MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

RESOURCE MANAGEMENT POLICIES INITIAL STUDY/MITIGATED NEGATIVE DECLARATION



OCTOBER, 2011



RESOURCE MANAGEMENT POLICIES INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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1 INTRODUCTION

This document is an Initial Study for the Resource Management Policies (RMPs) prepared by the Midpeninsula Regional Open Space District (the District). The purpose of this document is to determine if adoption and implementation of the RMPs would result in a significant environmental impact pursuant to the California Environmental Quality Act (CEQA). The District is a public agency that owns and manages open space preserves on over 60,000 acres of land in northwestern Santa Clara County, southeastern San Mateo County, and a small portion of Santa Cruz County. The RMPs would apply to open space preserve lands within the District's jurisdiction, and would be used to protect and manage plants, animals, water, soil, terrain, geologic formations, historic resources, scenic features, and cultural resources.

A. Report Organization

This Initial Study is organized into the following chapters:

Chapter 1: Introduction. This chapter provides an introduction and overview of the Initial Study document.

Chapter 2: Initial Study Checklist. This chapter summarizes pertinent project details, including lead agency contact information, project location, and General Plan and Zoning designations.

Chapter 3: Project Description. This chapter describes the location and setting of the District open space preserves, along with the objectives of the RMPs and the RMP development process. The chapter also provides an outline of the RMPs and the process by which they would be implemented.

Chapter 4: Environmental Checklist and Findings. Making use of the CEQA Appendix G Environmental Checklist, this chapter identifies and discusses anticipated impacts from adoption and implementation of the proposed RMPs, providing substantiation of the findings made. The chapter concludes with the determination, based on the analysis contained in this Initial Study, that a Mitigated Negative Declaration is appropriate for the proposed RMPs.

2 INITIAL STUDY CHECKLIST

- 1. Project Title: Resource Management Policies
- Lead Agency Name and Address: Midpeninsula Regional Open Space District 330 Distel Circle Los Altos, CA 94022
- 3. Contact Person and Phone Number: Julie K. Andersen, Resource Planner Tel. (650) 691-1200

4. **Project Location:**

The proposed Resource Management Policies (RMPs) would be implemented on properties owned and/or managed by the District in San Mateo, Santa Clara, and Santa Cruz counties, California, as shown in Figure 3-1, below.

Project Sponsor's Name and Address: Midpeninsula Regional Open Space District 330 Distel Circle

Los Altos, CA 94022

6. General Plan Land Use Designation: See Project Description below.

- 7. Zoning: See Project Description below.
- 8. Description of Project: See Project Description below.
- 9. Surrounding Land Uses and Setting: See Project Description below.

Other Public Agencies Whose Approval is Required: RMP adoption and implementation does not require any approvals by other public agencies; however, the RMPs have been developed in col-

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT RESOURCE MANAGEMENT POLICIES CEQA REVIEW INITIAL STUDY CHECKLIST

laboration and consultation with other Responsible Agencies and the general public, as described in Chapter 3 of this Initial Study.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

Aesthetics	\boxtimes	Land Use/Planning
Agriculture & Forestry Resources		Mineral Resources
Air Quality		Noise
Biological Resources		Population & Housing
Cultural Resources		Public Services
Geology & Soils		Recreation
Greenhouse Gas Emissions		Transportation/Traffic
Hazards & Hazardous Materials		Utilities & Service Systems
Hydrology & Water Quality		Mandatory Findings of Significance

Determination:

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as de-

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT RESOURCE MANAGEMENT POLICIES CEQA REVIEW INITIAL STUDY CHECKLIST

scribed on attached sheets. An ENVIRONMENTAL IMPACT RE-PORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLA-RATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARA-TION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Julie K. Andersen, Resource Planner

Ana Ruiz, Planning Manager

 $\frac{10/12/2011}{Date}$

3 PROJECT DESCRIPTION

In accordance with the California Environmental Quality Act (CEQA), this Initial Study has been prepared to identify and evaluate potential environmental effects associated with the Midpeninsula Regional Open Space District's Resource Management Policies (RMPs). The RMPs would apply to District owned and/or managed lands. The RMPs would be used to protect and manage plants, animals, water, soil, terrain, geologic formations, historic resources, scenic features, and cultural resources.

A. Background

Created by a voter initiative in 1972, the Midpeninsula Regional Open Space District (the District) is a public agency that owns and manages 26 open space preserves on over 60,000 acres of land in northern Santa Clara County, southern San Mateo County, and a small portion of Santa Cruz County.¹ The District was created to acquire and preserve a regional greenbelt of open space land in perpetuity; to protect and restore the natural environment; and to provide opportunities for ecologically sensitive public enjoyment and education.

The District works to balance opportunities for low-intensity public recreation on its preserves with natural resource protection through a comprehensive planning approach in partnership with the community. The District currently employs a staff of approximately 100 employees in five departments: Administration, Operations, Planning, Public Affairs, and Real Property.

B. Project Location and Setting

Figure 3-1 shows the District's regional location, as well as its boundaries and the location of the 26 open space preserves under its jurisdiction. Extending from Montara in the north to the Lexington Hills in the south, the District

¹ Total acreage cited is accurate as of May 2011.

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT (MROSD)

RESOURCE MANAGEMENT POLICIES CEQA REVIEW



Source: MROSD, 2011.

directly serves more than 25 communities with a combined population of over 700,000 residents. The District's open space preserves vary in size; the smallest is Stevens Creek Nature Study Area at 59 acres, while the largest is the Sierra Azul Preserve, with over 17,000 acres of land. Elevations within the District range from sea level in the baylands preserves to 3,486 feet atop Mount Umunhum in the Sierra Azul Range.

District lands protect a range of habitats rich in both numbers and variety of plants and animals. The District includes tidal salt marshes in the east, which provide habitat for the endangered clapper rail and salt marsh harvest mouse, and are also used by thousands of migratory birds. The heart of the District straddles the eastern and western flanks of the Santa Cruz Mountains. These lands are covered in a diverse mix of oak woodland, grassland, chaparral, coastal scrub, and both evergreen and coniferous forests that form an impressive scenic backdrop for the densely populated San Francisco Bay Area and Central California Coast. Creeks and streams that run through District lands provide refuge area for endangered coho salmon and threatened steelhead trout.

The natural setting of District preserves provides a peaceful refuge for visitors seeking low-intensity recreational opportunities away from the pressures of urban life. The preserves are open to the public every day, free of charge, providing over 220 miles of public trails and inviting activities such as hiking, biking, jogging, horseback riding, dog walking, and picnicking. There are relatively few improvements on District preserves, other than gravel parking areas, public rest rooms, informational signs, and maintenance and staging facilities.

C. Project Objectives

The Midpeninsula Regional Open Space District (MROSD) has established the following objectives for the RMPs:

- Set the framework for the District's resource management program;
- Provide general guidance for issue-specific and site-specific planning;

- Provide staff and Board a tool for informed, consistent, and effective resource management decision making;
- Inform the public of the purpose and intent of the District's resource management program; and
- Provide a basis for evaluating the District's progress in reaching its resource management objectives.

The RMPs are intended as an overarching policy tool to guide the District in carrying out everyday functions and operations. The RMPs do not establish detailed plans for management of individual preserves or resources. Other more specific master plans, site plans, resource management plans and projects would implement the RMPs as required to address site-specific conditions and circumstances.

D. Policy Development Process

In developing the RMPs, the District has consulted and collaborated with a number of public agency and private organization partners. District staff worked closely with subject matter experts from partner agencies and organizations, including California State Parks, the California Department of Forestry and Fire Prevention (CalFire), the US Forest Service, the San Mateo County Farm Bureau, the Peninsula Open Space Trust, and the Presidio Trust. Additionally, between March 2005 and April 2011, the District held a series of 13 public workshops to invite comment and review of the Draft RMPs. Citizen participation is an essential part of the planning process for the development and use of the District's open space preserves.

In 2003, the District completed the Coastside Service Plan and accompanying Environmental Impact Report (EIR) for the San Mateo Coastside Protection Program. This Program expanded the District's boundaries to include coastal San Mateo County. The Service Plan was developed to guide the acquisition of land and the operation and maintenance of land on the coast. The Service Plan recognizes the unique value of the natural resources and open space located in the Coastside Protection Area and establishes Policies to protect these resources. In addition, the Service Plan incorporates all Mitigation Measures adopted in the EIR to insure that potential adverse environmental impacts from the Program would be avoided. The RMPs and associated Mitigation Measures are intended to supplement and complement the Policies identified in the Service Plan for activities occurring in that Area. Furthermore, the RMPs will be implemented in a manner that is consistent with the Service Plan when project-specific or issue-specific activities occur in that Area.

Public review of the Complete Resource Management Policy Document is planned for October 2011. Staff expects to bring the RMPs to the Board for final approval and certification of the California Environmental Quality Act (environmental review) document at a public meeting in December 2011.

E. Outline of the RMPs

The RMPs are organized into chapters according to subject and resource category. Each chapter consists of a background section and a section containing goals, policies, and implementation measures. The background section provides rationale for the goal and policies that follow. Goals are phrased as broad, general statements describing the desired state or condition to be achieved, while policies identify what steps the District will take in order to attain that goal. Each policy includes one or more recommended implementation measures, which specify action items that can be undertaken, where feasible, to support related policies and goals.

The RMPs are grouped into the following 14 subject and resource categories:

- Vegetation Management;
- ♦ Wildlife Management;
- Invasive Species Management;
- ♦ Water Resources;
- Geology and Soils;
- Scenic and Aesthetic Resources;
- Cultural Resource Management;
- Research and Collection of Information;
- Public Interpretation and Environmental Education;
- Grazing Management;
- Forest Management;

- Ecological Succession;
- Habitat Connectivity; and
- Wildland Fire Management.

F. Implementation

The RMPs would be used to guide the overall planning, budgeting, and decision making processes for individual preserves and for District-wide programs. The suitability and scope of implementation of a specific RMP can only be effectively determined on a site- or issue-specific basis given the circumstances and conditions to be addressed. Therefore, the RMPs would be implemented through Use and Management Plans, Master Plans, and the District's annual Action Plan identifying existing and proposed resource management plans and projects. Each process would allow for evaluation of potential environmental impacts associated with the RMP, physical or other constraints, availability of funding, and feasibility of implementation as needed on a case-by-case basis. Site specific implementation projects or actions would also be subject to further environmental review under CEQA prior to implementation. Additionally, implementation of the RMPs would take place over time and would be subject to availability of funding, consideration of competing District needs, and overall feasibility.

4 ENVIRONMENTAL CHECKLIST AND FINDINGS

A. Discussion of Environmental Evaluation

Items identified in each section of the environmental checklist below are discussed following that section. Required mitigation measures are identified (if applicable) where necessary to reduce a potential impact to a level that is determined to be less than significant.

B. Sources

Copies of all documents and materials referenced herein are available for review at the Midpeninsula Regional Open Space District, 330 Distel Circle, Los Altos, CA, or are available online. These include the following documents:

- Draft Resource Management Policies, 2011
- State Water Resources Board Geotracker Website
- Bay Area Air Quality Management District CEQA Guidelines, 2010
- ◆ 2005 Bay Area Ozone Strategy
- Association of Bay Area Governments Earthquakes & Hazards Program
- ♦ Santa Clara County General Plan 1995-2015
- Santa Clara Valley Transportation Authority 2009 Congestion Management Program
- City of San Mateo General Plan Environmental Impact Report, 2009
- San Mateo Coastal Annexation Final Environmental Impact Report, 2003
- Mitigated Negative Declaration for Pond DR06 Repair, La Honda Creek Open Space Preserve, 2009
- Midpeninsula Regional Open Space District, Road and Trail Typical Design Specifications, prepared by: Best, T.C. Certified Engineering Geologist, 2008.
- California Salmonid Stream Habitat Restoration Manual
- GIS data from the California Department of Conservation Farmland Mapping & Monitoring Program, the California Department of Forestry and Fire Prevention (CalFire), and San Mateo and Santa Clara Counties

MIDPENINSULAREGIONALOPENSPACEDISTRICTRESOURCEMANAGEMENTPOLICIESCEQAREVIEWENVIRONMENTALCHECKLISTANDFINDINGS

I. AESTHETICS Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
a) Have a substantial adverse effect on a scenic vista?				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings with- in a State scenic highway?			•	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			-	
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?			-	

Existing Conditions

District preserves protect and restore a wide range of natural settings and landscapes, from wetlands and tidal salt marshes, to grasslands, woodlands, and forests, as well as coastal mountains. The combination of rugged topography and a climate which includes hot sun, wind, and fog, creates dramatic and appealing contrasts in vegetation. The interplay of color, pattern, form, and light on the coastal mountains is a sight particularly valued by local residents and visitors alike.

The District's aesthetic and visual resources are visible from trails and facilities within the preserves, and they form magnificent scenic backdrops to the urbanized midpeninsula region. An officially designated California Scenic Highway, State Route 35 (SR-35), also known as Skyline Boulevard, runs through or adjacent to, a number of preserves as it passes through the District.

Discussion

a) Would the project have a substantial adverse effect on a scenic vista?

Goal SA of the RMPs seeks to preserve District lands with natural appearance, diversity, and minimal evidence of human impacts. This goal is supported by a number of specific policies and implementation measures designed to preserve and protect scenic vistas from vantage points on and off District preserves. Policy SA-1, for example, calls for minimizing evidence of human impacts within preserves and is supported by implementation measures which require clustering of facilities and signs so as to lessen their visual impact; locating power lines, telecommunication towers, and other infrastructure where terrain or vegetation provides visual screening; and establishing trails so as to minimize their visibility from a distance. Policy SA-2 calls for the maintenance of significant landscapes or features and is supported by implementation measures designed to maintain important scenic viewpoints and vistas through vegetation control. Overall, the RMPs outline a policy framework which would protect and enhance scenic vistas from vantage points on and off District preserves. Impacts related to RMP implementation would be less than significant. (*Less than Significant*)

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a State scenic highway?

As described above, SR-35 is an officially designated California Scenic Highway which runs through or adjacent to a number of District preserves. Policies SA-1 and SA-2 and their associated implementation measures, summarized above, would also serve to preserve and protect visual resources adjacent to and visible from SR-35. Therefore, impacts to scenic resources within a State Scenic Highway would be less than significant. (*Less than Significant*)

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

As described above, RMP Goal SA seeks to preserve District lands with natural appearance, diversity, and minimal evidence of human impacts. This goal is supported by Policies SA-1 and SA-2 and their associated implementation measures, summarized above. No site specific actions or improvements are proposed as part of the RMPs; however, Goal SA and its associated policies and implementation measures would guide future actions taken on District preserves, thereby protecting and enhancing the existing visual character of District preserves. Consequently, impacts would be less than significant. (*Less than Significant*)

d) Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

District preserves are composed predominantly of natural open space, with relatively few existing structures or improvements. Pursuant to District Ordinance 93-1, District Preserves are closed one-half hour after sunset and therefore do not constitute a substantial source of light and glare. District Preserves also contain few lighting facilities. The RMPs do not propose any specific actions or improvements which could add new sources of light or glare or directly increase light or glare from existing sources on District preserves. In general, Policy SA-1 implementation measures requiring clustering of infrastructure and signs would minimize the potential for impacts from lighting that could be added to District lands in future preserve-specific use, management, or master plans. Similarly, Policy SA-2 implementation measures which call for vegetative screening would serve to minimize glare impacts from on-site structures or vehicle windshields in parking lots on District lands. Overall, light and glare impacts from implementation of the RMPs would be less than significant. (Less than Significant)

II. AGRICULTURE AND FORE-STRY RESOURCES

Would the project:

non-agricultural use?

