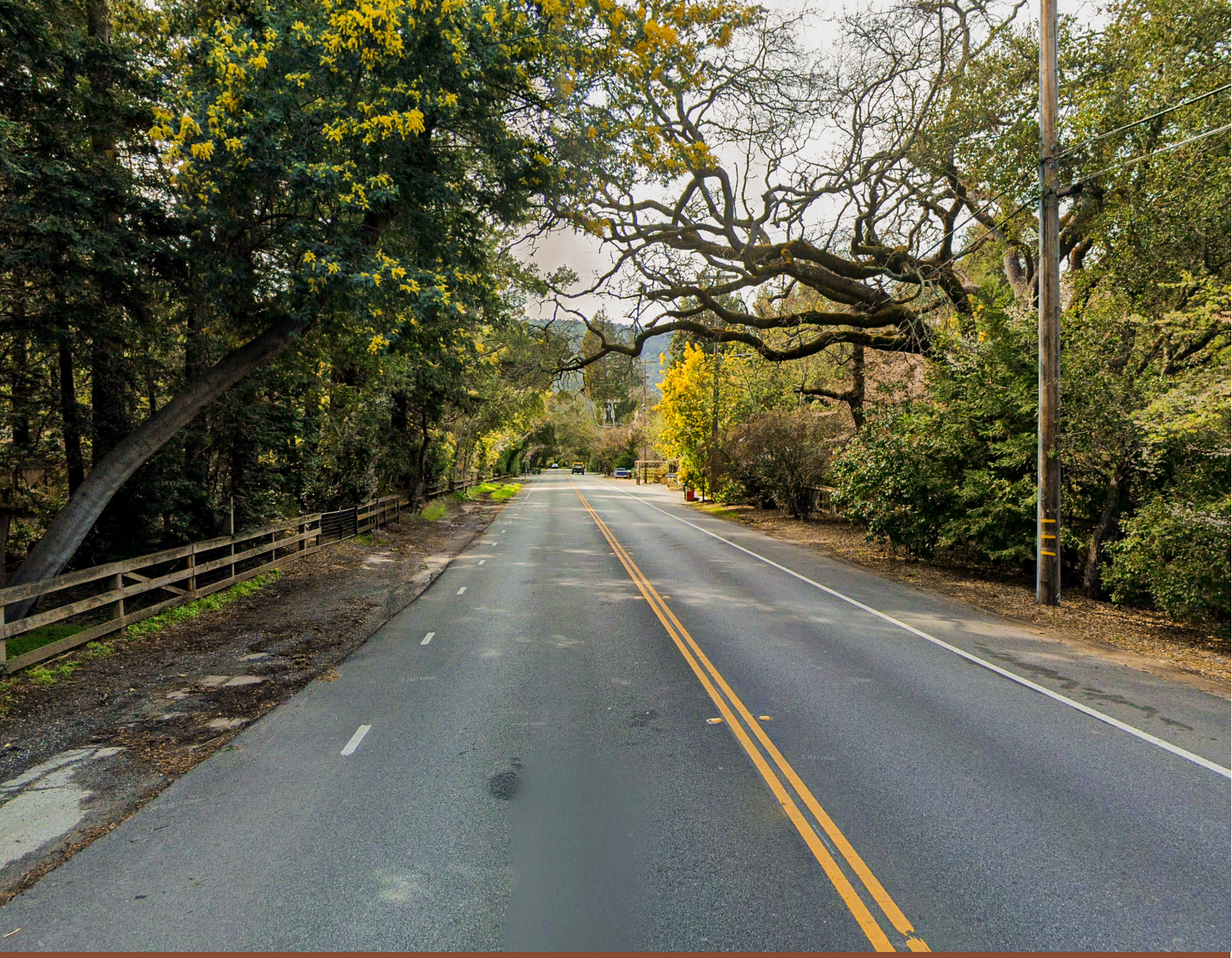


Town of Woodside Housing Element Update

Environmental Impact Report

PUBLIC REVIEW DRAFT

SCH# 2023050549

Volume 2

May 3, 2024

Town of Woodside Housing Element Update
Environmental Impact Report

Volume 2
May 3, 2024
Public Review Draft

Prepared for the Town of Woodside

Prepared by

DYETT & BHATIA
Urban and Regional Planners

In association with:

Salter
H.T. Harvey & Associates
Parisi Transportation Consulting

Table of Contents

Appendix A: NOP and Initial Study A-1
Appendix B: NOP Comment Letters B-1
Appendix C: Cultural Resources Materials C-1
Appendix D: GHG and Air Quality Data D-1
Appendix E: Biological Resources Reports E-1
Appendix F: Noise Study F-1
Appendix G: Traffic Study G-1

Appendix A

NOP AND INITIAL STUDY

NOTICE OF PREPARATION

Program Environmental Impact Report

Woodside Housing Element Update

Date May 23, 2023

To Reviewing Agencies, Interested Parties, and Organizations

Subject Notice of Preparation of a Draft Environmental Impact Report for the Woodside General Plan Housing Element Update and Scheduling of a Scoping Meeting on June 7, 2023

The Town of Woodside will be the Lead Agency and will prepare a programmatic Environmental Impact Report (EIR) for the Woodside Housing Element Update (the Project). The Project, its location, and potential environmental effects are described below.

Public agencies and members of the general public are invited to provide comments in writing as to the scope and content of the EIR. Specifically, the Town needs to know the views of Responsible and Trustee Agencies as to the potentially significant environmental issues, reasonable alternatives, and mitigation measures that are germane to each agency's statutory responsibilities in connection with the Project. Responsible Agencies will need to use the EIR prepared by the Town when considering permit or other approval for the Project.

Due to the time limits mandated by State law, responses must be sent at the earliest possible date, but no later than the close of the NOP review period, which runs as follows: May 23, 2023, through June 22, 2023.

Please send written responses to Sage Schaan, Planning Director, Town of Woodside at the address shown below. Public agencies providing comments are requested to include a contact person for the agency.

PROJECT TITLE:

Town of Woodside Housing Element Update

LEAD AGENCY CONTACT:

Sage Schaan, Planning Director
Town of Woodside
2955 Woodside Road
Woodside, CA, 94062
Email: sschaan@woodsidetown.org
Phone: (650) 851-6790

PROJECT SPONSOR:

Town of Woodside
2955 Woodside Road
Woodside, CA, 94062

PROJECT LOCATION AND CONTEXT:

Located in San Mateo County, California, the Town of Woodside is situated on the San Francisco Peninsula approximately 6 miles west of San Francisco Bay, midway between San Francisco and San Jose. Interstate 280 (I-280) runs roughly north-south through the eastern portion of the Town, while State Route 84 (SR-84) passes through its center. Woodside is a residential community distinguished by its rural character, scenic vistas, natural landscapes, and equestrian heritage. Existing residential development in Woodside numbers approximately 1,911 housing units. These are predominantly single-family residences, with some guest houses and accessory dwelling units on single-family properties. The beauty of the natural landscape helps define the character of the community, but it also presents risk of natural hazards that limit the potential for new housing, including steep topography and areas of landslide hazard in the hills and risk of flooding and liquefaction on much of the valley floor. Adjacent to the Town are the Jasper Ridge Biological Preserve to the southeast and Wunderlich County Park and Huddart County Park to the west of the Town limit. Residential neighborhoods of Redwood City and the unincorporated community of Emerald Lake Hills lie to the north, while the Town of Atherton borders the Town on the northeast.

Planning Area Boundaries

The Woodside Planning Area (Planning Area) totals approximately 11.8 square miles, including incorporated Town lands as shown in Figure 1.

Existing Land Uses

Located in San Mateo County, the Town of Woodside encompasses about 11.8 square miles and is home to 5,131 residents. Existing land uses within the Town are primarily single-family residential and open space uses, with some limited local-serving commercial uses. Institutional, public, and quasi-public land uses in Town include a school, a fire station, a library, a church, local government buildings, and a museum. Agriculture, including production of food and fiber products, livestock pasturing, vineyards, and beekeeping, is permitted on most lands within the Town. Overall, residential uses account for 5,611.3 acres, commercial uses occupy 17.6 acres, and open space uses occupy 1,001.4 acres. Vacant land accounts for 258.8 acres within the Town.

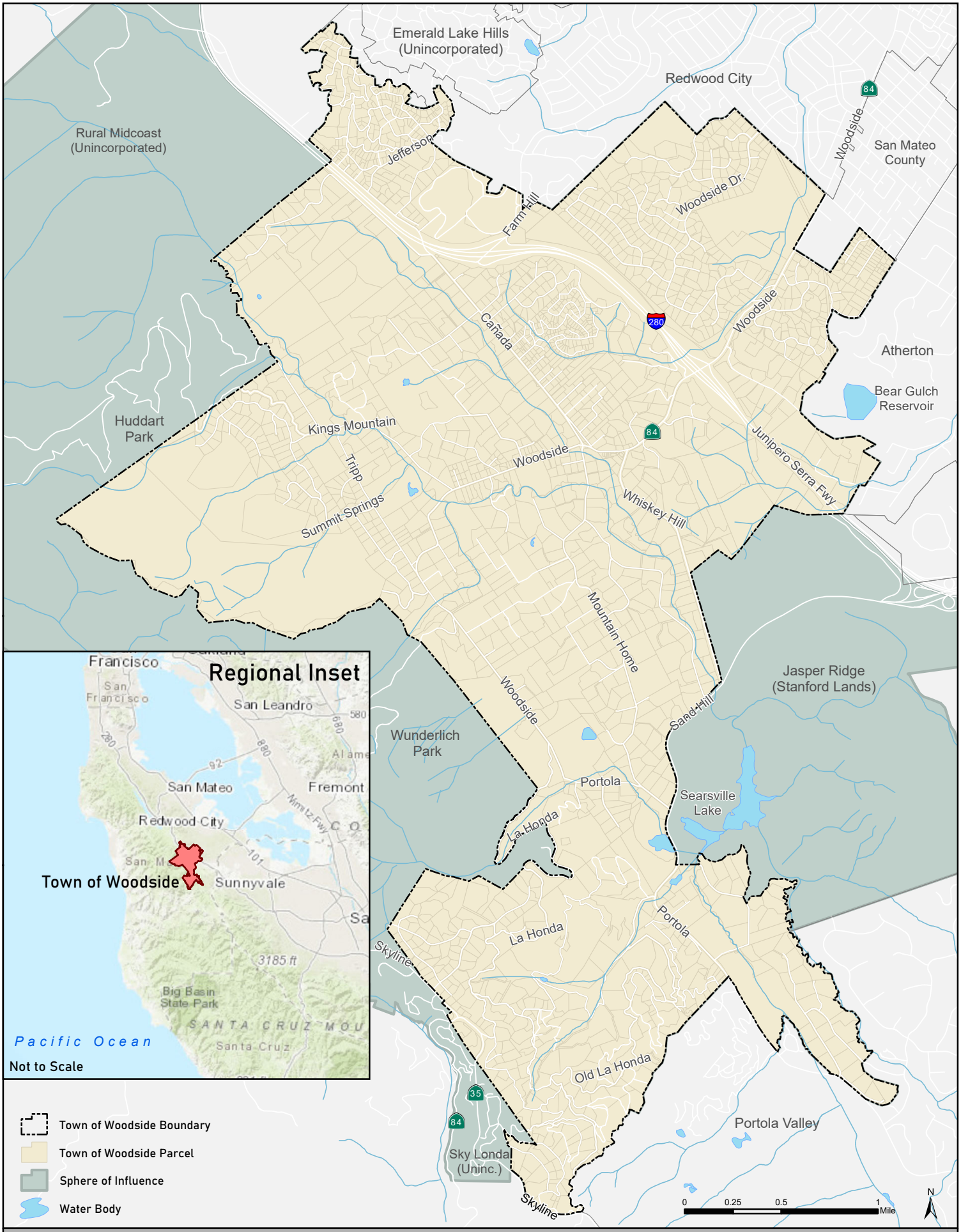


Figure 1
Planning Area

Town of Woodside

Natural Resources and Environmental Constraints

Woodside boasts abundant biodiversity due to the interplay of a range of microclimates, topography, and soils in the region. The wooded slopes and stream corridors of the Santa Cruz Mountains form the western backdrop to the town, while the central part of Woodside is characterized by gentle oak and grassland foothills, as well as flatter valley areas with rich riparian habitat. Numerous creeks flow in and through Woodside, including Redwood Creek and many tributaries of San Francisquito Creek. The freshwater marsh near Searsville Lake in the southern portion of Woodside is also an important water feature. Residential development is limited in and near these resources to preserve existing biodiversity, including required setbacks along the creeks.

Flood hazard areas are generally concentrated around Searsville Lake; however, portions of Woodside downstream from Schilling Lake, Bear Gulch Reservoir, and Searsville Lake are potentially at risk of flooding in the event of seiche or dam failure. Alleviated flatland areas in central portions of the Town have been identified as areas of liquefaction hazard, while the areas of steep terrain in the Western Hills have been identified as areas of significant potential for seismically induced landslides. Additionally, several active and potentially active fault traces pass through Woodside, including the San Andreas, Cañada, and Pilaratos Faults. Such features in the town that bring risk of exposure to natural hazards, including flooding, wildfires, liquefaction, and landslides, are shown in Figure 2.

PROJECT DESCRIPTION:

The Proposed Project involves a comprehensive update to the Town of Woodside Housing Element to account for changing demographics, market conditions, and projected housing need over an 8-year planning period that runs from 2023 through 2031. A detailed project description is included in the Initial Study, attached. Key project components are summarized below.

A Draft Housing Element update was released for public review on May 19, 2022 and subsequently sent to the California Department of Housing and Community Development (HCD) for review, as required under State law. Upon receipt of comments from HCD, the Draft Housing Element was revised based on direction from the Town Council and re-released for the legally-mandated 7-day public comment period on March 6, 2023, prior to resubmittal to HCD for certification. The Revised Draft Housing Element is available at this link: https://www.woodsidetown.org/planning/draft-2-housing-element-submitted-hcd-60-day-review-period

Under State law, each city and county in California must plan to accommodate its share of the regional housing need - called the Regional Housing Needs Allocation (RHNA) - for the coming 8-year planning period. The State determines the estimated need for new housing in each region of California, based on population projections and other factors including rates of vacancy, overcrowding, and cost-burden. The various regional planning agencies then allocate a target to each city or town within their jurisdiction, considering factors such as access to jobs, good schools, and healthy environmental conditions. RHNA is split into four categories representing different levels of affordability, based on area median income (AMI) in the county. The affordability categories are as follows:

- Very Low Income - Households making less than 50 percent of AMI
- Low Income - Households making 50-80 percent of AMI
- Moderate Income - Households making 80-120 percent of AMI
- Above Moderate Income - Households making more than 120 percent of AMI

Amid the ongoing hosing crisis in California, Woodside is required to plan for at least 328 new housing units between 2023 and 2031, including 90 Very Low-Income units, 52 Low Income units, 52 Moderate income units, and 134 Above Moderate units.

As required by State law, the Draft Housing Element includes a map of sites available for housing and an inventory of realistic capacity. The inventory demonstrates a total capacity of up to 423 new housing units, which is sufficient to meet the Town's RHNA obligations at all income levels with a buffer. The buffer is required to ensure that there is sufficient capacity to meet RHNA obligations at all times during the planning period, in the event that some sites on the inventory develop at lower densities than envisioned. Implementation of the Draft Housing Element would primarily involve facilitation of smaller scale housing construction in established neighborhoods on existing lots and infill sites.

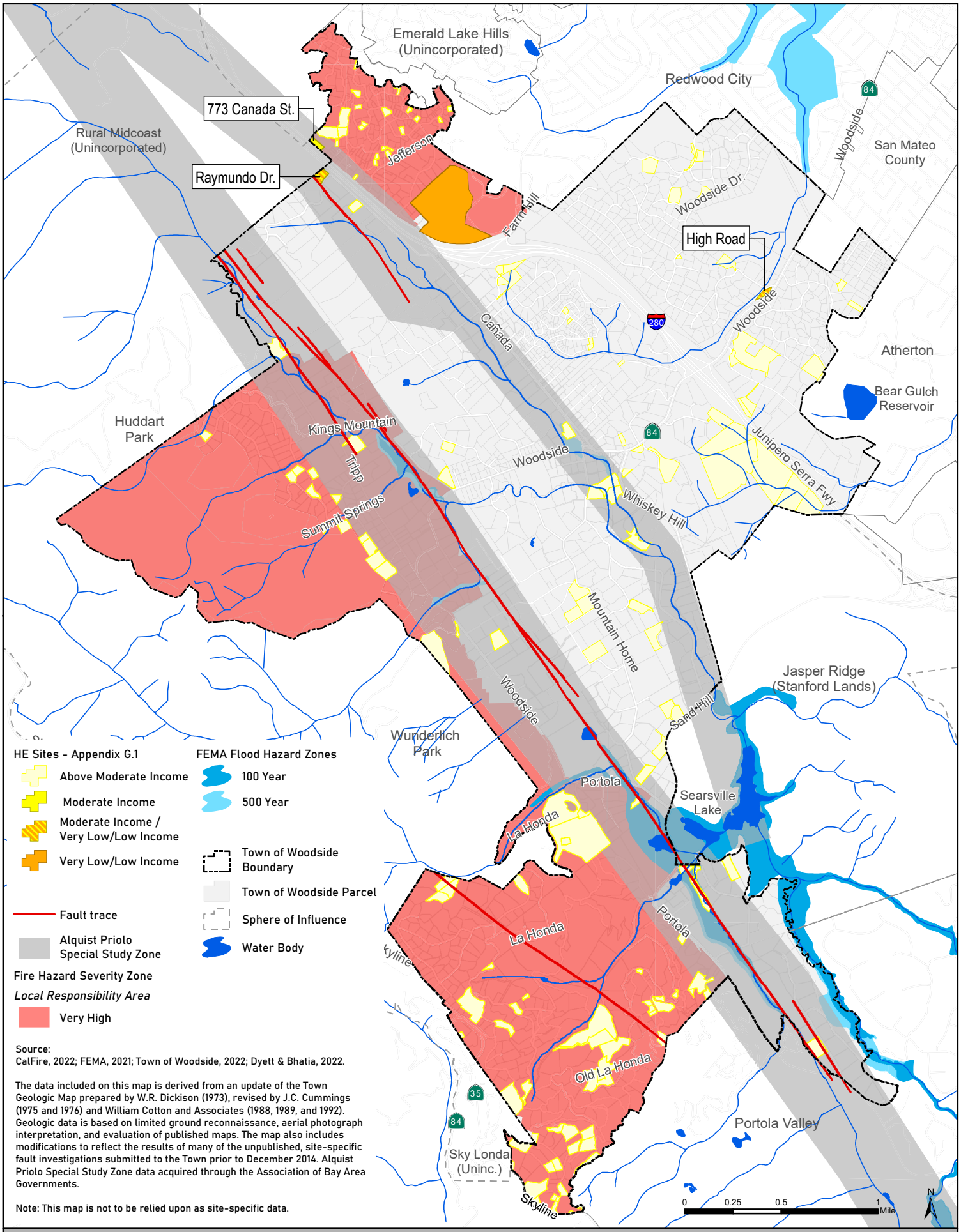
Buildout of the Proposed Project would involve construction of small-scale residential projects as well as higher density housing at 773 Canada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Canada College. Table 1 below provides a summary of the sites inventory and its projected capacity during the planning period.

Table 1: 2023 – 2031 Woodside RHNA Plan

	Low and Very Low Income	*Moderate Income*	*Above Moderate Income*	*Total*
Current Zoning Sites				
Vacant Single-Family Sites			105	105
Non-Vacant Single-Family sites			44	44
Pipeline Projects	6	3	21	30
Cañada College	75			75
ADUs @ 15 units annually	72	36	12	120
Rezoning Sites				
773 Cañada Site @ 20 units/acre		16		16
High Road @ 20 units/acre	11	5		16
Raymundo @ 20 units/acre	12	5		17
Total	**176**	**65**	**182**	**423**
RHNA Allocation	**142**	**52**	**134**	**328**
RHNA Buffer @ 20%	**28**	**10**	**27**	**65**
Total RHNA + Buffer	**170**	**62**	**161**	**393**
Surplus/Deficit	**+6**	**+3**	**+21**	**+30**

Source: Town of Woodside, 2022

The Draft Housing Element also includes an Action Plan, organized around six Guiding Principles. Each Guiding Principle is supported by policies and implementing programs that describe actions the Town will take to help meet its RHNA obligations. The housing sites inventory and map are included in the detailed project description in the Initial Study, together with a summary of Action Plan contents.



Source:
CalFire, 2022; FEMA, 2021; Town of Woodside, 2022; Dyett & Bhatia, 2022.

The data included on this map is derived from an update of the Town Geologic Map prepared by W.R. Dickison (1973), revised by J.C. Cummings (1975 and 1976) and William Cotton and Associates (1988, 1989, and 1992). Geologic data is based on limited ground reconnaissance, aerial photograph interpretation, and evaluation of published maps. The map also includes modifications to reflect the results of many of the unpublished, site-specific fault investigations submitted to the Town prior to December 2014. Alquist Priolo Special Study Zone data acquired through the Association of Bay Area Governments.

Note: This map is not to be relied upon as site-specific data.

Figure 2
Housing Sites and Environmental Constraints

Town of Woodside

PROBABLE ENVIRONMENTAL IMPACTS OF THE PROJECT

An Initial Study was prepared to evaluate potentially significant environmental impacts associated with the adoption and implementation of the Project. Consistent with the State CEQA Guidelines (Appendix G), the following environmental resource categories were analyzed:

- Aesthetics and Visual Resources
- Agricultural and Forest Resources
- Air Quality
- Biological Resources
- Cultural, Tribal, and Historic Resources
- Energy, Climate Change, and Greenhouse Gas Emissions
- Geology, Soils and Seismicity
- Hazards and Hazardous Materials
- Hydrology, Drainage, and Water Quality
- Land Use, Population, and Housing
- Noise and Vibration
- Public Facilities and Recreation
- Traffic and Transportation
- Utilities and Service Systems
- Wildfire

Environmental effects found to have no impact or a less-than significant impact are identified in the Initial Study. These topics will not be evaluated in detail in the EIR, which will focus on the potentially significant impacts of the Project, as identified in the Initial Study. Mitigation measures will be recommended in the EIR as needed to address any significant impacts identified, and the Initial Study will be incorporated as an Appendix to the Draft EIR. The following is a summary of the potentially significant environmental impacts of the Project identified in the Initial Study.

Aesthetics and Visual Resources

Buildout of the proposed sites inventory would introduce multifamily housing adjacent to I-280, a State Scenic Highway, as well as along Canada and Woodside Roads, which are designated scenic corridors in the General Plan. A careful analysis of potential impacts to these scenic resources is required, together with a consideration of potential impacts to scenic quality from new development. Appropriate mitigation measures will be developed.

Air Quality

Development would happen incrementally over the course of eight years, from 2023-2031, which would involve construction single-family housing and ADUs, that would not generate substantial quantities of construction-related pollution. Nevertheless, larger scale construction projects such as those involving multi-family development at the High Road at Woodside Road, Raymundo Drive at Runnymede Road, 773 Cañada, and Cañada College sites could involve diesel-emitting equipment over many months and could potentially impact adjacent sensitive receptors. This potentially significant construction-related air quality impact will be analyzed in detail in the EIR.

Biological Resources

Given the extent of biological resources throughout Woodside, future development pursuant to the Proposed Project has the potential to adversely affect sensitive species, riparian habitats, and sensitive communities. The potential presence of sensitive biological resources within the Town will be reviewed as a basis to determine whether new development on one or more of the housing opportunity sites may have potential to affect such resources. Where potential impacts are identified, programmatic biological resources mitigation measures will be identified that would apply to future individual development projects.

Geology and Soils

There are two active faults within Woodside designated under the Alquist-Priolo Earthquake Fault Zoning Act: the San Andreas Fault and the Cañada Fault. The Pilarcitos Fault also exists within Woodside, though it is not designated under the Alquist-Priolo Earthquake Fault Zoning Act. Because of these faults, the Town is subject to high levels of ground shaking. Creekside and hillside areas, which comprise the majority of the built environment in Woodside, are most vulnerable to damage caused by seismic-related ground failure. Creekside development on alluvial deposits can experience differential settlement caused by liquefaction. Given the steep topography in Woodside, there is also significant potential for landslides, particularly in the Western Hills. The development of housing in or adjacent to areas of geologic hazard could potentially result in significant impacts, which will be analyzed in further detail in the EIR.

Greenhouse Gas Emissions

As a long-range plan, the Proposed Project would be assumed to have a less than significant impact related to GHG emissions if the Town has a qualified GHG Reduction Strategy that demonstrates consistency with established SB32 and EO B-55-18 targets. While the Town's Climate Action Plan sets out a pathway to reducing GHG emissions by 15 percent below 2005 levels by the year 2020, it does not demonstrate consistency with targets for 2030 and 2045. Therefore, GHG emissions from the Proposed Project will be quantified and analyzed in further detail in the EIR. Consistency with the CARB Scoping Plan will also be analyzed.

Hazards and Hazardous Materials

Implementation of the Proposed Project could result in construction of up 423 new housing units in Woodside. The western half of Woodside is within a Very High Fire Hazard Severity Zones (VHFHSZ) delineated by the California Department of Forestry and Fire Protection (CAL FIRE), as well as the most northern areas near unincorporated Emerald Lake Hills. All new development would be required to comply with the fire protection provisions of the California Building Code and the Town Code; however, given the extent of wildfire hazard in Woodside, Project implementation would involve risk of exposure of people and structures to wildland fires. This is a potentially significant impact that will be analyzed in further detail in the EIR, accounting for new strategies proposed in the Safety Element Update and identifying mitigation as needed.

Noise

Vehicle trips generated by new residential development pursuant to the Project may increase ambient noise levels in Woodside, while construction activities may cause intermittent impacts. Construction-related noise effects and traffic noise effects will be evaluated based on Town standards and data regarding noise intensities for typical construction activities. Noise modeling will be conducted to determine if noise levels in excess of standards established in the General Plan and Town Code could be exceeded as a result of project implementation, either cumulatively or as a result of project implementation.

