inch of precipitation in a 24-hour period) or when heavy precipitation events are forecast.

GEO-7: No high ground pressure vehicles will be driven through project areas during the rainy season when soils are wet and saturated to avoid compaction and/or damage to soil structure. Existing compacted road surfaces are exempted as they are already well compacted from use.

GEO-8: Excavated spoil from project work will be placed in a stable location where it will not cause or contribute to slope failure, or erode and enter a stream channel or wetland. Spoil areas will be compacted in lifts and blended into the surrounding landscape to promote uniform sheet drainage. Stream flow will not be allowed to discharge onto spoil areas, regardless of discharge rate.

GEO-9: Bare ground will be mulched with vegetation removed during the work, or with other mulch materials, to the maximum extent practicable to minimize surface erosion.

GEO-10: Immediately following reconstruction, trails will be closed for a period following construction that allows for one wet-dry cycle (e.g., one winter's duration) to allow the soil and materials to settle and compact before the trail opens to the public. Routine maintenance will also be performed on the trail as necessary to reduce erosion to the extent possible and to repair weather-related damage that could contribute to erosion.

Project Design-Related Measures

GEO-11: Trail stream crossings will have a drainage structures designed for the 100-year storm flow event or be capable of passing the 100-year peak flow without significant damage.

GEO-12: Trail stream crossings will be designed and constructed without the potential for stream diversion.

GEO-13: CSP staff will install appropriate energy dissipaters and employ other erosion control measures at water discharge points, as appropriate.

GEO-14: Install armored rock crossings at ephemeral drainages, micro drainages and swales to harden the trail tread in areas of potential interface between trail users and natural topographic drainage features.

GEO-15: All drainages (including micro drainages) will not be captured, diverted or coupled with other drainages by the trail.

GEO-16: Water will not be accumulated on the trail and drained off onto landforms where natural drainages do not exist.

GEO-17: Trail fillslopes will be designed with stable slope gradients as defined in CSP trail construction manuals, guidelines, and handbooks. Unstable fillslopes will be stabilized or removed.

GEO-18: Trail surfaces and ditches will be hydrologically disconnected from wetlands, streams and stream crossings to the extent feasible.

GEO-19: Provide outslope to the trail tread and remove any outer edge berm to facilitate sheet flow off the trail where the dispersed flow can be filtered by vegetation and organic litter.

GEO-20: When outsloping trail surfaces are not feasible, such as steep linear trail grades, construct rolling dips to direct runoff safely off the trail to prevent buildup of surface runoff and subsequent erosion. Water bars will be used as a last resort if outsloping and rolling dips, or minor rerouting are not feasible, or on trails receiving minimal use. Water bars will be constructed to divert water to controlled points along the trail and with rock armor at the downslope end for energy dissipation.

GEO-21: If soils and parent material geologic capability are not sustainable, overly steep grades will be mitigated with surface hardening techniques. Hardening techniques (such as high-quality compacted aggregate or road/trail structures such as steps or retaining walls) will keep the surface sustainable, firm and stable.

GEO-22: CSP staff will develop a rehabilitation plan for the decommissioned road or trail that includes using brush and trees removed from the new trail alignment for bio-mechanical erosion control (bundling

slash and keying it in to fall of trail, filling damaged trails sections with soil and duff removed from the new trail alignment, constructing water bars, and replanting native trees and shrubs).

GEO-23: Both ends of the decommissioned road or trail or road-to-trail conversion will be clearly blocked, and scatter its length with vegetative debris from new trail construction to discourage continued use and degradation of the decommissioned portion of the road or trail.

GEO-24: Seasonally close trails to all users when soils are saturated and softened.

GEO-25: Install "pinch points" to reduce downhill bicycle speed and increase the line of sight at curves.

GEO-26: Construction or repair of barriers at switchbacks to discourage shortcuts and the creation of volunteer trails.

GEO-27: Educational signage and user safety plans will be provided in coastal areas subject to tsunamis, areas adjacent to enclosed waterbodies that are susceptible to seiches, and areas at risk for mudflows.

Event-Related Measures

GEO-28: After a large earthquake event (i.e., magnitude 5.0 or greater within 50 miles of the project site), CSP staff will inspect all project structures and features for damage, as soon as is possible after the event. Any damaged structures or features, including landslides, will be closed to park visitors, volunteers, residents, contractors, and staff until such features or structures have been evaluated and/or repaired.