Signifi-Potencant With tially Less Signifi-Mitigation Than No cant Incorpo-Signifi-Imrated Impact cant pact a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the Π Π maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to

Less Than

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT RESOURCE MANAGEMENT POLICIES CEQA REVIEW ENVIRONMENTAL CHECKLIST AND FINDINGS

II. AGRICULTURE AND FORE-STRY RESOURCES

Would the project:

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- d) Result in the loss of forest land or conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?



Existing Conditions

District lands currently contain approximately 5,300 acres of grassland habitat, including lands which were put into agricultural production with the arrival of early Spanish and Anglo settlers. The California Division of Land Resource Protection's Map of Important Farmland shows only a very small amount of Important Farmland and Unique Farmland within District borders. Four District preserves (Purisima Creek, La Honda Creek, Skyline Ridge, and Tunitas Creek) use grazing as a method of wildland fuel reduction and vegetation management. The District leases suitable agricultural lands to tenants with expertise in managing livestock for this purpose. All leases are subject to grazing management plans to support sustainable agriculture consistent with sound resource management practices. The Purisima Creek preserve has active commercial flower production on-site. Additionally, there are a total of 71 Williamson Act parcels on 13 District preserves, including Bear Creek, Coal Creek, El Sereno, La Honda, Long Ridge, Miramontes, Monte Bello, Purisima Creek Redwoods, Russian Ridge, Saratoga Gap, Sierra Azul, Skyline Ridge, and Tunitas Creek preserves.

District lands encompass approximately 30,000 acres of forest and woodland habitat, including roughly 11,500 acres of redwood and Douglas-fir associated coniferous forest and 18,500 acres of other hardwood forest and woodlands. In the past, the redwood and Douglas-fir forests of the Santa Cruz Mountains were the center of intense commercial logging activities; however, there are no ongoing commercial timber harvesting activities on District preserve lands today, except for the active Christmas tree farm (approximately 50 acres) at Skyline Ridge preserve. The primary role for the District is the preservation and protection of forests and woodlands on its preserves.

Discussion

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

As described above, there is only a minimal amount of Important and Unique Farmland within the District's borders. The RMPs do not specifically propose changes in land use on District preserves nor do the RMPs specifically propose the acquisition of new lands which could contain Important or Unique Farmland. Additionally, RMP Goal GM states explicitly that the District shall "help sustain the local agricultural economy, and preserve and foster appreciation for the region's agricultural heritage." Therefore, impacts related to conversion of Important Farmland would be less than significant. *(Less than Significant)*

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

There are a total of 71 Williamson Act parcels on 13 District preserves, including Bear Creek, Coal Creek, El Sereno, La Honda, Long Ridge, Miramontes, Monte Bello, Purisima Creek Redwoods, Russian Ridge, Saratoga Gap, Sierra Azul, Skyline Ridge, and Tunitas Creek preserves. However, the RMPs do not propose any changes in zoning or other activities which would conflict with agricultural activities on District preserves or surrounding lands. Further, as described above, Goal GM of the RMPs recognizes the importance of agriculture to the region and establishes that the District should help sustain the local agricultural economy. As such, implementation of the RMPs would not result in a conflict with Williamson Act contracts and impacts would be less than significant. *(Less than Significant)*

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

District preserves are predominantly zoned as open space and there are no ongoing commercial timber harvesting activities on preserve lands with the exception of the small Christmas tree farm. Implementation of the RMPs would not require rezoning of District lands and as such there would be no significant impact regarding conflicts with forest or timberland zoning. *(Less than Significant)*

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The RMPs include policies which would involve selective, controlled removal of trees for the purpose of forest and wild fire management; however, the primary role for the District is the preservation and protection of forests and woodlands on its preserves. Policy FM-4 of the RMPs calls for the District to manage conifer forests so as to maintain old growth (late seral) habitat conditions and includes implementation measures such as the restoration of degraded forest habitats and the protection of old growth trees and stands. Although some trees or other vegetation may be removed, the intent is to promote robust and healthy ecosystems, not to permanently convert forest land. Biomass lost initially through vegetation removal will be converted into growth in larger diameter overstory trees and other vegetation. Therefore, overall, implementation of the RMPs would result in a less-than-significant impact with respect to conversion of forest lands to non-forest uses. *(Less than Significant)*

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farm-

land, to non-agricultural use or conversion of forest land to non-forest use?

The RMPs outline policies and practices to be used in the protection and management of natural resources on District lands. As such, the RMPs are not in conflict with agricultural activity or preservation of forest and timberland in the surrounding area. As described above, the RMPs include goals which seek to support the local agricultural economy and preserve and protect forest and woodlands. Through policies such as Policy IS-3, the RMPs promote the use of Integrated Pest Management strategies which effectively control pests with minimum impact to human health, the environment and non-target organisms. Additionally, the wildland fire management and forest management practices outlined in the RMPs would reduce the risk of uncontrolled fires which could damage agricultural and forest resources on adjacent properties. Therefore, overall, implementation of the RMPs would not involve environmental changes which could result in the conversion of agricultural land to non-agricultural use or the conversion of forest land to nonforest use. Impacts would be less than significant. *(Less than Significant)*

III. AIR QUALITY

Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in nonattainment under applicable federal or State ambient air quality standards (including releasing emissions which exceed quantitative Standards for ozone precursors or other pollutants)?



MIDPENINSULA REGIONAL OPEN SPACE DISTRICT RESOURCE MANAGEMENT POLICIES CEQA REVIEW ENVIRONMENTAL CHECKLIST AND FINDINGS

IV. AIR QUALITY Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
d) Expose sensitive receptors to substan- tial pollutant concentrations?				
e)Create objectionable odors affecting a substantial number of people?				

Existing Conditions

Regional meteorological and topographical factors give the midpeninsula region a relatively high atmospheric potential for pollution compared to other parts of the San Francisco Bay Air Basin and provide a high potential for transport of pollutants to the east and south.

The California Air Resources Board (CARB) sets and enforces emission standards for motor vehicles, fuels, and consumer products, sets health-based air quality standards, and oversees and assists local air quality districts throughout the State. The Bay Area Air Quality Management District (BAAQMD) is the public agency entrusted with regulating stationary sources of air pollution in the nine counties that surround San Francisco Bay, including San Mateo, Santa Clara, and northern Santa Cruz counties. BAAQMD has adopted the 2005 Ozone Strategy, which provides a roadmap for compliance with California Clean Air Act planning requirements, and the 2010 Bay Area Clean Air Plan, a multi-pollutant plan which establishes emissions control measures to protect public health and the climate of the San Francisco Bay Area.

BAAQMD monitors air quality at several multi-pollutant monitoring sites in the San Francisco Bay Air Basin including Redwood City, in close proximity to the District. Historically, the most problematic criteria pollutants in the San Mateo area include ozone, particulate matter, and carbon monoxide.¹ Combustion of fuels and motor vehicle emissions are a major source of each of these three criteria pollutants. Ambient air quality monitoring data from

¹ Bay Area Air Quality Management District (BAAQMD), 2010, Clean Air Plan, http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx, accessed on July 28, 2011.

the Redwood City station show no daily exceedance of federal or State standards for any of the pollutants tracked in 2008;² however, the District is within the San Francisco Bay Area Air Ozone non-attainment area as delineated by the U.S. Environmental Protection Agency (EPA).

Toxic air contaminants (TACs) are another class of pollutants generated from sources such as petroleum refining and chrome plating operations, operation of gas stations and dry cleaning equipment, and diesel engine particulate matter. Mobile sources, such as trucks, buses, automobiles, trains, ships, and farm equipment, are by far the largest source of diesel emissions. Studies show that diesel particulate matter concentrations are much higher near heavily traveled highways and intersections. The human health risks associated with TACs include cancer, birth defects, neurological damage, and death; however, no safe levels of exposure to TACs have been established.

Discussion

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Implementation of the RMPs could involve some relatively small fuel management projects and other controlled burns in order to reduce vegetative fuels and to re-establish ecosystem health. Controlled burns of this nature would generate ozone precursors, such as particulate matter and nitrogen oxides (NOx); however, the BAAQMD's 2005 Ozone Strategy³ and 2010 Clean Air Plan both account for planned combustion such as the controlled burns proposed as a result of the RMPs. Additionally, BAAQMD Regulation 5 allows open burning for forest management on permissive burn days when air pollution generated is not expected to adversely affect ambient air quality or downwind populations. All prescribed burns on District preserves would be in conjunction with the California Department of Forestry and Fire Prevention (Calfire) and are subject to permits from BAAQMD. Prior to implementation, any potential future fire or fuels management projects that could conflict with air quality plans would be subject to further environmental review under CEQA. As such, implementation of the RMPs would not

² City of San Mateo, 2009, General Plan Update Draft EIR, page 4.5-4.

³ Bay Area Air Quality Management District (BAAQMD), 2005 Ozone Strategy, pages 14 through 20.

conflict with the established air quality plans for the region and impacts would be less than significant. (Less than Significant)

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in non-attainment under applicable federal or State ambient air quality standards (including releasing emissions which exceed quantitative Standards for ozone precursors or other pollutants)?

As described above, recent ambient air quality monitoring data from the Redwood City station show no daily exceedance of federal or State standards for any of the pollutants tracked. While implementation of the RMPs could involve some relatively small controlled burns which generate particulate matter and NOx as described above, open burning for forest management is allowed under BAAQMD Regulation 5, subject to permit. Prior to implementation, any potential future fire or fuels management projects that could generate pollutants would also be subject to further environmental review under CEQA. Additionally, the RMPs contain numerous measures which reduce the risk of wildland fires, including Policy WF-1 which calls for the implementation of fire and fuel management practices which reduce wildfires; Policy WF-2 which requires that the District aggressively support immediate suppression of wildfires; and Policy WF-6 which calls for interagency fire management partnerships. Implementation of these policies would minimize the risk of unplanned fires and, by extension, the risk that ozone precursors from unplanned fires on District preserves could contribute to a regional air quality violation. Therefore, overall, impacts associated with air quality violations from implementation of the RMPs would be less than significant. (Less than Significant)

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

District preserves are within the EPA-designated San Francisco Bay Area Air Ozone non-attainment area, although recent ambient air quality monitoring data from the Redwood City station do not indicate exceedence of federal or State ozone standards. Implementation of the RMPs could involve some relatively small controlled burns which would generate ozone precursors as described above; however, planned fires account for only a negligible amount of the total Bay Area baseline emissions inventory⁴ and controlled burns of the type described in the RMPs would be limited to permissive burn days under BAAQMD Regulation 5, subject to permit. Prior to implementation, any potential future fire or fuels management projects that could expose sensitive receptors to substantial pollutant concentrations would be subject to further environmental review under CEQA. Additionally, as outlined above, the RMPs contain numerous measures which reduce the risk of wildland fires, thereby minimizing the risk that ozone precursors generated by unplanned fires on District preserves could contribute to a cumulatively considerable net increase in ozone. Consequently associated impacts from implementation of the RMPs would be less than significant. (*Less than Significant*)

d) Would the project create objectionable odors affecting a substantial number of people?

District preserves are tracts of open space generally removed from the urbanized areas where sensitive receptors such as children, seniors, and people with impaired lung functions are most likely to live and work. Furthermore, implementation of the RMPs would not generate substantial pollutant concentrations. RMP implementation would not increase the generation of vehicle related emissions from operation of maintenance vehicles on District preserves and employee commuting over existing conditions, and controlled burns permitted under BAAQMD regulations would generate only relatively small amounts of ozone precursors. Therefore, associated impacts would be less than significant. (*Less then Significant*)

e) Would the project create objectionable odors affecting a substantial number of people?

Implementation of the RMPs would involve livestock grazing as a method of vegetation management; however, District preserves are generally removed from urbanized areas with large populations. Livestock grazing is also generally compatible with land uses surrounding District preserves and the distance between grazing areas and residences on surrounding land would be sufficient to attenuate odors associated with livestock. Further, RMP Policy GM-1 is

⁴ Bay Area Air Quality Management District, January 4, 2006, 2005 Bay Area Ozone Strategy, Volume 1, page 19.

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supported by an implementation measure which calls for the preparation of site specific grazing management plans for preserves where grazing would be used as a resource management tool so as to plan for and minimize potential conflicts with surrounding land uses. Consequently, implementation of the RMPs would result in a less-than-significant impact related to objectionable odors. (Less than Significant)

V. BIOLOGICAL RESOURCES

Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, of special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption or other means?

Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
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		-	

MIDPENINSULAREGIONALOPENSPACEDISTRICTRESOURCEMANAGEMENTPOLICIESCEQAREVIEWENVIRONMENTALCHECKLISTANDFINDINGS

V. BIOLOGICAL RESOURCES

Would the project:

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife sites?
- e) Conflict with any local ordinances or policies protecting biological resources?
- f) Conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or State habitat conservation plan?

Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
		•	
		•	

Existing Conditions

The District harbors a wealth of biological resources, attributable to the interaction of climate, topography, soils, and the limited development that has occurred within its boundaries. The District is located along the western edge of the North American continent on a geologically active peninsula between the Pacific Ocean and San Francisco Bay, which limits migration of plants and animals. This unique location is dominated by the Santa Cruz Mountains which are influenced by a Mediterranean climate comprised of mild wet winters and long hot and dry summers cooled by cyclical coastal fog. The eastern edge of the District is heavily influenced by the urban areas of San Francisco, San Jose and other Peninsula cites which result in natural lands that are often used as a large "urban backyard" rather than a pristine wilderness. These and other factors have shaped diverse and dynamic native plant communities that are precisely adapted to these complex and varied conditions.

Native plant communities found on District preserves include the following general vegetation types: salt marsh and brackish marsh, freshwater marsh, redwood forest, douglas fir forest, coastal scrub, chaparral, mixed evergreen forest, riparian forest, native grassland, and oak woodland. The greenbelts of District and neighboring public lands in the Skyline and Sierra Azul preserve areas are large and diverse enough to support such wide-ranging predators as black bear, mountain lion, coyote, bobcat, fox, badgers, and numerous hawks and owls. Appendix A of this Initial Study lists the special-status plant and animals likely to occur on District preserves.⁵

District open space lands also contain a variety of water resources, including such diverse habitats as freshwater wetlands and watercourses (including ponds and seasonal wetlands), salt water tidal wetlands within San Francisco Bay, and groundwater resources such as springs, seeps, and underground aquifers.

There are no habitat conservation plans that apply to District lands.⁶

Discussion

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on a plant or animal population, or essential habitat, defined as a candidate, sensitive or special-status species?

Table 4-1 lists the special-status plant and animals likely to occur on District preserves. The RMPs contain numerous goals, policies, and implementation measures designed to protect special-status species and preserve and enhance the habitats that support them. RMP Policy VM-3 calls for the District to protect and enhance the habitats and populations of special status plant species. This policy is supported by implementation measures requiring that the location and condition of special status plants and their habitats be identified; that surveys be conducted for special status plants during the appropriate season before significant site specific development or any unusual anticipated increase in use; and that areas with special status species be protected from human activities and other negative impacts.

⁵ Special status species are plant and animal species that are state or federally listed as threatened, rare, endangered, species of special concern, candidate species, or those plant species listed by the California Native Plant Society's list 1B and 2.