Transportation

According to State guidance, transportation impacts would result if home-based vehicle miles travelled (VMT) per resident under the Project are not 15 percent below baseline levels. VMT forecasts developed for the Project indicate that a 4.6 percent reduction in per capita VMT as compared to 2020 baseline conditions would result. This exceeds the threshold prior to mitigation. As such, this is a potentially significant impact that will be analyzed in further detail in the EIR with mitigation identified accordingly.

Tribal Cultural Resources

Given the high potential for yet undiscovered tribal cultural resources in Woodside and the ongoing tribal consultation, it cannot be definitively determined that no significant impact will result at this stage. This section will address whether the Proposed Project may have an adverse change on the significance of a tribal cultural resource.

Utilities and Service Systems

New residential development under the Proposed Project would increase demand for utilities and service systems involving expansion of sewer infrastructure. There would be expansion at specific sites as mentioned in the Housing Element, including 773 Cañada Road and Raymundo Drive at Runnymede Road. It is possible that the construction of expansion of sewer infrastructure may cause significant environmental effects. These potential impacts will be analyzed in detail in the EIR, and mitigation will be recommended to address impacts, as appropriate.

Wildfire

Given the extent of wildfire hazard in and adjacent to Woodside, this section of the EIR will address whether the project would substantially impair an adopted emergency response plan or emergency evacuation plan; expose people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; require installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or expose people or structures to significant risks, including downslope of downstream flooding or landslides as a result of runoff, postfire slope instability, or drainage changes.

SCOPING MEETING:

A scoping meeting will be conducted on Wednesday June 7, 2023, to collect oral comments from agencies and members of the public regarding the scope and content of the EIR in accordance with CEQA Section 21083.9.

EIR Scoping Meeting on the Woodside General Plan Housing Element Update

Wednesday June 7, 2023 | 6:00 PM

Independence Hall

2955 Woodside Road, Woodside, California 94062

For project information, please visit
https://www.woodsidetown.org/planning/draft-2-housing-element-submitted-hcd-60-day-review-period

Please contact Sage Schaan at (650) 851-6790 or sschaan@woodsidetown.org with any questions regarding this notice or the scoping meeting.

Sage Schaan, Planning Director

May 15, 2023

Date

INITIAL STUDY AND ENVIRONMENTAL CHECKLIST FOR THE
2023-2031 Housing Element Update

Town of Woodside, California

Prepared by:

DYETT & BHATIA
Urban and Regional Planners

4001 Howe St
Oakland, CA 94611
(415) 956-4300

May 2023

Table of Contents

1. Project Title: 3
2. Lead Agency Name and Address: 3
3. Contact Person and Email: 3
4. Project Location: 3
5. Project Sponsor's Name and Address: 3
6. General Plan Designation: 3
7. Zoning: 3
8. Surrounding Land Uses and Setting: 3
9. Description of Project: 7
10. Other Public Agencies Whose Approval is Required: 16
11. Native American Consultation: 16
12. Summary of Environmental Factors Potentially Affected: 16
13. Environmental Checklist: 17
13.A Aesthetics 18
13.B Agriculture and Forestry Resources. 20
13.C Air Quality 24
13.D Biological Resources. 28
13.E Cultural Resources 35
13.F Energy 39
13.G Geology and Soils. 41
13.H Greenhouse Gas Emissions. 44
13.I Hazards and Hazardous Materials. 45
13.J Hydrology and Water Quality 47
13.K Land Use and Planning. 50
13.L Mineral Resources. 51
13.M Noise. 52
13.N Population and Housing. 53
13.O Public Services. 55
13.P Recreation. 57
13.Q Transportation. 58
13.R Tribal Cultural Resources 60
13.S Utilities and Service Systems. 62
13.T Wildfire. 65
13.U Mandatory Findings of Significance. 66
14. Preparation 67
15. Determination. 67
16. De Minimis Fee Determination (Chapter 1706, Statutes of 1990-AB 3158) 67
17. Environmental Determination: 68
18. References 69

List of Figures

Figure 1: Location and Planning Boundaries 4
Figure 2: Housing Sites and Environmental Hazards 6
Figure 3: Sites Available for Housing 14
Figure 4: Scenic Corridors in Woodside 19
Figure 5: Important Farmland in Woodside 22
Figure 6: Special Status Plant Species with the Potential to Occur within the Planning Area 33
Figure 7: Special Status Animal Species with the Potential to Occur within the Planning Area 34

List of Tables

Table 1: Woodside Regional Housing Needs Assessment, 2023-2031 8
Table 2: 2023 – 2031 Woodside RHNA Plan 13
Table 3: Special-Status Plant Species with the Potential to Occur in the Planning Area 30
Table 4: Special-Status Animal Species with the Potential to Occur in the Planning Area 31
Table 5: Identified Historical Resources 36

Attachments

1. Town of Woodside, Cycle 6 Housing Element

Appendices

Appendix A: Sand Hill Estate Project Habitat Management Plan
Appendix B: Supporting Materials for Cultural Resources
Appendix C: Supporting Materials for Tribal Cultural Resources

1. PROJECT TITLE:

Town of Woodside Housing Element Update

2. LEAD AGENCY NAME AND ADDRESS:

Town of Woodside, 2955 Woodside Road, Woodside, CA 94062

3. CONTACT PERSON AND EMAIL:

Sage Schaan, Planning Director
sschaan@woodsidetown.org

4. PROJECT LOCATION:

Town of Woodside, San Mateo County, California

5. PROJECT SPONSOR'S NAME AND ADDRESS:

N/A

6. GENERAL PLAN DESIGNATION:

Varies

7. ZONING:

Varies

8. SURROUNDING LAND USES AND SETTING:

Located in San Mateo County, California, the Town of Woodside is situated on the San Francisco Peninsula approximately 6 miles west of San Francisco Bay, midway between San Francisco and San Jose. Interstate 280 (I-280) runs roughly north-south through the eastern portion of the Town, while State Route 84 (SR-84) passes through its center and Skyline Boulevard (State Route 35) moves through the southern portion of Town. Woodside is a residential community distinguished by its rural character, scenic vistas, natural landscapes, and equestrian heritage. The Town's riparian corridors, woodlands, and hillsides protect wildlife, provide scenic vistas, and contribute to a tranquil environment.

Planning Area Boundaries

The Woodside Planning Area totals approximately 11.8 square miles, including incorporated Town lands as shown in Figure 1. Adjacent to the Town are Jasper Ridge Biological Preserve to the southeast and Wunderlich County Park and Huddart County Park to the west of the Town limit. Residential neighborhoods of Redwood City and the unincorporated community of Emerald Lake Hills lie to the north of the Town Limit. The Town of Atherton is a northeasterly adjacent to the Town. While the Town does not have regulatory powers over any lands within the Planning Area that are outside its Town limits, the Planning Area boundaries signal to the County and other nearby local and regional authorities that development within this area has an impact on the future of Woodside.

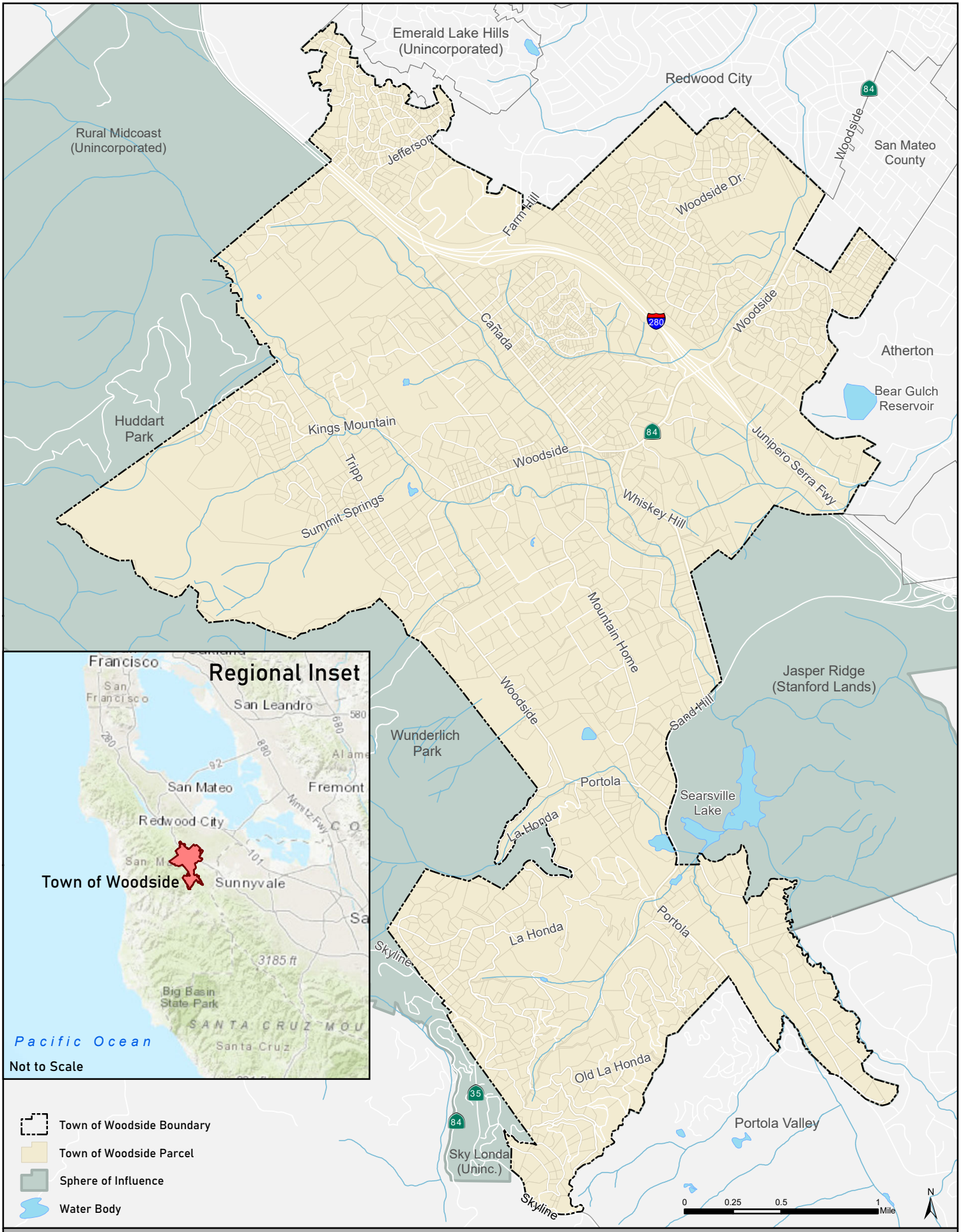


Figure 1
Planning Area

Town of Woodside

Existing Land Uses

Located in San Mateo County, the Town of Woodside encompasses about 11.8 square miles and is home to 5,131 residents. Existing land uses within the Town are primarily single-family residential and open space uses, with some limited local-serving commercial uses. Institutional, public, and quasi-public land uses in Town include a school, a fire station, a library, a church, local government buildings, and a museum. Agriculture, including production of food and fiber products, livestock pasturing, vineyards, and beekeeping, is permitted on most lands within the Town. Overall, residential uses account for 5,611.3 acres, commercial uses occupy 17.6 acres, and open space uses occupy 1,001.4 acres. Vacant land accounts for 258.8 acres within the Town.

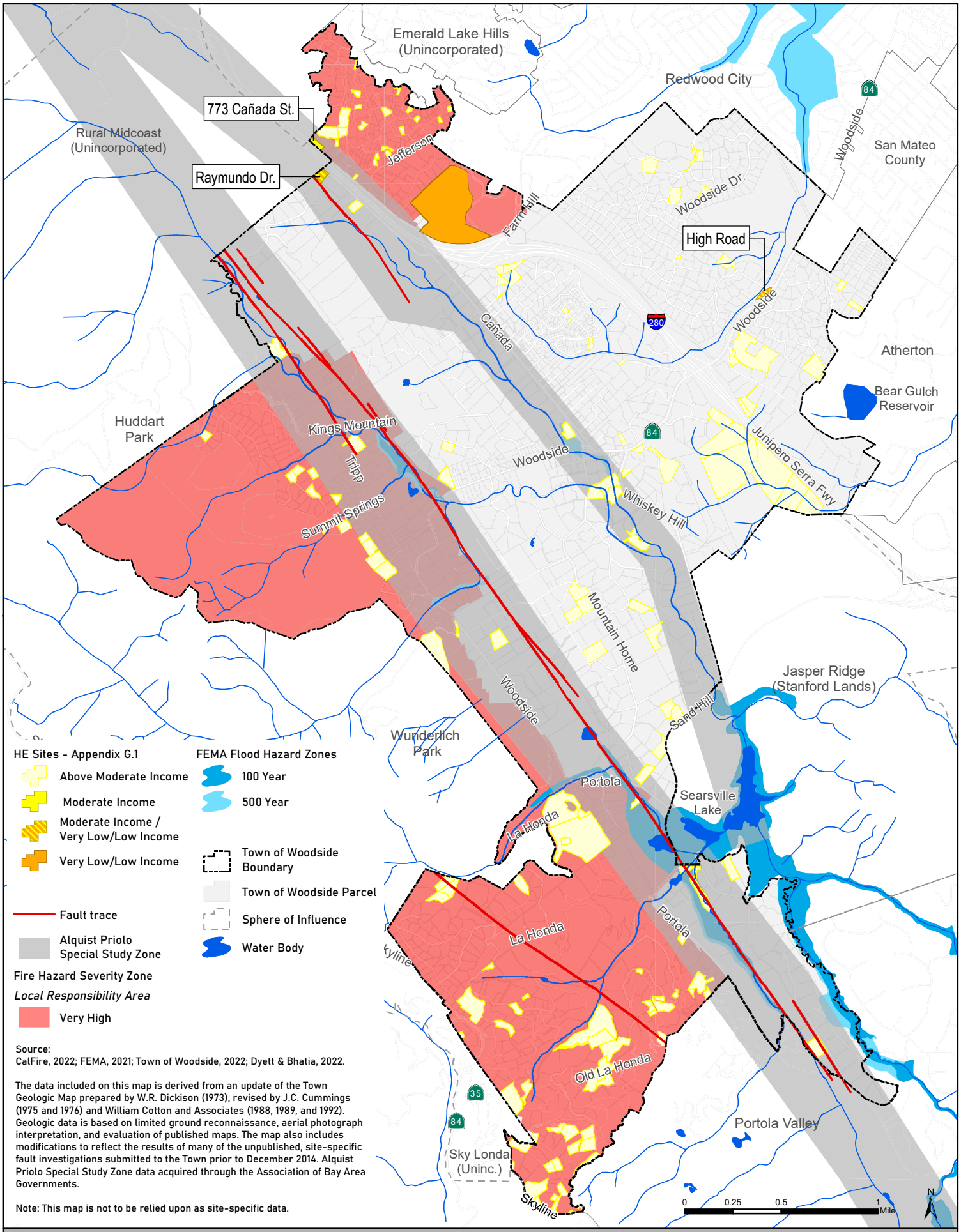
Natural and Scenic Resources

Like much of the San Francisco Bay Area, the Planning Area boasts abundant biodiversity due to the interplay of a range of microclimates, topography, and soils in the region. The wooded slopes and stream corridors of the Santa Cruz Mountains form the western backdrop to the town, while the central part of Woodside is characterized by gentle oak and grassland foothills, as well as flatter valley areas with rich riparian habitat. Numerous creeks flow in and through the Planning Area, including Redwood Creek and many tributaries of San Francisquito Creek. The freshwater marsh near Searsville Lake in the southern portion of the Planning Area is also an important water feature in Woodside.

Two State-designated scenic highways (I-280 and SR-35) run through the Planning Area; additionally, General Plan 2012 designates several local scenic roads and identifies scenic corridors and areas as shown in Figure 4. Under the provisions of the Town Municipal Code, all development within designated scenic corridors and Western Hills must undergo review by Town staff, the Architectural and Site Review Board, and/or the Planning Commission prior to approval. The level of review is based on the scope of a development project.

Natural Hazards

The Planning Area is exposed to significant geological and wildfire hazards, given its location, topography, and soil characteristics. Several active and potentially active fault traces pass through Woodside, including the San Andreas, Hermit, and Pilarcitos Faults shown in Figure 2. Soils of the Whiskey Hill and Santa Clara Formations present in the Planning Area are known to be potentially expansive and their shrink-swell properties can result in damage to buildings and structures. Serpentine soil deposits with similar expansive potential are also present throughout the Planning Area. No detailed map of potentially expansive soils in the Planning Area currently exists; however, site-specific investigations are required prior to development on most parcels in Woodside. Similarly, while no detailed map of soils with liquefaction potential exists, alleviated flatland areas in central portions of the Town have been identified as areas of liquefaction hazard on State seismic hazard maps. Given the steep topography in the Planning Area, there is also significant potential for landslides, particularly in the Western Hills. Areas designated as Very High Severity Fire Hazard Zones are also shown in Figure 2.



Source:
CalFire, 2022; FEMA, 2021; Town of Woodside, 2022; Dyett & Bhatia, 2022.

The data included on this map is derived from an update of the Town Geologic Map prepared by W.R. Dickison (1973), revised by J.C. Cummings (1975 and 1976) and William Cotton and Associates (1988, 1989, and 1992). Geologic data is based on limited ground reconnaissance, aerial photograph interpretation, and evaluation of published maps. The map also includes modifications to reflect the results of many of the unpublished, site-specific fault investigations submitted to the Town prior to December 2014. Alquist Priolo Special Study Zone data acquired through the Association of Bay Area Governments.

Note: This map is not to be relied upon as site-specific data.

Figure 2
Housing Sites and Environmental Constraints

Town of Woodside

Flood hazard areas are generally concentrated around Searsville Lake in the southern portion of the Planning Area as shown in Figure 2. The Planning Area is located far enough inland and is surrounded by mountains, so the risk of damage from tsunamis is minimal; however, portions of the Planning Area downstream from Schilling Lake, Bear Gulch Reservoir, and Searsville Lake are potentially at risk in the event of seiche or dam failure.

9. DESCRIPTION OF PROJECT:

The Proposed Project involves updates to the Town of Woodside General Plan Housing Element, as required under California law to account for changing demographics, market conditions, and projected housing need over an 8-year planning period that runs from 2023 through 2031. Details of the Proposed Project are described in Section 9 of this document and will be referred to through the document as the "Proposed Project."

Under State law, each city and county in California must plan to accommodate its share of the regional housing need - called the Regional Housing Needs Allocation (RHNA) - for the coming 8-year planning period. The State determines the estimated need for new housing units in each region of California, based on population projections and other factors including rates of vacancy, overcrowding, and cost-burden. The various regional planning agencies then allocate a target to each city or town within their jurisdiction, considering factors such as access to jobs, good schools, and healthy environmental conditions. RHNA is split into four categories representing different levels of affordability, based on median income level in the county. The affordability categories are as follows:

- Very Low Income - Households making less than 50 percent of the average median income (AMI)
- Low Income - Households making 50-80 percent of AMI
- Moderate Income - Households making 80-120 percent of AMI
- Above Moderate Income - Households making more than 120 percent of AMI

For the 2023-2031 period, Woodside must identify sites sufficient to accommodate 328 new housing units, with a specific number of units designated as affordable to each income category, as shown in Table 1. The RHNA does not specifically break down the need for extremely-low-income households. As provided by State law, the housing needs of extremely-low-income households, or those making less than 30 percent of area median income (AMI), is estimated as 50 percent of the very-low-income housing need.

Table 1: Woodside Regional Housing Needs Assessment, 2023-2031

Income Level	*AMI*	*Needed Units*	*Percent of Needed Units*
Very-Low-Income	0-50%	90	27.4%
Low-Income	51-80%	52	15.9%
Moderate-Income	81-120%	52	15.9%
Above-Moderate-Income	>120%	134	40.9%
Total		**328**	**100.0%**

Source: HCD State Income Limits, 2021; Town of Woodside, 2022; Dyett & Bhatia, 2022

Housing Element Update Process

Woodside Town Council established a Regional Housing Needs Allocation (RHNA) subcommittee consisting of members of the Planning Commission and Town Council to discuss the challenges of the RHNA allocations and develop strategies to meet the State-mandated requirements for the Housing Element. The RHNA subcommittee held a series of public meetings, working to identify sites for rezoning to meet the Town's RHNA targets by income category, while considering the various environmental, fire hazard, and infrastructure constraints in Woodside.

In addition to the publicly noticed RHNA subcommittee meetings that included public participation, residents of Woodside participated in a series of countywide workshops conducted by "21 Elements", a group aimed at supporting all twenty-one San Mateo County jurisdictions in developing, adopting, and implementing local housing policies and programs. Workshops in the form of issue-based webinars focused on affordability, housing and racial equity, the connection between housing and climate change, and planning new infill housing. The Town also participated in a meeting conducted jointly with the County of San Mateo and several other San Mateo County jurisdictions on developing ADUs.

Further, a Town-wide ADU survey was conducted to measure interest in constructing ADUs and to build an understanding of potential barriers to construction. The results of this survey helped inform the Town's Housing Plan in the Housing Element. Multiple public hearings with the Planning Commission and Town Council for review and discussion of the Draft Housing Element. These hearings included a discussion on SB 9 Code amendment and subdivisions, multiple housing study sessions, a review of Housing Element chapters, and discussion of RHNA subcommittee recommendations.

The Draft Housing Element was released for a 45-day public review period that ran from May 19, 2022, to July 1, 2022. The Town received a total of 65 comments by this deadline, and eight additional comments after the deadline. A formal response to comments was prepared and presented at a noticed Town Council hearing on July 12, 2022. At this meeting, the Town Council made changes to the RHNA approach and added several new programs – in response to the public comments received. These changes were incorporated into the draft Housing Element on July 16, 2022.

The California Department of Housing and Community Development (HCD) provided comments on October 14, 2022. On January 31, 2023, Town Council directed Town staff to make revisions to the draft Housing Element in response to HCD's comments.

On March 6, 2023, the Town of Woodside posted Cycle 6 Housing Element Draft 2 to the Town's website based on the Town Council direction from January 31, 2023. The Cycle 6 Housing Element Draft 2 was made available for public comment between March 7, 2023, and March 13, 2023, pursuant to California Assembly Bill 215. On March 15, 2023, the Town submitted Draft 2 Housing Element to HCD. The final documents submitted to HCD included the comments received during the seven-day public review period. On May 12, 2023, the Town received comments from HCD.

Project Objectives

The Housing Element's purpose is to address the housing needs and objectives of the Town and to meet the State Housing law requirements. The Town balances the objective to make all parts of the community accessible with the need to encourage development of housing in areas with few environmental constraints and hazards. The Housing Element outlines six guiding principles, listed below:

- **Guiding Principle 1:** Provide adequate housing for all persons regardless of race, color, ancestry/national origin, religion, income, age, disability, sex, sexual orientation, gender identity or expression, genetic information, marital status, familial status, military, or veteran status, and/or source of income.
- **Guiding Principle 2**: Assure a variety of housing types within the context of the Town's General Plan and existing physical constraints.
- **Guiding Principle 3:** Integrate new housing types while maintaining the Town's rural character and equestrian heritage.
- **Guiding Principle 4:** Provide opportunities for housing to meet the needs of those families and individuals who wish to live in a rural setting—in quiet residential areas which provide privacy, separation from traffic, undisturbed terrain, extensive vegetation, and opportunities to keep horses and other animals.
- **Guiding Principle 5:** Provide adequate and safe housing for households of varied income levels.
- **Guiding Principle 6:** Allow housing development that is subordinate, sensitive, and complementary to the natural environmental setting and specific site conditions, including sites designated and rezoned for medium to high density housing with full consideration of environmental/service constraints.

Draft 2023-31 Housing Element Organization and Contents

The Housing Element is a legally mandated part of the Woodside General Plan, published under separate cover. The Draft 2023-31 Housing Element is an update to the current Housing Element prepared to respond to the requirements for the Sixth Housing Element Cycle, which runs from 2023 through 2031. The organization and content is described below.

The Housing Element is organized into the following three sections that comply with the requirements of State law:

- **Introduction –** this section emphasizes the importance of housing and shelter, provides an overview of Woodside's demographics and its changing characteristics, summarizes a wide range of new housing and housing-related laws that have been adopted since the last Housing Element Update, and details the legislation that requires the integration of the Housing Element with the Safety Element with the Local Hazard Mitigation Plan.
- **Review of Cycle 5 (2015-2023) Housing Element** - this section reviews and evaluates the Town's progress in meeting the objectives and implementing the Programs that were developed as part of the 2015-2023 Housing Element, and identifies the work still required to broaden the opportunities for affordable housing in Woodside.
- **Cycle 6 (2023-2031) Housing Element –** this section provides Woodside's assigned Regional Housing Needs Allocation (RHNA) of 328 units, distributed by income level. It also includes a summary of Town collaboration with 21 Elements, a project aimed at supporting all twenty-one San Mateo County jurisdictions in developing, adopting, and implementing local housing policies and programs. This section also includes an overview of public engagement throughout the Housing Element process and the Woodside Fair Housing Assessment. This section details an inventory of land suitable and available for development of housing within the planning period, strategies for meeting RHNA allocation, and specific actions or programs to address the development, improvement, and conservation of housing to meet current and future needs. This includes goals, policies, and specific housing programs.

Additionally, there are twelve appendices that contain supporting data and information. Appendices are listed below:

- **Appendix A:** Definitions and Abbreviations
- **Appendix B:** Housing Needs Data Report
- **Appendix C:** SB 35 Statewide Determination Summary
- **Appendix D:** San Mateo County Multijurisdictional Local Hazards Mitigation Plan (LHMP), 2021
- **Appendix E:** ADU Affordability Report
- **Appendix F:** Housing Development Constraints, Development Costs, and Zoning Analysis
- **Appendix G**: Adequate Sites Inventory
- **Appendix H:** Public Engagement and Input Summary
- **Appendix I:** ADU Production in Woodside (2015-2021)
- **Appendix J:** Town of Woodside ADU Ordinances
- **Appendix K:** AFFH – Analysis of Impediments to Fair Housing Choice
- **Appendix L:** Inventory of Shelters and Services for the Homeless in San Mateo County

Summary of Proposed Actions

Inventory of Sites Available for Housing

As required by State law, the Draft Housing Element includes a map of sites available for housing and an inventory of capacity. The inventory demonstrates a total capacity of up to 423 new housing units, which is sufficient to meet the Town's RHNA obligations at all income levels with a buffer. The buffer is required to ensure that there is sufficient capacity to meet RHNA obligations during the planning period, in the event that some sites on the inventory develop at lower densities than envisioned. Implementation of the Draft Housing Element would primarily involve facilitation of smaller scale infill development in established residential neighborhoods, with some additional multi-family housing to provide varied housing types. Smaller-scale development includes vacant and underutilized single-family residences and development of accessory dwelling units (ADUs).