GEO-29: After a large storm or rainfall event (i.e., ≥ 1" in 24 hours), **[insert who]** will inspect all project structures and features for damage, as soon as is possible after the event. Any damaged structures or features will be closed to park visitors, volunteers, residents, contractors, and staff until such features or structures have been evaluated and/or repaired.

GREENHOUSE GAS/CLIMATE CHANGE/SEA-LEVEL RISE STANDARD PROJECT REQUIREMENTS

Construction-Related Emission Control Measures

AQ-1: No more than 1.0 acre of ground disturbance (e.g., earth moving, grading, excavating, land clearing) will occur in any single day.

AQ-14: Operation of large diesel- or gasoline-powered construction equipment (i.e., greater than 50 horsepower [hp]) will not exceed 16 equipment-hours per day, where an equipment-hour is defined as one piece of equipment operating for one hour.

AQ-15: All diesel- and gasoline-powered equipment will be properly maintained according to manufacturer's specifications, and in compliance with all State and federal emissions requirements. Maintenance records will be available at the construction site for verification.

AQ-16: Haul truck trips to and from the site will be limited to 20 one-way trips per day. This includes trips for hauling gravel, materials, and equipment to and from the site.

AQ-17: The maximum number of construction worker-related commute trips for any change-in-use project at a park will not exceed 60 one-way worker commute trips per day.

AQ-18: No open burning of removed vegetation will be performed. All removed vegetative material will be either chipped on site or taken to an appropriate recycling site, biomass power plant, or if a site is not available, a licensed disposal site.

Measures Pertinent to Carbon Sequestration

BIO-10: Natural wetland habitat such as marsh, riparian, and vernal pools will not be filled by stream-crossing construction projects. Equipment will remain on existing road or trail alignments to the maximum extent practicable. Equipment could travel off road or trail only when no other alternative is available and after the project inspector and District's Senior Environmental Scientist have reviewed the route.

BIO-18: All projects will be designed to minimize the removal of all native trees. Specifically, projects will be designed to retain and protect trees 24 inches diameter-at-breast-height (DBH) or greater to the maximum extent practicable. Limbs of these trees will be removed if required for access or safety considerations. Trees smaller than 24 inches DBH will be retained whenever practicable. Equipment operators will be required to avoid striking retained trees to minimize damage to the tree structure or bark.

BIO-19: The roots of retained trees will be avoided during excavation or other construction activities to the maximum extent practicable. Any trenching in a "structural root zone" will be completed by hand; no roots larger than **[insert diameter size]** in diameter will be cut or damaged.

BIO-20: No ground disturbance or staging will be allowed within **[insert number]** times the DBH of retention trees, unless approved in advance by a qualified biologist, forester, or certified arborist.

BIO-21: A **[insert who]** will be present during all ground-disturbing activities within the **[insert quantitative area]** of retained trees.

BIO-22: Project areas will be monitored and maintained by **[insert who]** for up to **[insert time period]**, including regular watering and replacement planting, as necessary to assure an approximately **[insert percentage]** survival rate.

BIO-25: The percolation testing will be conducted at a minimum distance of **[insert quantitative distance]** of any significant tree over **[insert number]** DBH.

CUL-10: **[Insert who]** will manually remove or flush cut vegetation to avoid ground-disturbing activities; removal of roots will not be allowed.

Measures Pertinent to Resiliency to Climate Change

HAZ-8: Prior to the start of construction, **[insert who]** will develop a Fire Safety Plan for **[insert name]** approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s).

HAZ-9: All heavy equipment will be required to include spark arrestors or turbo chargers that eliminate sparks in exhaust and have fire extinguishers on-site.

HAZ-10: Construction crews will park vehicles **[insert distance]** from flammable material, such as dry grass or brush. At the end of each workday, construction crews will park heavy equipment over a non-combustible surface to reduce the chance of fire.

HAZ-11: CSP personnel will have a CSP radio at the park unit, that allows direct contact with Cal Fire and a centralized dispatch center, to facilitate the rapid dispatch of control crews and equipment in case of a fire.

HAZ-13: Under dry conditions, a filled water truck and/or fire engine crew will be onsite during activities with the potential to start a fire.

GEO-29: After a large storm or rainfall event (i.e., ≥ 1" in 24 hours), **[insert who]** will inspect all project structures and features for damage, as soon as is possible after the event. Any damaged structures or features will be closed to park visitors, volunteers, residents, contractors, and staff until such features or structures have been evaluated and/or repaired.