⁶ Julie K. Andersen, Resource Planner, Midpeninsula Regional Open Space District, personal communication with The Planning Center | DC&E, Monday July 18, 2011.

Policy WM-3.3 calls for the District to consult with responsible wildlife agencies to conserve special status species or to control problem wildlife when other significant natural resources are threatened. Policy WM-4 requires action to protect and enhance the habitats and populations of special status animal species. Policy WR-4.5 establishes that the District shall monitor water quality and condition of aquatic habitats containing spawning, breeding, or rearing habitat for special status fish, reptile, amphibian, or other aquatic species. Policy WR-5.1 states that the District shall monitor sediment delivery and transport within watersheds supportive of special status animals requiring aquatic habitat.

Additionally, Policy FM-1.3 calls for an inventory of District forest wildlife with a particular emphasis on special status species and indicator species. Policy FM-2 requires that the District ensure forest management activities are compatible with the protection of special status plant and animal species. Policy ES-1.4 requires the District monitor and manage grasslands for invasive species and biodiversity so as to promote use of grasslands by native and special status species. Policy ES-3 calls for the District to facilitate regeneration of disturbance-dependent special status, rare, or unique plants. Further, Policy HC-4.2 states that the District shall protect and restore known habitats of rare, endangered, or special status species, while Policy HC-4.6 calls for the District to collaborate with resource agencies to restore and enhance the habitats of protected and special status species known to utilize preserve areas.

Any future projects that could have a potential impact to sensitive or specialstatus species or essential habitat would be subject to further environmental review under CEQA prior to implementation.

In general RMP implementation would be beneficial for special-status plant and animal species and therefore would not result in a significant impact. (Less than Significant)

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community type?

The RMPs contain numerous policies and implementation measures which would protect and enhance riparian habitat and sensitive natural communi-

ties. For example, RMP implementation measure WR-4.2 requires that the District manage agricultural leases and easements to maximize the protection and enhancement of riparian areas and water quality; measure GS-2.4 calls for the District to limit agricultural activities, facility development, and trail construction in riparian and other wetland areas to protect them from disturbance; and measure GM-1.3 requires the management of agricultural leases and easements to protect and enhance riparian areas and to maximize the protection or enhancement of water quality. Additionally, measure WM-2.1 calls for the District to inventory critical and sensitive wildlife habitats and develop management strategies for their protection; measure WM3.1 states that the District will discourage human intrusion into sensitive wildlife habitats by appropriate placement of facilities and trails; measure FM-2.3 calls for the continuation of regular consultation with regulatory agencies and experts to develop plans to protect and enhance habitat for sensitive species; and measure WR-6.2 requires that the District prioritize restoration and enhancement of areas providing habitat to sensitive species. Any future projects that could have a potential impact to riparian habitat or other sensitive natural community type would be subject to further environmental review under CEQA prior to implementation. As such, implementation of the RMPs is generally beneficial for riparian habitat and sensitive natural communities and there would result in no significant impact. (Less than Significant)

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act, through direct removal, filling, hydrological interruption or other means?

RMP Goal WR calls for the District to protect and restore natural water courses, wetlands, and hydrologic processes. Additionally, several other RMP policies and implementation measures seek to protect and preserve wetlands. For example, Policy WR-7 requires the District to preserve and enhance ponds and other wetland habitats by inventorying and assessing ponds and wetlands to identify opportunities for habitat maintenance and enhancement, as well as by monitoring sensitive reptile, amphibian, and aquatic organism populations dependent on District wetlands. Additionally, implementation measure GS-2.4 requires the District to limit agricultural activities, facility development, and trail construction in riparian and other wetland areas to protect them from disturbance. Implementation measure GM-3.4 calls for the monitoring of water quality in ponds, wetlands, and watercourses with unrestricted livestock access; and finally, Policy ES-2 requires the preservation and enhancement of pond habitats and other wetlands. Any future projects that could have a potential impact to wetlands would be subject to further environmental review under CEQA prior to implementation.

Generally RMP implementation would be beneficial to wetlands and there would be no significant impact. (Less than Significant)

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species, their wildlife corridors or nursery sites?

RMP Goal HC calls for the District to protect ecosystem integrity by maximizing habitat connectivity. In turn, this goal is supported by five policies which seek to facilitate adequate movement of migratory species and to protect and enhance migratory corridors. Policy HC-1 calls for the District to incorporate local and regional habitat connectivity into its land acquisition planning activities. Policy HC-2 requires the District identify and protect existing habitat networks to prevent further compromise to ecosystem integrity, including through the preparation of habitat connectivity and riparian corridor protection and restoration plans; the formulation of site specific habitat management goals; and the incorporation of construction practices that avoid the creation of unnecessary barriers to habitat connectivity. Additionally, Policy HC-3 requires that the District collaborate with neighboring land holders and surrounding agencies to support regional efforts to establish and maintain habitat networks. Policy HC-4 states that the District shall restore, maintain, or enhance local habitat networks formed within its preserves or which incorporate preserves and other protected lands. Finally, Policy HC-5 requires that the District preserve and enhance riparian, stream, and other wetland habitat locally and at a watershed level to provide important habitat connections. Any future projects that could have a potential impact to native resident or migratory fish or wildlife species, their wildlife corridors or nursery sites would be subject to further environmental review under CEQA prior to implementation. Therefore, RMP implementation would not adversely affect the movement of migratory species or substantially interfere with wildlife migration corridors. Implementation would result in no significant impact. (Less than Significant)

e) Would the project conflict with any local ordinances or policies protecting biological resources?

The overarching aim of the RMPs is to preserve, protect, and manage natural resources on District lands. The numerous RMP goals, policies, and implementation measures cited above and throughout this Initial Study support this aim. Additionally, prior to implementing projects or activities, the District consults with federal, State, and local agencies having jurisdiction over biological resources in order to comply with all regulations, ordinances and policies and to obtain necessary permits. Some of these agencies include: California Department of Fish and Game, US Fish and Wildlife Service, National Oceanic and Atmospheric Administration, and National Marine Fisheries Service. The District may also collaborate with non- regulatory agencies such as: California State Parks, California Department of Forestry and Fire Prevention (CalFire), the US Forest Service, and the San Mateo County Farm Bureau to provide assistance or to partner in the protection of biological resources. Therefore, RMP implementation would be consistent with local ordinances and policies designed to preserve and protect biological resources and associated impacts would be less than significant. (Less than Significant)

f) Would the project conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or State habitat conservation plan?

There are no adopted Habitat Conservation Plans which apply to District lands. Therefore, RMP implementation would result in *no impact* with respect to habitat conservation plan compliance. (*No Impact*)
VI. CULTURAL RESOURCES Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
 a) Cause a substantial adverse change the significance of a historical resourt as defined in § 15064.5? 	è in rce		-	
b) Cause a substantial adverse change the significance of an archaeolog resource pursuant to § 15064.5?	∍in ical 🔲			
c) Directly or indirectly destroy a unic paleontological resource or site unique geologic feature?	or 🗖		•	
d) Disturb any human remains, includ those interred outside of formal cer teries?	ing ne- 🗖		-	

Existing Conditions

The San Francisco Peninsula has had a rich and diverse history, including settlement by Native American groups; the Spanish (1776-1821) and Mexican Republican (1821-1848) colonization of the region; the annexation of California by the United States in 1848; and subsequent industrial, agricultural, and residential development. There are remains from each of these periods on District lands, including Native American village sites and bedrock mortars, barns and other ranching features, orchards, wineries, historic homes, sawmills, mines, historic roads and trails, and outdoor recreational sites. As time passes, more recent periods of California's history become historically significant. As such, some 20th century sites such as World War II and Cold War military sites are now considered historically significant resources throughout California. Collectively, these sites, structures, features, and artifacts comprise the cultural resources of the District.

Discussion

a) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Generally, the preservation of open space land in the peninsula's greenbelt provides the opportunity for the District to protect and interpret the rural

history of the Santa Cruz Mountains and San Francisco Bay for the benefit of present visitors and future generations. The District has adopted Policies Regarding Improvements on District Lands which provide a public process used to assess and determine whether District structures and improvements are historic or cultural resources, and how they can most appropriately be managed.

The RMPs are consistent with the Policies Regarding Improvements on District Lands, supplementing them with additional measures to protect and preserve historical resources on District lands. Goal CR of the RMPs states that cultural resources shall be identified, protected, preserved, and interpreted for the benefit of present and future generations. In turn, Goal CR is supported by a variety of policies and implementation measures, including Policy CR-1 which calls for maintaining an inventory of cultural resources for use in planning of trail development and other projects; implementation measure CR-2.3 which requires that trails, staging areas, new structures and other facilities be located so as to avoid loss or degradation of historically significant resources; and Policy CR-4 which calls for the preservation and maintenance of cultural resources through partnerships with private or non-profit groups to aid in the restoration, management, and use of historic structures, among other means.

Therefore, implementation of the RMPs would preserve and protect significant historical resources on District lands to the maximum extent practicable and associated impacts would be less than significant. (*Less than Significant*)

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

In general, the preservation of open space on District lands greatly reduces the potential disturbance or loss of archaeologically significant resources on lands managed by the District by minimizing the amount of development that can take place. The RMPs also contain measures to prevent disturbance or loss of known archaeological resources on District lands, including Policy CR-1, which requires documentation of known resources in the District's inventory of cultural resources, as well as implementation measure CR-1.3 of the same policy that requires archaeological site records be completed and filed with the

Northwest Information Center. Additionally, the RMPs include protocols for implementation in the event that archaeological sites are discovered in the course of developing trails, staging areas, new structures, or other facilities on District lands. Policy CR-3 states that cultural resources shall be protected from disturbance to the maximum extent feasible, including by preserving them in situ; by erecting protective fencing and establishing patrols to reduce vulnerability to vandalism and looting; and by following established guidelines for reporting, protecting, and recording archaeological sites and features in the event of unexpected discovery. Therefore, implementation of the RMPs would ensure that archaeological resources are protected to the maximum extent practicable and associated impacts would be less than significant. (*Less than Significant*)

c) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As described above, the preservation of open space on District lands greatly reduces the potential disturbance or loss of cultural resources, including paleontological resources and unique geological features, on District lands by minimizing the amount of development that can take place. Additionally, the same policies, implementation measures, and protocols described above would serve to preserve and protect known paleontological resources and also to minimize the risk of disturbance or loss of significant paleontological resources in the event of unexpected discovery to the maximum extent practicable. Policy GS-3 also specifically calls for the protection of unique geological features from human damage. Therefore, implementation of the RMPs would result in a less-than-significant impact with respect to destruction of a paleontological site or unique geographic feature. (*Less than Significant*)

d) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

As described above, the preservation of open space on District lands greatly reduces the potential disturbance or loss of cultural resources, including human remains, on District lands by minimizing the amount of development that can take place. The policies, measures, and protocols described above would also serve to protect known and as yet undiscovered human remains to the maximum extent practicable. Additionally, the RMPs include specific

measures to minimize potential impacts to human remains on District lands, including implementation measure CR-2.4, which requires the District to consult with Native American and other ethnic groups when developing plans for the management of resources related to their heritage. Further, California Public Resources Code Sections 21038.2 and 5097.9-5097.994, and the federal Native American Graves Protection and Repatriation Act of 1990 (NAG-PRA) stipulated protocols and measures to minimize adverse impacts associated with the disturbance of human remains. Therefore, implementation of the RMPs and continued compliance with applicable federal and State regulations would ensure that impacts to human remains would be less than significant. (Less than Significant)

VII. GEOLOGY AND SOILS Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
a) Expose people or structures to potential	-			-
 substantial adverse effects, including the risk of loss, injury or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? 			•	
ii) Strong seismic ground shaking?				
iii) Seismic-related ground failure, in- cluding liquefaction?				
iv) Landslides, mudslides or other sim- ilar hazards?				
b) Result in substantial soil erosion or the loss of topsoil?				
 c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsi- 			•	
dence, liquefaction or collapse?				

VII. GEOLOGY AND SOILS

Would the project:

- d) Be located on expansive soil, creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?



Existing Conditions

District lands include a diverse set of dynamic geological resources characterized by steep slopes, earthquake faults, landslides, unstable and erosive soils, and attractive but fragile rock formations. General conditions on District preserves are discussed below under the respective impact criteria.

The California Building Code (CBC) is another name for the body of regulations known as the California Code of Regulations (C.C.R.), Title 24, Part 2, which is a portion of the California Building Standards Code. The California Building Code incorporates by reference the International Building Code with necessary California amendments. About one-third of the text within the CBC has been tailored for California geologic and seismic conditions.

Discussion

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
ii) strong seismic ground shaking; iii) seismic-related ground failure, including liquefaction; iv) landslides, mudslides or other similar hazards?

(i) The San Andreas Fault passes through the midpeninsula region, and numerous District preserves fall within fault rupture hazard zones identified in the San Mateo County and Santa Clara County General Plans. Specifically,

the Bear Creek Redwoods, El Sereno, Fremont Older, Los Trancos, Monte Bello, Picchetti Ranch, Rancho San Antonio, Saratoga Gap, Sierra Azul, and St. Joseph's Hill preserves are located within identified fault rupture hazard zones.

The RMPs do not propose new habitable development, including housing, which would directly place a substantial number of people or structures at risk in the event of rupture along a known fault line. There are relatively few improvements that occur on District lands. Additionally, RMP Policy GS-1 states that facilities shall be located and constructed so as to avoid high-risk area subject to faulting. Further, implementation measure GS-1.1 calls for minimizing construction of buildings, roads, pipelines, septic tanks, and other major improvements in active fault zones. Implementation measure GS-1.3 requires that the District review available geohazard data for proposed facilities and infrastructure where geologic hazards may be present. As such, implementation of the RMPs would minimize the risk of injury, damage, or death in the event of fault rupture to the maximum extent practicable. With continued compliance with CBC standards, RMP implementation would therefore result in a less than significant impact. *(Less than Significant)*

(ii) The San Andreas Fault passes directly through several District preserves and all preserves are at risk of ground shaking during a severe seismic event. As described above, however, implementation of RMP Policy GS-1 as well as implementation measures GS-1.1 and GS-1.3 would serve to minimize the risk of damage, death, or injury associated with seismic ground shaking to the maximum extent practicable. As such, with continued compliance with CBC standards, RMP implementation would therefore result in a less than significant impact. (*Less than Significant*)

(iii) Liquefaction is most likely to occur in sandy or silty soils along riverbeds, beaches, and dunes. As such, the risk of liquefaction is greatest at the District's coastal preserves. United States Geological Survey (USGS) data for Bay Area liquefaction risk indicates that areas of the Stevens Creek Nature Study Area and the Ravenswood Open Space Preserve are at high risk of liquefaction in the event of a major earthquake. As described above, the RMPs do not propose development which would directly place a substantial number of people or structures at risk in the event of seismically induced liquefaction. Further, the RMP policies and implementation measures cited above, including Policy GS-1 which requires the District to locate and construct facilities to avoid high-risk areas, would minimize liquefaction-related risks to people and structures, as would compliance with CBC standards. Therefore, liquefactionrelated impacts from RMP implementation would be less than significant. *(Less than Significant)*

(iv) Areas in southern San Mateo County between Skyline Boulevard and the Coast have the highest landslide susceptibility, while the highest landslide risk areas in Santa Clara County are in the eastern part of the county or in the mountains along the border with Santa Cruz County.7 Low lying areas and flat lands are generally less at risk in the event of landslides. As such, portions of some inland District preserves are in areas with high landslide risk; however, given the very low and widely scattered population density on District preserves and low population density on lands adjacent to District Preserve, the potential for injury, damage, and death due to landslides is minimal. Additionally, the RMPs do not propose habitable development, including housing, which would directly increase the number of people living or working on District preserves and therefore RMP implementation would not directly increase the risk of injury, damage, and death due to landslides. Moreover, the RMPs contain numerous policies and implementation measures which seek to promote slope stability and minimize the potential for erosion, including those discussed in detail in Sections VI and IX of this Initial Study. Consequently, RMP implementation would result in a less-than-significant impact with respect to risks associated with landslides. (Less than Significant)

b) Would the project result in substantial soil erosion or the loss of topsoil?