As shown on Figure 3 and Table 2 below, the inventory anticipates construction of 149 new single-family homes on residentially zoned properties throughout Woodside, including 105 vacant parcels and 44 underutilized parcels. Underutilized sites have some structures and improvements such as sheds, solar panels, animal enclosures, vineyards, parking lots or driveways, or old barns, but do not have a single-family residence, other type of residential unit, or substantial improvement(s). In some cases, the Underutilized parcels adjoin a parcel with a single-family residence and are used for additional yard space. Based on the annual rate of construction permits issued for ADUs by the Town since 2018, it is projected that 15 new ADUs will be constructed on existing single-family lots in Woodside each year over the course of the 8-year planning period, for a total of 120 new ADUs. By virtue of their smaller size, many ADUs may offer rents affordable to lower and moderate-income households. New single-family homes would provide additional housing opportunities for above moderate-income households.

Additionally, to help meet the Town's RHNA obligations for lower income households, the inventory includes that four sites will develop with multi-family housing:

- **Housing at Cañada College.** San Mateo County Community College District (District) adopted a Districtwide Facilities Master Plan (FMP) in June 2022 that envisions the construction of affordable housing units on the Cañada College site in Woodside. The District intends to proceed with construction as soon as funding is available. The MFRD Overlay Zone that currently applies to the site permits multi-family housing development. Policy H3.2 and subsequent Programs require the rezoning of this site to provide increased housing densities (18 dwelling units per acre to 20 dwelling units per acre) and to expand the locations available on the site for the projected housing development. Allowing increased housing density to further facilitate residential development at the site at the density and locations consistent with the Town Housing Element and District FMP. The Proposed Project includes Program H3.1a, under which the Town will assist the District in obtaining financing to the extent feasible by the Town, and Program H3.1b, under which the Town commits to reducing the complexity of the entitlement process for this overlay zone. The site is served by public transit, including San Mateo

County Transit District (SamTrans) Route 278 with service to the Redwood City Transit Center, as well as by water, sewer, and stormwater facilities. In conversations with Town staff, the District has indicated that construction of 75-80 units that would be affordable to households making less than 80 percent of the San Mateo County AMI is a reasonable assumption. Therefore, the inventory assumes 75 lower income RHNA units on this site over the planning period.

- **773 Cañada Road (APN: 068-100-220).** This approximately 5-acre site located north of Cañada College is under private ownership. The property owner is actively exploring residential development opportunities, including the development of multi-family housing units on approximately a 1-acre portion of the site that fronts Cañada Road. Water service is available, and the site is adjacent and eligible to connect to the Town Center Sewer District with necessary approvals and an amendment to the Emerald Lake Hills Specific Plan; therefore, adequate utilities are available and accessible. To facilitate residential development at this location, the Proposed Project includes Program H2.1a, under which the Town will rezone the site to permit residential development at 20 dwelling units per acre on the approximately 1-acre portion. In conversations with Town staff, the owner has indicated a willingness to make the new housing units available to households making less than 120 percent of the San Mateo County AMI through long-term affordability agreements. Therefore, the inventory assumes 16 moderate income RHNA units on this site over the planning period.
- **Raymundo Drive (APN: 072-041-040).** This Town-owned site is 1.77 acres in size and currently zoned Open Space (OS). The eastern portion of the site is currently used as a Town Public Works corporate yard for staging of landscape materials. The western side of the property is a fenced pasture used by an adjacent property owner. The Hermit Fault runs along the western boundary of the site, and the Hermit Fault setback zone extends into the site. Water and sewer service are accessible for the site. To facilitate development of affordable housing on this site, the Proposed Project includes two programs: Through Program H2.1a, the Town will rezone the site to permit residential development at 20 dwelling units per acre, and through H4.2c, the Town will partner with an affordable housing developer for the construction of workforce housing. A total of 17 multi-family housing units are projected on this site, but may include up to 20 units per acre.
- **High Road (APN: 069-170-450).** This Town-owned site is 1.055 acres in size, vacant, and currently zoned Open Space for Preservation of Natural Resources (OSN). The southern portion of the site is sloped as it abuts Highway 84/Woodside Road, but the site is does not have any identified environmental constraints. It is located approximately 0.5 miles from Woodside High School, which is accessible via striped Class II bicycle lanes on Woodside Road as noted in the Circulation Element. The site is located within the CalWater Service Area and the Redwood Creek Sewer Assessment District. Therefore, water and sewer service are accessible for the site. To facilitate development of affordable housing on this site, the Proposed Project includes to programs: Through Program H2.1a, the Town will rezone the site to permit residential development at 20 dwelling units per acre, and through H4.2c, the Town will partner with an affordable housing developer for the construction of workforce housing. A total of 16 multi-family housing units are projected on this site.

The release of an (Request for Proposal) RFP for affordable housing development on the two Town-owned sites is anticipated by early 2025. Town staff had preliminary conversations with non-profit affordable housing developers, who have expressed interest in the development of affordable housing on the Town-owned sites.

Table 2: 2023 – 2031 Woodside RHNA Plan

	Low and Very Low Income	*Moderate Income*	*Above Moderate Income*	*Total*
Current Zoning Sites				
Vacant Single-Family Sites			105	105
Non-Vacant Single-Family sites			44	44
Pipeline Projects	6	3	21	30
Cañada College	75			75
ADUs @ 15 units annually	72	36	12	120
Rezoning Sites				
773 Cañada Site @ 20 units/acre		16		16
High Road @ 20 units/acre	11	5		16
Raymundo @ 20 units/acre	12	5		17
Total	**176**	**65**	**182**	**423**
RHNA Allocation	**142**	**52**	**134**	**328**
RHNA Buffer @ 20%	**28**	**10**	**27**	**65**
Total RHNA + Buffer	**170**	**62**	**161**	**393**
Surplus/Deficit	**+6**	**+3**	**+21**	**+30**

Source: Town of Woodside, 2022

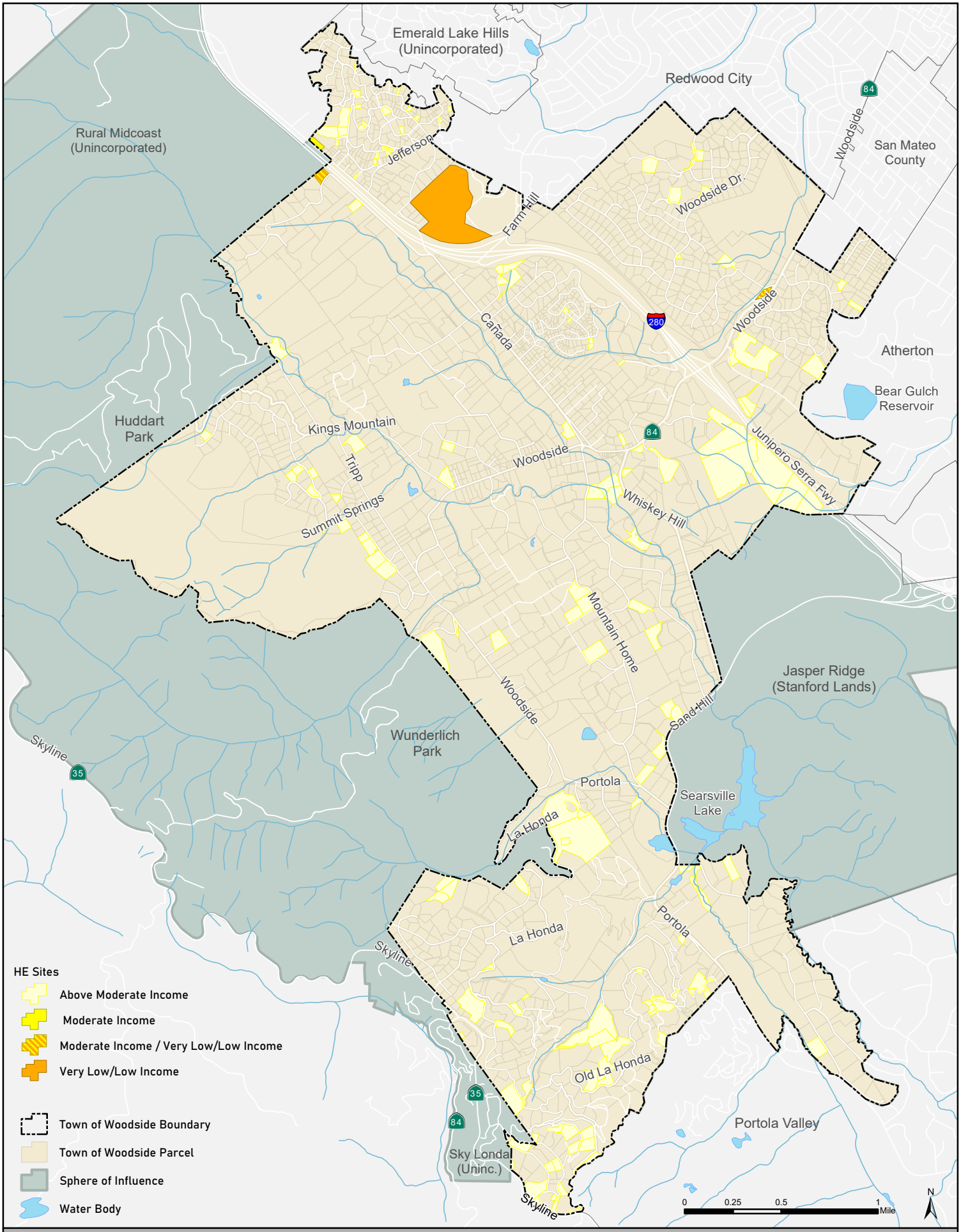


Figure 3
Housing Sites

Town of Woodside

Action Plan

Additionally, the Proposed Project incorporates six goals, supported by policies and programs to provide housing types available for households of all income levels and demographics, while balancing the objectives of State and Federal legislation enacted to preserve habitats for listed threatened and endangered species.

- **Goal H1, Increase Opportunities for Development of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs),** is supported by policies and programs that seek to minimize barriers to the construction of ADUs, by providing outreach to residents encouraging development of ADUs. Programs include preparation and distribution of brochures with information on ADUs/JADUs, an ADU survey, and consideration of modifying local regulations to permit additional ADUs on properties exceeding two acres.

- **Goal H2, Affirmatively Further Fair Housing (AFFH),** outlines programs to provide opportunities for various housing types with access to high resource area amenities (schools, libraries, retail, restaurants, and services), and transit routes: including bus stops, designated bicycle lanes, and Safe Routes to School pathways. Programs include consideration of revising SB 9 unit development standards.

- **Goal H3: Support Opportunities for High Density Housing**, details the support of new housing at Cañada College, as well as the rezoning of three sites, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and 773 Cañada Road, to meet RHNA targets, and provide varied housing types.

- **Goal H4: Promote the Availability of Housing for Special Needs Groups,** identifies opportunities to promote affordable housing for persons with disabilities of all types (not limited to physical disabilities), seniors, students, service personnel, caretakers, equestrian managers/employees, and public sector employees.

- **Goal H5: Plan for a Resilient Community**, provides programs to minimize damage from natural disasters and to provide adequate utilities, such as updating the Very High Fire Hazard Severity Zones (VHFHSZ) Map and coordinating with CALWater (California Water Service) to ensure adequate water supplies.

- **Goal H6: Conserve and Rehabilitate the Existing Housing Stock and Develop New Housing Stock,** highlights programs that will conserve and rehabilitate the existing housing stock, such as continuously applying the California Building Code, maintain and improving housing, enforcing housing standards, providing exceptions and variances, and promoting sustainability including energy efficiency.

Project Implementation

The Town of Woodside 6th Cycle 2023-2031 Housing Element Update is scheduled for adoption by Town Council in Summer- Fall 2023. Once adopted, Housing Element goals, policies, and strategies would be implemented by the Town through the adoption and

implementation of regulations, guidelines, and programs; and, through the approval process for development projects. The Housing Element includes an Action Plan for Program Implementation Matrix intended to serve as a tool for identifying schedule, status, and departments responsible for implementation of programs designed achieve the Housing Element objectives.

10. OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:

No other agency is required to approve the Housing Element update, but it will be reviewed by the California Department of Housing and Community Development (HCD) for the purpose of determining whether it complies with the requirements of the Housing Element Law.

11. NATIVE AMERICAN CONSULTATION:

In accordance with the requirements of California Public Resources Code 21080.3.1, the Town notified Native American Tribe representatives identified by the California Native American Heritage Commission (NAHC) that are traditionally and culturally affiliated with the project area. The listed NAHC representatives were notified via certified mail on November 7, 2022, and December 5, 2022. No formal requests were received for tribal consultation as of April 10, 2023.

12. SUMMARY OF ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The Proposed Project would have the following Potentially Significant Impacts to the resource areas checked below. A summary of the environmental factors potentially affected by this project, consisting of a Potentially Significant Impact or Potentially Significant Impact Unless Mitigated, are indicated by the checklist on the following pages.

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

13. ENVIRONMENTAL CHECKLIST:

This section analyzes the potential environmental impacts that may result from the Proposed Project. For the evaluation of potential impacts, the questions in the Initial Study Checklist (Section 13) are stated, and responses are provided based on the analysis undertaken as part of the Initial Study. The analysis considers the Proposed Project short-term impacts (construction-related), and its operational or day-to-day impacts. For each question, there are four possible responses. They include:

1. *No Impact.* Future development arising from the Proposed Project's implementation will not have any measurable environmental impact on the environment and no additional analysis is required.

2. *Less than Significant Impact.* The development associated with the Proposed Project's implementation will have the potential to impact the environment; these impacts, however, will be less than the levels or thresholds that are considered significant and no additional analysis is required.

3. *Potentially Significant Unless Mitigated.* The development associated with the Proposed Project's implementation will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the project's physical or operational characteristics can reduce these impacts to levels that are less than significant.

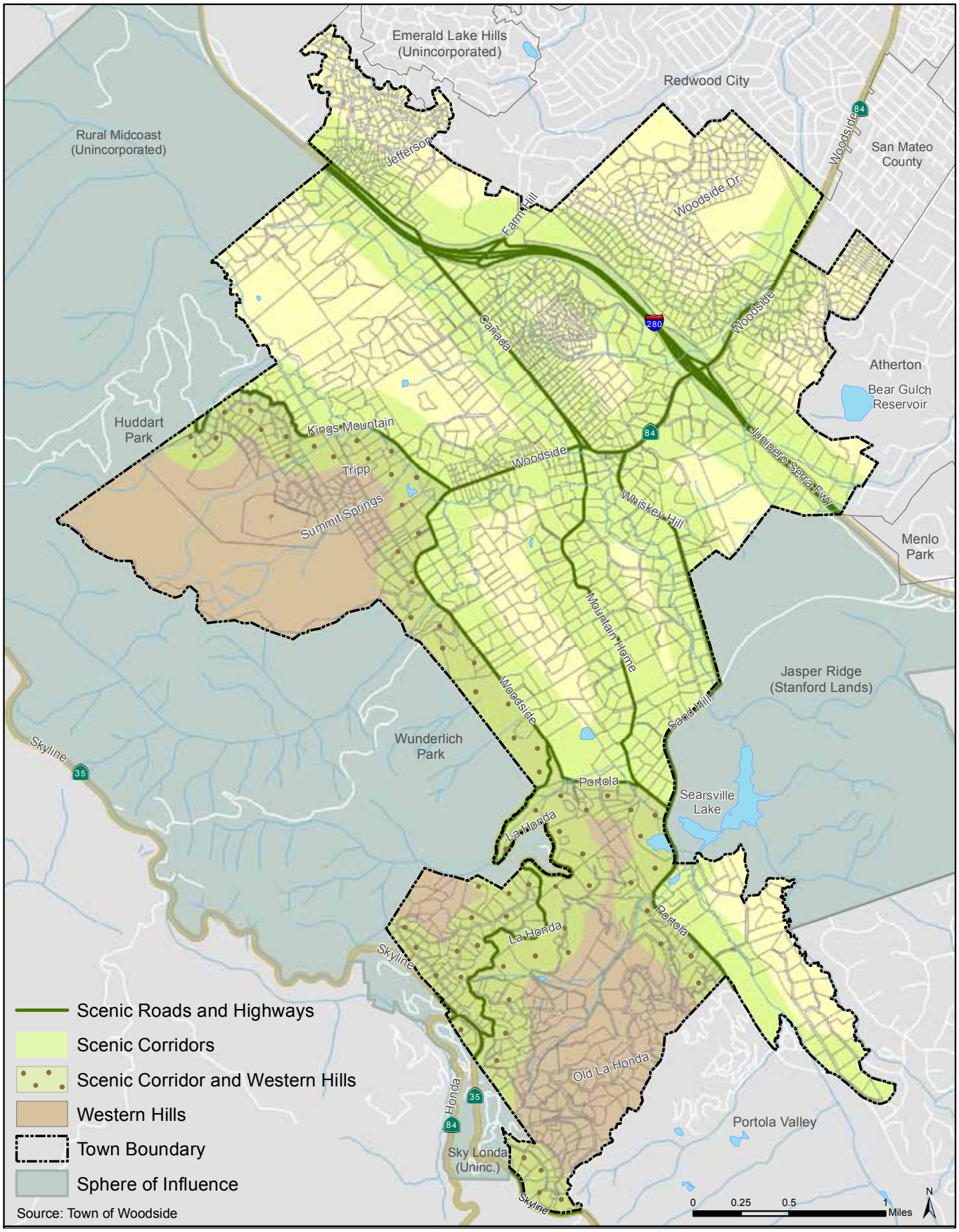
4. *Potentially Significant Impact.* Future development arising from the Proposed Project's implementation will have impacts that are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.A Aesthetics. Except as provided in Public Resources Code Section 21099, would the project:				
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 building along a State- designated scenic highway?	☐	☒	☐	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

Setting. Woodside is a residential community distinguished by its rural character, scenic vistas, natural landscapes, and equestrian heritage. The existing visual character of the Town is distinguished by wooded slopes and stream corridors of the Santa Cruz Mountains, forming the western backdrop to the town, while the central part of Woodside is characterized by gentle oak and grassland foothills, as well as flatter valley areas with rich riparian habitat. Numerous creeks flow in and through Woodside, including Redwood Creek and many tributaries of San Francisquito Creek. Woodside promotes the integration of new homes and accessory structures into the natural landscape. Woodside's neighborhoods mix old and new construction through the use of appropriate building materials and landscaping; and, through the appropriate design, scale, and siting of improvements. As a residential community of primarily large lot single-family homes and neighborhoods of dense tree canopy, the principal sources of light and glare are limited to the existing homes in the community.

Two State-designated scenic highways (I-280 and SR-35) run through the Planning Area; additionally, General Plan 2012 designates several local scenic roads and identifies scenic corridors as shown in Figure 4. General Plan 2012 also contains measures to protect scenic corridors, including Policy CL2.2 and Strategy LU1.3b. Additionally, the Town has adopted Residential Design Guidelines for the development of single-family dwellings, and Objective Design Standards for SB 9 projects, to promote the integration of new homes and accessory structures into the natural landscape.

Map CL2: Scenic Corridors



a thru d. Potentially Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. As shown on Figure 4, all of the higher density housing sites and several small-scale sites would be located within established Scenic Corridors. Further, three of the higher density housing sites (Raymundo Drive at Runnymede Road, 773 Cañada Road, and Cañada College) and several sites identified for small scale residential projects are located adjacent to State-designated Scenic Highways. Development in these locations would be subject to review for compliance with standards established in the Municipal Code to the extent they apply, including the evaluation criteria related to site planning, building design, and landscape elements in Sec. 153.915 (D). Additionally, the Town intends to adopt objective design and development standards for multi-family development which would apply to the four higher density sites; however, as these standards have not yet been adopted, there is potential for impacts to scenic vistas and corridors from buildout of the Proposed Project, as well as impacts related to conflicts with regulations governing scenic quality and light and glare. These potential impacts will be analyzed in detail in the EIR, and mitigation will be recommended to address impacts, as appropriate.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.B Agriculture and Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?	☐	☐	☒	☐
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in 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?	☐	☐	☒	☐

Setting. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established by the State Legislature in 1982 to assess the location, quality, and quantity of agricultural lands and conversion of these lands over time. The FMMP has established five Important Farmland categories. Important Farmland found in Woodside is displayed in Figure 5.

- Prime Farmland comprises the best combination of physical and chemical features able to sustain long-term agricultural production. Irrigated agricultural production is a necessary land use 4 years prior to the mapping date. The land must be able to store moisture and produce high yields.

- Farmland of Statewide Importance possesses similar characteristics to Prime Farmland with minor shortcomings, such as less ability to hold and store moisture and more pronounced slopes.

- Unique Farmland has a production history of propagating crops with high-economic value.

- Farmland of Local Importance is important to the local agricultural economy. Local advisory committees and county specific board of supervisors determine this status.

- Grazing Land is suitable for browsing or grazing of livestock.

a. Less than Significant Impact. Under the Farmland Mapping and Monitoring Program as displayed in Figure 5, the Town of Woodside is mostly categorized as "Urban and Build-Up Land" and "Other Land." There are 7.6 acres of "Prime Farmland" located in southern Woodside along Portola Road adjacent to 1.5 acres of "Unique Farmland," as well as 71.9 acres of "Grazing Land" found in northeast Woodside along both sides of I-280 (California DOC, 2022). The current General Plan Land Use designation for all Important Farmland in Woodside is R-ESA (Residential / Environmentally Sensitive Area). The zoning designation for the both "Prime Farmland" and "Unique Farmland" is SCP-5 (Special Conservation Planning-5 Acres), while the zoning designations for "Grazing Land" are both SCP-5 and SCP-7.5 (Special Conservation Planning-7.5 Acres). Woodside Municipal Code permits agricultural uses in SCP zoning district (Town of Woodside, Sec. 153.107). There are some housing sites identified for development in the Grazing Land under the Proposed Project. However, the Proposed Project would not convert existing Grazing Land in Woodside to a non-agricultural use because both zoning districts, SCP-5 and SCP-7.5, allow for continued agricultural use. Therefore, the Project would have a less than significant impact on Prime Farmland, Unique Farmland, and Grazing Land in Woodside.

b. No Impact. The Williamson Act, codified in 1965 as the California Land Conservation Act, allows local governments to enter into contracts with private landowners with the intent of restricting the use of land to agricultural or related open space through tax incentives. These incentives tax farmers based on an open space designation, which is a much lower rate than the full market value tax. Through this contract, property owners agree to preserve portions of their land as agriculture use or for open space preservation for 10 years. The current San Mateo County Williamson Act Parcel Map does not list any Williamson Contract parcels located within the Town of Woodside (County of San Mateo, 2022). Therefore, no impacts related to conflicts with agricultural zoning or Williamson Act contracts would occur.