HYDRO-5: All construction activities will be suspended during heavy precipitation events (i.e., at least 1/2-inch of precipitation in a 24-hour period) or when heavy precipitation events are forecast. If the construction manager must suspend work the construction manager will install drainage and erosion controls appropriate to site conditions, such as covering (tarping) stockpiled soils, mulching bare soil areas, and by constructing silt fences, straw bale barriers, fiber rolls, or other control structures around stockpiles and graded areas, to minimize runoff effects.

HAZARDS AND HAZARDOUS MATERIALS STANDARD PROJECT REQUIREMENTS

HAZ-1 Avoid locating trail modifications in areas that could have been used previously for industrial/manufacturing uses, or other uses that could have involved use, handling, transport, or storage of hazardous materials (including but not limited to auto maintenance, gas station, equipment yard, dry cleaner, railroad, agriculture, mining, etc.). If such areas cannot be avoided, prior to any construction within such areas, **[insert implementing party]** shall hire a qualified professional to conduct a Phase 1 Environmental Site Assessment (ESA), limited to the area of proposed ground disturbance, that will identify the presence of any soil contamination at concentrations that could pose health risk to construction workers. If such levels of soil contamination are identified, the **[insert implementing party]** shall follow the recommendations in the Phase 1 ESA, which may include removal of contaminated soil in compliance with all EPA, OSHA, and DTSC requirements.

HAZ-2 If any construction will occur directly below overhead power poles with transformers, prior to construction, the soil directly beneath the transformers will be inspected for staining. If staining is present, the **[insert implementing party]** will avoid the stained soil, coordinate with the utility company for clean-up, or hire a qualified professional to provide recommendations that will be implemented.

HAZ-3 Prior to any excavation in the vicinity of underground utility easements, **[insert implementing party]** shall coordinate with the utility company to ensure avoidance of the utility line.

HAZ-4 Prior to the start of on-site construction activities, **[insert who]** will inspect all equipment for leaks and regularly inspect thereafter until equipment is removed from the project site. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.

HAZ-5 Prior to the start of on-site construction activities, **[insert who]** will prepare a Spill Prevention and Response Plan (SPRP) as part of the Storm Water Pollution Prevention Plan (SWPPP) for **[insert who]** approval to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of vehicle fluids or other potential contaminants. This plan will include (but not be limited to)

- a map that delineates construction staging areas, where refueling, lubrication, and maintenance of equipment will occur;
- a list of items required in a spill kit on-site that will be maintained throughout the life of the project;
- procedures for the proper storage, use, and disposal of any solvents or other chemicals used in the restoration process;
- and identification of lawfully permitted or authorized disposal destinations outside of the project site.

HAZ-6 **[Insert who]** will develop a Materials Management Plan to include protocols and procedures that will protect human health and the environment during remediation and/or maintenance activities that cause disturbances to the native soil and/or mine and mill materials causing the potential exposure to metals and dust resulting from materials disturbances. All work will be performed in accordance with a Site Health and Safety Plan. The Materials Management Plan will include the following (where applicable):

- requirement that staff will have appropriate training in compliance with 29 CFR, Section 1910.120;
- methods to assess risks prior to starting onsite work;
- procedures for the management and disposal of waste soils generated during construction activities or other activities that might disturb contaminated soil;
- monitoring requirements;
- storm water controls;
- record-keeping; and
- emergency response plan.

HAZ-7 **[Insert who]** will set up decontamination areas for vehicles and equipment at CSP unit entry/exit points. The decontamination areas will be designed to completely contain all wash water generated from washing vehicles and equipment. Best Management Practices (BMPs) will be installed, as necessary, to prevent the dispersal of wash water beyond the boundaries of the decontamination area, including over-spray.

HAZ-8 Prior to the start of construction, **[insert who]** will develop a Fire Safety Plan for **[insert name]** approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s).

HAZ-9 All heavy equipment will be required to include spark arrestors or turbo chargers that eliminate sparks in exhaust, and have fire extinguishers on-site.

HAZ-10 Construction crews will park vehicles **[insert distance]** from flammable material, such as dry grass or brush. At the end of each workday, construction crews will park heavy equipment over a non-combustible surface to reduce the chance of fire.