Erosion can be caused by natural causes or human activity. Soil erosion is accelerated by loss of plant cover, disruption of natural drainage patterns, landslide activity, or recreation use. On District preserves, poor placement of roads or trails, shortcutting of trails, poor design, poor construction or placement of drainage systems, excessive grazing pressure, past cultivation practic-

⁷ Association of Bay Area Governments (ABAG), "Hazard Maps and Information," http://gis3.abag.ca.gov/Website/Landslides/viewer.htm, accessed on July 20, 2011.

es, and inappropriate development of facilities can also accelerate natural erosion.

The RMPs include numerous goals, policies, and implementation measures which address these potential causes of erosion. RMP Goal GS calls for the District to avoid or minimize soil loss. Policy GS-1 requires the District to locate and construct facilities so as to avoid high-risk areas subject to erosion by minimizing construction of major improvements in highly erodible areas and by designing roads, trails, and facilities to minimize soil disturbance. Policy GS-2 requires the District to minimize unnatural soil erosion and sedimentation through a variety of implementation measures, including identifying and monitoring areas with accelerated soil erosion or slope failure potential so as to limit construction activity in those problem areas by properly locating facilities and by installing drainage or erosion-control measures; reconstructing and stabilizing roads and trails with the potential for ongoing erosion problems; minimizing soil disturbance associated with construction and maintenance operations; reseeding disturbed ground; revegetating with native plant species to ensure long-term erosion control; and preventing the physical removal of naturally occurring soil wherever possible.

Consequently, implementation of the RMPs would reduce the potential for erosion and loss of topsoil to the maximum extent practicable and associated impacts would be less than significant. (*Less than Significant*)

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Peat and other organic soils generally found in existing or former marshy areas may pose a subsidence hazard. Such soils are found on coastal District preserves. Additionally, landslide deposits are present throughout the mountains of San Mateo and Santa Clara counties, including on District preserves. However, as described above, the population density on and around District preserves remains low. The RMPs would not increase the population density and therefore implementation of the RMPs would not directly increase the number of people or structures at risk of soil instability hazards or increase the potential for injury, damage, or death due to soil instability. Additionally, the RMP policies and implementation measures cited above, including Policy GS-1, would ensure that associated risks would be reduced to the maximum extent practicable and that, overall, impacts would be less than significant. (*Less than Significant*)

d) Would the project be located on expansive soil, creating substantial risks to life or property?

As described above, the population density is low on and around District preserves and the RMPs would not directly increase the number of people or structures on District preserves. Therefore, RMP implementation would not directly increase the risk of injury, damage, or death due to expansion or contraction of soils and associated impacts would be less than significant. (*Less than Significant*)

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

Wastewater from District facilities is discharged to vault toilets, septic systems, or municipal wastewater treatment systems. The RMPs do not specifically propose construction of new or expanded septic or alternative wastewater disposal systems, nor would they result in substantial development that would require construction of such facilities. Future construction of wastewater treatment systems on District preserves, if any, would be planned for in separate Use and Management Plans or Master Plans. Site specific implementation projects or actions would be subject to further environmental review under CEQA prior to implementation. Therefore, RMP implementation would result in a less-than-significant impact associated with soils supporting septic tanks and other alternative wastewater disposal systems. (*Less than Significant*)

VI Wa	II.GREENHOUSE GAS EMIS- SIONS puld the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the envi- ronment?			•	
b)	Conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			•	

Existing Conditions

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture solar heat as it is radiated from the surface of the earth back into the atmosphere, creating a warming effect like that of a greenhouse. The accumulation of GHGs in the earth's atmosphere has been linked to global climate change, often described as changes in the climate of the earth caused by natural fluctuations and anthropogenic activities which alter the composition of the global atmosphere. California State law recognizes the following gases as GHGs: Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O), Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride.

The principal sources of GHG emissions in San Mateo and Santa Clara counties are transportation and electric power generation. Taken together these two sources emit approximately 74 percent of GHGs in the State.⁸ The Bay Area Air Quality Management District (BAAQMD) has established thresholds of significance for operations-related GHG emissions which apply to the Plan Area. The litmus test for a significant impact under the BAAQMD

⁸ City of San Mateo, "Our Carbon Footprint," http://www.cityof sanmateo.org/index.aspx?NID=709, accessed on September 1, 2010.

thresholds is either compliance with a qualified Climate Action Plan or a qualified General Plan or annual emissions of less than 1,100 metric tons per year.⁹

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which Statewide emission of GHGs would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

AB 32 establishes a timetable for the CARB to adopt emission limits, rules, and regulations designed to achieve the intent of the Act. CARB staff is preparing a scoping plan to meet the 2020 GHG reduction limits outlined in AB 32. In order to meet these goals, California must reduce their GHGs by 30 percent below projected 2020 levels, or about 10 percent from today's levels.

On September 30, 2008, Governor Schwarzenegger signed into law SB 375. SB 375 focuses on housing and transportation planning decisions to reduce fossil fuel consumption and conserve farmlands and habitat. SB 375 provides a path for improved planning by providing incentives to locate housing developments closer to where people work and go to school, allowing them to reduce vehicle miles traveled every year. Finally, SB 375 provides certain exemptions under CEQA law for projects that are proposed consistent with local plans developed under SB 375. MTC will prepare a Sustainable Communities Strategy for the Bay Area to implement this bill.

⁹ BAAQMD, CEQA Air Quality Guidelines, http://www.baaqmd.gov/ Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx, accessed on September 1, 2010.

Carbon sequestration, the process of capturing and permanently storing GHGs, is one of the most promising ways for reducing the buildup of GHGs in the atmosphere.¹⁰ Microbes and plants play substantial roles in the global cycling of carbon through the environment. Biomass, in the form of trees and plants, removes carbon dioxide from the atmosphere and effectively captures it as long as the trees and plants continue to grow.

Discussion:

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Significant GHG emissions result from activities which are sustained over long periods of time. Land uses which result in ongoing energy and water consumption or which generate regular vehicle trips can generate significant GHG emissions on an annual basis. However, implementation of the RMPs would not result in new residential or commercial development and would not substantially increase vehicle miles travelled as a result of employee commute trips or visits to District preserves, and as such, RMP implementation would not result in a significant level of GHG emissions. In general, the type of project that would stem from RMP implementation would be temporary in nature, such as trail improvements, parking lot construction, controlled burns for fuel management, or mowing projects which would not generate substantial GHG emissions over prolonged periods.

For the reasons outlined above, BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, the 2011 BAAQMD Air Quality Guidelines establish screening level criteria to provide lead agencies and project applicants with a conservative indication of whether operation of a proposed project could result in potentially significant GHG impacts over time. Derived from the default emissions assumptions in the URBEMIS model, the screening level criteria indicate the size and scope of project that would result in significant GHG emissions impacts according to land use. According to BAAQMD screening level criteria, for a significant operational GHG emission impact to result for city park lands, the active recreational areas, such as lighted soccer fields, playgrounds, and well-travelled

¹⁰ US Department of Energy, "Carbon Sequestration," http://www.energy. gov/sciencetech/carbonsequestration.htm, accessed on June 14, 2011.

parking lots, would need to have a total area of over 600-acres. District preserves are predominantly areas of passive open space, where active recreational acreage is well below this threshold.

Additionally, biomass on District lands allows for the capture of carbon dioxide across the Midpeninsula region. Protection and management of plant resources on District lands is therefore beneficial for regional GHG reduction. As such, implementation of the RMPs would result in no adverse impact with respect to the generation of GHG emissions. *(Less than Significant)*

b) Would the project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

The Santa Clara County Board of Supervisors adopted a Climate Action Plan for Operations and Facilities in September 2009, and San Mateo County is currently in the process of developing an Energy Efficiency Climate Action Plan (EECAP) to build on its existing Energy Reduction Strategy and Adaptation Plan.

In general, the creation of a regional greenbelt of open space such as the District greatly benefits the GHG reduction initiatives undertaken in the San Francisco Bay Area. Biomass in the form of trees and plants on over 60,000 acres of District land preserved in perpetuity represents the potential for ongoing carbon sequestration. Implementation of the RMPs would ensure that District resources, including trees and plants, are managed sustainably and as such would support implementation of GHG reduction plans throughout the region. Therefore, impacts related to conflict with established GHG reduction plans would be less than significant. (*Less than Significant*)

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?
- e) For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people living or working in the project area?
- f) For a project within the vicinity of a private airstrip, result in a safety hazard for people living or working in the project area?
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
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IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
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Existing Conditions

The District uses hazardous materials such as petroleum fuels and pesticides under specifically regulated circumstances. In general, however, the District employs Integrated Pest Management (IPM) techniques which target pests with minimum impact to non-target species, favoring non-chemical strategies where effective. Remnant contamination from previous industrial uses, particularly in Bayside areas, may be present on District preserves. Some active or abandoned agricultural sites may have residual material in soils or have hazardous materials present in containers or tanks. Table 4-1 shows the seven known sites of contamination on District preserves, including three sites currently under assessment or remediation.

Independent of the RMPs, the District uses the following best management practices (BMPs) to manage hazardous substances. When acquiring new properties, the District performs Phase I environmental site assessments to identify hazards and remediation actions as needed. The District also consults with a licensed Pest Control Adviser to assist with selection of herbicides for use on District lands, as well as the amounts, methods, and time of year for application. All herbicide application is done by qualified applicators in accordance with the 2006 State of California red-legged frog injunction. Additionally, the District runs an Injury and Illness Prevention Program (IIPP) that identifies BMPs for District staff when working with or around hazardous substances.

	Site 1	Site 2	Site 3	Site 4	Site 5
Preserve	Sierra Azul	Bear Creek Redwoods	Bear Creek Redwoods	La Honda Creek	Pulgas Ridge
Address	Mt. Umunhum Rd.	19480 Bear Creek Road	19480 Bear Creek Rd	5701 La Honda Road	Hassler
City	Alviso	Los Gatos	Unincorporated	La Honda	San Carlos
County	Santa Clara	Santa Clara	Santa Clara	San Mateo	San Mateo
ZIP	95033	95033	95030	94020	94070
Acres	17795.11	1377.75	1377.75	5712.46	364.90
Case Type	Military UST Site	LUST Cleanup Site	LUST Cleanup Site	Cleanup Program Site	Cleanup Program Site
Status	Remediated	Open – Site Assessment	Completed – Case Closed	Completed-Case Closed	Completed – Case Closed
Potential Contaminant	Benzene, Toluene, Xylene, Diesel, Gasoline, Heating Oil / Fuel Oil	Gasoline	Diesel	Other Insecticides / Pesti- cide / Fumigants / Herbi- cides, Diesel, Heating Oil / Fuel Oil	Diesel
Potentially Affected Resource	Groundwater (other than drinking), Soil	Soil, Surface water, Under Investigation	Soil	Soil	Groundwater (other than drinking), Soil

TABLE 4-1 Known Contaminated Sites on District Preserves

Source: State Water Resource Control Board (SWRCB) Geotracker database, 2011.

	Site 6	Site 7
Preserve	Ravenswood	Stevens Creek Nature Study Area
Address	2100 Bay Road	North Perimeter Rd. and Lindbergh Ave. Moffett Field
City	East Palo Alto	Mountain View
County	San Mateo	Santa Clara
ZIP	94303	94035
Acres	376	55
Case Type	Other - Industrial Area	Military Cleanup Site
Status	Open – Site Assessment	Open - Remediation
Potential Contaminant	None Specified	DDD / DDE / DDT, Lead, Other Metal, Po- lychlorinated Biphenyls (PCBS)
Potentially Affected Resource	Soil	Sediments, Soil, Surface Water

TABLE 4-1 KNOWN CONTAMINATED SITES ON DISTRICT PRESERVES (CONTINUED)

Source: State Water Resource Control Board (SWRCB) Geotracker database, 2011.

The biggest potential public hazard on District preserves is unplanned wildland fires. Factors contributing to higher risk of wildland fires are frequency of critical fire weather, slope and fuel load in grasslands or on forest floors. Coastal preserves are less at risk; however, the majority of inland preserves are classified as High or Very High risk areas by CalFire.¹¹

There are a total of eight airports in San Mateo and Santa Clara counties: San Francisco International, San Carlos, and Half Moon Bay County Airport in San Mateo County; and Palo Alto, Reid-Hillview, South County, San Jose International, and Moffett Federal Field in Santa Clara County. Stevens Creek Open Space Preserve is adjacent to Moffett Federal Field and Ravenswood Open Space Preserve is located within 5-miles of the Palo Alto Airport. District lands are primarily larger parcels of open space well removed from populated areas.

Discussion

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

With implementation of the RMPs, the transport, storage, and use of petroleum fuels and pesticides on District preserves would not substantially increase. Continued implementation of existing District policies and practices regarding good housekeeping and routine vehicle maintenance would minimize potential hazards from petroleum fuels to less than significant levels. Existing District policies for pesticides, cited above, require selection of low toxicity products and application in accordance with a prepared integrated pest management plan. Further, any pesticide use would be in compliance with federal and State law, would be done only in accordance with the label and any safety and environmental restrictions, and per State law, would be done under a site specific prescription from a licensed Pest Control Advisor, and usage would be reported to the County Agricultural Commissioner monthly. Additionally, risks associated with use of pesticides would be further reduced through the implementation of RMP implementation measure IS-3.5 and IS-3.10. IS-3.5 requires that the District take all reasonable precautions to pro-

¹¹ California Department of Forestry and Fire Prevention (CalFire), Fire Hazard Severity Zones, GIS data, 2009.

tect the environment, the health and safety of District employees, adjacent lands and preserve visitors when using pesticides. IS-3.5 also requires the use of the least toxic, effective pesticides only where alternative methods are known to be ineffective or infeasible. IS-3.10 requires that the District keep records of all pesticides applied and submit monthly and annual reports to the County Agricultural Departments; obtain pest control recommendations and provide field staff safety training in the storage, mixing and application of pesticides; and continue to follow all federal, State, and local regulations regarding the use of pesticides. Therefore, implementation of the RMPs and continued compliance with applicable federal and State regulations would ensure that risks from the routine transport, storage, and use of hazardous substances are less than significant. (*Less than Significant*)

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Please refer to Section VIII, criteria a) of this Initial Study for a discussion of the transport, storage, and use of hazardous substances on District preserves. Implementation of the RMPs and continued compliance with existing District policies regarding hazardous materials, cited above, and with applicable federal and State regulations would ensure that risks from the release of hazardous substances are less than significant. *(Less than Significant)*

c) Would the project emit hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?