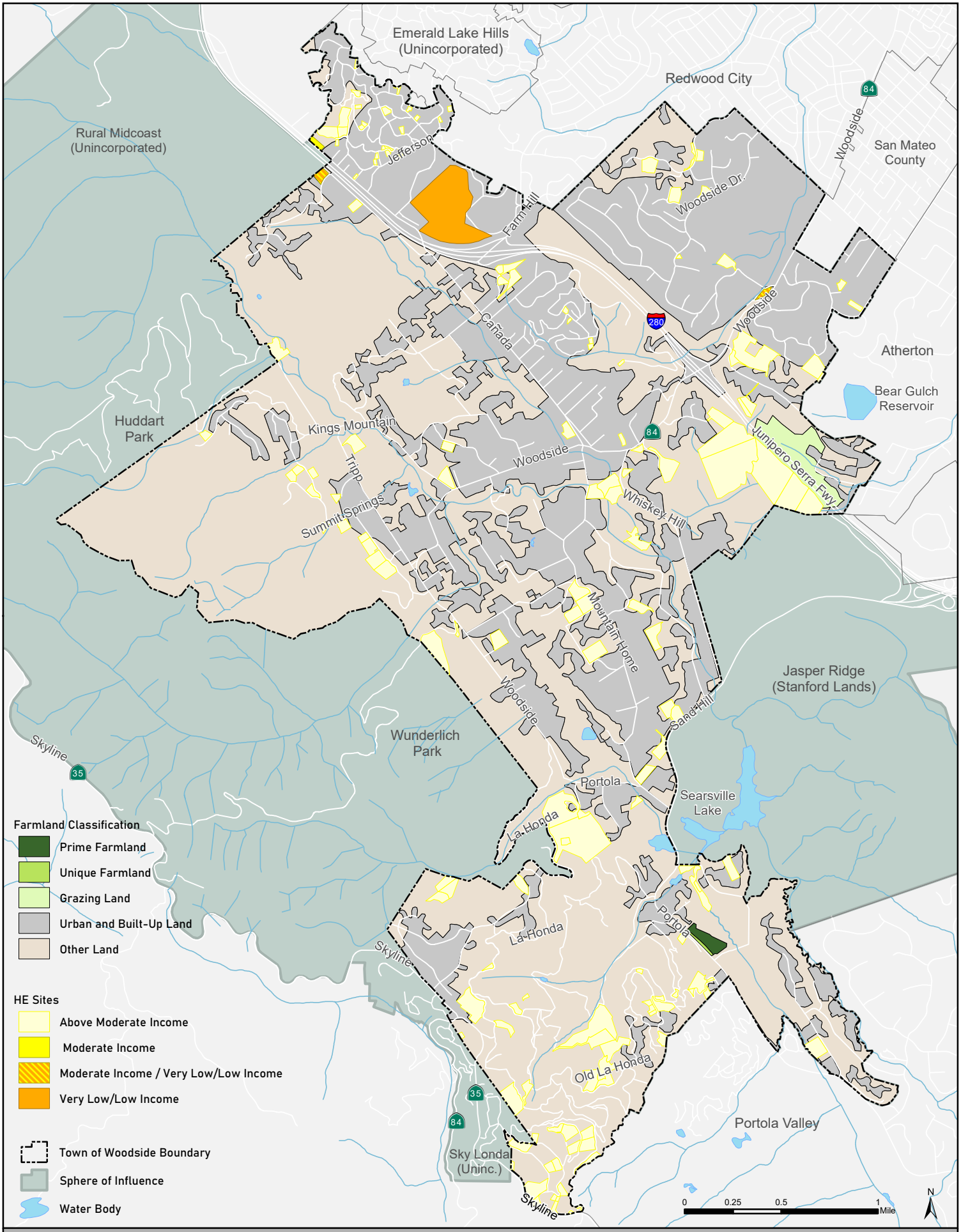


Figure 5
Important Farmland in Woodside

Town of Woodside

c. Less than Significant Impact. In the Public Resources Code (PRC) section 4526, the California Board of Forestry and Fire Protection defines "Timberland" as land, not owned by the federal government, nor designated as experiential forest land, which is capable and available for growing any commercial tree species. The board defines commercial trees on a district basis following consultation with district committees and other necessary parties. There is no land within the Town of Woodside zoned for timberland production or that otherwise meets this definition. The PRC section 12220 (g) defines forest land as ". . . land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." While wooded hillsides in Woodside may support more than 10 percent native tree coverage, development pursuant to the Proposed Project would take place on parcels currently zoned for residential uses and as such no conflicts would result from Project implementation. Impacts would be less than significant.

d. Less than Significant Impact. While wooded hillside areas of Woodside may meet the definition of forest land in the PRC, any development pursuant to the Proposed Project would be on parcels currently zoned for residential uses and would not result in the loss of forest land or conversion of forest land to non-forest use. Impacts would be less than significant.

e. Less than Significant Impact. Woodside is a quiet residential community located in the highly urbanized context of the San Francisco Bay Area. As described above, Important Farmland in Woodside is zoned for agricultural uses and the Proposed Project would not involve rezoning of Important Farmland to non-agricultural uses. While wooded hillside areas of Woodside may meet the definition of forest land, all development pursuant to the Proposed Project would be on land currently zoned for residential uses. Buildout of the Proposed Project would involve construction of smaller-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, and would not 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. Impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.C Air Quality. Where applicable, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under the applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting. The Town of Woodside is located within the San Francisco Bay Area Air Basin (Air Basin). The Bay Area Air Quality Management District (BAAQMD) is the air pollution control agency for the Air Basin and is responsible for air quality management plans (AQMP) to achieve air quality standards. The Air Basin is an area designated as non-attainment because it does not currently meet National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for certain pollutants regulated under the Clean Air Act and California Clean Air Act, respectively. Specifically, the Air Basin does not meet the NAAQS for ozone, PM10, and PM2.5.

a. Less than Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Development would happen incrementally over the course of eight years, from 2023-2031. The BAAQMD's 2017 Clean Air Plan is the applicable air quality plan for projects located in the Air Basin. The primary goals of the 2017 Clean Air Plan are the attainment all state and national air quality standards, elimination of disparities among Bay Area communities in cancer health risk from toxic air contaminants, and the reduction of Bay Area GHG emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. Consistency may be determined by evaluating whether the Proposed Project supports the primary goals of the 2017 Clean Air Plan, including applicable control measures contained within the 2017 Clean Air Plan, and would not conflict with or obstruct implementation of any 2017 Clean Air Plan control measures. The control measures are organized into nine categories: stationary sources, transportation, buildings, energy, agriculture, natural and working lands, waste, water, and super-GHG pollutants (e.g., methane, black carbon, and fluorinated gases).

The stationary source measures, which are designed to reduce emissions from stationary sources, are incorporated into rules adopted by the BAAQMD and then enforced by the BAAQMD's Permit

and Inspection programs. Development under the project would be subject to the BAAQMD's permitting requirements for stationary sources. Therefore, the Proposed Project would be consistent with the stationary source control measures.

The transportation control measures are designed to reduce vehicle trips, use, miles traveled, idling, or traffic congestion for the purpose of reducing vehicle emissions. The Town adopted a Multi-Family Residential Development Overlay at Cañada College during the fifth cycle Housing Element, which provides an opportunity for higher density residential development. The Proposed Project demonstrates capacity for 75 units of housing at Cañada College, which would eliminate the need for vehicle trips, miles traveled, or traffic congestion, as residents would be able to live, work, and attend classes on the same site. Additionally, as noted in Section 13.Q Transportation, transit services operate from Cañada College to the Redwood City Transit Center, which would support the reduction vehicle trips and emissions. The Town of Woodside also has various Class II and Class II bikeways on arterial roads with proximity to multi-family development sites, such as the Class II bikeway on Cañada Road near the Raymundo Drive site and Class II bikeways on Woodside Road near the High Road site. With this, the Proposed Project would not conflict with the goals for transportation control in the 2017 Clean Air Plan.

The energy control measures are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Peninsula Clean Energy (PCE) is the official electricity provider for the Town and provides every residence and business with 100 percent access to clean and renewable energy. For residence and business that do not choose PCE, Pacific Gas and Electric Company (PG&E) supplies 93 percent of its electric power mix from a combination of renewable and GHG-free sources. (Pacific Gas and Electric, 2019). With this, the Proposed Project would be consistent with the goals for energy control measures.

The BAAQMD has authority to regulate emissions from certain sources in buildings such as boilers and water heaters but has limited authority to regulate buildings themselves. Therefore, the building control measures focus on working with local governments that have authority over local building codes to facilitate adoption of best practices and policies to control GHG emissions. Future projects within the Town will be required to meet the minimum code efficiency requirements for the Title-24 Green Building Standards Code and Energy Code. Therefore, the project would be consistent with the buildings control measures.

The agriculture control measures are designed to primarily reduce emissions of methane. Since the Proposed Project does not include any agricultural activities, the agriculture control measures of the 2017 Clean Air Plan are not applicable to the project. Similarly, the control measures for the natural and working lands sector focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to ordinances that promote urban-tree plantings. Since the Proposed Project does not include the disturbance of any rangelands or wetlands, the natural and working lands control measures of the 2017 Clean Air Plan are not applicable to the project.

The waste management measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. Future development under the Proposed

Project would comply with local requirements for waste management as mentioned in Section 13.S Utilities and Service Systems. Therefore, the Proposed Project would be consistent with the waste management control measures.

The water control measures to reduce emissions from the water sector will reduce emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. Since these measures apply to POTWs and local government agencies (and not individual projects), the water control measures of the 2017 Clean Air Plan are not applicable to the Proposed Project.

The super-GHG control measures are designed to facilitate the adoption of best GHG control practices and policies through the BAAQMD and local government agencies. Since these measures do not apply to individual projects, the super-GHG control measures of the 2017 Clean Air Plan are not applicable to the Proposed Project.

Overall, the Proposed Project would be consistent with applicable control measures from the 2017 Clean Air Plan. The Proposed Project focuses on promoting infill development on existing residential lots and within urbanized areas, preserving existing residential units, implementing sustainable and environmentally sensitive design, and promoting multimodal mobility, all of which support the goals of the Clean Air Plan. Therefore, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, and the impact would be less than significant.

b. Less than Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Development would begin incrementally over the course of eight years, from 2023-2031. To meet the Threshold of Significance for operational-related criteria air pollutant and precursor impacts for plans (other than regional plans), a proposed plan must satisfy the following criteria:

- Consistency with current air quality plan (AQP) control measures (this requirement applies to project-level as well as plan-level analyses).

- A proposed plan's projected VMT or vehicle trips (VT) (either measure may be used) increase is less than or equal to its projected population increase.

AQPs may be clean air plans, state implementation plans (SIPS), ozone plans, and other potential air quality plans developed by BAAQMD. To date, the Air District's most current plan is the 2017 Clean Air Plan. The primary goals of the 2017 Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health in the Bay Area, reduce GHG emissions, and protect the climate. The Proposed Project focuses on promoting infill development on existing residential lots and within urbanized areas, and preserving existing residential units, all of which would support the goals of the Clean Air Plan (proposed policies 2.1, 2.2, 2.4, 3.2, 3.3, 3.4, and proposed programs 2-B, 2-C, 3-A, 3-B, 3-D, and 3-K). Other fundamental components of the Proposed Project also support the goals of the Clean Air Plan. The Proposed Project's criteria for selecting Housing Opportunity areas includes adequate neighborhood service and neighborhood facility access which support less energy consumption and fewer vehicle trips compared to the current more auto-oriented development pattern. Therefore, the Proposed Project would support the

primary goals of the Clean Air Plan and have a less than significant impact with respect to conflicts with the 2017 Clean Air Plan.

Townwide VMT projections under existing 2020 conditions and for future 2031 VMT, accounting for buildout of the cumulative Proposed Project indicate that 2031 future Proposed Project generated home-based VMT per resident would be 24.8, which is below the existing Woodside average home-based VMT per resident, which is less than the projected population increase. As such, operational impacts from implementation of the Proposed Project would be less than significant.

c. Potentially Significant Impact. Development would happen incrementally over the course of eight years, from 2023-2031, which would minimize construction-related air quality impacts. Additionally, buildout of the Proposed Project would involve construction of small-scale residential projects, which would not generate substantial quantities of construction-related pollution. Nevertheless, higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College could involve diesel-emitting equipment over many months and could potentially impact adjacent sensitive receptors. Therefore, this potentially significant construction-related air quality impact will be analyzed in detail in the EIR.

Operation of the Proposed Project could result in a significant impact if residential development would result in areas of vehicle congestion that have the potential to create or exacerbate pockets of CO called hotspots. These pockets have the potential to exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. However, under existing and future vehicle emission rates, a plan would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour in order to generate a significant CO impact and the423 new housing units anticipated with buildout of the Proposed Project would not generate traffic volumes of this magnitude. Because there is not an intersection that generates more than 44,000 vehicles per hour, the Proposed Project would not result in substantial amounts of pollution. Therefore, operational-relation air quality impacts would be less than significant under the Proposed Project.

d. Less than Significant Impact. According to the BAAQMD, land uses associated with odor complaints typically include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. Residential development does not create substantial odors. Potential odor emitters during construction include diesel exhaust and evaporative emissions generated by asphalt paving and the application of architectural coatings. Construction-related activities near existing receptors would be temporary in nature, and construction activities would not result in nuisance odors. Potential odor emitters during operations would include exhaust from vehicles and fumes from the reapplication of architectural coatings as part of ongoing building maintenance. However, odor impacts would be limited to circulation routes, parking areas, and areas immediately adjacent to recently painted structures. Although such brief exhaust- and paint-related odors may be considered adverse, they would not be atypical of developed urban areas and would not affect a substantial number of people or rise to the level of a significant impact under CEQA. Because the Proposed Project would not result in a new, substantial, or long-term source of odors, this impact would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.D Biological Resources. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the 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 Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Setting. The Town of Woodside contains a wide variety of natural and biological resources, including gentle oak and grassland foothills, flatter valley areas, valley stream corridors containing riparian habitat, as well as flood plains, ground water aquifers and seismic rift zones. The portion of Town east of Interstate 280 is predominantly mixed oak woodland. The Town's location provides a natural habitat for flora and fauna, including some endangered and threatened plant and wildlife species, while the riparian corridors along the creeks provide habitat and movement corridors for wildlife.

A "special-status species" refers to species that are considered sufficiently rare that they require special consideration and/or protection and should be, or have been, listed as rare, threatened, or endangered by Federal and/or State governments. Information regarding the occurrences of special-status species in the vicinity of the Planning Area was obtained from a query of the CDFW's California Natural Diversity Database (CNDDB). The CNDDB is regularly updated to track occurrences of previously documented special-status species; however, it contains only those records that have been submitted to CDFW. Therefore, there may be additional occurrences of special-status species within the area that have not yet been surveyed and/or mapped. A lack of information in the CNDDB about a species or an area does not imply that the species does not occur or that there

is a lack of diversity in that area. Based on the records search shown in Table 3 and Table 4 as well as Figure 6 and Figure 7, 15 special-status plant species and 20 special-status wildlife species were identified as having the potential to occur in the Planning Area.

a thru d. Potentially Significant Impact. Given the extent of biological resources throughout the community, future development pursuant to the Proposed Project has the potential to adversely affect sensitive species, riparian habitats, sensitive communities, and federally protected wetlands.

There are 15 special-status plant species and 20 special-status wildlife species were identified as having the potential to occur throughout the Planning Area, as shown in Figure 6 and Figure 7. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Pursuant to CEQA Section 15303, the State has determined that projects involving three or fewer single-family homes or multifamily projects involving four or fewer units would not have a significant effect on the environment. Larger scale projects anticipated with buildout of the Proposed Project, including the Cañada College site, High Road site, and 773 Cañada Road, site could have a significant direct or indirect impact on special-status species if it would result in the removal, disturbance, or degradation of the species or potentially suitable habitat. For riparian habitats, impacts could occur on sites identified for development located adjacent to creeks. There is a chance that riparian habitat and other sensitive communities could be impacted throughout the buildout of the Proposed Project during construction activities, such as grading, excavation, and removal of vegetation. Development pursuant to the Proposed Project would be required to comply with federal and State regulations related to biological resources, including the Federal Endangered Species Act, Clean Water Act, California Endangered Species Act, California Fish and Game Code, and the California Native Plant Protection Act. General Plan policies and Municipal Code requirements would further reduce impacts on biological resources by requiring the protection of environmental resources, retention of natural areas, and creek setbacks to protect riparian habitat. While federal, State, regional, and General Plan policies need to be complied with by the Proposed Project, potential impacts to biological resources remain potentially significant and will be studied further in the EIR.

Table 3: Special-Status Plant Species with the Potential to Occur in the Planning Area

Scientific Name	*Common Name*	*Status*	
		USFWS[1]	*CDFW*[2]
Serpentine Bunchgrass	Serpentine Bunchgrass	None	None
Acanthomintha duttonii	San Mateo thorn-mint	Endangered	Endangered
Monolopia gracilens	woodland woollythreads	None	None
Plagiobothrys chorisianus var. chorisianus	Choris' popcornflower	None	None
Trifolium amoenum	two-fork clover	Endangered	None
Arctostaphylos regismontana	Kings Mountain manzanita	None	None
Arctostaphylos andersonii	Anderson's manzanita	None	None
Eryngium jepsonii	Jepson's coyote-thistle	None	None
Dirca occidentalis	western leatherwood	None	None
Pentachaeta bellidiflora	white-rayed pentachaeta	Endangered	Endangered
Allium peninsulare var. franciscanum	Franciscan onion	None	None
Fritillaria liliacea	fragrant fritillary	None	None
Hesperolinon congestum	Marin western flax	Threatened	Threatened
Malacothamnus arcuatus	arcuate bush-mallow	None	None
Cirsium fontinale var. fontinale	fountain thistle	Endangered	Endangered

Source: CNDDB GIS Data, California Department of Fish and Wildlife, 2022

Table 4: Special-Status Animal Species with the Potential to Occur in the Planning Area

Scientific Name	*Common Name*	*Status*	
		USFWS[1]	*CDFW*[2]
Thamnophis sirtalis tetrataenia	San Francisco gartersnake	Endangered	Endangered
Falco peregrinus anatum	American peregrine falcon	Delisted	Delisted
Bombus caliginosus	obscure bumble bee	None	None
Dicamptodon ensatus	California giant salamander	None	None
Lasiurus cinereus	hoary bat	None	None
Rana boylii pop. 4	foothill yellow-legged frog - central coast DPS	Proposed Threatened	Endangered
Microcina edgewoodensis	Edgewood Park micro-blind harvestman	None	None
Dipodomys venustus venustus	Santa Cruz kangaroo rat	None	None
North Central Coast Steelhead/Sculpin Stream	North Central Coast Steelhead/Sculpin Stream	None	None
Corynorhinus townsendii	Townsend's big-eared bat	None	None
Antrozous pallidus	pallid bat	None	None
Bombus occidentalis	western bumble bee	None	Candidate Endangered
Taxidea taxus	American badger	None	None
Aneides niger	Santa Cruz black salamander	None	None
Euphydryas editha bayensis	Bay checkerspot butterfly	Threatened	None
Rana draytonii	California red-legged frog	Threatened	None
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	None	None
Emys marmorata	western pond turtle	None	None
Neotoma fuscipes annectens	San Francisco dusky-footed woodrat	None	None
Ambystoma californiense pop. 1	California tiger salamander - central California DPS	Threatened	Threatened

Source: CNDDB GIS Data, California Department of Fish and Wildlife, 2022

e. Less than Significant Impact. A significant impact would occur if the Proposed Project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Woodside has a Tree Protection Ordinance, Municipal Code Section 153.430, which promotes and enhances a community environment, maintains the rural character, and ensures the maximum preservation of the valuable natural features and scenic character as

stated in the General Plan of the Town. The Tree Ordinance establishes minimum standards and requirements relating to the protection of trees. The Woodside General Plan, specifically the Conservation Element, includes goals and policies that development under the Proposed Project would be subject to as well. These policies include but are not limited to the conservation and utilization of natural resources, and protection of the aesthetic qualities of the community. Additionally, as noted in Policy CV1.1, Plan Development to be Sensitive to Preservation of Natural Features and Landscape, all projects that may have significant impact on the Woodside environment shall be reviewed by qualified professionals. Specific requirements may include a biotic report and pre-construction surveys to identify and mitigate potential impacts. The Town's Stream Corridor Protection Ordinance, Municipal Code Section 153.440, states that a protected stream corridor extends a horizontal distance of 50 feet measured from each side of the centerline of the stream, or 25 feet measured from the top of bank, whichever is greater. The Planning Commission may establish greater horizontal measurements for specific stream corridors. Development under the Proposed Project would comply with all local policies and ordinances protecting biological resources, including the Tree Protection Ordinance and the Stream Corridor Protection Ordinance. As a result, the Proposed Project would not conflict with local policies or ordinances protecting biological resources, and a less than significant impact would occur.

f. Less than Significant Impact. A significant impact would occur if a project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There is an adopted Habitat Management Plan (HMP) in Woodside for the Sand Hill Estates Project situated on about 91.4 acres of land located west of I-280, between Woodside Road and Sand Hill Road. The Sand Hill Estates Project includes construction of a roadway and driveways to support future development of single-family residences within designated buildable areas on five parcels. Buildout of the Proposed Project would include development on the five parcels in the Conservation Area in HMP, which include APNs 073-150-005, 073-15-020, 073-15-012, 073-15-019, 073-15-018. Consistent with the HMP, layout and design of the housing development would be required to occur within the buildable areas of Conservation Area and would be required to implement the minimization and mitigation measures identified in the HMP to protect and maintain habitat for the California red-legged frog (CRLF) and other sensitive species that may be present in the area, while still allowing development in buildable areas. The minimization and mitigation measures are listed in section 2.0 of the Sand Hill Estates Project HMP, included in Appendix A. Therefore, with implementation of Minimization and Mitigation Measures listed in HMP, buildout of the Proposed Project would not conflict with any approved Habitat Conservation Plan, and impacts would be less than significant with mitigation.

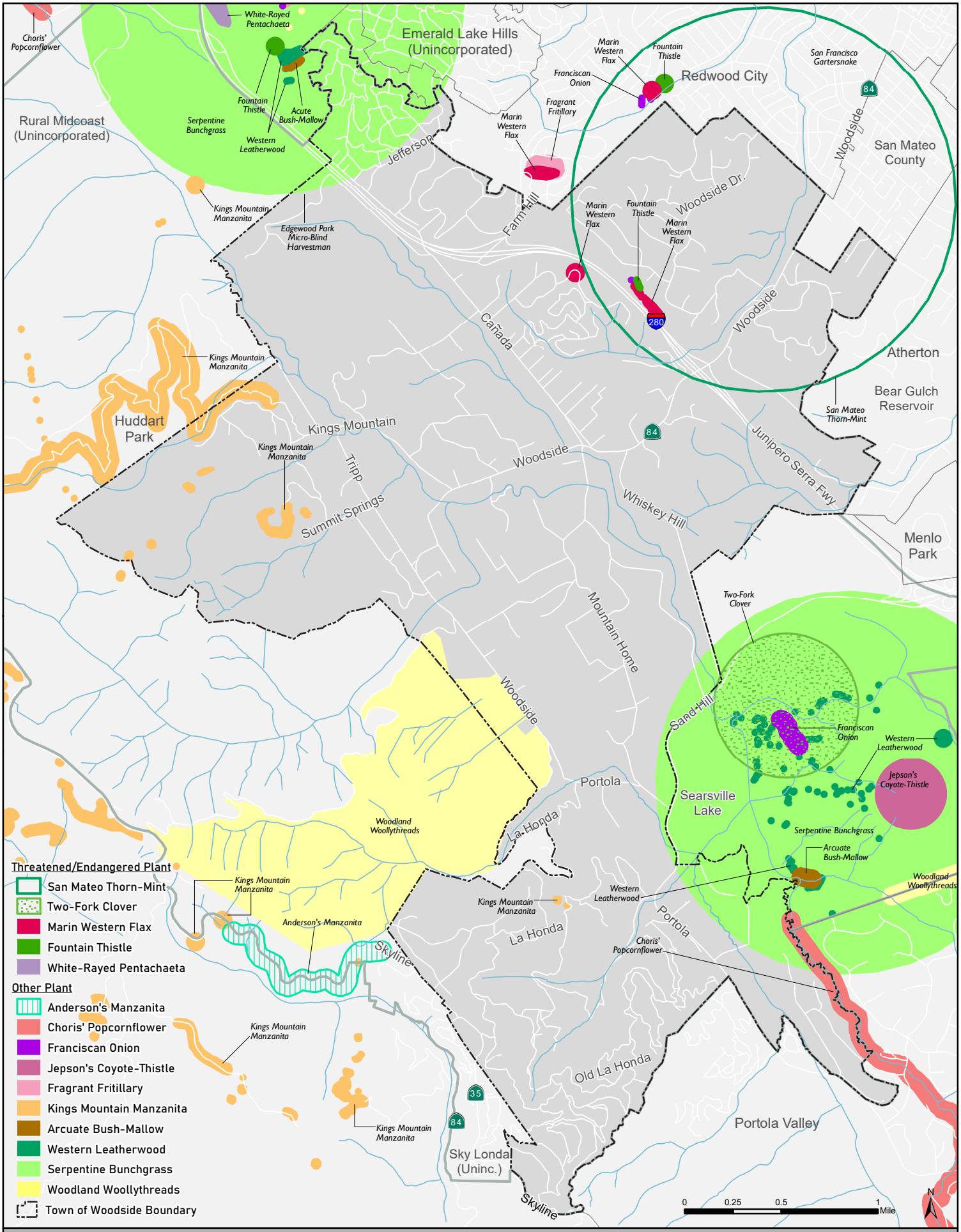


Figure 6
Threatened and Endangered Plant Species

Town of Woodside

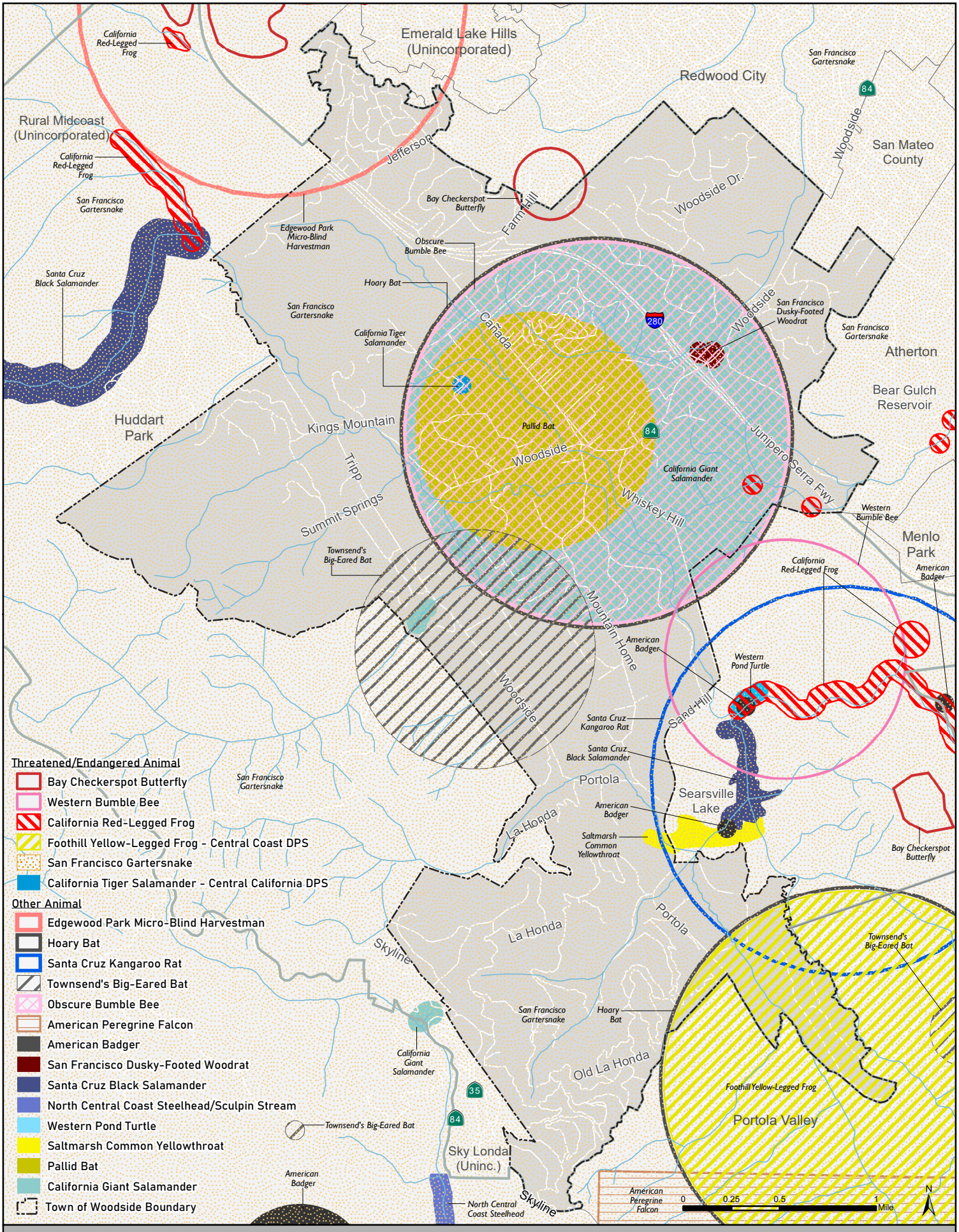


Figure 7
Threatened and Endangered Animal Species

Town of Woodside

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.E Cultural Resources. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Setting. To determine the presence or absence of cultural and historical resources within the Proposed Project site and the surrounding area, a records search and literature review was requested for the Planning Area on November 1, 2022, at the Northwest Information Center (NWIC), located at Sonoma State University. The purpose of this review was to access existing cultural resource survey reports, archaeological site records and historic maps, and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the town. According to the NWIC results, the State Office of Historic Preservation Built Environment Resources Directory (OHPBERD) lists thirty-four (34) recorded buildings or structures within or adjacent the Town of Woodside. In addition to these inventories, the NWIC maps show thirty-seven (37) recorded buildings or structures within the town limits. The Caltrans Bridge Inventory also indicates thirteen historic bridges in the town. Given these resources, NWIC also determines that there is a high potential for unrecorded historic-period archaeological resources to be within the town limits.