HAZ-11 CSP personnel will have a CSP radio at the park unit, that allows direct contact with CalFire and a centralized dispatch center, to facilitate the rapid dispatch of control crews and equipment in case of a fire.

HAZ-12 Prior to the start of on-site construction activities, **[insert who]** will clean and repair (other than emergency repairs) all equipment outside the project site boundaries.

HAZ-13 Under dry conditions, a filled water truck and/or fire engine crew will be onsite during activities with the potential to start a fire.

HAZ-14 **[Insert who]** will designate and/or locate staging and stockpile areas within the existing maintenance yard area or existing roads and campsites to prevent leakage of oil, hydraulic fluids, etc. into **[insert where i.e., native vegetation, sensitive wildlife areas, creek, river, stream , etc.]**.

HYDROLOGY, WATER QUALITY, AND SEDIMENTATION STANDARD PROJECT REQUIREMENTS

Construction General Permit and SWPPP Measures

HYDRO-1: Prior to the start of construction involving ground-disturbing activities totaling 1 acre or more, CSP project staff will prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) for CSP approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities. The SWPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan (SPCP), as appropriate.

Basin Plan Requirement Measures

HYDRO-2: The project will comply with all applicable water quality standards as specified in the appropriate Regional Water Quality Control Board Basin Plan.

Construction-Related Measures

HYDRO-3: All trail design and construction will be consistent with the CSP BMPs and DOM 0306 policies and Trail Handbook guidelines.

HYDRO-4: No high ground pressure vehicles will be driven through project areas during the rainy season when soils are wet and saturated to avoid compaction and/or damage to soil structure. Existing compacted road surfaces are exempted as they are already well compacted from use.

HYDRO-5: All construction activities will be suspended during heavy precipitation events (i.e., at least 1/2-inch of precipitation in a 24-hour period) or when heavy precipitation events are forecast. If the construction manager must suspend work the construction manager will install drainage and erosion controls appropriate to site conditions, such as covering (tarping) stockpiled soils, mulching bare soil areas, and by constructing silt fences, straw bale barriers, fiber rolls, or other control structures around stockpiles and graded areas, to minimize runoff effects.

HYDRO-6: Construction activities extending into or occurring during the rainy season, or if an un-seasonal storm is anticipated, CSP staff will properly winterize the site by covering (tarping) any stockpiled materials or soils, mulching bare soil areas, and by constructing silt fences, straw bale barriers, fiber rolls, or other structures around stockpiles and graded areas.

HYDRO-7: Immediately following reconstruction, trails would be closed for a period following construction that allows for one wet- dry cycle (e.g. one winter's duration) to allow the soil and materials to settle and self-compact before the trail opens to the public. Routine maintenance will also be

performed on the trail as necessary to reduce erosion to the extent possible and to repair weather-related damage that could contribute to erosion.

HYDRO-8: Treat rehabilitated trail segments that have less than a 50-foot natural buffer to stream channels with mulch applied to provide 50 percent to 70 percent surface coverage.

HYDRO-9: Salvage trees and brush removed prior to excavation for mulching bare soil areas after construction.

HYDRO-10: During dry, dusty conditions, all unpaved active construction areas will be wetted using water trucks, treated with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material), or covered. Any dust suppressant product used must be environmentally benign (i.e., non-toxic to plants and shall not negatively impact water quality) and its use shall not be prohibited by the California Air Resources Board, U.S. EPA, or the SWRCB. Exposed areas will not be over-watered such that watering results in runoff. Unpaved areas subject to vehicle travel could also be stabilized through the effective application of wood chips, gravel, or mulch. The type of dust suppression method shall be selected by the contractor based on soil, traffic, and other site-specific conditions.

HYDRO-11: Excavation and grading activities will be suspended when sustained winds exceed 15 miles per hour (mph), instantaneous gusts exceed 25 mph, or when dust occurs from remediation related activities where visible emissions (dust) cannot be controlled by watering or conventional dust abatement controls.

HYDRO-12: Prior to the start of on-site construction activities, all equipment will be inspected for leaks and regularly inspected thereafter until equipment is removed from the project site. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.

HYDRO-13: Staging and stockpile areas will be designated and/or located within the existing maintenance yard area or existing roads and campsites to prevent leakage of oil, hydraulic fluids, or other chemicals into lakes, streams, or other waterbodies.