In general, District preserves are tracts of open space well removed from developed urban centers where schools are most likely to be located. However, the following schools are located in close proximity to District Preserves: Kings Mountain Elementary School (Purisima and el Corte de Madera); La Honda Elementary School (La Honda); Lakeside Elementary School (Felton Station); Lexington Elementary school and Loma Prieta Elementary School (Sierra Azul); Monte Bello Elementary School (Picchetti); Regnart Elementary School (Fremont Older); Tunitas School (Tunitas); Corte Madera School (Windy Hill); Coastano and East Palo Alto School (Ravenswood). Maintenance vehicles and equipment operated on District preserves could emit small quantities of toxic air contaminants (TACs); however, not at levels which would pose substantial human health risk. Additionally, as described above, RMP implementation measures IS-3.5 and IS-3.10 would reduce health risks associated with pesticides to the maximum extent practicable. Therefore, impacts associated with hazardous emissions in proximity to schools would be less than significant. (*Less than Significant*)

d) Would the project be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

There are seven known sites of contamination on District preserves, including one site currently under assessment, as shown in Table 4-2. As described in detail below under Section XIII of this Initial Study, RMP implementation would not directly increase the number of visitors, residents, or employees on District preserves, and therefore RMP implementation would not increase the risks associated with these sites.

Additionally, the RMPs contain policies and implementation measures that would further minimize the associated risks to people and the environment. Policy WR-1 calls for the District to protect surface and ground water from contamination, and is supported by implementation measure WR-1.1, which requires that the District inventory existing facilities and uses that affect watercourses, riparian areas, and wetlands, and prepare plans for protection or restoration, as appropriate; as well as by implementation measure WR-1.1, which calls for the District to research and pursue cleanup of likely sources of pollution, such as buried fuel tanks, improperly dumped or stored material, and faulty waste or drainage systems. Policy GS-4 states that the District shall prevent or remediate contaminated soils. In turn, this policy is supported by implementation measure GS-4.2, requiring that the District investigate areas where soil contamination may have occurred due to previous land use, including disposal sites, mining areas, or leaks from storage tanks; and by implementation measure GS-4.3, which calls for the remediation of areas where contaminants pose a threat to human and ecological health through implementation of recommended treatment options including biodegradation, safe removal of contaminated soils, capping of soils, or other methods as recommended by a remediation professional. Future land acquisitions and property interests will be subject to the same policies, BMPs, and Phase I environmental site assessment and remediation process in order to avoid or minimize hazards to the public or the environment.

As such, RMP implementation would facilitate the clean up of known and potentially present contaminated sites on District preserves. Therefore, associated impacts would be less than significant. (*Less than Significant*)

e) For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people living or working in the project area?

Ravenswood Open Space Preserve is not located within the Airport Safety Zone or the Airport Influence Area identified in the Palo Alto Airport Comprehensive Land Use Plan. While Stevens Creek Open Space Preserve is adjacent to Moffett Federal Field, RMP implementation would not directly increase the number of people living or working on that preserve, and therefore RMP implementation would not create or exacerbate an associated safety hazard. Overall, impacts would be less than significant. (*Less than Significant*)

f) For a project within the vicinity of a private airstrip, result in a safety hazard for people living or working in the project area?

There are no private air strips within the vicinity of any District preserves and therefore RMPS implementation would result in no impact associated with safety hazards from private airstrips. (*No Impact*)

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Implementation of the RMPs would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. As described in more detail below in Section XIII, Population and Housing, of this Initial Study, RMP implementation would not result in substantial growth or a substantial increase in the number of visitors to District preserves. As such, RMP implementation would not directly increase the number of people visiting, living, or working in the Midpeninsula region and therefore would not significantly impair emergency response or evacuation. Associated impacts would be less than significant. (*Less than Significant*)

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires?

Prescribed fire is a powerful tool that not only has ecological benefit, but also considerable wildland fire management benefit. Unplanned wildland fires, however, are a hazard to people and property. Coastal preserves are less at risk; however, the majority of inland preserves are classified as High or Very High risk areas by CalFire.¹² The RMPs include a goal which specifically seeks to mitigate the adverse effects of wildland fires. Goal WF states that the District will manage land to reduce the severity of wildland fire and to reduce the adverse impact of fire suppression activities within District preserves and adjacent residential areas; manage habitats to support fire as a natural occurrence on the landscape; and promote District and regional fire management objectives.

Several associated RMPs specifically support the mitigation of the adverse effects of unplanned wildland fires, including Policy WF-1, which calls for the implementation of fire and fuel management practices necessary to protect public health and safety, protect natural resources, and to reduce the impacts of wildland fire. Additionally, Policy WF-2 calls for the District to aggressively support the immediate suppression of all unplanned fires that threaten human life, private property or public safety. Further, Policy WF-3 requires that the District work with adjacent landowners and fire agencies to maintain adequate fire clearance around qualifying structures. Grazing management policies cited above in Section II of this Initial Study and Vegetation Management policies described in Section IV would also serve to reduce the potential for adverse effects from unplanned wildland fires. Although wildland fire and fuels management is an overall goal of the RMPs, any site specific or preservewide fire or fuels management plans or projects would be subject to further environmental review under CEQA prior to implementation. Therefore,

¹² California Department of Forestry and Fire Prevention (CalFire), Fire Hazard Severity Zones, GIS data, 2009.

overall, implementation of the RMPs would result in a less-than-significant impact with respect to wildland fires. (Less than Significant)

X. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements?

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a significant lowering of the local groundwater table level?
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of runoff in a manner which would result in substantial erosion, siltation or flooding on- or off-site?
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of runoff in a manner which would result in flooding on- or offsite?
- e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?



X. HYDROLOGY AND WATER QUALITY

Would the project:

- f) Provide substantial additional sources of polluted runoff, or otherwise substantially degrade water quality?
- g) Place occupied development within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j) Potentially be inundated by seiche, tsunami, or mudflow?

Existing Conditions

District open space lands contain a variety of water resources that include such diverse habitats as freshwater wetlands and watercourses, salt water tidal wetlands within San Francisco Bay, and groundwater resources such as springs, seeps, and underground aquifers. District preserves are located within 22 major watersheds extending from the Pacific Ocean in San Mateo County to the baylands in San Mateo and Santa Clara Counties. Many of the District's lands are located within the headwaters or uppermost sections of these watersheds.

Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
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Most preserve watersheds contain steep ridges and deep canyons typical of the Santa Cruz Mountains. Rainfall occurs mostly between November and April with seasonal rainfall totals varying greatly within the District. The greatest rainfall quantities occur along the west facing slopes near the summit of the mountain range where totals can reach 40 to 50 inches per year; however, averages around 20 to 30 inches per year are more typical. In the Santa Cruz Mountains, fog accounts for approximately 10-20 inches of this precipitation, much of which is delivered in the dry summer months. Many smaller creeks and streams are intermittent, reflecting this seasonal distribution of rainfall. Winter flows are higher, especially during and immediately following storms.

Discussion

a) Would the project violate any water quality standards or waste discharge requirements?

In general, implementation of the RMPs would protect and enhance water quality on District lands. RMP implementation would involve minimal development on District lands, and as such, would not result in the creation of substantial new sources of water pollution. Additionally, the District has entered into routine maintenance agreements with the Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Game (CDFG). These agreements specify BMPs which the District must follow to avoid impacts to water quality. Potential sources of water pollution associated with RMP implementation include stormwater runoff carrying pollutants and septic tanks serving District facilities and public restrooms.

RMP implementation could result in the creation of some relatively small areas of new impervious surface in the form of staging areas, parking lots, or other structures on District lands; however, NPDES Provision C.3 standards governing stormwater treatment and control would apply for projects creating or replacing 10,000 square feet or more of hardscape. Prior to construction of such projects, the District would be required to prepare and implement stormwater pollution prevention plans (SWPPPs) detailing how runoff will be detained and infiltrated so that peak flows and durations match preproject conditions. Additionally, RMP Policy WR-1 calls for the District to protect surface and groundwater from contamination and implementation measure WR-4.6 calls for the incorporation of stormwater BMPs to protect

water quality. Therefore, implementation of the RMPs, compliance with applicable State and local regulations, and adherence to BMPs specified in the above-mentioned routine maintenance agreements would minimize the risk of stormwater quality violations to the maximum extent practicable.

Installation and operation of septic tanks on District lands is subject to permit from the local County Department of Public Health in the applicable jurisdiction. Compliance with permit conditions would reduce the risk of water quality violation to a less-than-significant level. Consequently, Overall, RMP implementation would result in a less-than-significant impact with respect to water quality violations. (*Less than Significant*)

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a significant lowering of the local groundwater table level?

Agricultural activities at the Purisima Creek and Skyline Ridge preserves involve the use of irrigation water; however RMP implementation would not require an increase in the volume of water used over existing conditions. In general, irrigation water comes from surface waters on District lands where appropriative rights have been attained and RMP implementation would generally not require use of groundwater. Additionally, the preservation of open space in its natural condition on District lands provides ample opportunity for groundwater recharge which would more than offset groundwater use. Therefore, RMP implementation would not substantially deplete groundwater levels or interfere with groundwater recharge, and associated impacts would be less than significant. (*Less than Significant*)

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of runoff in a manner which would result in substantial erosion, siltation or flooding on- or off-site?

RMP Goal WR calls for the District to protect and restore natural watercourses, wetlands, and hydrologic processes. Goal WR is supported with policies and implementation measures to further this aim. Policy WR-2 requires that interference with the natural flow of surface and groundwater be minimized through a variety of implementation measures, including installing erosion control measures and structures; removing culverts and drainage diversions where appropriate; minimizing soil disturbance during construction projects; locating trails to minimize slop erosion and sediment delivery; and minimizing the creation of impervious surfaces. Additionally, the District has developed and implements trail design standards separate from the RMPs which establish BMPs to limit and control erosion and sedimentations.¹³ As such, implementation of the RMPs would serve to protect and restore the natural drainage patterns on District preserves to the maximum extent practicable and impacts associated with substantial erosion would be less than significant. (*Less than Significant*)

d) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?

As described above, implementation of the RMPs would serve to protect and restore the natural drainage patterns on District preserves to the maximum extent practicable. Implementation of RMP Goal WR, Policy WR-2, and associated implementation measures, including implementation measure WR-2.5, requiring that creation of impervious surface be minimized, would ensure that impacts related to flooding as a result of substantial increases in the rate or amount of stormwater runoff are less than significant. (Less than Significant)

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?

District preserves are made up overwhelmingly of natural open spaces, with minimal areas of impervious surface. In general, implementation of the RMPs would serve to protect and restore natural open space, and would not create substantial new sources of stormwater runoff.

¹³ District trail design standards include Midpeninsula Regional Open Space District, prepared by: Best, T.C. Certified Engineering Geologist, 2008. Road and Trail Typical Design Specifications, and California Salmonid Stream Habitat Restoration Manual.

RMP implementation could result in the creation of new impervious surfaces in the form of parking lots, staging areas, or structures and facilities; however, such projects would be implemented through either site specific projects, Use and Management, or Master Plans, each subject to separate CEQA review. Individual projects creating or converting 10,000 square feet or more of hardscape would be subject to NPDES Provision C.3 requirements for control stormwater discharge. Compliance with these requirements would ensure that potential stormwater impacts are reduced to less-than-significant levels. Additionally, implementation measure WR-2.5, states specifically that the creation of impervious surfaces shall be minimized. Therefore, overall, implementation of the RMPs would result in a less-than-significant impact with respect to stormwater runoff and pollution. (*Less than Significant*)

f) Would the project provide substantial additional sources of polluted runoff, or otherwise substantially degrade water quality?

Overall, implementation of the RMPs would protect and enhance water quality on District lands. The RMPs contain policies and implementation measures which promote and protect water quality. RMP Policy WR-1 calls for protection of surface and groundwater from contamination. This policy is supported by implementation measures which require the District to take inventory of facilities that could affect water quality and develop plans for protection and restoration as appropriate; to research and pursue cleanup of likely sources of contamination such as buried fuel tanks; and to control activities having a high potential for pollution. Policy WR-4 calls for the District to restore, maintain, and enhance water quality on District lands. In turn, this policy is supported by implementation measures requiring vegetation management to improve water quality; management of agricultural easements to protect water quality; and regulation of human activity on District lands to protect water quality. Therefore, implementation of the RMPs and continued compliance with applicable State and local regulations described above would insure that impacts related to water quality degradation would be less than significant. (Less than Significant)

g) Would the project place occupied development within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No housing units are proposed and implementation of the RMPs would result in no impact with respect to placement of housing within a 100-year flood hazard area. (*No Impact*)

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The District's inland preserves are generally situated in mountainous terrain and are not located within FEMA-designated flood hazard areas. However, the Stevens Creek Nature Study Area and the Ravenswood Open Space Preserve are located in FEMA-designated 100-year flood risk areas near the shores of San Francisco Bay.¹⁴ RMP Policy GS-1 requires that the District locate and construct facilities to avoid high-risk areas subject to flooding. Additionally, Policy WR-2 calls for the District to minimize interference with the natural flow of surface water. Therefore, implementation of the RMPs would limit and control the placement of structures within areas of 100-year flood risk. Associated impacts would be less than significant. (*Less than Significant*)

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The Stevens Creek Nature Study Area, located in the levee inundation area at the south end of San Francisco Bay, is the only entire preserve at risk of flooding in the event of dam or levee failure. However, isolated portions of Preserves are at risk of small scale flooding if an earthen dam or levee failed at one of the District's small lakes or ponds. These are small water bodies that are generally located within isolated areas of a Preserve. As described in detail below under Section XIII of this Initial Study, RMP implementation would not directly increase the number of visitors, residents, or employees on District preserves, including Stevens Creek Nature Study Area, and therefore RMP implementation would not increase the risks of injury, damage, or death

 $^{^{\}rm 14}$ Federal Emergency Management Agency (FEMA), Mapping Service GIS data, 2010.

associated with levee failure. Additionally, RMP Policy GS-1 states that facilities shall be located and constructed so as to avoid high-risk areas subject to flooding, and implementation measure GS-1.1 calls for minimizing construction of buildings, roads, pipelines, septic tanks, and other major improvements in flood hazard zones. Therefore, RMP implementation would minimize risks related to inundation to the maximum extent practicable and associated impacts would be less than significant. (*Less than Significant*)

j) Would the project potentially be inundated by seiche, tsunami, or mudflow?

Tsunamis are a relatively rare event and have not traditionally been a major problem in the San Francisco Bay Area; however, several coastal preserves are located within Association of Bay Area Governments (ABAG) identified Tsunami Evacuation Planning Areas.¹⁵ District preserves located adjacent to San Francisco Bay are also potentially at risk in the event of seiche. The 2010 Local Hazard Mitigation Plan, approved by the Federal Emergency Management Authority (FEMA) and adopted by ABAG, identifies regional hazards, including tsunami and seiche in San Francisco Bay, assesses vulnerability, and sets out specific risk mitigation actions for implementation. RMP implementation would not directly increase the number of people or structures in atrisk areas on District preserves, and therefore would not adversely affect the inherent risk to people or property in the relatively rare event of a tsunami or seiche in San Francisco Bay. Therefore, risks from tsunamis and seiches associated with RMP implementation would be less than significant.