Further, the Town of Woodside contains nineteen (19) recorded Native American archaeological resources. Based on an evaluation of the environmental setting and features associated with known sites, Native American resources in this part of San Mateo County have been found on ridges, midslope benches, in valleys, near intermittent and perennial watercourses and near areas populated by oak, buckeye, manzanita, and pine, as well as near a variety of plant and animal resources. The Town of Woodside is located in San Mateo County and includes a portion of Santa Cruz Mountains, Kings Mountain, San Andreas Rift Zone, Jasper Ridge, and several creeks including, La Honda Creek, West Union Creek, McGarvey Gulch, Martin Creek, Alambique Creek, Corte De Madera Creek, Searsville Lake, Schilling Lake, Bear Creek, San Francisquito Creek, and several springs. Aerial maps indicate a heavily wooded and densely chapparraled Western half with a few roads, buildings and structures. The Eastern half, although still fairly wooded, is more densely populated by buildings structures and includes large areas of low grasses or bare ground. Given the similarity of these environmental factors the ethnographic and archaeological sensitivity of the Planning Area, there is a high potential for unrecorded Native American resources to be within the Town limits.

Details of the recorded archaeological and historic resources are included in Appendix B – Supporting Materials for Cultural Resources.

Table 5: Identified Historical Resources

Primary Number	*OTIS ID*	*Name of Property (if Applicable)*	*St #*	*St Name*	*City*	*Evaluation Info*	*Circa*
41-001810	497439	ALLEN PEAK FIRE LOOKOUT STATION			WOODSIDE	4CM, 09/11/1996, ST.AG.-3540-0050	1966
41-000716	408301	INDEPENDENCE HALL	2955	WOODSIDE ROAD	WOODSIDE	1S, 01/01/1978, 4062- 08/03/1978, NPS - 78000772-0000	1884
41-000719	408304	MAIN HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0001	1917
41-000720	408305	TERRACED GARDEN AND LILY POND	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0002	1912
41-000721	408306	ROMAN POOL, WATERGARDENS	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0003	1912
41-000722	408307	MAIN DRIVE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0004	1912
41-000723	408308	SWIMMING POOL & ATTENDANT STRUCTURES	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0005	1916
41-000724	408309	DAIRY HOUSE, GREENE`S FOLLY	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0006	1928
41-000725	408310	ELEANOR FLEISHHACKER SLOSS HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0007	1931
41-000726	408311	CAMPERDOWN ELM ALLEE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0008	1930
41-000727	408312	BUTLER`S HOUSE, GROUNDSKEEPER'S HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0009	1931
41-000728	408313	EARTH DAM	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0010	1913
41-000729	408314	VICTORIAN FARMHOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0011	1892
41-000730	408315	VICTORIAN WATER TOWER	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0012	1892
41-000731	408316	AUTO BARN	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0013	1907

Table 5: Identified Historical Resources

Primary Number	*OTIS ID*	*Name of Property (if Applicable)*	*St #*	*St Name*	*City*	*Evaluation Info*	*Circa*
41-000732	408317	GREENHOUSE REMNANTS	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0014	1915
41-000733	408318	DAVID FLEISHHACKER HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062 - 0004-0015	1972
41-000734	408319	MORTIMER FLEISHHACKER III HOUSE	329	ALBION AVE	WOODSIDE	7R, 4062-0004-0016	1962
41-000735	408320	FLEISHHACKER BARN REMNANT	329	ALBION AVE	WOODSIDE	7R, 4062-0004-0017	1911
41-000736	408321	BELLA GERSTLE FLEISHHACKER'S STUDIO	329	ALBION AVE	WOODSIDE	7R, 4062-0004-0018	1950
41-000737	408322	TENNIS COURT	329	ALBION AVE	WOODSIDE	7R, 4062-0004-0019	1965
41-000738	408323	GREEN GABLES|COUNTRY HOUSE|FLEISHHACKER|MORTIMER	329	ALBION AVE	WOODSIDE	1S, 01/01/1986, 4062-0004-9999 | 1S, 09/26/1986, NPS-86002396-0000	1911-1935
41-001502	488361	SHINE HOUSE		CANADA RD	WOODSIDE	7P, 05/19/1971, SPHISMA-014	1882
41-000186	408302	Bourn-Roth Estate	86	CANADA RD	WOODSIDE	1CL, 02/08/1977, SHL-0907-0000 | 1S, 08/28/1975, 4062-0002-0000 | 1S, 08/28/1975, NPS-75000479-0000	1915
41-000718	408303	Woodside Store | Woodside Store Or Tripp Store	471	KING MOUNTAIN RD	WOODSIDE	1S, 07/18/1985, 4062-0003-0000 NPS - 85001563-0000 | 1S, 07/18/1985, NPS - 85001563-0000 | 3S,	1854

Table 5: Identified Historical Resources

Primary Number	*OTIS ID*	*Name of Property (if Applicable)*	*St #*	*St Name*	*City*	*Evaluation Info*	*Circa*
						4062-0003-0000 | 7L, 03/29/1933, SHL-0093-0000	
41-001831	507092	BRIDGE #35C-122		MOUNTAIN DR	WOODSIDE	2S2, 10/19/1986, DOE-41-86-0003-0000 | 2S2, 10/19/1986, FHWA860919Z	1900
41-001832	507093	BRIDGE #35C-123		MOUNTAIN DR	WOODSIDE	2S2, 10/19/1986, DOE-41-86-0004-0000 | 2S2, 10/19/1986, FHWA860919Z	1903
	557903		17554	SKYLINE BLVD	WOODSIDE	6Y, 05/23/2003, DOE - 43-03-0013-0000 | 6Y, 05/23/2003, HUD030516T	1929
	532955	SKEGGS POINT SCENIC VIEW		SR 35	WOODSIDE	6Y, 02/26/2007, FHWA070125A	1934
41-000633	408212	BEAR CREEK BRIDGE, BRIDGE #35-44		SR 84	WOODSIDE	7R, 4027-0001-0000	1903
41-000634	408213	BRIDGE #35-45		SR 84	WOODSIDE	7R, 4027-0002-0000	1904
41-002353	408214	SAN FRANCISQUITO CREEK BRIDGE, BRIDGE #35-68	SR 84	WOODSIDE	7N, , 4027-0003-0000	1903	9/23/2022
	668181	Woodside Fire Station No. 7	3111	Woodside Rd	Woodside	6Y, 09/05/2016, FCC_2016_0616_004	
	553762	FOLGER ESTATE STABLE HISTORIC DISTRICT	4040	WOODSIDE RD	WOODSIDE	1S, 04/16/2004, NPS- 04000328-9999 | 3S, 02/06/2004, 41-0034	1905-1941

a. No Impact. A significant impact would occur if development of the Proposed Project would cause a substantial adverse change in the significance of a historical resource. According to the NWIC results, the State Office of Historic Preservation Built Environment Resources Directory (OHPBERD) lists thirty-four (34) recorded buildings or structures within or adjacent the Town of Woodside. In addition to these inventories, the NWIC base maps show thirty-seven (37) recorded buildings or structures within the town limits. None of the sites on the Housing Element inventory contains historic buildings or structures as identified by NWIC. As such, development of the Proposed Project would not cause significant adverse change of historic resources, and no impact would occur.

b. Less than Significant Impact. The Proposed Project would plans for the construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. There are several homes, buildings, and structures older than 50 years in the Planning Area that may be eligible for listing on local, state, or national registers. The Historic Preservation Element also lists Goal HP1 to protect historically and archaeologically significant structures, sites, and artifacts with specific strategies. The Town of Woodside Residential Design Guidelines introduces regulations that can reduce impacts on potential historic resources. Such guidelines require development to preserve buildings and structures that contribute to community fabric. Preservation or adaptive reuse of existing or historic structures is preferred over demolition. Development of the Proposed Project would need to adhere to the General Plan and Town Residential Design Guidelines, with respect to historic and archaeological resources. As such, with compliance of existing regulations, implementation of the Proposed Project would result in a less than significant impact to historic and archeological resources.

c. Less than Significant Impact. Buildout of the proposed project includes construction of small-scale residential projects as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, not in areas known to contain human remains. However, there is always the possibility that subsurface construction activities associated with the Proposed Project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94 and Section 5097.98 must be followed. Thus, with compliance of existing regulations, implementation of the Proposed Project would result in a less than significant impact to disturbance of human remains.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.F Energy. Would the project:				
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting. Energy resources in the State of California include natural gas, electricity, water, wind, oil, coal, solar, geothermal, and nuclear resources. Energy production and energy use both result in the depletion of nonrenewable resources, such as oil, natural gas, and coal, and result in the emissions of pollutants. Peninsula Clean Energy provides electricity to the Planning Area. All buildings within the Planning Area have existing connections to infrastructure, although the vacant areas do not.

a and b. Less than Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. A significant impact would occur if development under the Proposed Project would result in potentially significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources during project construction and operation. The construction and long-term operation of residential development is needed to meet projected demand in the Town of Woodside, which is thereby necessary and not wasteful. Future development would be required to comply with the California Green Building Standards Code and California's Title 24 Building Energy Efficiency Standards. This includes the update to Title 24, effective January 1, 2023, which requires that all new homes under three stories install solar panels. Title 24 also applies to ADUs and requires them to include a solar energy system that can generate enough to offset the dwelling's annual electrical usage. The Town also verifies compliance with the California Building Code (CBC) as part of the building permit issuance and construction inspection process. The Town's General Plan also adopted a number of sustainability building and energy efficiency goals and policies in the Sustainability Element that development under the Proposed Project would be subject to as well, such as encouraging and supporting renewable clean energy and requiring new buildings to be designed energy efficiently. Additionally, the Town's Draft Housing Element also lists a policy and programs aligned with energy conservation, which includes Policy H6.3 – Promote Sustainability Including Energy Efficient and Sustainability. This policy specifies the Town's continued compliance with Title 24 and inclusion of energy saving siting, features, and materials in the retrofit of existing and new units. Given the level of buildout and compliance with existing regulations, the Proposed Project would result in a less than significant impact to energy resources.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.G Geology and Soils. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☒	☐	☐	☐
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- site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. 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?	☐	☐	☒	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Setting. The Town of Woodside is situated in the seismically active San Francisco Bay Area. The regional seismic setting is dominated by stress associated with the oblique collision of the Pacific tectonic plate with the North American tectonic plate. The boundary between the two tectonic plates is the San Andreas fault system, which extends nearly 700 miles along a northwest trend from Mexico to offshore northern California. The San Andreas fault system includes the San Andreas, Hayward, Calaveras, Seal Cove-San Gregorio, and other related faults in the San Francisco Bay area. According to the U.S. Geological Survey, there is a 72 percent chance of at least a magnitude 6.7 (or greater) earthquake in the San Francisco Bay region within the next 30 years. There are two active faults within Woodside designated under the Alquist-Priolo Earthquake Fault Zoning Act: the San Andreas Fault and the Hermit Fault. The Pilarcitos Fault also exists within Woodside, though it is not designated under the Alquist-Priolo Earthquake Fault Zoning Act. Because of these faults, the Town is subject to high levels of ground shaking.

Creekside and hillside areas, which comprise the majority of the built environment in Woodside, are most vulnerable to damage caused by seismic-related ground failure. Creekside development on alluvial deposits can experience differential settlement caused by liquefaction. Most land within the Town limit is located in areas of very low and moderate areas of earthquake liquefaction susceptibility, with pockets of high susceptibility areas near Searsville Lake and Corte Madera Creek on the southeastern part of Woodside. Hillside construction is also vulnerable to earthquake-induced landslides. There is a strip of land in the middle of Woodside, running from north to south into the Town of Portola Valley, of flat land where the hazard of landslides is minimal. Most of Woodside is located on areas of "few landslides", while there are pockets of areas that are in "most landslides. "Landslide vulnerability is increased during periods of intense or prolonged rainfall when soils become saturated.

Large areas of the Town of Woodside are underlain by the expansive soils of the Whiskey Hill Formation (formerly Butano Formation) and the Santa Clara Formation, both of which are known to have potentially expansive units (predominantly claystone). Soils and surficial deposits, including colluvium, alluvium, and landslide deposits, derived from these formations can also be potentially expansive. In addition, serpentinite, which underlies portions of the eastern hills, can weather to soils that are potentially expansive.

a (i and ii). Potentially Significant Impact. For the Proposed Project, a significant impact due to fault rupture could occur if new structures were constructed within a designated Alquist-Priolo Earthquake Fault Zone, or within an active or potentially active known fault. A significant impact due to ground shaking could occur if implementation of the Proposed Project led to construction in an area that would experience ground shaking, potentially causing damage or harm to buildings or people. As noted above, there are two designated Alquist-Priolo fault zones in Woodside, which are subject to ground shaking in the event of an earthquake. Specifically, two sites included in the Housing Sites Inventory, Town-owned site Raymundo Drive and privately owned site 773 Cañada Road, are located in the Alquist-Priolo Special Study Zone. Additionally, many vacant and underutilized sites are located within or adjacent to the Alquist-Priolo Special Study Zone as shown in Figure 2. All future development under the Proposed Project would be required to comply with the provisions of Woodside Municipal Code Section 153.420, Geologically Hazardous Areas. Future development would also be required to comply with current California Building Codes, and the specifications outlined in project-specific geotechnical investigations which are required for development per Chapter 152.123 of the Municipal Code. Though compliance with existing regulations would ensure that risks are minimized to the extent practicable, the potential for impacts related to fault rupture and ground shaking remains. As such, impacts are considered potentially significant and will be analyzed in further detail in the EIR.

a (iii). Potentially Significant Impact. As shown on Figure 2, areas adjacent to the creeks in Woodside are subject to high liquefaction risk. Town-owned site Raymundo Drive, privately-owned site 773 Cañada Road, and the Cañada College site are all within Very Low and Low liquefaction susceptibility zones. However, Town-owned site High Road is located in a Very High liquefaction susceptibility zone, as well as vacant and underutilized sites near Searsville Lake and other Town creeks. Housing development within these areas pursuant to the Proposed Project would be required to comply with the provisions of the California Building Code related to soils and foundations. With the following policy and mitigation strategies contained in the Town of Woodside Natural Hazards and Safety Element, Policy NH1.5 – Require Assessment and Mitigation of Soil

Liquefaction Risks, the Town shall seek to minimize the risk associated with soil liquefaction by requiring adequate geotechnical and geologic reports, such as an assessment of soil liquefaction risks, and requiring appropriate mitigation measures. Though compliance with existing regulations and mitigation strategies would reduce potential impacts related to liquefaction to the maximum extent practicable, impacts related to seismic-related ground failure, including liquefaction remain. Therefore, impacts are considered potentially significant and will be analyzed in further detail in the EIR.

a (iv) and c. Potentially Significant Impact. As noted above, there is potential for landslides, particularly in western hills. Housing development within these areas pursuant to the Proposed Project would be required to comply with the provisions of the Town of Woodside Natural Hazards and Safety Element, Policy NH1.3 – Require Assessment and Mitigation of Landslide Hazards. The Town shall seek to minimize the risk associated with landslide hazards by requiring adequate geotechnical and geologic reports, requiring that structures be appropriately sited, and requiring special design and construction techniques for State highways and local roads, and utility lines. Though compliance with existing regulations and mitigation strategies would reduce potential impacts related to landslides to the maximum extent practicable, the potential for impacts related to landslides remain. Therefore, impacts are considered potentially significant and will be analyzed in further detail in the EIR.

b. Less than Significant Impact. Stormwater can cause erosion of soils on hillsides and creek banks in Woodside. Future development under the Proposed Project would be required to comply with the provisions of the Municipal Code pertaining to grading, landscaping and erosion control. In addition, construction that disturbs more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit requires an erosion and sediment control plan, which includes sufficient engineering analysis to show that the proposed erosion and sediment control measures during the period when preconstruction and construction related grading activities are to occur are capable of controlling surface runoff and erosion and retaining sediment on the project site. Construction activity subject to NPDES permitting requirements also must include a post-construction erosion and sediment control plan. Once construction is complete and exposed areas are re-vegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially eliminated or reduced. Because erosion control and stormwater pollution prevention measures would be implemented, the Proposed Project has limited potential to result in substantial soil erosion or loss of topsoil. This impact would be considered less than significant.

d. Less than Significant Impact. Areas within Woodside are underlain by expansive soils, which swell and shrink as they gain and lose moisture and can result in damage to overlying structures. Compliance with the provisions of the California Building Code, adopted by the Town as Chapter 152.123 of the Municipal Code require a soils report portion of the geotechnical report to identify corrective action needed to prevent structural damage to each dwelling proposed to be constructed on the expansive soil. Therefore, compliance with existing regulations would reduce expansive soil-related impacts to a less than significant level.

e. Less than Significant Impact. About two-thirds of the parcels in Woodside utilize private on-site septic systems for effluent waste disposal, while the rest utilizes the sewer system. The Municipal Code (Chapter 51.030) requires that every building be connected to a private wastewater disposal

system where a public sanitary sewer is not available. The use of private onsite septic systems is regulated by the San Mateo County Department of Environmental Health and by regulations contained in the Town Municipal Code. Continued compliance with these regulations would ensure that septic systems needed to accommodate future development occurring with buildout of Proposed Plan would be constructed on soils capable of supporting them. Therefore, associated impacts would be less than significant.

f. Less than Significant Impact. Paleontological resources are mineralized or fossilized remains of prehistoric plants and animals, as well as mineralized impressions or trace fossils that provide indirect evidence of the form and activity of ancient organisms. Many fossil localities have been identified within San Mateo County, including several localities potentially located within or near the Planning Area. Sub-surface construction activities associated with the Project implementation, such as grading or trenching, could result in a significant impact to paleontological resources, if encountered. Public Resources Code Section 5097.5 specifies the procedures to be followed in the event of the unexpected discovery of human remains. Compliance with existing regulations would result in less than significant impacts related to paleontological resources.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.H Greenhouse Gas Emissions. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Setting. At the State level, targets have been set for reduction of greenhouse gas (GHG) emissions to combat climate change. Senate Bill (SB) 32 calls for a reduction in statewide GHG emissions 40 percent below 1990 levels by 2030, while Executive Order B-55-18 establishes a statewide target of carbon neutrality by 2045. Woodside adopted a Climate Action Plan (CAP) in 2015, which incorporates GHG reduction measures. To help track progress toward the goals established in the CAP, the Town publishes an annual Implementation Report, which documents the Town's progress in implementing the measures identified in the CAP and highlights measures still requiring attention. According to Climate Action Plan Implementation Program (2021), the Town of Woodside has reduced emissions 24 percent since 2005 and has met its 2020 goal.

a and b. Potentially Significant Impact. As a long-range plan, the Proposed Project would be assumed to have a less than significant impact related to GHG emissions if the Town has a qualified GHG Reduction Strategy that demonstrates consistency with established SB32 and EO B-55-18 targets. While the Town's CAP sets out a pathway to reducing GHG emissions by 15 percent below 2005 levels by the year 2020, it does not demonstrate consistency with targets for 2030 and 2045. Therefore, GHG emissions from the Proposed Project will be quantified and analyzed in further detail in the EIR. Consistency with the CARB Scoping Plan will also be analyzed.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.1 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 conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely 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 materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☒	☐	☐	☐

Setting. Woodside is a quiet residential community of about 1,919 homes. According to State databases, there are no recorded hazardous materials sites in or adjacent to the Town limit and the principal hazardous substances in the community are cleaning supplies, and landscaping chemicals. About 16 percent of the homes in Woodside were built before 1939, so asbestos and lead-based paints may be present in some existing structures. A variety of federal, State and local regulations governs the handling, transport and disposal of hazardous materials in Woodside.

a thru c. Less than Significant Impact. Implementation of the Proposed Project would involve facilitation of housing construction and would not involve the transport, use, or disposal of significant quantities of hazardous materials. Demolition or development under the Proposed Project may involve the handling and transport of hazardous materials that could result in the need to handle and transport asbestos or lead based paints; however, such activities are subject to various federal, State, and local regulations, including BAAQMD regulations pertaining to asbestos abatement; Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations; Part 61, Subpart M of the Code of Federal Regulations (pertaining to asbestos); and lead exposure guidelines provided by the United States Department of Housing and Urban Development. Asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the state Department of Health Services. Construction activities may involve the use of diesel-powered equipment or the application of

architectural coatings, but not at levels that could create a significant hazard to the public or environment. Similarly, once constructed, the residents of new homes constructed pursuant to the Proposed Project may use cleaning solvents or landscaping chemicals, but not at levels that could create a significant hazard to the public or environment. Overall, any transport, use, storage, and disposal of hazardous materials would be required to comply with existing regulations established by several agencies, including the Department of Toxic Substances Control, the US Environmental Protection Agency (EPA), the US Department of Transportation, and the Occupational Safety and Health Administration. The construction and operation of housing generally does not involve the release -- accidental or otherwise -- of hazardous materials that would create a significant hazard to the public, nor would it involve emitting or handling acutely hazardous materials or wastes in the vicinity of schools. Overall, compliance with existing regulations would result in a less than significant impact.

d. No Impact. A significant impact would occur if development under the Proposed Project is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC)'s EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action site, and the State Water Resources Control Board's GeoTracker database, which tracks authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. According to the DTSC's database on December 22, 2022, there are no hazardous materials sites located in the Town of Woodside. Therefore, there would be no impact.

e. No Impact. There are no public airports within two miles of the town limits. The nearest airport is the San Carlos Airport located approximately five miles north of the town. The Proposed Project generally involves small-scale residential development on previously developed parcels within the Town limit. Therefore, implementation of the Proposed Project would result in no impact related to airport hazards.

f. Less than Significant Impact. The risk of natural hazards, including wildfire, earthquake, and landslides, is present in Woodside, where evacuation is necessary if a natural disaster were to happen. The Town of Woodside has adopted an Emergency Operations Plan and the County of San Mateo has adopted a Local Hazard Mitigation Plan with strategies to address emergency evacuation scenarios. The Woodside Fire Protection District has also prepared an Evacuation Plan for the Town of Woodside, which provides coordinated evacuation routes and evacuation areas in case of an emergency situation. The Town of Woodside Evacuation Plan lists 25 evacuation routes for various neighborhoods in Woodside, depending on location within the Town. All evacuation routes are displayed and listed in Appendix 4 of the Evacuation Plan. The Natural Hazards and Safety Element of the General Plan also outlines numerous policies regarding emergency preparedness, including the preservation of critical facilities like Evacuation Routes, development of emergency preparedness plans, and support of emergency preparedness education Townwide. The Town has an Emergency Preparedness Committee that supports the General Plan policies to institute or participate in education related to natural hazards and to support emergency preparedness education. The Emergency Preparedness Committee works with Town staff to develop and maintain appropriate plans and procedures for responding to disasters, including wildfires, earthquakes, floods, and other emergencies. The Emergency Preparedness Committee supports the work of the

Citizens' Emergency Response and Preparedness Program (CERPP) to develop a network of volunteers to respond to emergencies at the neighborhood level. The Proposed Project could result in the development of 423 new housing units over eight years. Given the current evacuation plans and policies in place at the Town of Woodside, impacts related to the impairment or interference of an adopted emergency response plan or emergency evacuation plan are less than significant.

g. Potentially Significant Impact. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas in San Mateo County with significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), are classified by the CAL FIRE Director in accordance with Government Code Sections 51175-51189 to assist responsible local agencies identify measures to reduce the potential for losses of life, property, and resources from wildland fire. As shown on Figure 2, the western half of Woodside is within a VHFHSZ delineated by CAL FIRE, as well as the most northern area near unincorporated Emerald Lake Hills. All new development would be required to comply with the fire protection provisions of the California Building Code and the Town Code; however, given the extent of wildfire hazard in Woodside, Project implementation would involve risk of exposure of people and structures to wildland fires. This is a potentially significant impact that will be analyzed in further detail in the EIR.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.J Hydrology and Water Quality. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin	☐	☐	☒	☐
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 through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting. The conservation of the natural drainage system in the Woodside Planning Area is one of the more important tasks before the Town. The tributary system of San Francisquito Creek drains much of the area, while Redwood Creek and Atherton Creek drain the remainder. Major streams in Woodside that are part of this system and are of regional significance are: Alambique, Bear Gulch, West Union, and Dry Creeks. Other streams in Woodside of local significance include tributaries of the major creeks. Control of the upstream portions of this drainage system is important to both Woodside and the downstream communities of the Midpeninsula. Appropriate land use and control of development is essential to prevent widespread damage in the lower reaches of the streams through siltation (from upstream erosion), flooding, and loss of flow in the stream in the dry seasons.

Throughout recorded history, Woodside has experienced minor flooding in areas adjacent to streams. Areas subject to flooding are shown on Figure 2 Environmental Hazards and Constraints, which identifies the Federal Emergency Management Administration (FEMA) 100-year and 500-year flood zones, requiring special consideration when development is proposed. Certain areas adjacent to major creeks in Woodside are designated flood plains. Most of the flood plain areas are in the southern part of Woodside along Alambique, Sausal, and Corte Madera Creeks. Small sections of West Union Creek and Dry Creek in central Woodside also are in the flood plain. Development resulting in impervious surfaces and paved areas can increase runoffs and the potential for flooding.