HYDRO-14: Decontamination of equipment shall occur prior to delivery onto state park lands. Equipment shall be thoroughly inspected by the State's Representative upon delivery and may be rejected if in the opinion of the State's representative the equipment does not meet decontamination standards (defined elsewhere). Upon demobilization decontamination shall take place off-site.

HYDRO-15: All heavy equipment parking, refueling, and service will be conducted within designated areas outside of the 100-year floodplain to avoid watercourse contamination.

Project Design-Related Measures

HYDRO-16: Project planning will identify public water supply and Park water systems that could be affected. Persons responsible for the maintenance of these water systems will be consulted and if negative effects are anticipated, mutually agreeable mitigations will be developed.

HYDRO-17: CSP staff will install appropriate energy dissipaters and employ other erosion control measures at water discharge points, as appropriate.

HYDRO-18: Trails will be designed and constructed so that they do not significantly disrupt or alter the natural hydraulic flow patterns of the landform.

HYDRO-19: Trails located within 100-year flood hazard zones will be designed and constructed so that they do not significantly disrupt or alter natural flood flows.

HYDRO-20: Existing (altered) drainage patterns will be restored to pre-disturbance patterns. In some cases where pre-disturbance patterns cannot be restored, conversion work may require the realignment of a stream segment. To ensure that channel stability will be maintained, project planners will establish new drainage segments only after thorough review by a qualified geologist, geomorphologist, or hydrologist.

HYDRO-21: Install armored rock crossings at ephemeral drainages, micro drainages and swales to harden the trail tread in areas of potential interface between trail users and natural topographic drainage features.

HYDRO-22: Provide outslope to the trail tread and removing any outer edge berm to facilitate sheet flow off the trail where the dispersed flow can be filtered by vegetation and organic litter.

HYDRO-23: When outsloping trail surfaces is not feasible, such as steep linear trail grades, construct rolling dips to direct runoff safely off the trail to prevent buildup of surface runoff and subsequent erosion. Water bars will be used as a last resort, if outsloping and rolling dips or rerouting are not feasible or on trails receiving no use. Water bars will be constructed to divert water to controlled points along the trail and with rock armor at the downslope end for energy dissipation, where needed.

HYDRO-24: Install gravel surfacing on trail areas in areas with saturated or unstable soils, and on bridge approaches, to provide a stable tread surface.

HYDRO-25: Seasonally close trails to all users when soils are saturated and softened.

HYDRO-26: Install “pinch points” where necessary to reduce downhill bicycle speed and increase the line of sight at curves.

HYDRO-27: Construct or repair barriers at switchbacks to discourage shortcuts and the creation of volunteer trails.

HYDRO-28: CSP will provide educational signage and user safety plans in areas designated as flood-prone or within 100-year flood zones, coastal areas subject to tsunamis, areas adjacent to enclosed waterbodies that are susceptible to seiches, and areas at risk for mudflows.

NOISE STANDARD PROJECT REQUIREMENTS

N-1: Operation of noise-generating construction activity (equipment and power tools and haul truck delivery of equipment and materials) will abide by the time-of-day restrictions established by local jurisdictions (i.e., city and/or county) if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship) located in the applicable local jurisdictions. Cities and counties in California typically restrict construction-noise to particular daytime hours. If the local, applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating construction activity can occur, then noise-generating construction activity will be limited to the hours of 8:00 AM to 5:00 PM Monday through Friday.

N-2: All powered construction equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered construction equipment will be

properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.

N-3: Equipment engine shrouds will be closed during equipment operation.

N-4: All construction equipment and equipment staging areas will be located as far as possible from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship) located outside the park.

N-5: All motorized construction equipment will be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes.

N-6: No pile driving, blasting, or drilling will occur in areas that may adversely affect sensitive receptors outside the park unit.

N-7: Written notification of construction activities will be provided to any and all off-site noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of locations where powered construction equipment and/or power tools will be operated. Notification will include anticipated dates and hours during which construction activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification.

N-8: Construction activities involving heavy equipment (i.e., 50 horsepower [hp] or greater) will not operate within 50 feet of land uses that are potentially sensitive to ground vibration, including residential buildings, schools, hospitals, and places of worship. Heavy construction equipment will also not be operated within 30 feet of historically significant structures that could be vulnerable to structural damage from ground vibration, and known archaeological sites, that could be vulnerable to vibration-induced changes to the stratigraphic relations of the soil layers that are important to archaeological study.