Given the steep ridges and deep canyons found in some District preserves, there is potential for mudslides, particularly following heavy rainfall. In general, however, there are relatively few structures on District preserves and only daytime visitors and staff are potentially at risk in the event of mudslides. Daytime visitors and staff are dispersed widely in most Preserves and not located in fixed structures; therefore the likelihood of an impact to people is very low. The RMPs contain numerous policies and implementation measures which address slope stability and erosion. Policy GS-1 calls for the District to locate and construct facilities so as to avoid high-risk areas subject to

¹⁵ ABAG, Earthquakes and Hazards Program, http://quake.abag.ca.gov/ tsunamis/, accessed on June 15, 2011.

landslides and erosion. Policy GS-2 requires that unnatural soil erosion be minimized and is supported by the implementation measures described above. Implementation of the RMPs would therefore reduce risks to people or property associated with mudslides to the maximum extent practicable and impacts would be less then significant. (*Less than Significant*)

XI. LAND USE Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
a) Physically divide an established com- munity?				
b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (includ- ing, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the pur- pose of avoiding or mitigating an envi- ronmental effect?				
c) Conflict with any applicable habitat con- servation plan or natural community conservation plan?				

Existing Conditions

The 26 District preserves have a total area of over 60,000 acres, serving 25 communities in the midpeninsula region. Predominant land uses on District preserves are open space, recreational facilities, agriculture, and timber production; however, many of the Preserves abut or surround low density residential development. Residential land uses adjacent to District preserves total approximately 75 acres of land, which is less than 0.2 percent of the total area of District preserves.¹⁶ There are no approved habitat conservation plans that apply to District lands.

 $^{^{16}}$ Determined on the basis of GIS data on land use from the Counties of San Mateo and Santa Clara.

Discussion

a) Would the project physically divide an established community?

Residential land uses represent only a very small portion of the total land area of District preserves, which have been established to preserve and protect open space in its natural condition. The RMPs are designed to protect and enhance natural and cultural resources and to support low intensity recreational and agricultural use of District lands. As such, implementation of the RMPs would not involve substantial development which could physically divide an established community. Therefore, overall implementation of the RMPs would result in a less-than-significant impact with respect to dividing an existing community. (*Less than Significant*)

b) Would the project conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

District preserves abut numerous jurisdictions in the midpeninsula region, including unincorporated San Mateo, Santa Clara, and Santa Cruz County lands as well as 17 incorporated communities. As such, conflicts with applicable land use plans, policies, or regulations could result from RMP implementation. Therefore, to ensure that the District's actions do not result in conflicts with any applicable land use plan, policy or regulation, the following mitigation measure is proposed for inclusion in the conditions of approval for the Project:

<u>Mitigation Measure LU-1</u>: In implementing the RMPs through (but not limited to) site specific projects, Use and Management Plans and Master Plans the District shall obtain all necessary permits and approvals from appropriate federal, State, and local regulatory agencies with jurisdiction over the project.

After implementation of the above-listed mitigation measure, impacts related to conflicts with applicable land use plans, policies, or regulations resulting from implementation of the RMPs would be less than significant. (Less than Significant with Mitigation Incorporated)

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

As described above, while there are no approved habitat conservation plans that apply to District lands, the overarching aim of the RMPs is to preserve, protect, and manage natural resources on District lands. The RMPs have been developed in collaboration with agency and organizational partners, including California State Parks, CalFire, the US Forest Service, the San Mateo County Farm Bureau, the Peninsula Open Space Trust, and the Presidio Trust. Therefore, there would be no substantial adverse impact with respect to habitat conservation plan compliance resulting from RMP implementation. (*No Impact*)

XII. MINERAL RESOURCES Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
a)Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			-	
b) Result in the loss of availability of a locally important mineral resource re- covery site delineated on a local gener- al plan, specific plan or other land use plan?				

Existing Conditions

Mineral resources of significance found and extracted in Santa Clara County include construction aggregate deposits such as sand, gravel, and crushed stone, as well as salts derived from evaporation ponds at the edge of San Francisco Bay.¹⁷ In San Mateo County, the principal mineral resources found and

¹⁷ Santa Clara County, 1994 General Plan Draft EIR, page 5B-25.

extracted include mineral water, salines, and crushed stone.¹⁸ Rock suitable for road-base construction is found throughout the mountainous regions of both counties.

The San Mateo County General Plan identifies a significant mineral resource area adjacent to the Purisima Creek Redwoods and Tunitas Creek preserves, while the Santa Clara County General Plan EIR identifies valuable limestone deposits currently mined for cement in the Kaiser Permanente quarries along Monte Bello Ridge, near the Monte Bello and Picchetti Ranch preserves. Although there are no active quarries on District lands, the Kaiser Permanente and Stevens Creek quarries are in close proximity to the Monte Bello and Picchetti Ranch preserves respectively. The San Mateo County General Plan also identifies active quarries in proximity to the Miramontes and Russian Ridge preserves.

Discussion

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The overarching aim of the RMPs is to preserve, protect, and manage natural resources on District lands. The RMPs do not specifically propose any land use or zoning changes or any development which would result in the loss of availability of a known mineral resource. (*Less than Significant*)

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

As described above, there are no active mines located on District lands and RMP implementation would not result in land use changes or development which would result in the loss of an active recovery site on adjacent lands. Therefore, there would be no impact with respect to loss of a locally important mineral recovery site. (*No Impact*)

¹⁸ San Mateo County, General Plan Background and Issues, Chapter 3: Mineral Resources, http://www.sforoundtable.org/P&B/gp/GP%20Ch%2003_Minerals.pdf, accessed on July 14, 2011.

XIII.NOISE	Poten- tially Signifi- cant	Less Than Signifi- cant With Mitigation Incorpo-	Less Than Signifi-	No Im-
Would the project:	Impact	rated	cant	pact
a) Expose people to or generate noise levels in excess of standards estab- lished in the local general plan or noise ordinance, or other applicable stan- dards?			•	
b) Expose people to or generate excessive groundborne vibration or groundborne noise levels?			-	
c) Create a substantial permanent in- crease in ambient noise levels in the project vicinity above levels existing without the project?			•	
d) Create a substantial temporary or peri- odic increase in ambient noise levels in the project vicinity above levels existing without the project?			•	
e) Expose people living or working in the project area to excessive noise from a public airport?			•	
f) Expose people living or working in the project area to excessive noise from a private airport?				

Existing Conditions

In general, the low intensity of development, activities, and uses on District preserves makes for a quiet noise environment. Noise levels are highest near heavily travelled roads and highways; however, the topography of District lands and the pervasive vegetative cover provides a degree of noise attenuation. Noise-sensitive receptors on or adjacent to District preserves would include wildlife species, preserve visitors, and occupied residences, although the latter are scattered in low-density development patterns, primarily along SR-35.

Under the Noise Compatibility Standards of the Santa Clara County General Plan, exterior noise levels above 55 dB Ldn are considered incompatible with open space preserves.¹⁹ The San Mateo County General Plan does not contain any directly applicable noise standards for open space use, however, if open space is considered a "noise sensitive land use," enjoyment of open space would be impaired where noise levels exceed 60 dB Community Noise Equivalent Level (CNEL).

There are a total of eight airports in San Mateo and Santa Clara counties: San Francisco International, San Carlos, and Half Moon Bay County Airport in San Mateo County; and Palo Alto, Reid-Hillview, South County, San Jose International, and Moffett Federal Field in Santa Clara County.

Discussion

a) Would the project expose people to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or other applicable standards?

In general, on trails within District preserves, noise levels are well below 60 dB CNEL.²⁰ Implementation of the RMPs would likely result in the development, redevelopment, or repair of trails and other facilities on District preserves, which could potentially result in construction noise in excess of established noise compatibility standards. However, potential construction noise impacts would be temporary and localized in the vicinity of the construction site. Additionally, the District develops noise and vibration control procedures on a site specific basis to account for sensitive receptors including wild-life species and human residences that are potentially present in the vicinity of a project site. These procedures are included in the site specific Use and Management Plans and Master Plans through which the RMPs would be implemented. The District also limits work dates and times in areas where noise sensitive species are likely to occur as a matter of standard procedure. Therefore, with continued implementation of site specific noise control procedures

¹⁹ Santa Clara County, 1994, General Plan 1995-2015, Book A, page I-30.

²⁰ Midpeninsula Regional Open Space District, October 30, 2009, Mitigated Negative Declaration for Pond DR06 Repair, La Honda Creek Open Space Preserve, page 26.
tailored to project circumstances, RMP implementation would result in a lessthan-significant impact with respect to noise levels in excess of applicable standards. (*Less than Significant*)

b) Would the project expose people to or generate excessive groundborne vibration or groundborne noise levels?

RMP implementation could potentially involve the felling of trees; however, the resulting groundborne vibration would be relatively minor and temporary in nature. Temporary groundborne vibration could also be generated in the construction of trails or other facilities on District preserves. However, as described above, the District develops general noise and vibration control procedures which are incorporated into site specific projects, Use and Management Plans and Master Plans through which the RMPs would be implemented. Continued implementation of these procedures would ensure that groundborne vibration impacts would be reduced to the maximum extent practicable and associated impacts would be less than significant. (Less than Significant)

c) Would the project create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

In general, RMP implementation would preserve natural open space on District lands and maintain or enhance the existing quiet noise environment. Implementation of the RMPs would not result in development or land use changes that would substantially alter existing ambient noise levels on District preserves or in the surrounding area. As RMP implementation would not directly increase the number of people employed on District preserves or the number of recreational visitors, vehicle-related noise would not substantially increase. Therefore, associated impacts would be less than significant. (*Less than Significant*)

d) Would the project create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

As discussed above, implementation of the RMPs would likely result in the development, redevelopment, or repair of trails and other facilities on District

preserves, which would potentially result in construction noise. Construction noise, however, would be temporary and localized in the vicinity of the construction site. Additionally, the District develops noise and vibration control procedures on a site specific basis to account for sensitive receptors including wildlife species, preserve visitors, and occupied residences that are potentially present in the vicinity of a project site. These procedures, when implemented through site specific projects, Use and Management Plans and Master Plans, would reduce potential construction noise impacts to the maximum extent practicable and associated impacts would be less than significant. (*Less than Significant*)

e) Would the project expose people living or working in the project area to excessive noise from a public airport?

Stevens Creek Open Space Preserve is adjacent to Moffett Federal Field and Ravenswood Open Space Preserve is located within 5-miles of Palo Alto Airport. However, implementation of the RMPs would not result in development that would directly increase the number of people living and working on District preserves, nor would RMP implementation substantially alter the exposure of noise-sensitive receptors currently on District preserves to airport noise. Therefore, associated impacts would be less than significant. (*Less than Significant*)

f) Would the project expose people living or working in the project area to excessive noise from a private airport?

There are no private air strips within the vicinity of any District preserves and therefore RMPS implementation would result in no impact associated with excessive noise levels from private airstrips. (*No Impact*)

XIV. POPULATION AND HOUS ING

Would the project:

- a) Induce substantial unexpected population growth or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?
- c) Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

OUS-	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
l popula- ch inade- either di- sing new rectly (for roads or			•	
of exist- ating the housing			•	
of people, n of re-			•	

Existing Conditions

The District directly serves 25 communities in San Mateo, Santa Clara, and northern Santa Cruz counties with a combined population of over 700,000 residents. District preserves are made up predominantly of natural open space and land in agricultural or timber production; however many preserves abut a small amount of low density residential development. Residential land uses adjacent to District preserves total approximately 75 acres of land, which is less than 0.2 percent of the total area of District preserves.

The District employs approximately 100 full time staff in its Administrative Services, Operations, Planning, Public Affairs, and Real Property departments. Additionally, District staff includes approximately 20 part-time and seasonal employees.²¹

²¹ Midpeninsula Regional Open Space District, "Human Resources," http://www.openspace.org/about_us/hr.asp, accessed on June 28, 2010.

Discussion

a) Would the project induce substantial unexpected population growth or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Implementation of the RMPs would not result in the construction of housing or require hiring new employees. Neither would RMP implementation result in land use changes that would require an increase the number of agricultural or timber workers on District lands. Therefore, RMP implementation would not result in substantial growth, either directly or indirectly, and associated impacts would be less than significant. (*Less than Significant*)

b) Would the project displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?

As described above, many District preserves currently surround or abut a small amount of low-density housing. The RMPs do not specifically propose the removal of any housing units, and RMP implementation would not result in the displacement of housing from District preserves or surrounding lands. Additionally, site specific plans, Use and Management Plans and Master Plans would be developed to implement the RMPs on District preserves and would be subject to separate CEQA review, ensuring an opportunity to evaluate and mitigate any potential site specific impacts related to housing displacement, if any. Therefore, overall, RMP implementation of the RMPs would result in a less than significant impact with respect to displacement of housing. (Less than Significant)

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The vast majority of land on District preserves is undeveloped natural open space and land in agricultural production. The RMPs would be used by the District to protect and manage natural and cultural resources on its lands. No land use changes are specifically proposed in the RMPs, and implementation of the RMPs would not result in land use changes which would displace substantial numbers of people from District lands or areas surrounding District

preserves. Associated impacts would be less than significant. (Less than Significant)

 XV. PUBLIC SERVICES Would the project: a) Result in substantial adverse physical impacts associated with the provision of new or physically altered 	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
governmental facilities, the				
construction of which could cause significant environmental impacts, in				
order to maintain acceptable service ratios, response times or other				
performance objectives for any of the public services:				
Fire protection?				
Police protection?				
Schools?				

Existing Conditions

Within the District, fire protection services are provided by local fire departments and volunteer fire companies, as well as the California Department of Forestry (CDF), which provides fire protection in the rural areas which comprise the majority of land on District preserves. Law enforcement services are provided by local police departments, and the respective County sheriff's offices serve unincorporated areas of San Mateo, Santa Clara, and Santa Cruz counties. The California Highway Patrol responds to vehicular accidents, including those involving pedestrians, bicyclists, and equestrians. State and county park rangers provide law enforcement within state and county parks, respectively.

The District also employs 18 rangers, 4 supervising rangers, and 2 area superintendents to augment police and fire protection services provided by other agencies. Rangers are peace officers and patrol preserves to enforce federal, State, and local laws and to perform fire suppression duties as needed. Supervising rangers are responsible for overseeing the ranger activities as well as for coordinating with police, fire, and other park agencies regarding public safety concerns on or adjacent to District lands.

The District offers environmental science-based educational programming to school children and members of the general public at the David Daniels Nature Center at Skyline Ridge Open Space Preserve and other District facilities. The District's docent and volunteer programs also train adults in conducting activities such as environmental science-based field trips as well as interpreting District resources.

Discussion

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools?

Fire Protection

Implementation of the RMPs would not increase the need for fire protection services on District preserves. As described above, RMP implementation could involve the use of prescribed burns for the purpose of vegetation management; however, pursuant to RMP Policy FM-5.6, planning and implementation of prescribed burns, if undertaken, would be done in coordination with responsible public agencies. The RMPs also include numerous measures which would reduce the risk of unplanned fires. Goal FM calls for the promotion of District and regional fire management objectives; Policy GM-3.1 requires the district to monitor the amount of residual dry matter on the ground from grazing and evaluate and report on any increased risk of wildland fire; and Policy FM-1.4 requires that the District identify access issues as well as fire concerns. Further, Policy FM-5 calls for the District to:

• Maintain essential roads for emergency fire access and forest management activities undertaken to reduce fire hazard;

- Maintain adequate fire clearance around District structures and facilities;
- Encourage neighboring property owners to maintain adequate fire clearance around existing development and consult with regulatory agencies to encourage that construction of new development maintains fire agency recommended setbacks for fire clearance between new development and District forest and woodland;
- Evaluate the potential to reduce forest fuel loading through the removal of smaller trees to reduce forest floor fuel buildup and ladder fuels; and
- Coordinate with fire agencies and local communities to define locations where fire protection infrastructure is desirable and practical.