Schilling Lake is the only significant body of water in Woodside and a potentially damaging seiche could impact developed areas downstream along Dennis Martin Creek. Bear Gulch Reservoir and Searsville Lake are located outside of Woodside, and potentially damaging seiches from these sources would impact downstream undeveloped and developed areas of Stanford University, Menlo Park, and Atherton.

The Town of Woodside enforces the FEMA's flood plain administration regulations, which regulates impervious surface coverage, and site drainage. The Town of Woodside also participates in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP). SMCWPPP is operated under the auspices of the City/County Association of Governments (C/CAG), which consists of the twenty San Mateo County cities and San Mateo County. All of the municipalities are listed as co-permittees in a municipal storm water National Pollutant Discharge Elimination System (NPDES) permit adopted by the Regional Water Quality Control Board (RWQCB). SMCWPPP implements common tasks and assists the municipalities to implement their local storm water pollution prevention programs.

a. Less than Significant Impact. A significant impact would occur if the Proposed Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Development would be required to adhere to all applicable federal, State, and local regulations. Construction activities must comply with the NPDES Construction General Permit which requires standard erosion control measures and BMPs identified in a Stormwater Pollution Prevention Plan (SWPPP) and implemented during construction to reduce sedimentation in waterways and any loss of topsoil. Development associated with the Proposed Project would also be required to comply with Town of Woodside Storm Water Management and Discharge Control Ordinance (Chapter 52 of

the Municipal Code) requirements and prepare a stormwater control plan, which would require construction-site control and erosion control BMPs to reduce impacts related to stormwater runoff. Conformance with federal, State, and local regulations would ensure that future projects would not result in increased rates or amounts of surface runoff, exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows. Therefore, implementation of the Proposed Project would result in less than significant impacts related to water quality and waste discharge.

b and c. Less than Significant Impact. A significant impact would occur if the Proposed Project would substantially decrease groundwater supplies, interfere with groundwater recharge, or alter the existing drainage pattern of the site. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. The Proposed Project does not propose the modification of drainage patterns nor is expected to interfere with groundwater recharge. Construction activities occurring due to the implementation of the Proposed Project would be subject to the erosion and sedimentation control provisions of the Municipal Code Section 151.20(A)(8). All development pursuant to the Proposed Project would be subject to the applicable provisions of the Municipal Code regarding low impact development for stormwater management and drainage plans. Additionally, certain projects may be subject to drainage calculations by civil engineer of record, which shall comply with Woodside Municipal Code Sec 151.43, to show that post construction run-off does not exceed preconstruction run-off for both scenarios. Compliance with these regulations would ensure that future development under the Proposed Project would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered, or the existing drainage pattern of the Town would be altered. Therefore, implementation of the Proposed Project would result in less than significant impacts related to groundwater and drainage patterns.

d. Less than Significant Impact. Figure 2 shows Special Flood Hazard areas in Woodside, as defined on maps prepared by the Federal Emergency Management Agency (FEMA). Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, some of which are located within or adjacent to Special Flood Hazard areas, including the 100-year flood plain. Flood hazard areas are located within Residential/Environmentally Sensitive (R-ESA) and Open Space/Environmentally Sensitive (OS-ESA) land use designations. General Plan Policy NH1.6 requires that the Town assess and mitigates flood hazards, outlining six aspects to evaluating this policy. The Town Municipal Code also includes measures to protect against and minimize damage, loss, and death from flooding, requiring permits for development in areas of flood hazard and establishing construction standards for flood hazard reduction. Development in Special Flood Hazard areas is regulated by the standards in Chapter 55.41 of the Municipal Code, which requires that buildings be protected against flood damage at the time of initial construction; restricts the alteration of natural floodplains, stream channels, and natural protective barriers, which help accommodate or channel floodwaters; and establishes standards for filling, grading, dredging, and other development activities which may increase flood damage. Additionally, as noted above, all development pursuant to the Proposed Project would be subject to the applicable provisions of Chapter 52 of the Municipal Code regarding stormwater management and drainage control, which would help ensure no net increase in the rate and volume of peak runoff from the site compared to pre-project conditions. Compliance with these regulations would

limit the risk of loss and damage due to flooding to the maximum extent practicable and associated impacts would be less than significant with compliance.

There would be no impact with respect to tsunamis, given that Woodside is located about 10 miles inland from the Pacific Ocean and outside any tsunami hazard zone (DOC, 2019). A seiche is a temporary disturbance or oscillation in the water level of a landlocked body of water (such as a lake) that may be caused by seismic activity. At some locations and times, the resulting oscillations and currents can produce hazardous or even destructive conditions. Schilling Lake is the only significant body of water in Woodside and a potentially damaging seiche could impact developed areas downstream along Dennis Martin Creek. Bear Gulch Reservoir and Searsville Lake are located outside of Woodside and given its location further downstream and its distance from development that may occur with Project implementation, the risk of loss or damage due to seiche is minimal and impacts would be less than significant.

e. No Impact. As discussed above, future development under the Proposed Project would be required to adhere to all applicable federal, State, and local regulations with respect to stormwater pollution control, which would reduce the potential for stormwater pollution to the maximum extent practicable. Santa Clara Valley basin and the San Mateo Plain Subbasin underlie the bayside of San Mateo County from approximately the City of San Mateo on the north, to approximately the County boundary at San Francisquito Creek on the south. The California Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to prepare Groundwater Sustainability Plans to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Since the groundwater basin within San Mateo County have been ranked by the Department of Water Resources (DWR) as a low priority, there is no requirement for the County to prepare a Groundwater Sustainability Plan (SGMA, 2022). For these reasons, future development under the Proposed Project would not substantially degrade water quality or conflict with a sustainable groundwater management plan, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.K Land Use and Planning. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Setting. The Woodside Planning Area totals approximately 23 square miles, including incorporated Town lands and adjoining unincorporated lands. Existing land uses within the Town are primarily single-family residential and open space uses, with some limited local-serving commercial uses. Agriculture, including production of food and fiber products, livestock pasturing, vineyards, and beekeeping are permitted on certain lands within the Town. At the heart of the community is Woodside Road, which serves as the Town Center (business and government buildings). The

Woodside Elementary School, Woodside Fire Protection District Station 7, Woodside Library, and Town Hall are all located within a half a mile from one another.

a. Less than Significant Impact. The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local bridge that would impact mobility within an existing community of between a community and outlying area. The Proposed Project does not involve any such features and would not remove any means of access or impact mobility. Implementation of the Proposed Project would facilitate residential development required to meet the Town's RHNA allocation, consisting of construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. As such, the Proposed Project would not physically divide an established community and impacts would be less than significant.

b. Less than Significant Impact. Implementation of the Proposed Project would require amendments to the Town of Woodside Zoning Map and adoption of objective design and development standards for multifamily development. Residential development under the Proposed Project will be required to comply with the General Plan policies regarding land use and Municipal Code requirements associated with zoning districts, allowable uses, and development standards, as amended for Proposed Project implementation. Therefore, implementation of the Proposed Project would have a less than significant impact in regard to conflicts with a land use plan, policy, or regulation adopted to avoid an environmental effect.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.L Mineral Resources. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land-use plan?	☐	☐	☐	☒

Setting. The State requires local jurisdictions to adopt policies that restrict designated mineral resource sites from premature development and protect surrounding communities from impacts associated with mineral extraction. The purposes of such State policies include encouraging extraction of necessary mineral and construction commodities in locations reasonably close to their markets and ensuring that mined lands are reclaimed to minimize adverse effects on the environment and public health. Furthermore, local governments have a responsibility to protect the public health and safety of their residents by requiring that only legal mining and material transport and handling activities are conducted, and that the impacts of such operations are adequately mitigated using the best available management practices.

The San Mateo County General Plan identifies 13 mineral resources found within the County: chromite, clay, expansible shale, gemstones, limestone and shells, mercury, mineral water, oil and

gas, salines, sand and gravel, sands (specialty), stone (crushed and broken), and stones (dimension) (County of San Mateo, 1986). The minerals in the County are considered beneficial resources that have primarily been used as low-cost construction materials and a source of energy. The Planning Area is located within Mineral Resource Zone (MRZ) 4, which includes areas where available information is inadequate for assignment to any other MRZ zone, as described by the Surface Mining and Reclamation Act Mineral Land Classification Report. No important mineral resources are known from the proposed Project area. (California DOC, Division of Mines and Geology 1996).

a and b. No Impact. Mineral resources in the Town of Woodside are limited to gravel and stone sand, gravel and crushed stone. However, there are no mineral preservation sites located in the Town of Woodside as noted in the San Mateo County General Plan. Thus, the Proposed Project would not result in the loss or availability of a known mineral resource that would be of value to the region and the residents or the state. In addition, no locally important mineral resource recovery sites are delineated in the General Plan or other land use plans. Therefore, adoption of the Proposed Project would result in no impact to mineral resources.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.M Noise. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting. Woodside is a quiet residential community. The most significant noise sources throughout the Town are the major highways and roadways, including Interstate 280, Highway 84 (Woodside Road), Cañada Road, Portola Road, Whiskey Hill Road, and Sand Hill Road. Noise sources in residential areas include generators, power mowers, leaf blowers, chain saws, air conditioners, swimming pool filters, animals, and sound amplifiers. Building construction creates noise from hammering, hand tools, power tools and earth-moving equipment. The Town of Woodside aims to minimize noise pollution through General Plan policies. General Plan policies establish standards for noise disturbances, including minimizing noise exposure on residents, mitigating noise exposure generated by new development and vehicular noise, as well as minimizing aircraft noise. Town of Woodside does not currently have a Noise Ordinance; however, the Woodside Municipal Code does regulate construction hours, and impose amplified sound restrictions on construction sites. Additionally, projects requiring certain planning entitlements are required to comply with best management practices for controlling construction noise.

a and b. Potentially Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Woodside Municipal Code Sections 151.55.B (construction hours) and 151.55.D (amplified noise restrictions) limits construction hours to prevent unnecessary noise from construction, but noise impacts could potentially result from construction during permitted hours and will be analyzed at a programmatic level in the EIR. Additionally, noise modeling will be conducted to determine if noise levels in excess of standards established in the General Plan could be exceeded as a result of project implementation, either cumulatively or as a result of project implementation. Construction activities in steep hillside areas and areas of liquefaction risk may require the use of equipment that could generate vibration. Therefore, associated impacts will also be analyzed at a programmatic level in the EIR.

c. No Impact. The Town of Woodside is not located within the vicinity of a private airstrip or airport land use plan, or where such a plan has not been adopted, is not located within two miles of a public airport or public use airport. However, the Woodside is within the Airport Influence Area A boundary for the San Francisco International Airport (C/CAG, 2012) and the Town is an active participant in the San Francisco Airport/Community Roundtable. The Airport Influence Area A boundary identifies areas that are overflown by aircraft to and from San Francisco International Airport at least once per week at altitudes of 10,000 feet or less. However, based on 2011 data, Woodside is subject to some of the lowest number of overflights in the Airport Influence Area A, which is generally not subject to high levels of aircraft noise and would not result in a safety hazard for individuals or construction workers located in the Planning Area. Therefore, future development consistent with the Proposed Project would not expose people residing or working in the project area to excessive noise levels, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.N Population and Housing. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting. The Regional Housing Needs Assessment (RHNA) is a State-mandated process intended to ensure every city, town, and county plans for enough housing production to accommodate future growth. The State of California Housing and Community Development Department (HCD) assigns each region of the state an overall RHNA allocation. For the nine-county Bay Area region, Association of Bay Area Governments (ABAG) then distributes a "fair share" portion of that allocation to each local jurisdiction. Each jurisdiction must then identify adequate sites with a realistic capacity for development sufficient to meet this RHNA.

For the 2023-2031 period, Woodside must identify sites sufficient to accommodate at least 328 new housing units between 2023 and 2031, with a specific number of units designated as affordable to each income category, as shown in Table 1. This determination is based on population projections produced by the California Department of Finance and the application of specific adjustments to determine the total amount of housing needs for the region. The RHNA does not specifically break down the need for extremely-low-income households. As provided by State law, the housing needs of extremely-low-income households, or those making less than 30 percent of area median income (AMI), is estimated as 50 percent of the very-low-income housing need.

The timing for jurisdictions to update their housing elements is based on the update schedule of the regional transportation plans (RTPs) by the federally designated metropolitan planning organizations (MPOs). The Town of Woodside is a member of ABAG, which is the designated MPO for the region. ABAG is required to update its Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) every four years, which puts all member jurisdictions on a schedule to update their housing elements every eight years. Plan Bay Area combines these three initiatives into a single, integrated regional plan. For example, RTPs traditionally include land use projections. Plan Bay Area's distribution of growth is the SCS. Senate Bill 375 also stipulates that the SCS will identify areas to accommodate the RHNA. State law requires that the RHNA follow the development pattern specified in the SCS.

a. Less than Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. While implementation of the Proposed Project would involve the extension of utility infrastructure to some sites, all new development would occur within the Town limit and the Proposed Project would not involve the extension of roads or infrastructure into undeveloped areas in a way that would induce substantial unplanned growth. Buildout of the Proposed Plan would result in an increase in population and housing units consistent with regional planning projections, and it would occur incrementally over a period of 8 years. Therefore, the Proposed Project would result in a less than significant impact associated with population growth, either directly or indirectly.

b. No Impact. The proposed project would facilitate the provision of housing to meet the projected need at all income levels in Woodside. The proposed project also includes measures to preserve the existing housing stock, especially affordable units, such as by providing amnesty for unpermitted ADUs. Development under the proposed project would increase housing supply in the community at all income levels and help prevent displacement. Therefore, it would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.O Public Services. Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire Protection?	☐	☐	☒	☐
ii) Police Protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

Setting. The Woodside Fire Protection District (WFPD) is a consolidated department that serves Woodside, Portola Valley, Emerald Hills, Ladera, Los Trancos, Skyline, and Vista Verde. WFPD currently operates three fire stations and serves a population of 25,000 with 1 fire chief, 5 battalion chiefs, 12 fire captains, a fire marshal, a deputy fire marshal, 26 firefighters and firefighter paramedics, an emergency preparedness coordinator, and an executive administrator. Fire Station 7 is located in Woodside along Woodside Road, while Station 8 is located in Portola Valley and Station 19 is located in Redwood City. Station 7 is being upgraded to a larger station that will feature storage for firefighting and emergency response vehicles and emergency alerting technology. Station 7 fire services have been relocated to Interim Fire Station 7 at the Stanford Linear Accelerator Center about 3 miles east.

The San Mateo County Sheriff's Office, located at 400 County Center in Redwood City, provides various law enforcement services to all cities in the County, including contract police services for the Town of Woodside. Woodside is served by the Headquarters Patrol Bureau, which also serves the areas of North Fair Oaks and Portola Valley. About 28 Deputy Sheriff's, four Sergeants and one Lieutenant serve this area.

The only school located within the Town boundary is Woodside Elementary School, which operates under the Woodside School District. The school served 383 students in kindergarten through eighth grade in the Town of Woodside during the 2020-2021 enrollment year (Woodside Elementary School District, 2021). Enrollment for the school has decreased slightly over the past few years, with a total of 415 students during the 2018-2019 school year and 386 students during the 2019-2020 school year. Woodside is additionally served by three other elementary school districts, which include La Lomitas, Portola Valley, and Redwood City. Each district serves grades kindergarten through eighth.

The Town of Woodside is also located within the Sequoia Union High School District, where public school students from Woodside attend Woodside High School, located in unincorporated San Mateo County by Woodside Road and Alameda de las Pulgas. The total enrollment at Woodside High School for the 2020-2021 school year was 1,909 students (Sequoia Union High School District, 2022).

According to the Town of Woodside General Plan, public parks and open space account for 8,287 acres within the Woodside Planning Area. Additionally, there is a total of 37,471 acres of open space adjacent to the Planning Area that are held by Midpeninsula Regional Open Space District and San Mateo County Parks. This translates to about 4.3 acres of parkland per housing unit within the Planning Area, and about 23.8 acres of parkland per housing unit within and adjacent to the Planning Area, including the Sphere of Influence. Current and future residents of Woodside also have access to community facilities within the town, including school spaces that could be used for community activities. The public library in Woodside is the Woodside Library, located on Woodside Road west of the Town Center.

a (i and ii). Less than Significant Impact. Buildout of the Proposed Project would involve construction of up to 423 housing units throughout the town, consisting of construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. The increased local population generated by the Proposed Project would likely result in an increase in calls for fire and emergency medical service compared to existing conditions. However, development would take place incrementally over the 8-year planning period and be concentrated primarily in areas with fire and police access. The current redevelopment of Station 7 would involve the upgrade of eight apparatus bays for storing firefighting and emergency response vehicles, five more than the existing site's three. Station 7 fire services were moved to Interim Fire Station 7 at the Stanford Linear Accelerator Center site on Sand Hill in June, which is fully functional. As such, the Proposed Project would not require the construction of new police and fire facilities over and above those already occurring in Woodside. Impacts would be less than significant.

a (iii). Less than Significant Impact. Implementation of housing programs in the Proposed Project would involve construction of up to 423 housing units throughout the Town. While many of these new housing units would be ADUs and smaller apartments for singles, and college students, it is reasonably foreseeable that some of these units would support families with children that may attend the surrounding school districts. New students of various ages would be enrolled incrementally over the 8-year planning period. Therefore, in view of the Woodside Elementary's recent enrollment trend and the fact that Woodside is served by three other elementary school districts, the incremental increase in enrollment resulting from the Proposed Project would not necessitate the construction or expansion of new school facilities and this impact would be less than significant. Further, development under the Proposed Project would be also required to comply with SB 50, which mandates statutory school facilities fees for residential developments. Compliance with SB 50 would financially offset impacts on Woodside School District capacity and would provide funding for potential future school facility development needs associated with the Proposed Project-related population increase.

a (iv). Less than Significant Impact. Implementation of housing programs in the Proposed Project would involve construction of up to 423 housing units throughout the town, consisting of small-

residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Public parks, including Barkley Fields and Park with active recreation facilities, and open space account for 8,287 acres within the Woodside Planning Area. Additionally, there is a total of 37,471 acres of open space adjacent to the Planning Area that are held by Midpeninsula Regional Open Space District and San Mateo County Parks. This translates to about 4.3 acres of parkland per housing unit within the Planning Area, and about 23.8 acres of parkland per housing unit within and adjacent to the Planning Area, including the Sphere of Influence. Factoring in the additional construction of the 423 housing units from the Proposed Project, this translated to about 3.5 acres of parkland per housing unit, and about 19.5 acres of parkland per housing unit within and adjacent to the Planning Area, including the Sphere of Influence. This displays there would be a minimal reduction in parkland per housing unit. As there would still be adequate park facilities in Woodside, implementation of the Proposed Project would not trigger the need to construct new parks in order to maintain established services rations. Impacts would be less than significant.

a (v). Less than Significant Impact. Other public facilities typically include libraries, hospitals, and administrative buildings. As described above, there is one library and no hospitals in Woodside and the construction of up to 423 new homes over the 8-year planning period would not be of a magnitude that would trigger the need for new or expanded facilities elsewhere in the county. Redevelopment of the existing Town Hall and administrative building was completed fairly recently in 1990, so the Proposed Project would not require the construction of other public services facilities over and above those that have already occurred. As such, impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.P 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 recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Setting. As described above, public parks and open space account for 8,287 acres within the Woodside Planning Area, which includes Barkley Fields and Park that provide active recreation facilities for children and adults. Additionally, there is a total of 37,471 acres of open space adjacent to the Planning Area that are held by Midpeninsula Regional Open Space District, San Mateo County Parks, and the Town of Atherton. In addition to the open space associated with residential and commercial uses, most public/quasi-public uses, including the school, the library, Barkley Fields and Park, and the commercial stables provide space for various forms of active recreation, such as play fields, native plant demonstration gardens, and equestrian riding arenas.

a and b. Less than Significant Impact. Project implementation would result in increased use of parks and recreational facilities in the Town and the surrounding area; however, given the extent

of existing facilities in Woodside and the surrounding area and that development under the Proposed Project would result in up to 423 new housing units incrementally over the planning period, population growth with implementation of the Proposed Project would not be expected to result in the substantial physical deterioration of existing facilities or to require construction or expansion of recreational facilities to meet the needs of new residents. Therefore, a less than significant impact associated with the provision of new or expanded recreational facilities would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.Q Transportation. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Setting. The Town of Woodside primarily accommodates vehicular travel given that there is limited public transit services. The road system in Woodside consists of two categories of local roads (collector roads and minor rural roads), and three categories of thoroughfares that provide channels for movement of traffic around and through Woodside (arterial roads, expressways, and freeways). I-280 also runs through Woodside, travelling from north to south. Transit service is provided by San Mateo County Transit District (SamTrans), which operates bus service on two routes: Route 278 from Cañada College to Redwood City Transit Center, and Route 87 Woodside High to Portola Valley, which connects to Route 278. Class II bikeways are striped bike lanes located in a road right of way, which include parts of Woodside Road, Cañada Road, Alameda de Las Pulgas, and Sand Hill Road. Class III bikeways (bike routes) are located on La Honda Road, Portola Road, and Skyline Boulevard. Numerous existing paved, gravel, and dirt pedestrian pathways function primarily as linkages to the Town Center and linkages between neighborhoods. Woodside includes a public system of equestrian trails that are frequently shared with pedestrians, which provides local circulation and recreational opportunities. Additionally, General Plan measures are in place to keep the Town's streets and walkways safe for adults, children, pedestrians, bikers, and the disabled.

a. Less than Significant Impact. New residential development under the Proposed Project would result in additional vehicular trips and the increased use of streets (for all modes of transportation). Applicable local regulations and plans related to transportation include Plan Bay Area 2050, the C/CAG Congestion Management Program, and the Town's General Plan. Implementation of the Proposed Project would result in the development of 423 housing units, comprised of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College.

The Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050 as the official regional long-range transportation and land use plan for the Bay Area. Strategies in this plan include encouraging land use patterns that foster shared transportation modes, lessen the share of single-occupancy work commutes, and reduce greenhouse gas emissions. The Proposed Project focuses on multi-family housing sites with transit access, albeit transit stops and locations are limited in frequency and time of service, and overall housing unit share in existing low-VMT areas is in line with the emission reduction objectives of Plan Bay Area 2050.

The Town's General Plan is a comprehensive long-range guide for future development of the Town. The General Plan includes various goals and policies that address the Town roadway network, traffic, and other transportation facilities. The Circulation Element includes goals for development of a circulation system that balances system user needs, maintains safe roadways, expands the bikeway network and pedestrian pathways, and encourages and supports vehicle trip reduction. Development of Housing Element Update housing units would result in increased use of the circulation system, and integration of driveway entrances, curb cuts, and upgrades to facilities would be subject to applicable design standards and guidelines related to roadways, bikeways, sidewalks, and equestrian trails. Required TDM plans associated with multi-family housing developments and facilitation of ADU development in areas of existing low VMT is consistent with policies in the General Plan.

As a result, future development consistent with the Proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, adoption of the Proposed Project would result in a less than significant impact related to conflicts with transportation plans.

b. Potentially Significant Impact. According to State guidance, transportation impacts would result if home-based vehicle miles travelled (VMT) per resident under the Project are not 15 percent below baseline levels. VMT forecasts developed for the Project indicate that a 4.6 percent reduction in per capita VMT as compared to 2020 baseline conditions would result. This exceeds the threshold prior to mitigation. As such, this is a potentially significant impact that will be analyzed in further detail in the EIR with mitigation identified accordingly.

c and d. Less than Significant Impact. Implementation of the Proposed Project would involve construction of up to 423 housing units throughout the Town, consisting of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. While the Proposed Project does not specifically propose the construction or realignment of any roadways, access improvements may be needed to accommodate new housing on some proposed housing sites, particularly the higher density housing, due to the additional vehicles associated with the developments. Interstate 280, Woodside Road, and arterial roads of Woodside are designated as evacuation routes for use in the event of an emergency and shall be maintained in usable conditions at all times. Individual developments associated with the Proposed Project would be required to be assessed for impact to emergency vehicle access and designed in accordance with all applicable design standards for emergency access within and around the site. Requirements include considerations for very high severity fire hazard zone developments, minimum lane width of the internal on-site drive aisles to allow for passing of emergency vehicles within multi-family developments, and fire safety plan review and approval. Additionally, all such access improvements would be required to comply with applicable

provisions of the Woodside Municipal Code, including Article X – Required Improvements and Standards of Design, specifically Chapter 152, Section 152.114, Road Design, which requires the standard design of the layout of new roadways, the Circulation Element Policy CL2.1 Maintain and Improve Town Roadways that strategizes design principles and standards, road safety, and roadway maintenance, and the Woodside Fire Protection District Roadways and Access Requirements (2022), which includes provisions for grading, width/height clearance, and driveway length. Potential impacts to roadway emergency access during construction would be addressed through the construction traffic control plan and reviewed and approved by appropriate Town departments. Compliance with these regulations and standards would ensure that impacts related to roadway design features and emergency access would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.R Tribal Cultural Resources. Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

Setting. The 2022 NWIC records search indicates that the Town of Woodside contains 19 recorded Native American archaeological resources. Native American resources in this part of San Mateo County have been found on ridges, midslope benches, in valleys, near intermittent and perennial watercourses and near areas populated by oak, buckeye, manzanita, and pine, as well as near a variety of plant and animal resources. The Town of Woodside HEU project area is located in San Mateo County and includes a portion of Santa Cruz Mountains, Kings Mountain, San Andreas Rift Zone, Jasper Ridge, and several creeks including, La Honda Creek, West Union Creek, McGarvey Gulch, Martin Creek, Alambique Creek, Corte De Madera Creek, Searsville Lake, Schilling Lake, Bear Creek, San Francisquito Creek, and several springs. Aerial maps indicate a heavily wooded and densely chapparraled Western half with a few roads, buildings and structures. The Eastern half, although still fairly wooded, is more densely populated by buildings structures and includes large areas of low grasses or bare ground. Given the similarity of these environmental factors and the

ethnographic and archaeological sensitivity of the Planning Area, NWIC has determined that there is a high potential for unrecorded Native American resources to be within the Town limits.