Population and Housing Standard Project Requirements

AQ-17: The maximum number of construction worker-related commute trips for any change-in-use project at a park will not exceed 60 one-way worker commute trips per day.

Public Services and Utilities Standard Project Requirements

The Standard Project Requirements (SPRs) do not include a category of provisions specifically related to Public Services and Utilities management.

Recreation Standard Project Requirements

The Standard Project Requirements (SPRs) do not include a category of provisions specifically related to recreation use management.

Transportation and Traffic Standard Project Requirements

TRAN-1 In cases where addition of a use is proposed for trails within urban areas or immediately accessible by urban populations such that the new park users could meaningfully utilize the trails before or after normal weekday business hours (8 am to 5 pm), a designated CSP District staff person will, prior to

implementing the change in use, first review the local jurisdiction's General Plan for guidance on level of service (LOS) changes, or Caltrans standards if the affected facilities are part of a state highway. If it is determined that (or uncertain whether) project traffic could potentially result in unacceptable LOS of local traffic facilities, CSP will coordinate with the applicable jurisdiction(s) that operate/maintain the traffic facilities in the vicinity of the trail heads and associated parking areas to determine the maximum number of peak hour trips that could be generated by the proposed additional use that would not cause significant adverse local traffic effects. If CSP demand projections identify an increase in visitation that would generate peak hour, weekday trips that exceed the maximum number of trips identified by the applicable agency, the proposed additional use would be disqualified from the proposed process and would require individual CEQA analysis, including project-specific traffic analysis. In addition, following implementation of the proposed additional use **[insert who]** will include follow-up consultation with the applicable agency as part of the Adaptive Use Management process to consider the actual traffic levels generated by the additional trail use and the LOS of the affected transportation facilities. If the increased trips generated by the additional trail users are found to exceed original projections and are also found to be causing an exceedance of applicable LOS standards, **[insert who]** will implement a management response to resolve the exceedance, in consultation with the applicable agency. Measures in the management response will include (but will not be limited to) public education actions to encourage visitation during non-peak traffic periods, restriction of the timing of certain types of trail use during peak traffic periods, altering the point(s) of access to transfer project-related traffic from impacted roadways/intersections to less constrained roadways/intersections, coordination with local transit operators to increase access to the trail, coordination with the local transportation department regarding improved bicycle connectivity (for addition of bicycle use), or a combination of these measures.

TRAN-2 For proposed addition of bicycle use, stop signs for cyclists will be installed at all locations where the trail crosses a roadway (including maintenance roads). Appropriate warning signs will be installed along the roadways and on pavement (as necessary) at the approach of bicycle crossings to warn drivers of potential crossing bicyclists.

TRAN-3 For proposed addition of equestrian use, **[insert who]** will ensure driveways/access points to parking facilities have adequate line-of-sight for horse trailers and that parking facilities are either designed to be "pull through" or include a designated "turn-around" for horse trailers (where vehicle parking is restricted). Parking and access for parking facilities accommodating vehicles with horse trailers will be designed per American Association of State Highway and Transportation Officials (AASHTO) standards.

TRAN-4 **[insert who]** will assess parking capacity prior to implementing a proposed change in use. After implementation of the change in use, CSP staff will monitor parking levels as part of the Adaptive Use Management process. If monitoring indicates an exceedance of parking capacity (i.e., increased use of undesignated on-street parking or increased illegal parking due to overflow of parking lot facilities), the **[insert who]** will implement a management response to resolve the parking capacity issue. Measures in the management response may include, but would not be limited to re-designing parking facilities (including minor parking lot expansions in areas where environmental resources will not be affected), installing parking meters and/or applying time limits, working with local transportation departments to increase nearby off-site parking availability, directing users to other existing lots, and/or working with local transit operators to increase transit to the trail facility. CSP District personnel will determine which actions are feasible at the park unit.

TRAN-5 Prior to initiating construction activities the construction manager will have a Construction Traffic Management Plan (CTMP), prepared by a qualified professional, that will provide measures to

reduce potential traffic obstruction or service level degradation at affected traffic facilities. The scope of the CTMP will depend on the type, intensity, and duration of the specific construction activities associated with each qualifying change-in-use project under the Process. Measures included in the CTMP could include (but are not be limited to) construction signage, flaggers for lane closures, construction schedule and/or delivery schedule restrictions, etc. The CTMP will be submitted to the local Public Works Department.