For additional discussion of impacts associated with unplanned wildland fires, please see Section VIII.h, above. Overall, RMP implementation would result in a less-than-significant impact regarding physically altered fire protection facilities. (*Less than Significant*)

Police Protection

Implementation of the RMPs would not directly increase the number of visitors to District preserves or introduce development which could require substantially increased police protection services. Further, RMP Policy CR-3.3 requires that the District implement security measures such as protective fencing and patrolling to reduce vulnerability to vandalism and looting. Therefore, overall, RMP implementation would not require substantial construction or expansion of police protection facilities and associated impacts would be less than significant. (*Less than Significant*)

Schools

As described above in Section VIII of this Initial Study, there are a number of schools in close proximity to District preserves. However, RMP implementation would not result in the construction of new housing or the creation of substantial numbers of new jobs on District preserves or in surrounding areas, and therefore, RMP implementation would not substantially impact local schools. Although RMP implementation would not directly increase the number of visitors to District preserves, over time implementation of Policy PI-1, which calls for the District to provide interpretative facilities, could po-

tentially lead to the construction of new educational facilities on District preserves. These would be small scale environmental education and/or interpretive facilities that do not qualify as K-12 schools and would not affect service ratios and other performance objectives for K-12 schools. At this time there are no plans for the construction of new educational facilities and any future construction or expansion of such facilities would be proposed in the site specific Use and Management or Master Plans prepared for preserves. These plans would be subject to separate CEQA review prior to implementation. Therefore, overall, RMP implementation would result in a less-thansignificant impact with respect to environmental impacts from the construction or expansion of school facilities. (*Less than Significant*)

XVI. PARKS AND RECREATION

Would the project:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Include parks or recreational facilities or require the construction or expansion of parks and recreational facilities which might have an adverse physical effect on the environment?



Existing Conditions

The District manages land primarily to preserve a regional greenbelt of open space land. District preserves offer a variety of recreational opportunities to residents and visitors to the San Francisco Bay area. With over 220 miles of public trails inviting low-intensity recreational activities such as hiking, biking, jogging, horse-back riding, dog walking, and picnicking, District preserves serve as popular weekday and weekend recreational destinations. There are relatively few improvements on District preserves, other than gravel parking areas, public rest rooms, informational signs, and maintenance and staging facilities.

Discussion

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

The primary purpose of the RMPs is to guide the District in protecting and managing natural resources on its lands. As such, implementation of the RMPs would not result in a substantial increase in the number of visitors to District preserves. While the RMPs include policies that call for the continued operation of existing interpretive and educational programs, such as Policy PI-1, and outreach activities, such as those identified in PI-3, these facilities and outreach activities are intended to promote visitor awareness and increase knowledge for current and ongoing visitors. As such, RMP implementation is not expected to substantially increase visitor use. Any new recreational facilities that could result in increased use would be planned for and evaluated in site specific projects, or in Use and Management plans or Master Plans, which would be subject to separate CEQA review prior to approval.

Additionally, the RMPs contain numerous policies and implementation measures to minimize adverse physical impacts and deterioration which come with visitor use of recreation facilities. For example, Policy WM-3 seeks to discourage human intrusion into sensitive wildlife habitats through the appropriate placement of facilities and trails; Policy GS-1.2 calls for the District to design roads, trails and facilities to minimize disturbance to vegetation and soil; and Policy SA-1.8 requires that areas degraded by human use be rehabilitated by restricting access or type(s) of use, rerouting trails and roads, removing unsightly human-made features and non-native plants, restoring natural contours, and revegetating with native plants. Further, Policy FM-3.2 requires that the District maintain essential roads to high standards, and Policy WF-8.6 prohibits smoking, firearms, fireworks and off-road vehicle use and limits trail use, picnicking, and camping to designated activities.

Therefore, overall, implementation of the RMPs would result in a less-thansignificant impact with respect to physical deterioration of the District's parks and recreational facilities. (*Less than Significant*)

b) Would the project Include parks or recreational facilities or require the construction or expansion of parks and recreational facilities which might have an adverse physical effect on the environment?

The RMPs would guide the construction and expansion of the District's parks and recreational facilities in the future. The RMPs contain numerous policies and implementation measures, including the policies and measures described above, which avoid or minimize the potential adverse environmental effects that could result from such construction or expansion. Additionally, the site specific projects, Use and Management plans, and Master Plans through which the RMPs would be implemented would be subject to separate CEQA review, ensuring an opportunity to evaluate and mitigate any potential site specific impacts related to the construction and expansion of the District's parks and recreational facilities in the future. Therefore, RMP implementation would minimize potential impacts associated with the construction and expansion of parks and recreational facilities and a less-than-significant impact would result. (*Less than Significant*)

XVII. TRANSPORTA-TION/TRAFFIC

Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?
- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?



Existing Conditions

Major roadways providing access to District preserves include State Routes 9, 17, 35, 84, and 92, as well as Interstate 280. State Route 35 (SR-35), also known as Skyline Boulevard, runs adjacent to 15 of the 26 District preserves, serving as a key gateway to District preserves.

The San Mateo City/County Association of Governments (C/CAG) is the designated Congestion Management Agency for San Mateo County, while the Valley Transit Authority (VTA) is the designated Congestion Management Agency for Santa Clara County. Each agency is responsible for developing and updating the Congestion Management Program (CMP) in its respective jurisdiction. The San Mateo County Congestion Management Program (2009) identifies I-280, SR-1, SR-35, SR-84, and SR-92 as CMP roadways, while the VTA's Congestion Management Program contains a more extensive list of CMP roadways, including SR-17 and SR-35, which pass adjacent to District preserves. Additionally, each document also identifies CMP intersections, which are generally concentrated in more urbanized areas.²²²³

The San Mateo County Transit Authority (SamTrans) and the Santa Clara VTA operate public bus and rail service within the region, although there is no direct service to any District preserves.

Public parking is available at all of the District's preserves, except Bear Creek Redwoods, La Honda Creek, Miramontes Ridge, Teague Hill, and Tunitas Creek preserves. In the event additional parking areas were proposed in the future, such improvements would be identified in site specific projects, Use and Manage Plans, and Master Plans and would be subject to CEQA review prior to approval.

The use of private motorized vehicles is not permitted on District preserve lands, except in parking lots and on access roads leading to them. However,

²² Please see: City/County Association of Governments of San Mateo County, 2009, Final San Mateo County Congestion Management Program, Appendix A: Detailed Inventory of CMP Roadways and Intersections.

²³ Please see: Santa Clara Valley Transportation Authority, 2009, Congestion Management Program, Appendix B: CMP System Roadways.

District preserves offer a 220-mile network of hiking, bicycling, and equestrian trails for use by the general public.

Discussion

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

District preserves are located in multiple midpeninsula jurisdictions, including unincorporated San Mateo, Santa Clara, and Santa Cruz counties. Roadways providing access to District preserves are therefore subject to a wide variety of plans, policies, and ordinances governing the performance of the circulation system. However, as described above, implementation of the RMPs would not directly increase the number of people traveling to and from District preserves. As such, RMP implementation would not substantially affect the performance of roadways providing access to District preserves and associated impacts would be less than significant. *(Less than Significant)*

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Although there are a number of CMP roadways and intersections which provide access to District preserves, because implementation of the RMPs would not directly increase the number of people traveling to and from District preserves, RMP implementation would not substantially affect the performance of CMP roadways or intersections. Therefore, associated impacts would be less than significant. (*Less than Significant*)

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

As described above, there are a total of eight airports in San Mateo and Santa Clara counties, including Moffett Federal Field, adjacent to Stevens Creek Open Space Preserve, and Palo Alto Airport, located approximately 5-miles to the south of Ravenswood Open Space Preserve. However, RMP implementation would not involve land use changes or development which could affect air traffic patterns and therefore there would be no impact. (*No Impact*)

d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Implementation of the RMPs would involve the maintenance of existing trails and roadways on District preserves, as well as the potential construction of new trails and access roads. RMP Policy SA-1.1 calls for the clarification and documentation of appropriate standards for designing and locating trails, parking areas, and buildings. Additionally, Policy WF-2.5 calls for the development of trail and road rehabilitation measures to address potential safety issues, while Policy WF-8.6 prohibits off-road vehicle use on District preserves. Therefore, RMP implementation would not directly increase roadway hazards and associated impacts would be less than significant. (Less than Significant)

e) Result in inadequate emergency access?

Preserve entrances are maintained to provide access for emergency vehicles and the RMPs contain several policies and implementation measures which are intended to ensure adequate emergency access. For example, Policy FM-5.1 calls for the District to maintain roads essential for emergency fire access and forest management activities undertaken to reduce fire hazard. Additionally, Policy FM-8.3 requires that trail alignments and access points be located so that they also serve as emergency access routes. Policy FM-8.3 also states that where feasible, emergency helicopter landing sites shall be provided for remote areas. Therefore, overall, RMP implementation would result in a less-than-significant impact with respect to inadequate emergency access. (Less than Significant)

f) Would the project conflict with adopted policies, plans or programs supporting alternative transportation?

The RMPs would not result in changes on roadways providing access to District preserves such that access by alternative modes of transportation (including bus, bicycle, or horse) would be substantially affected. As described above, within its preserves, the District offers approximately 220 miles of hiking, bicycling, and equestrian trails for use by the general public. Therefore, implementation of the RMPs would not substantially decrease the performance or safety of public transit, bicycle, or pedestrian facilities and associated impacts would be less than significant. (*Less than Significant*)

XVIII. UTILITIES AND SERVICE SYSTEMS Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
a) Exceed wastewater treatment require- ments of the applicable Regional Water Quality Control Board?			-	
b) Require or result in the construction of new water or wastewater treatment fa- cilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			•	
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the con- struction of which could cause signifi- cant environmental effects?			•	
d) Have insufficient water supplies availa- ble to serve the project from existing and identified entitlements and re- sources?			•	
e) Have insufficient wastewater treatment capacity available to serve the project's projected demand in addition to existing demand as determined by the wastewa- ter treatment provider which serves or may serve the project?			•	
f) Not be served by a landfill with sufficient permitted capacity to accommodate the buildout of the project's solid waste dis- posal needs?			•	

XVIII. UTILITIES AND SERVICE SYSTEMS Would the project:	Poten- tially Signifi- cant Impact	Less Than Signifi- cant With Mitigation Incorpo- rated	Less Than Signifi- cant	No Im- pact
g) Comply with federal, state, and local statutes and regulations related to solid waste?			-	

Existing Conditions

District preserves are made up predominantly of natural open space and land in agricultural production. As such, in general, the need for water, wastewater, and stormwater infrastructure and solid waste disposal services is minimal.

Water for use in administrative buildings and public facilities on District preserves generally comes from local streams, creeks, and groundwater. Irrigation water for agricultural production on District preserves comes from onsite surface waters for which the District has obtained appropriative rights.²⁴ Wastewater from public restrooms and other facilities on District preserves is stored in on-site septic tanks before removal and disposal by local service providers. Trash bins are provided at select preserves in public parking areas and around restrooms and other public facilities. Visitors to most preserves are encouraged to take food wrapping and containers home with them for disposal. Solid waste disposal services on District preserves are provided for employee residents and tenants by local providers.

Discussion

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Wastewater from public restrooms and other facilities on District preserves is stored in on-site septic tanks before removal and disposal by local service providers. Operation of on-site septic tanks is regulated by permit from the local

²⁴ Julie K. Andersen, Resource Planner, Midpeninsula Regional Open Space District, personal communication with The Planning Center | DC&E, Monday July 25, 2011.

Department of Public Health in the jurisdiction where the tanks are located. Implementation of the RMPs would not directly increase the number of visitors to District preserves or otherwise significantly increase the amount of wastewater generated. Therefore, continued compliance with local regulations and permit conditions would ensure that impacts related to wastewater treatment standards from RMP implementation would be less than significant. (*Less than Significant*)

b) Would the project require or result in the construction of new water or wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As described above, RMP implementation would not directly increase the number of people visiting or working on District preserves and therefore would not require the construction or expansion of water or wastewater facilities. Neither would the RMPs result in development or land use changes that would substantially increase the amount of water used or wastewater generated on District preserves. In the event any such construction or expansion of water or wastewater facilities and infrastructure on District preserves were ever proposed, the project would be part of a site specific project, Use and Management Plan, or Master Plan process, subject to separate CEQA review. Therefore, impacts related to the construction and expansion of water or wastewater facilities from RMP implementation would be less than significant. (*Less than Significant*)

c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

District preserves are made up predominantly of natural open space and land in agricultural production, with relatively few improvements. As such, there is relatively little impervious surface and only minimal stormwater infrastructure required to dispose of stormwater runoff. In general, RMP implementation would guide the protection and management of natural resources on District lands and would not result in development which would substantially increase the volume of stormwater generated on District preserves. Any construction of new or expansion of existing buildings, structures, or roadways that could increase the amount of impervious surface on District lands would be subject to Provision C.3 guidelines requiring projects which create or replace 10,000 square feet of impervious surface to prepare a stormwater control plan for detaining runoff or promoting infiltration so that peak flows and durations match pre-project conditions. Therefore, continued compliance with State and local stormwater regulations, including Provision C.3, would ensure that impacts related to stormwater infrastructure resulting from RMP implementation would be less than significant. (*Less than Significant*)

d) Would the project have insufficient water supplies available to serve the project from existing and identified entitlements and resources?

Operation of administrative buildings and public facilities on District preserves requires a minimal amount of water which is either sourced from water utility companies or from on-site streams, creeks, and groundwater. Additionally, the District has developed an Agriculture Management Plan to ensure that the amount of irrigation water used in agricultural production at the Purisima Creek preserve does not exceed the amount allocated under the adjudication order. Further, as RMP implementation would not directly increase the number of people visiting or working on District preserves, implementation would not substantially increase the volume of water used. Overall, associated impacts would be less than significant. (*Less than Significant*)

e) Would the project have insufficient wastewater treatment capacity available to serve the project's projected demand in addition to existing demand?

As described above, wastewater from public restrooms and other facilities on District preserves is stored in on-site septic tanks before removal and disposal by local service providers. RMP implementation would not directly increase the number of people visiting or working on District preserves and therefore would not require additional wastewater capacity. Associated impacts would be less than significant. (*Less than Significant*)

f) Would the project not be served by a landfill with sufficient permitted capacity to accommodate the buildout of the project's solid waste disposal needs?

As District preserves are made up predominantly of natural open space and land in agricultural production, only a minimal amount of solid waste is generated from operations. RMP implementation would not directly increase the number of people visiting or working on District preserves or involve land use changes or development which would significantly increase the amount of solid waste generated on District preserves. Therefore, RMP implementation would result in a less-than-significant impact with respect to landfill capacity. (*Less than Significant*)

g) Would the project not comply with federal, State, and local statutes and regulations related to solid waste and recycling?