In accordance with the requirements of Public Resources Code 21080.3.1, the Town staff conducted Native American outreach and consultation efforts. The Town contacted the Native American Heritage Commission (NAHC) on October 31, 2022, with a request to facilitate involvement of interested Native American tribes in the planning process and a search of the Sacred Lands File for sites within the Planning Area. The NAHC responded on December 1, 2022, with a letter that indicated the results of the search of the Sacred Lands File were positive. On November 7, 2022, the Town sent tribal outreach letters to the six Native American representatives from five tribes that were previously identified by the NAHC to consult on the Proposed Project. The Town send out additional three additional letters to Native American representatives from three tribes on December 5, 2022, to consult on the Proposed Project. The Town has not received any responses as of May 22, 2023.

Details of the recorded tribal cultural resources are included in Appendix C – Supporting Materials for Tribal Cultural Resources.

a (i and ii). Potentially Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. Further, all development under the Proposed Project would be required to comply with existing regulations, including CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94 and Section 5097.98, and provisions of the Town Code which stipulate protocols that must be followed in the event of discovery of archaeological resources, tribal cultural resources, and human remains. Nevertheless, given the high potential for as yet undiscovered resources in Woodside and the ongoing tribal consultation, it cannot be definitively determined that no significant impact will result at this stage, even with regulatory compliance. Therefore, impacts related to tribal cultural resources remain potentially significant and will be analyzed in further detail in the EIR.

	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less than Significant Impact	No Impact
13.S Utilities and Service Systems. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting. Peninsula Clean Energy (PCE) provides electricity from clean energy sources, while Pacific Gas and Electricity (PG&E) owns the power lines and delivers the power generated by PCE. In addition, the Town of Woodside Public Works Department oversees the management, maintenance and construction of public facilities and infrastructure and the public rights-of-way. This includes oversight, management and supervision of private contractors who perform capital projects and maintenance on storm drains. Public Works operations staff provides maintenance and complete minor repairs of the Town's basic infrastructure including catch basin cleaning and storm drainage system and storm drain repairs.

California Water Service (Cal Water) Bear Gulch District supplies most of the water supply to the Town of Woodside, while the Emerald Lake Hills area of Woodside is served by Redwood City, who purchases their water from the Hetch Hetchy Regional Water System. The Bear Gulch District receives 85 to 95 percent of its daily supply from the San Francisco Regional Water System, with the balance supplied by surface water runoff from California Water Service Company's own watershed (Bay Area Water Supply and Conservation Agency, 2022).

Wastewater from the Bear Gulch District is treated at the Silicon Valley Clean Water (SVCW) Wastewater Treatment Plant (WWTP). The wastewater at the SVCW WWTP undergoes primary, secondary (activated sludge), dual media filtration, disinfection, and dechlorination treatment before being discharged to a deep-water outfall in the San Francisco Bay. The SVCW WWTP has a capacity to treat 29.5 million gallons per day (MGD), but currently receives approximately 20.0 MGD from customers in the SVCW service area (Cal Water, 2021).

The storm drain system in Woodside consists primarily of open ditches, and some culverts which flow through private properties and public rights-of-way with limited sections of concrete-lined channels and pipes. The Town maintains drainage systems located within the public rights-of-way. The Town of Woodside reviews drainage and erosion control plans as part of a site development and/or building permit to ensure the latest Non Point Discharge Elimination System (NPDES) requirements are reflected and implemented as part of the permitted work.

The Town of Woodside has historically utilized private on-site septic systems for managing waste disposal, which reflects the Town's rural nature and lack of widespread access to public sewer disposal. About a third of the parcels in Town are served by sewer. The Town's two public sanitary sewer districts, Redwood Creek/Fair Oaks and Town Center, serve 550 and 180 existing connections throughout Woodside. Redwood Creek/Fair Oaks sewer district included the Redwood Creek Trunk Assessment Area and the Glen Sewer Collection System Area. The capacity for the Redwood Creek/Fair Oaks district is 150,000 gallons per day, while the capacity for the Town Center sewer district is 100,000 gallons per day.

Woodside contracts with GreenWaste Recovery for solid waste management services, including the collection of refuse, recyclables, unlimited yard waste, and some household hazardous waste such as batteries and compact fluorescent lights. GreenWaste vehicles deliver all material collected in Woodside to the GreenWaste Materials Recovery Facility (MRF) in San Jose for processing.

a. Potentially Significant Impact. Buildout of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College. New residential development under the Proposed Project would increase demand for utilities and service systems involving expansion of sewer infrastructure. All development resulting from the Proposed Project would occur within Town limits, so no sewer infrastructure expansion would occur in unincorporated areas; however, there would be expansion at specific sites as mentioned in the Housing Element, including 773 Cañada Road and Raymundo Drive at Runnymede Road. The Town would need to secure necessary updated agreement with the Redwood Creek/Fair Oaks Sewer Assessment District to allow for expansion to existing sewer district. As such, pending the updated agreement with the sewer district, it is possible that the construction of expansion of sewer infrastructure may cause significant environmental effects. These potential impacts will be analyzed in detail in the EIR, and mitigation will be recommended to address impacts, as appropriate.

b and c. Less than Significant Impact. California Water Service (Cal Water) and Redwood City supply water to the Town of Woodside. In 2021, both Cal Water and Redwood City, respectively, prepared separate Urban Water Management Plans (UWMP) to ensure that sufficient water supplies are available to meet existing and future water needs, and that steps are in place should a critical water shortage occur. Cal Water prepared a UWMP for the Bear Gulch area specifically, while Redwood City prepared a UWMP for their service area, which includes parts of Woodside. Both UWMPs accounted for ABAG projections of population, housing, and employment through 2040 (Cal Water, 2021). Therefore, sufficient water supply is available to serve development under the Proposed Project during normal, dry, and multiple dry years. Further, no additional infrastructure over and above that already planned in the UWMPs would be required to serve development under the Proposed Project.

Similarly, Silicon Valley Clean Water (SVCW) provides wastewater services to communities including Belmont, Redwood City, San Carlos, and the West Bay Sanitary District. The regional wastewater treatment plant has an average dry weather flow permitted capacity of 29 MGD and a design capacity of 71 MGD peak wet weather flow. According to the Bear Gulch District UWMP, the District collected 0.9 MGD of wastewater from the Woodside service area in 2020, when the Town of Woodside had an estimated 1,919 housing units, according to the United States Census Bureau. The Proposed Project could involve development of up to 423 new housing units by 2031, which could total an increase of 22 percent of Woodside's housing stock. If wastewater collected also increased by 22 percent, this would put the Woodside service area at 1.1 MGD, increasing collection by 0.2 MGD of wastewater. Given that the SVCW WWTP has a capacity to treat 29.5 MGD, but currently receives approximately 20.0 MGD from customers in the SVCW service area, the Proposed Project represents a relatively small increase with respect to the total available capacity.

New development would be subject to the applicable provisions of the Stormwater Checklist for Small Projects, which is part of the San Mateo Countywide Water Pollution Prevention Program. This checklist examines the site design measures included in the project plans, appropriate source controls, and construction best management practices. Additionally, the Town's Residential Design Guidelines encourage sustainable landscape design, incorporating greywater and rainwater collection, and gravity drip irrigation. Overall, impacts related to adequate water supply and wastewater treatment would be less than significant.

d. Less than Significant Impact. Located in San Jose, the GreenWaste Municipal Solid Waste facility that serves Woodside operates two processing lines that operate 90 tons per hour, where the facility recovers up to 75 percent of the material it processes (GreenWaste, 2022). According to the California Department of Resources Recycling and Recovery (CalRecycle), the typical solid waste generation rate for single-family homes is between 8 and 12 pounds per day, while the typical rate for multi-family homes is between 4 and 8 pounds per day. Conservatively assuming an average rate of 10 pounds per unit per day and development of up to 423 new housing units by 2031, the Proposed Project would generate 4,230 pounds or 2.11 tons per day. Given that the GreenWaste Municipal Solid Waste facility operates two processing lines that operate 90 tons per hour, the hourly capacity of these lines combined totals 180 tons. This totals 1,440 tons per day assuming an eight-hour workday. The Proposed Project would contribute 2.11 tons per day, or 0.14 percent of daily processing capacity, which represents a small percent of the average daily permitted capacity of the GreenWaste processing facility. Additionally, residential development under the Proposed Project would be required to comply with Senate Bill 1383, which requires a 75 percent reduction in organic waste disposal from 2014 levels by 2025. As such, implementation of the Proposed Project would not generate solid waste in excess of established standards or in excess of the capacity of local infrastructure. Impacts would be less than significant.

e. Less than Significant Impact. The Municipal Code incorporates provisions to ensure compliance with State laws governing solid waste reduction and recycling, including the California Waste Management Act of 1989 (commencing with Section 40000 of the Public Resources Code), the Jobs and Recycling Act of 2011 (AB 341), the Mandatory Commercial Organics Recycling Act of 2014 (AB 1826), and the Short- Lived Climate Pollutants Bill of 2016 (SB 1383), and as implemented by the regulations of CalRecycle. Chapter 50.33 of the Municipal Code also requires the diversion of recyclable construction materials from landfill consistent with State law. Development pursuant to the

Proposed Project would be required to comply with all applicable State and local regulations. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.T Wildfire. If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☒	☐	☐	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☒	☐	☐	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☒	☐	☐	☐

Setting. The risk of wildfire is real and present in Woodside. As noted above and shown on Figure 2, CalFire has mapped a Very High Fire Hazard Severity Zone (VHFHSZ) for about half of the western portion Town of Woodside, closer to the Teague Hill Open Space Preserve, Wunderlich Park, and Sky Londa neighborhood. In steep, heavily wooded areas of the Town, particularly in the Western Hills, fire hazards remain quite high. The California Building Code and the Municipal Code incorporate requirements for new construction to address this risk, while the Natural Hazards and Safety Element, the Fire Management Plan, and the Multijurisdictional Local Hazards Mitigation Plan include strategies to reduce and avoid the potential for loss and damage due to wildfires. Additionally, the Safety Element Update will incorporate strategies to address the risk of wildfire in Woodside, leveraging the analysis and strategies of aforementioned plans.

a thru d. Potentially Significant Impact. Given the extent of wildfire hazard in Woodside, Project implementation would involve risk of exposure of people and structures to woodland fires, expose people to pollutant concentrations from wildfire, or involve construction that could exacerbate fire risk. This is a potentially significant impact that will be analyzed in further detail in the EIR.

	Potentially Significant Impact	Potentially Significant Unless Mitigated.	Less than Significant Impact	No Impact
13.U Mandatory Findings of Significance. Does the project:				
a. 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, substantially 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. 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. Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a. Potentially Significant Impact. As noted above, implementation of the Proposed Project would have potentially significant impacts related to biological, cultural, historic, and tribal cultural resources that will be analyzed in further detail in the EIR. Given that the Proposed Project would involve construction of up to 423 housing units, comprised of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, the Project does have the potential to substantially degrade the quality of the environment, 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, adversely affect rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, impact is potentially significant unless mitigated with adherence to applicable policies, regulations, and guidelines.

b. Potentially Significant Impact. As noted above, implementation of the Proposed Project would have potentially significant impacts related to biological, geological, historic, and tribal cultural resources as well as to GHG emission, noise, VMT, and wildfire that will be analyzed in further detail in the EIR. The potential for cumulative impacts related to these topics in combination with other past, present, and reasonably foreseeable projects will be considered in the EIR.

c. Potentially Significant Impact. As noted above, implementation of the Proposed Project would have potentially significant impacts related to the following resource categories that will be analyzed in further detail in the EIR: aesthetics, air quality, biological resources; geology and seismicity; GHG emissions; noise; VMT; tribal cultural resources; and wildfire. Given that implementation of the Proposed Project would involve construction of small-scale residential projects, as well as higher density housing at 773 Cañada Road, Raymundo Drive at Runnymede Road, High Road at Woodside Road, and Cañada College, the Project does have the potential cause substantial adverse effects

on human beings, either directly or indirectly. Therefore, impact is potentially significant unless mitigated with adherence to applicable policies, regulations, and guidelines.

14. PREPARATION. THE INITIAL STUDY FOR THE SUBJECT PROJECT WAS PREPARED BY:

Dyett & Bhatia, Urban and Regional Planners, on behalf of the Town of Woodside.

15. DETERMINATION. BASED ON 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 the mitigation measures described on an attached sheet have been added to the project. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

[X] I find that the Proposed Project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

[ ] I find that the Proposed Project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

[ ] I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the Proposed Project, and nothing further is required.

16. DE MINIMIS FEE DETERMINATION (CHAPTER 1706, STATUTES OF 1990-AB 3158)

[ ] It is hereby found that this project involves no potential for any adverse effect, either individually or cumulatively, on wildlife resources and that a "Certificate of Fee Exemption" shall be prepared for this project.

[X] It is hereby found that this project could potentially impact wildlife, individually or cumulatively, and therefore fees shall be paid to the County Clerk in accordance with Section 711.4(d) of the Fish and Game Code.

17. ENVIRONMENTAL DETERMINATION:

The initial study for this project has been reviewed and the environmental determination, contained in Section 15 preceding, is hereby made:

_____

Planning Director
Town of Woodside

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2016 Residential Design Guidelines
2017 Emergency Operations Plan
2022 Town Code

Appendix B

NOP COMMENT LETTERS

Table of Contents

June 7, 2023 Planning Commission Verbal Comments B-1
California Department of Transportation Comment Letter B-9
Midpeninsula Regional Open Space District Comment Letter B-12
Native American Heritage Commission Comment Letter B-14
Additional Scoping Comments B-19

Town of Woodside
June 7, 2023, Planning Commission Meeting
Cycle 6 Housing Element NOP/EIR Scoping Public Hearing Verbal Comments

Toni Donaldson: My name is Toni Donaldson, and these are just some of the issues that I would like to see addressed for all the properties, but my experience and understanding is more on the High Road on the Woodside Road issues. So that's more or less kind of what I'm addressing. So I kind of put it down in different areas. So traffic was my first concern that the area of Woodside Road and High Road is already a highly congested area, especially in the morning and in the afternoon. There's also a very dangerous blind curve coming off of Woodside Road that's been a source of concern to our neighborhood for a very long time. Trying to get out on Woodside Road from High Road is already a challenge many parts of the day, especially during the school year, and with there only being one way and and one way out of that portion of High Road, any construction that would be made along there would pose a huge problem for the residents of High Road. Also on parking, If there was, if you were going to put parking on Todo El Mundo. It's basically a very small street now. And if you did put parking on there, it would basically become a one lane road. My next issue was safety. So the Woodside Road, High Road exit is one of only 2 ways out of Woodside hills. The other exit is being all the way up of High Road, going out towards Alameda. In the event of a fire, this would be a death trap for people trying to get out of that area. There is no other way to get out of there. Has anybody can, you know, confirm the size of the large gas line running along Todo El Mundo? I'd like to make sure that PG&E gas line is included in this review. I don't think anybody wants another San Bruno pipeline situation. And then in geology, Caltrans has completed major slide remediations multiple times on that site from High Road, and all the way up to 280 it still is not stable. They still constantly come out there to try to fix the sliding that is coming down, especially in this last area, this last time during the rains. Noise, There's also already quite a bit of noise from Woodside Road. Adding more cars and exhaust to this area, I think, would really create a real issue for air quality. And my last thing is a aesthetics. The site is open space now, and a natural barrier from the traffic on Woodside Road. To take that away and build structures on this site would totally change the aesthetic of that whole neighborhood. Thank you.

Hank Upton: I'm Hank Upton. Can you hear me? Okay. I'm Hank Upton, my wife, Joan and I live on Todo El Mundo for the past 32 years. It's a little beyond my comprehension. It's a little beyond my comprehension how this site would work. But Todo El Mundo is really going to be the most severely, adversely, affected by this. There's no question about that, because of parking on the street, congestion, traffic, trying to get on the Woodside Road trying to turn on Todo El Mundo. Now, I'm not exactly sure exactly what environmental impact is. However, if it concerns the ambience and aesthetics, a multi-story building at that place is going to ruin both of those. The question about construction equipment, It's gonna block the road. It's gonna take a long time. And as our first speaker said so articulately, fire trucks wouldn't be able to get in. She mentioned several excellent points. I have noticed that after a rain, there's a lot of pooling of water down at the bottom of that slope on Todo El Mundo. And I wonder, has there been any soils engineering done on these sites? I mean, I'm totally innocent about that. Does anybody know about it? I know that that there's been slippage there before.

Erica Malozsak : Hi! My name is Erica Malozsak. Some of you may have known me since I live right on the corner High Road, Woodside Road, so who else would be better to know and to hear what's happening than us. We live there since 27-28 years, and I had seen a lot, so I don't want to get into the traffic and safety, and the accidents and lives that we saved. This is a long story. I could write a book. So my main concern I have lots of issues, and some of them are traffic, safety, gas, transmission pipeline, noise, pollution, aesthetics, emergency, and parking. These are the thoughts that I live with every day with, and I go to sleep with this question marks. But my main concern is the high pressure gas transmission pipeline that runs right along my property, half of my property on High Road, and crosses

Todo El Mundo and that's where the so-called project will be built. The entrance would be from Todo El Mundo, exactly where the pipeline is. It is interesting to build something close to gas pipeline that's 50 feet away. I have not heard of, but anyway, maybe this is the first time we will hear about this. So I'm extremely concerned knowing what happened in San Bruno, leaving up along this whole thing. It's very, very, very, it makes me very nervous, as you can tell. I'm even nervous right now, just talking about it.

So this pipeline is not a small little something that goes into your house. This is a 30-inch diameter, huge pipeline. And my husband told me, who is a contractor, that the pressure that that moves the gas is over 100 pounds pressure, which I think it's a lot or more than a hundred above pressure. So this is not a joke. So if you think this is a joke, then go ahead, build it, and then pray to God that nothing will happen to me and to my fellow neighbors who are right there. The gas transmission pipeline was not mentioned by staff in any of the previous discussions about development on High on the High Road site. And the Town was, in my opinion, was delinquent for failing to note such a significant hazard that was right there. But no, they mentioned all kind of little earthquakes and traffic on the other side, but this seemed like not being important, or not too important. There is an element called hazards, But there is no mention of this gas transmission line which has a potential to do more damage than any earthquake or landslide. We should demand that the gas transmission line be included as part of the Safety and Utilities Review period. I'm done.

Marcella Mahony Delalcazar: My name is Marcella Mahony Delalcazar. I'm not prepared to say anything. I should have prepare, but I've just got to say what I feel, and I concur with everybody. I said Hank and Joan. Excuse me.

Marcella Mahony Delalcazar: 210 Todo El Mundo, and I am neighbors with Hank and Joan over here; and, there are only three houses there. We have been living there for 22 years, so we can tell you exactly all the problems and all the hazards that it will that is right now, and it will be later you have more people. I was asking Hank, what is the length of Todo El Mundo? It's like one and a half lines right when we drive the width. Yeah, it's very small, very, very dangerous. And considering everything about the environment, about PG&E things and all the noises, and all the pollution, it will be terrible. You guys are from Woodside. You love Woodside. You I sincerely recommend maybe go to Cañada. That is higher, it's more open. But yeah, it will be killing all of us over there, and so I'm completely against that. My my husband he is he is a Geological Engineer, and he couldn't hear very good. So, what we are going to do? He's going to write later, and we're going to send it before the 22nd. But I asked you please, to reconsider that it will be really really bad for everybody. Consider having, so many houses, so many people there, going back and forth. You will have to deplete, cut so many trees to widen the road for all these people that they are going to be living there. Right now, I would like to ask you if you can fix the road for us because we are in a I mean 210, there are 220, and there is 230 (on Todo El Mundo). So every time that we drive there, we're going to go right to 280 to Woodside Road. We're in dangers to be killed because the people coming down the hill. They come at 35-40 miles per hour. They don't respect anybody, so That would be great. If you can do something, put a stop, sign, or say, you know, this is a speed limit, 10 of 15 or 50 miles of 20 miles. And thank you very much for listening. And no. Thank you.

Louis Malozsak (2360 Woodside Road): So on our property, which one is starting from High Road and the following the creek. Between the creek and our swimming pool, there is a sewer line passing through which was built most probably after some time after that house was erected like in the 1950s. So in the past 2 or 3 years it was clogged up. I would say that 3, 4 times. Public Works came out and try to clean up the mess but was created by that problem over there. So the manhole was overflowing. Overflowing so much that all the switch coming down from outside here was coming through over there through that manhole. Okay? And then almost getting inside, in our swimming pool. In the meantime, all the

vegetation it was filled up with this whatever. So, after they showed up, they started to clean up things. They had to throw some out there. You know that to kill the germs in the same time they killed all the vegetation too. So right now, just the past one week I was cutting because I have time. I don't have to be able to work. I was cutting everything, what is dry over there? It is trees, bushes, everything. What was screening us from next to our neighbors. No, so and this is happening since 3, 4 years. My problem with it is that this will happen further down the road too. Why? because, the main clog. It was happening between our property and the next property. which would be closer to the golf course. So somewhere on the line over there, it was the problem 3 times. Okay, so now imagine that these people want to connect up this whole sewer system, whatever they are trying to do with the 16 units over there. Well, I do not see that that will be a very smart idea. And I pretty sure they don't want to put in leech fields. I found at my house when I was digging in the backyard, close to Woodside Road, there was the leach field for our house, and after that, later on it got the transferred over into the main sewer line, which was running down next to the creek. So, anyhow, so our property shows that it is all the way into the middle of the creek. It's our land. Okay? So, but it's not our land because it is owned by Public Works basically, but we are paying the taxes on it. So once again, if they are going to connect anything else to this main sewer line, most probably this will, this will happen not every year, once or twice it will happen 10 times, 15 times, 20 times, because it looks like Public Works doesn't care about it. This would be one of our issues regarding the main sewer line. Then having the transition line right on our property, I mean, next to the street between our fence and the street knowing that me as a plumbing contractor, too how dangerous is the gas line, and how many times I was smelling gas line around because they have some manholes over there, and they have some operation devices over there, and I was smelling gas line many, many times which one it shouldn't be. So, what I'm saying this could be a disaster for us and for everybody that will blow up over there.

Louis Malozsak: If that's just one number one and number 2, number 3 it is. Let's suppose that they gonna put the stop sign or a light in the corner of a High Road and Woodside Road in order to pass through during the daytime, or whatever. So what will happen over there? It will stop the traffic. So right now the traffic is being stopped by the school light. Okay, passing through. So sometime there is a half a mile of cars sitting over there on Woodside road because of the lights at the High School. The and the problem it is the pollution. So the traffic is standing so, and every time that the traffic it starts up, then there is more gas coming out, and all that thing is coming directly in our house, which one is 30 feet away from that road.

Louis Malozsak: So that is another issue for us. So now they got to put the light of it there. It will be more gas coming in. Right now, we have to deal with the traffic, and we have to deal every time. God, I hope I'm not gonna hit anybody and nobody will hit me.

Paul Goeld : Hi, good evening, Paul Goeld, I live in Woodside Hills. Actually, I live a couple of hundred yards from Ayden.

Thank you for holding this session and allowing the public to comment on it, and I want to congratulate Mr. Hill. I thought your your consulting job was really good on this, and it's time to at least examine this. I do have a couple of issues I did want to mention that are specific and regretfully, the only way to make the point is to mention the properties, because, a lot of these things were not included in the initial review that we had. I, by the way, I sit on the Town Council. I'm an elected official. I am speaking tonight as an individual, as a as a citizen, and I did want to mention some of them. And I'm glad to see this happen, because I think many of these as previous speakers have said should have been incorporated, I think, before we made the decision to do this, which was quite controversial. The specific issues, and I don't want to repeat what others have said, or traffic, and then a combination of safety utilities and hazards. And the third one I want to mention was aesthetics. Let me mention traffic first,

because I think it's very timely tonight. I'm coming to you and speaking tonight with Highway 84 is closed. Old La Honda is closed, and we only have one route going up the hill and that's Kings Mountain right now. That's today. That's happening right now, and the inconvenience this is causing on the citizens of Woodside, who live on the hillside just a little bit west of where I'm standing is enormous. So you can imagine the concerns that you've heard expressed tonight from a community which, by the way, is not just Woodside Hills. Technically, Woodside Hills starts about a quarter of a mile up the hill from High Road. But the Todo El Mundo community which you've heard from tonight, and the Woodside Hills community, which includes Ms. Kutay and me. We only have very limited access in and out of that community. So in the event of a landslide, a fire like as what happened, we just saw a tree goes down. We have no way to get in or out of that community, and High Road is a bottleneck, which is the main access to it. By the way, we can't put a traffic light in that area, because that's Caltrans. We don't control that, It's a It's a state highway. But I just wanted to mention that the impact that that would cause should there be a sink hole, a tree fall down which, by the way, trees the fall, and across High Road and Woodside Drive, which is the street that runs all the way through Woodside Hills. I think there were 3 or 4 major closures just within the last rainstorms which occurred. So this is a huge impact for safety to the community. So this is not a theoretical issue. I also wanted to mention something that was brought up before. We have several members of the Todo El Mundo Street. That's there. You may not be familiar with this area. You try by it all the time. But who who makes that turn down High Road and makes that angular drive and comes up high road unless you really have to. Just like a lot of us. Don't drive through the Glens, because if you're just driving through there, there's no reason to go into it. But Todo El Mundo is a very short street. It's not a mile and a half long. It's a couple of 100 yards, in fact, it's from the desk to Woodside Road to the Pub. That's how long the street is. There's only 6 houses on it. They're tiny houses, and, in fact, where Hank lives, and some of the others; it's at the end of a cul-de-sac. There's 3 homes that come off there. It's a very small street. It is barely one lane wide. And this has been mentioned tonight, and I'll mention this and again, and I appreciate your forbearance on the time. Here there is a gas pipeline that runs right along to Todo El Mundo against this property, which was never mentioned in any of the staff, reports that we saw prior to me bringing it up at a at one of the last meetings, because that's when I became aware of it. But it's a tiny little street. and that's the street that has the only access to this property. So getting back to the Environmental Impact Report, which is, I know, the reason for this tonight. parking is going to be a real problem. Construction is going to tie up Todo El Mundo, this tiny little street. But, as I said, runs from you to Woodside road, and it's really going to create a huge impact on folks for construction. Now, I did want to switch. And I mentioned the the the second topic which was safety utilities and hazards. it's interesting that in some of the sites Staff noted really important issues of the environment, like trace faults which are an issue landslides which are an issue and never once mentioned a major PG&E. gas transmission line 30 inches wide. By the way, that number should resonate with you. That's the same gas pipeline that blew up in San Bruno. It's the same one. There's 2. They run right along highway 280. You can see them as you ride down the road you see those little angular signs pointing down to the pipeline, but it runs right along Todo El Mundo. Any project that would be built there would be within 50 feet up given the building envelope. There's limitations you can't build up on the hillside that goes up to Woodside Road. It's a tiny building envelope. It's a one-acre site, but the building envelope is about 0.7-acres. You're going to build 16 units on that. They're necessarily going to be right up against that gas pipeline. They'll be as close to that gas pipeline as you are to the front door. That's how close it will be to the gas pipeline. just as a reminder. The kill zone in a gas pipeline like that is 700 feet.