California's Integrated Waste Management Act of 1989 (AB 939) requires that cities and counties divert 50 percent of all solid waste from landfills as of January 1, 2000, through source reduction, recycling, and composting. As described above, RMP implementation would not directly increase the number of people visiting or working on District preserves or involve land use changes or development which would significantly increase the amount of solid waste generated on District preserves. RMP implementation could result in construction activities on District preserves; however, solid waste generated from such activities would be subject to local Construction and Debris Ordinances, such as those required by the County of San Mateo.²⁵ Therefore, continued compliance with State and local regulations governing solid waste disposal would ensure that impacts from RMP implementation would be less than significant. (*Less than Significant*)

²⁵ California Department of Resources Recycling and Recovery (CalRecycle), http://www.calrecycle.ca.gov/condemo/Ordinances/Jurisdiction/SanMateo.htm, accessed September 29, 2011.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below selfsustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?



a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The overarching intent of the RMPs is to define policies and practices for use in the protection and management of plants, animals, water, soil, terrain, geologic formations, and historic, scenic, and cultural resources on District preserves. As described in detail above, the RMPs contain numerous goals, policies and implementation measures which further this intent. Therefore, RMP implementation would be beneficial for the quality of the environment and wildlife on District preserves and associated impacts would be less than significant. (*Less than Significant*)

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The RMPs do not propose new land uses or substantial development on District lands, and RMP implementation would not induce substantial growth, either directly or indirectly. RMP implementation would not increase the number of people visiting or working on District preserves, and therefore would not substantially increase vehicle traffic associated with the preserves. As described above, prescribed burns for fire and forest management, if any, would be implemented in conjunction with local fire agencies, following any and all permit conditions, and limited to permissive burn days when air pollution generated is not expected to adversely affect ambient air quality or downwind populations. Additionally, biomass in the form of trees and plants on over 60,000 acres of District land preserved in perpetuity represents the potential for ongoing carbon sequestration. As such, RMP implementation would not substantially contribute to the degradation of regional air quality or ambient noise levels on and around District preserves, nor would RMP implementation result in a cumulatively considerable volume of GHGs. Overall, RMP implementation would not result in a significant cumulative environmental impact. (Less than Significant)

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, RMP implementation would protect and manage natural resources on District lands while promoting enjoyment of natural open space and awareness of the natural environmental for visitors to District preserves. The RMPs do not propose new land uses or development which would have substantial adverse effects on humans. Nor would RMP implementation place

substantial numbers of people at risk of injury or damage from natural disasters - in fact, numerous policies and measures such as those cited in Sections II, IV, and VIII of this Initial Study, would serve to reduce risk to humans from such natural disasters. While RMP implementation would require the transport, storage, and use of hazardous substances such as petroleum fuels and pesticides, as described above, continued compliance with applicable federal, State, and local regulations as well as continued implementation of other existing District policies and practices would minimize potential risks to humans to the maximum extent practicable. Additionally, Policy IS-3 which requires the use of IPM techniques, favors non-chemical strategies where effective, thereby minimizing the potential for adverse effects to humans from pesticides. Consequently, RMP implementation would not result in substantial adverse effects on humans and associated impacts would be less than significant. (*Less than Significant*)

A P P E N D I X A

PLANT AND ANIMAL SPECIES POTENTIALLY OCCURRING ON DISTRICT PRESERVES

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TABLE A-1 SPECIAL STATUS SPECIES AND SENSITIVE RESOURCES POTENTIALLY OCCURRING ON DISTRICT PRESERVES

		Federal	California	Global	State	Rare Plant	
Species	Common Name	Status	Status	Rank	Rank	Rank	Preserve
Animals							
Dipodomys venustus venustus	Santa Cruz kangaroo rat	None	None	G4T1	S1		Pulgas Ridge OSP, Teague Hill OSP
Reithrodontomys raviventris	salt-marsh harvest mouse	Endangered	Endangered	G1G2	S1S2		Stevens Creek Natural Study Area, Ravenswood OSP
Bats							
Corynorhinus townsendii	Townsend's big-eared bat	None	None	G4	S2S3		Long Ridge OSP
Lasiurus cinereus	hoary bat	None	None	G5	S4?		Windy Hill OSP, La Honda Creek OSP
Laterallus jamaicensis coturniculus	California black rail	None	Threatened	G4T1	S1		Ravenswood OSP
Birds							
Asio otus	long-eared owl	None	None	G5	\$3		Coal Creek OSP, Los Trancos OSP, Monte Bello OSP, Russian Ridge OSP, Skyline Ridge OSP, Coal Creek OSP, Rancho San Antonio OSP
Falco peregrinus anatum	American peregrine falcon	Delisted	Delisted	G4T3	S2		Bear Creek Redwoods OSP, El Sereno OSP, Felton Station OSP, Saratoga Gap OSP,
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	None	None	G5T2	S2		Ravenswood OSP
Melospiza melodia pusillula	Alameda song sparrow	None	None	G5T2?	S2?		Ravenswood OSP
Rallus longirostris obsoletus	California clapper rail	Endangered	Endangered	G5T1	S1		Ravenswood OSP
Fish							
North Central Coast	North Central Coast	None	None	G?	SNR		La Honda Creek OSP

TABLE A-I SPECIAL STATUS SPECIES AND SENSITIVE RESOURCES POTENTIALLY OCCURRING ON DISTRICT PRESERVES (CONTINUED)

		Federal	California	Global	State	Rare Plant	
Species	Common Name	Status	Status	Rank	Rank	Rank	Preserve
Steelhead/Sculpin Stream	Steelhead/Sculpin Stream						
Oncorhynchus mykiss irideus	steelhead - central California coast DPS	Threatened	None	G5T2Q	S2		La Honda Creek OSP, Long Ridge OSP, Skyline Ridge OSP
Insect							
Danaus plexippus	monarch butterfly	None	None	G5	S3		Miramontes Ridge OSP, Purisima Creek Redwoods OSP
Microcina edgewoodensis	Edgewood Park micro- blind harvestman	None	None	G1	S1		Pulgas Ridge OSP
Trimerotropis infantilis	Zayante band-winged grasshopper	Endangered	None	G1	S1		Bear Creek Redwoods OSP, Sierra Azul OSP
Plants							
Allium peninsulare var. franciscanum	Franciscan onion	None	None	G5T2	S2.2	1B.2	Coal Creek OSP, Foothills OSP, Los Trancos OSP, Monte Bello OSP, Coal Creek OSP, Russian Ridge OSP, Skyline Ridge OSP
Arctostaphylos andersonii	Anderson's manzanita	None	None	G2	S2?	1B.2	Saratoga Gap OSP, Long Ridge OSP, Purisima Creek Redwoods OSP, Saratoga Gap OSP
Arctostaphylos regismontana	Kings Mountain manzanita	None	None	G2	S2.2	1B.2	El Corte de Madera OSP, Long Ridge OSP, Purisima Creek Redwoods OSP, Teague Hill OSP
Calyptridium parryi var. hesseae	Santa Cruz Mountains pussypaws	None	None	G3G4T2	S2	1 B .1	Sierra Azul OSP
Centromadia parryi ssp. congdonii	Congdon's tarplant	None	None	G4T2	S2	1B.2	Stevens Crk Nat Stdy Area
Chloropyron maritimum ssp. palustre	Point Reyes bird's-beak	None	None	G4?T2	S2.2	1B.2	Ravenswood OSP
Chorizanthe robusta var. robusta	robust spineflower	Endangered	None	G2T1	S1.1	1 B .1	El Sereno OSP, St. Joseph's Hill OSP

TABLE A-I SPECIAL STATUS SPECIES AND SENSITIVE RESOURCES POTENTIALLY OCCURRING ON DISTRICT PRESERVES (CONTINUED)

					_	Rare	
•		Federal	California	Global	State	Plant	D
Species	Common Name	Status	Status	Kank	Kank	Kank	Preserve
Cirsium fontinale var. campylon	Mt. Hamilton fountain thistle	None	None	G212	\$2	1B.2	Sierra Azul OSP
Clarkia concinna ssp. automixa	Santa Clara red ribbons	None	None	G5?T3	\$3.3	4.3	Bear Creek Redwoods OSP, Saratoga Gap OSP, Sierra Azul OSP, Long Ridge OSP, Monte Bello OSP, Skyline Ridge OSP, Russian Ridge OSP
Collinsia multicolor	San Francisco collinsia	None	None	G2	\$2.2	1B.2	Sierra Azul OSP
Dirca occidentalis	western leatherwood	None	None	G2G3	S2S3	1B.2	Rancho San Antonio OSP, La Honda Creek OSP, Russian Ridge OSP, Windy Hill OSP
Eriogonum nudum var. decurrens	Ben Lomond buckwheat	None	None	G5T2	S2.1	1B.1	Saratoga Gap OSP, Long Ridge OSP
Eriophyllum latilobum	San Mateo woolly sunflower	Endangered	Endangered	G1	\$1.1	1B.1	Coal Creek OSP, Russian Ridge OSP
Hoita strobilina	Loma Prieta hoita	None	None	G2	S2	1B.1	El Sereno OSP, Sierra Azul OSP, St. Joseph's Hill OSP
Lessingia arachnoidea	Crystal Springs lessingia	None	None	G1	S1.2	1B.2	Pulgas Ridge OSP
Lessingia micradenia var. glabrata	smooth lessingia	None	None	G2T2	S2	1B.2	Sierra Azul OSP
Malacothamnus arcuatus	arcuate bush-mallow	None	None	G2Q	S2.2	1B.2	La Honda Creek OSP, Monte Bello OSP, Rancho San Antonio OSP, Sierra Azul OSP
Monardella villosa ssp. globosa	robust monardella	None	None	G5T2	S2.2	1B.2	Sierra Azul OSP, Rancho San Antonio OSP, Coal Creek OSP, Windy Hill OSP
Monolopia gracilens	woodland woollythreads	None	None	G2G3	\$2\$3	1B.2	El Sereno OSP, Picchetti Ranch OSP, Sierra Azul OSP, St. Joseph's Hill OSP, El Corte de Madera OSP, Foothills OSP, Monte Bello OSP, Rancho San Antonio OSP, Pulgas

TABLE A-I SPECIAL STATUS SPECIES AND SENSITIVE RESOURCES POTENTIALLY OCCURRING ON DISTRICT PRESERVES (CONTINUED)

				~ 1 1 1	-	Rare	
		Federal	Calitornia	Global	State	Plant	-
Species	Common Name	Status	Status	Rank	Rank	Rank	Preserve
							Ridge OSP
Northern Coastal Salt Marsh	Northern Coastal Salt	None	None	G3	S3.2		Ravenswood OSP
	Marsh			0.174		17.6	
Penstemon rattanıı var. kleei	Santa Cruz Mountains beardtongue	None	None	G412	\$2.2	1 B. 2	Sierra Azul OSP
Piperia candida	white-flowered rein orchid	None	None	G2	S2	1B.2	Los Trancos OSP
Plagiobothrys glaber	hairless popcorn-flower	None	None	GH	SH	1A	El Sereno OSP, St. Joseph's Hill OSP
Serpentine Bunchgrass	Serpentine Bunchgrass	None	None	G2	S2.2		Pulgas Ridge OSP
Speyeria adiaste adiaste	unsilvered fritillary	None	None	G1G2T1	S1		Long Ridge OSP
Streptanthus albidus ssp.	Metcalf Canyon jewel- flower	Endangered	None	G2T1	S1.1	1B.1	Sierra Azul OSP, Bear Creek Bedwoods OSP
Streptanthus albidus ssp.	most beautiful jewel-flower	None	None	G2T2	S2.2	1B.2	Sierra Azul OSP, St. Joseph's Hill OSP
Usnea longissima	long-beard lichen	None	None	G4	S4.2		Purisima Creek Redwoods OSP
Reptiles and Amphibians							
Ambystoma californiense	California tiger salamander	Threatened	Threatened	G2G3	S2S3		Rancho San Antonio OSP
Emys marmorata	western pond turtle	None	None	G3G4	S3		Sierra Azul OSP
Rana boylii	foothill yellow-legged frog	None	None	G3	S2S3		Sierra Azul OSP
Rana draytonii	California red-legged frog	Threatened	None	G4T2T3	S2S3		Sierra Azul OSP, La Honda Creek OSP, Purisima Creek Redwoods OSP, Russian Ridge OSP
Thamnophis sirtalis tetrataenia	San Francisco garter snake	Endangered	Endangered	G5T2	\$2		Ravenswood OSP, Thornewood OSP, El Corte de Madera OSP, La Honda

TABLE A-1 Special Status Species And Sensitive Resources Potentially Occurring On District Preserves (continued)

		Federal	California	Global	State	Rare Plant	
Species	Common Name	Status	Status	Rank	Rank	Rank	Preserve
							Creek OSP, Miramontes Ridge OSP,
							Purisima Creek Redwoods OSP,
							Teague Hill OSP, Tunitas Creek OSP,
							Windy Hill OSP, Coal Creek OSP,
							Foothills OSP, Long Ridge OSP, Los
							Trancos OSP, Monte Bello OSP,
							Pulgas Ridge OSP, Rancho San
							Antonio OSP, Russian Ridge OSP,
							Saratoga Gap OSP, Skyline Ridge OSP

Notes:

The global rank (G-rank) is a reflection of the overall condition of an element throughout its global range.

G1 = Less than 6 viable element occurrences (EOs) OR less than 1,000 individuals OR less than 2,000 acres.

G2 = 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres.

G3 = 21-100 EOs OR 3,000-10,000 individuals OR 10,000-50,000 acres.

G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e., there is some threat, or somewhat narrow habitat.

G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.

Subspecies receive a T-rank attached to the G-rank. With the subspecies, the G-rank reflects the condition of the entire species, whereas the T-rank reflects the global situation of just the subspecies or variety. For example: Chorizanthe robusta var. hartwegii. This plant is ranked G2TI. The G-rank refers to the whole species range i.e., Chorizanthe robusta. The T-rank refers only to the global condition of var. hartwegii.

The State rank is assigned much the same way as the global rank, except state ranks in California often also contain a threat designation attached to the S-rank.

S1 = Less than 6 EOs OR less than 1,000 individuals OR less than 2,000 acres

S1.1 = very threatened

S1.2 = threatened

S1.3 = no current threats known

S2 = 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres

S2.1 = very threatened

S2.2 = threatened

S2.3 = no current threats known

S3 = 21-100 EOs or 3,000-10,000 individuals OR 10,000-50,000 acres

S3.1 = very threatened

S3.2 = threatened

S3.3 = no current threats known

S4 - Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat. NO THREAT RANK. S5 - Demonstrably secure to ineradicable in California. NO THREAT RANK.

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

RESOURCE MANAGEMENT POLICIES CEQA REVIEW

APPENDIX A

TABLE A-1 Special Status Species And Sensitive Resources Potentially Occurring On District Preserves (continued)

Rare Plant rank (CNPS List)

Indicates the California Native Plant Society (CNPS) list to which the taxon is assigned (plants only).

List 1A: Plants presumed extinct in California

List 1B.1: Plants rare, threatened, or endangered in California and elsewhere; seriously threatened in California

List 1B.2: Plants rare, threatened, or endangered in California and elsewhere, fairly threatened in California

List 1B.3: Plants rare, threatened, or endangered in California and elsewhere, not very threatened in California

List 2.1: Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California

List 2.2: Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California

List 2.3: Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California

List 3.1: Plants about which we need more information; seriously threatened in California

List 3.2: Plants about which we need more information; fairly threatened in California

List 3.3: Plants about which we need more information; not very threatened in California

List 4.1: Plants of limited distribution; seriously threatened in California

List 4.2: Plants of limited distribution; fairly threatened in California

List 4.3: Plants of limited distribution; not very threatened in California

Source: CNDDB, 2011.