Paul Goeld: So, by the way, I did want to mention one other thing, the construction during that time it's going to have to have piles driven in there next to a gas pipeline. You're essentially inducing an earthquake next to a 30-inch-high pressure gas transmission line. It's just insane. So, I hope that's taken into account because it hasn't been mentioned even once prior too.

Paul Goeld: The last thing I wanted to mention was aesthetics. And during the Town Council meeting, the Town Council unanimously said, what we don't want is a 3 or 4 story. Actually, they said, a 3 story if I use the limit. A 3-story apartment complex at the very entrance of woods of our Town. It's in complete contradiction to the aesthetics and the General Plan which is equestrian and rural in nature. And yet we're gonna now build something that has 16 units. If you think about that on a 0.7-acre building envelope, it's gonna have to be 3, 4, maybe even 5 stories high with parking underneath for 16 or more cars. It just, it doesn't seem to make sense. So I can't imagine the impact this is going to have on the environment or neighbors, or even the people who live there, as far as getting in getting out. Are they going to park along Todo El Mundo which can barely hold the cars that are there? Now, it's a tiny little street. So I just bring this up. These are the elements that I think are important. It's regretful that they haven't been brought up before. Specifically, I think, the gas Transmission line which you've heard and spades tonight, but I hope that they will at least be addressed in the Environmental Impact Report. By the way, I did not see the mentioned in the draft that I saw, or at least in the review document that was included at the a website. Thank you.

Hank Upton: Hank Upton, 230 Todo El Mundo. Somebody mentioned widening Todo El Mundo. That would not be possible, because on one side the creek comes very close. I can send you pictures if you'd like on the other side. There's some beautiful redwood trees so it would ruin the aesthetics. How, however, also it would be impinging on the gas pipeline. Probably that's all I had to say.

Joan Upton: I'm Joan Upton, and just another comment about Todo El Mundo. We've been there 42 years, and those of you that have been in the area for a long time remember the floods of 1982. And at that time, there were 3 landslides on Todo El Mundo. Now, I'm not a soils engineer. I one neighbor is. But at that time of Todo El Mundo was closed. And we had to get the key from PG and E to go through that substation and to the edge of the creek where we have a footbridge that goes across because there was no driving. Our next door neighbors were allowed to go into the front houses of newer houses that are gated. They had a apparatus to open the gate, and they could go to their houses that way, not all the way into their garages, but it's very fragile. Geologically, there was a slide where I will the 3 of us that live in the original houses in the back, where our mailboxes they had a dish slide, and it took about a year for it to be repaired. Caltrans property encroached on our property, and so Caltrans had to do the repair. There was another slide up closer to the PGand E substation, and the third slide was the property that the Town of Woodside owns. So that's my comment.

Wendy Ellis: Good evening, I'm Wendy Ellis at 1040 High Road. Oh, that's right, right. High road is where we live. We've been there almost 20 years. Now, I'm in a hundred percent agreement with Paul and his remarks, and very alarmed about trying to shoehorn 16 units into 0.7 acres it. Try to imagine the crowds, the traffic, the danger. There have been fatalities on Woodside Road, as you know. It's a major thoroughfare to the 280 people are going they're not going 45 miles an hour. It is a death waiting to happen, and I fear that it would be even worse with what we're talking about. Anyway, I won't take more time, but thank you for your consideration.

Steve Lubin: Steve Lubin, Palm Circle. I lived at Palm Circle for 42 years in the Woodside for 74 years. It's that makes it different. I'd appreciate that, you know there's, there's another entrance to Town besides Woodside Road, that's Canada Road. And, and I appreciate that the the the scoping document talks about the aesthetic of, of putting dense development at the entrance to the Town, and that's also the only part of Town is not in the Western Hills that it's a very high fire danger, but on both sides of 280 there. But I think there's a over riding concern that I have, and that's the the general, the the cumulative impact over years of adding more housing. And I think it's not just this one. It's one cycle. I think we're setting a precedent in this cycle for cycles to come as we get more density in Town, and that it's important to have that density in a place that doesn't cause more vehicle miles traveled, as it says. I think the you know

there's there's a big problem with a plan that we have now that it fits it on the periphery of Town. It's as if the Town was trying to put density where it doesn't bother people in the middle of Town, and that to me is exactly backwards. I'm sorry I'm commenting on the plan, but I think.

Steve Lubin: I think it's a it's important to consider that the vehicle miles travel, and the induced traffic where we're getting you know, we now have a traffic jam coming into Town in the morning. The Housing Element mentions that there's a large increase in employment in Town, and all those people coming into Town. It would be great if they lived here if the housing was a place they didn't have to drive to their jobs. And so I think it's important to consider transit and altered. It means the transportation and vehicle miles traveled in of in the Town wide scope. Thank you.

Craig London (Planning Commissioner): Craig, London. And listening to all of you, and and certainly other people that I talked to outside of this room. I think many people are concerned about the location of some of the some of the recommendations, at least of where we might put some of these locations for homes. And of course every one of them has some negative ones. So I think, you know, as we go forward as a Planning Commission, and certainly as we work with the State. We have to take it have to take into account some of these locations, and they and the dangers that may exist. Or or the other other considerations of the natural, it could be physical. Whatever, and I think at some point, the State has to listen to it, and we have to make some decisions on what to do to to accommodate that. So I guess my comments are that it's every one of you have come up. I've given some very good reasons why, maybe a particular location is not the right way to go. I think what we have to do is to lay out what those are specifically and and put those in, I guess, into a writing process. And you know, Andrew, you you didn't say exactly, but I think the State has to listen to some of these areas. And we have to really say that, you know, to make these kind of decisions without taking into consideration some of the dangers you know, is is, in my view, not not acceptable. So I think if if we all can make these comments, whether we do it online. Like you said we can do that as well or here in in an open session that we're you're monitoring and also taking notes. I think this, you know, the information that you have to do and take back to the State through whatever process is involved is that we are looking at it seriously. And we're not just sort of saying it's not good, or it is good. I think we have specific answers and specific reasons why a particular site is not acceptable. And then the State's gonna come back to us and say, well, give us some some other change, other choices. We may see this thing all over again. But at least we're not ignoring it. So that's all I have to say.

Matt Garr (Planning Commissioner): Matt Garr, So my comments, first just that, thanks all members of the public for bringing this specific commentary about the individual sites. I think that's exactly what the intent was that Andrew had laid out for seeing the Environmental Impact reviews. I think that's that's great to have all that on record. I don't have anything to add specifically on the individual sites. I think the comments made seem quite comprehensive about that. I did have a chance to read the the report that was put together. It also seemed quite confident in terms of looking at the various aspects. To Craig's point, I think we're gonna have some interesting discussions coming down the road in terms of sites, and you know, long term planning, and how we look at really being prepared for the next cycle, and we should continue to consider that. But I won't spend more time on that tonight. Supportive of the the scoping as submitted, plus all the the comments that were made tonight, plus anything else submitted. Thanks.

Darrell Batchelder (Planning Commissioner): Darrell Batchelder, I'm I'm sympathetic to what I heard tonight. I I live in the Woodside Glens. We have a one way road. Parking is always an issue. Traffic is an issue. And I think these you know, everything that's been mentioned really needs to be addressed and resolved, or if it can't be resolved, then it's Matt said, we're gonna have to look at a at alternatives. The 2 issues that that I really heard tonight with the the gas line, and how we can be assured from the Town

perspective that it's as safe as It needs to be. And then I'm concerned that the that the sewer overflowing, the manful manhole overflowing, and and it's happened before, and and adding more to it will obviously so, those are 2 issues that I see that really need some extra after to resolve.

Aydan Kutay (Planning Commissioner): Aydan Kutay, and I represent Woodside Hills, the entire district that the these residents who brought up the gas pipeline issue. I represent that district. I was aware of the gas pipeline issue there, but it wasn't really brought up during the staff presentations. Now, I'm very, very concerned about putting 16 units in an area that there is a gas pipeline. There's a creek, there are redwood trees. There's an enormous traffic problem that will arise. There's all already a traffic problem. So Something has to be done. What? What is I mean? In what? When it comes to this state. What is more important, providing people housing or providing people housing that that they will be, it could be their debt warrant one day. So, those issues have to be looked at and have to be brought up with the state that it. There are enormous restrictions to safety this in that area, if 16 units are built. That's all.

Lyle Weaver (Planning Commissioner): Yes, this is Lyle Weaver speaking. I both want to thank our consultant for the scoping report, which seems quite thorough, and for all the public comments we've gotten tonight. Based on both the scoping reports and the public comments, It seems the sticking points for accommodating 350 odd units of additional housing in Woodside are going to be the fact The State is asking us to put 350 units of housing into the urban wildland interface and exposing more people to the dangers of wildfires. The other thing is, Woodside was created with the primary means of transportation, being private motor vehicles, and having 350 units in woodside versus in other communities is probably gonna have a bigger carbon footprint impact as opposed to if those people were living in other communities that had a higher job density, a higher density of shopping opportunities and better transportation alternatives. The comments are denied are very heartfelt. I think the 1 point that probably is worth mentioning is in an ideal world, there is the presence of that gas pipeline that provides a vital utility service to the entire peninsula. And if you go up further on the Peninsula, there is a lot of high-density housing in Pacifica and Daily City, and probably a lot of other communities that is also right on top of that pipeline. And so any high-density housing we might choose to put on High road, they're not going to be the only high-density development that's going to be close to that pipeline other than that, no further comments.

Alex Tauber (Planning Commissioner): Alex Tauber. First off, thank you for all your comments. Okay, it's not the first time that I've heard them. If you come to a Town Council meeting I've heard them there, so there's a steady drumbeat. I think the goal tonight was just to provide a forum for public moment at the outset of the process. It's the start of the process and, tonight, there was plenty of time for that. I think Sage signaled or the tone, the the openness to answer questions and engage the public by given a member of a member here tonight is hard. And so I think by him doing that, he signaled how open the Town is to make sure that all comments are provided. We're not here to talk about a specific Housing Element. We were here to talk about the environmental conditions. Yeah. I think what resonated with me was the gas pipeline, the sewer, the traffic. And I think the hard thing for me is that, you know, you always apply that golden rule to this, which is, if you lived in this area, how would you feel about it? And and I think you all have kind of brought that to life with your comments tonight a lot of tenured folks who have lived here for a long time. And this is their community. So how would I feel if I had lived here 30 or 42 years. And this happened? So you did a great job of bringing these Housing Element side. The environmental factors that concern you. And so I just wanna make sure that you feel heard. Because I think the goal tonight is to make sure that there is a active phase of comments, and as we were shown in the presentation, there's going to be several parts; several phases, in this process where that's gonna happen at the end of the day. We're here to serve the Town, and we're here to serve you. So from my part. And this was helpful. Thank you.

Chair Voelke (Planning Commissioner): Exactly. We'll say what we've all said, which is, thank you. Thank you for showing up tonight, and I'm sure you'll continue to communicate with Town. Marilyn Voelke, I don't have any comments to regarding specific sites. But for me, concerns and adding new housing at this level, or primarily fire danger in all housing types. Not just in the multi-family units, but in all housing types. I have a lot of concern about adding a to use, particularly those that are being allowed or being mandated, to have allowed by the State reduced setbacks. Because in my area, which is Western Hills, and I like to live in a one way out street. It's a concern to me that we would be adding housing very close to other housing when we spent a lot of time reducing fire danger at the suggestion of our fire department by clearing trees and vegetation around us so putting dwellings closer together. And those areas seems somewhat counterproductive, and we need to do something to mitigate that effect. The State has told us we have a right to put those in. So we need to do something to mitigate that effect. I share the same issue with the multi-family housing. They need to, we need to make sure that they are fires safe. And I think the thought of multi-family housing and Woodside is so foreign to so many of us who live in Woodside that you know it's a concern. I personally think it can be done right. I think the the units that were built up the Canada College are quite attractive, and has shown the way that such things can be built. But I I share the concern about fire, danger for the with the larger properties and and also traffic, because those sites, if they were to be built, would be built near single family homes, have been there a long time, so they need to be built in a way that traffic circulates. The traffic circulates in a way not to burden the neighboring properties. Alright terribly over much, you know. You gotta do something to mitigate the traffic circulation and then on aesthetics. I think that, and this is really for the multi-family sites, we need to make sure that when they are build, that they're aesthetically pleasing and scaled so that they fit in with what exists in Woodside. And so far as it can be scaled that way, and we need to make sure that we have good landscaping plans so that they don't just see buildings they have to be able to fit into our natural landscape somehow. So those are my issues. And they're just general to all of you all of the areas in which it's been proposed that we add housing.

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

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Sage Schaan, Planning Director
City of Woodside
2955 Woodside Road
Woodside, CA 94062

Re: Woodside Housing Element Update – Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)

Dear Sage Schaan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Woodside Housing Element Update. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated, and efficient transportation system. The following comments are based on our review of the May 2023 NOP.

Project Understanding
The proposed project is both a policy document and an implementation tool for implementing the Town's General Plan to account for changing demographics, market conditions, and projected housing need over an 8-year planning period that runs from 2023 through 2031. The project would involve changing the zoning ordinances in order to facilitate the future development of up to 423 units within the approximately 11.8-square-mile Planning Area.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide (*link*).

If the project meets the screening criteria established in the city's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the city's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the city's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the city.

- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance (*link*).

- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Multimodal Transportation Planning
Please review and include the reference of the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the STN in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 (*link*), which supersedes Deputy Directive 64-R1, and further builds upon its goals.

Integrated Transportation and Land Use Planning
Transportation and housing are integrally connected. The Housing Element Update process provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.

Please review and include the reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages the City of Woodside to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

Caltrans looks forward to reviewing the DEIR that should demonstrate how the future housing development patterns align with the City of Woodside's adopted VMT policies. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through efficient and equitable land use planning and policies. The City of Woodside should also continue to coordinate with Caltrans to identify and implement necessary network improvements and impact mitigation.

Lead Agency
As the Lead Agency, the City of Woodside is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

YUNSHENG LUO
Acting District Branch Chief
Local Development Review

c: State Clearinghouse

GENERAL MANAGER
Ana M. Ruiz

BOARD OF DIRECTORS
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June 7, 2023

Sage Schaan, Planning Director
Town of Woodside
2955 Woodside Road
Woodside, CA 94062

SENT VIA E-MAIL TO: sschaan@woodsidetown.org

Subject: **Town of Woodside Housing Element Environmental Impact Report Scoping Meeting Comments**

Dear Mr. Schaan:

On behalf of the Midpeninsula Regional Open Space District (Midpen), we respectfully submit the following comments regarding the Town of Woodside (Town) Housing Element Environmental Impact Report (EIR) Scoping Meeting. Midpen has been following the Housing Element Update process and appreciates the Town's selection of environmental resource categories to be analyzed in the EIR.

Comprised of over 70,000 acres of acquired and protected open space on the San Francisco Peninsula, Midpen is one of the largest regional open space districts in California. Our braided mission is to acquire and preserve in perpetuity open space and agricultural land of regional significance, to protect and restore the natural environment, to preserve rural character and encourage viable agricultural use of land resources, and to provide opportunities for ecologically sensitive public enjoyment and education.

Midpen owns and manages Teague Hill and Thornewood Open Space Preserve. These two preserves are adjacent to housing sites identified in the Town's Draft Housing Element, along Summit Springs Road, Partition Road and a site south of Thornewood Open Space Preserve (APN 075220280). The proposed housing sites are also within the CALFIRE-identified Wildland Urban Interface (WUI) in a CALFIRE-identified Very High Fire Severity Zone[1]. These sites are examples of where additional intensification of development in the WUI increases the risk of wildfire that may spread to adjacent natural lands such as Teague Hill and Thornewood Open Space Preserve.

[1] https://experience.arcgis.com/experience/6508928ba28b49648ec26f61848a3f76

WILDFIRE

The wildfire section of the EIR should study if defensible space can be maintained around structures on the Town's recommended housing sites and if any new fuel breaks are needed to protect new housing. If fire clearance extends into Midpen preserves, this would result in an ongoing impact to the environment, since defensible space needs to be maintained. Midpen has a defensible space permit program to which the adjacent landowner would need to apply to install and maintain defensible space. The adjacent landowner will be responsible to prevent the introduction of invasive species and pathogens to Midpen preserves when working under the defensible space permit program. This Midpen program should be referenced in the EIR.

BIOLOGICAL RESOURCES

The Biological Resources section of the EIR should identify the species and habitat constraints that would preclude installation and/or maintenance of defensible space surrounding a structure and/or new fuel breaks resulting from new housing, particularly new housing adjacent to Midpen preserves.

In addition, the proposed site south of Thornewood Open Space Preserve (APN 075220280) is considered "essential habitat" by The Conservation Lands Network 2.0 Report (CLN 2.0). The CLN 2.0 establishes a blueprint for conserving land for biological connectivity and diversity. The EIR should analyze which housing sites are considered essential habitat under the CLN 2.0.

Thank you for your consideration and we welcome any questions you may have. Please direct questions to Jane Mark, Planning Manager, at jmark@openspace.org .

Sincerely,

Jane Mark, AICP
Planning Manager

CC: Susanna Chan, Assistant General Manager, Midpen
Melissa Borgesi, Planner II, Midpen

STATE OF CALIFORNIA Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

RECEIVED
MAY 31 2023
WOODSIDE TOWN HALL

May 25, 2023

Sage Schaan
Town of Woodside
2955 Woodside Rd.
Woodside, CA 94062

Re: 2023050549, Woodside Housing Element Update, San Mateo County

Dear Mr. Schaan:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

ACTING CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

a. A brief description of the project.

b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.

b. Recommended mitigation measures.

c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

a. Type of environmental review necessary.

b. Significance of the tribal cultural resources.

c. Significance of the project's impacts on tribal cultural resources.

d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Cody.Campagne@nahc.ca.gov

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

cc: State Clearinghouse

From: Wendy Ellis
To: Sage Schaan
Subject: EIR
Date: Wednesday, June 7, 2023 8:53:49 PM

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good evening Sage-

I attended tonight's town meeting about the Environmental Impact Report. I spoke at the mic, but neglected to raise a topic that I feel should be added to the impact review process.

"Hydrology" was not a highlighted topic to be reviewed, but I think the creekside setting for the High Road building envelope demands a review of how the creek there will be affected. Of special concern is the building process itself and the disruption to the adjacent waterway, and the wildlife that depend on it. Of course, future heavy traffic will be a problem there as well.

I hope it's not too late to mention this matter. I appreciate your help in conveying my concern to Mr. Hill.

Kind regards,

Wendy Ellis
1040 High Road
Woodside CA

From: Heidi Hess
To: Sage Schaan
Subject: Housing Element Cycle 6
Date: Friday, June 2, 2023 10:46:06 AM

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sage,

I realize this is all an exercise in futility but I still want to voice my objection to the high density planned for 773 Canada Road.

We've already had one fire very close to the property and the proposal to build high density housing in a Very High Fire Hazard Severity Zone is unconscionable.

State Farm is doing something about the danger our state legislators have refused to acknowledge. They have decided to no longer insure new housing in CA due to wildfire and high construction costs.

Any building on 773 Canada should ensure there is a buffer zone between existing houses and new builds and sensitivity to the Wildland Urban Interface to try to prevent a catastrophic fire event.

Heidi Hess

Thalia & Stephen Lubin, Architects
11 Palm Circle Woodside, California 94062
650-851-4234 steve@stlubin.ne

June 22, 2023

Sage Schaan, Planning Director
Town of Woodside
Comments re: Scope of EIR for the Woodside Cycle 6 Housing Element Update

Dear Sage,

In preparing the EIR for the Housing Element the following issues should be considered:

- Vehicles Miles Travelled/Traffic Generation

The EIR should consider the effect of the location of new housing on vehicle miles travelled and the impact of additional vehicle travel on the use of pedestrian, bicycle and micro-mobility alternatives to automobiles.

- Potential for transit service

The EIR should consider the potential for bus service to the selected sites and how such service would affect vehicle miles travelled.

- Hazardous Conditions

The EIR should consider the hazards present in Woodside and the effect of the location of new housing on exposure to and exacerbation of these hazards. The hazards include earthquake, fire, landslides, flooding and utility line mishaps.

- Town Identity/Scenic Roads

The EIR should consider the visual image of the Town, including issues of Town Gateways and creating a compact village vs dispersed projects peripheral to the Town.

- Open Space/Habitat Preservation

A primary goal of the General Plan is to preserve both large open spaces and natural habitats on individual properties so plant and animal habitats and the connectivity of habitats is preserved. The EIR should consider how increased housing density effects the preservation of natural habitats and open spaces.

- Cumulative Impacts

Each of the above-mentioned issues could seem of limited significance with regard to this first cycle of mandated housing. However, this one cycle cannot be considered in isolation. It must be assumed that the patterns established in the Housing Elements will persist for many decades. The EIR should consider the long-term effects of the Housing Element Policies.

- Housing of the Town's Workforce

The EIR should analyze the balance of jobs and the availability of workforce housing in Town. The effect of any imbalance between jobs and housing on vehicle miles travelled and the use of roads by pedestrian, bicycle and micro-mobility alternatives to automobiles should be analyzed.

Thank You for your attention to these matters.

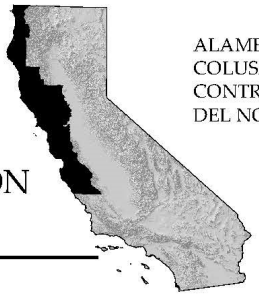
Regards

Steve Lubin

Appendix C

CULTURAL RESOURCES MATERIALS

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM



ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE
HUMBOLDT
LAKE
MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCO
SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
1400 Valley House Drive, Suite 210
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
https://nwic.sonoma.edu

ACCESS AGREEMENT SHORT FORM

File Number: 22-0712

I, the the undersigned, have been granted access to historical resources information on file at the Northwest Information Center of the Califronia Historical Resources Information System.

I understand that any CHRIS Confidential Information I receive shall not be disclosed to individuals who do not qualify for access to such information, as specified in Section III(A-E) of the CHRIS Information Center Rules of Operation Manual, or in publicly distributed documents without written consent of the Information Center Coordinator.

I agree to submit historical Resource Records and Reports based in part on the CHRIS information released under this Access Agreement to the Information Center within sixy (60) calendar days of completion.

I agree to pay for CHRIS services provided under this Access Agreement within sixty (60) calendar days of receipt of billing.

I understand that failure to comply with this Access Agreement shall be grounds for denial of access to CHRIS Information.

Print Name: Claire Villegas Date:

Signature:

Affiliation: Dyett & Bhatia

Address: City/State/ZIP:

Billing Address (if different from above):

Special Billing Information

Telephone: Email: claire@dyettandbhatia.com

Purpose of Access:

Reference (project name or number, title of study, and street address if applicable):

Data Search for Town of Woodside Housing Element Update

County: SMA USGS 7.5' Quad: Woodside, Palo Alto, La Honda

This is not an invoice. Sonoma State University will send separate Invoice

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM

ALAMEDA
COLUSA
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HUMBOLDT
LAKE
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MENDOCINO
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SAN BENITO
SAN FRANCISCO
SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
1400 Valley House Drive, Suite 210
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
https://nwic.sonoma.edu

January 5, 2023 NWIC File No.: 22-0712

Claire Villegas
Dyett & Bhatia
1330 Broadway, Ste. 604
Oakland, CA 94612

Re: Record search results for the proposed Town of Woodside (HEU) Housing Element Update

Dear Claire Villegas:

Per your request received by our office on the 1st of November, 2022, a records search was conducted for the above referenced project by reviewing pertinent Northwest Information Center (NWIC) base maps that reference cultural resources records and reports, historic-period maps, and literature for San Mateo County. Please note that use of the term cultural resources includes both archaeological resources and historical buildings and/or structures.

The 2023-31 Woodside Housing Element is the Town's plan to accommodate its share of the regional housing need for the 2023 – 2031 planning period and to address new State law. The Housing Element Update includes an inventory of vacant and underutilized properties throughout the Town that are available for residential development, and it identifies actions the Town will take to diversify its housing stock and to increase affordability. In total, the inventory has a capacity for 408 housing units over the planning period, including 160 accessory dwelling units that would be constructed on existing single-family lots, 80 units for student and faculty on the Canada College site, and 27 units at 773 Canada, including 16 townhomes and 11 single-family units.

Review of the information at our office indicates that there have been ninety-three (93) cultural resource studies covering approximately 1/3 of the Town of Woodside HEU project area. See attached Report Listing. This Town of Woodside HEU project area contains nineteen (19) recorded Native American archaeological resources, including lithic scatters, habitation sites, burials, quarry, bedrock mortars, petroglyphs, hearths, pits, and rock shelters and caves. This project area contains twenty-seven (27) historic-period archaeological resources, including isolates, orchards or groves, trash scatters, a cabin site, an abandoned dirt road, concrete slab and spigot, graves or cemetery, a Mill, a water tower, farm house earth dam, and roman pool. See attached Resource List. In addition, there are nine (9) Informal Resources (C-348, C-349, C-353, C-354, C-355, C-356, C-354, C-355, C-356, C-373, C-389, and SMA-ISO-1), eight (8) of which are historic buildings and structures, and one prehistoric isolate. Informal Resources are those resources not recorded on DPR 523A primary record forms and not submitted in CHRIS standard format to an IC by OHP.

The State Office of Historic Preservation Built Environment Resources Directory (OHP BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of

Historic Places, lists thirty-four (34) recorded buildings or structures within or adjacent to the proposed Town of Woodside HEU project area. See attached BERD Listing and California Historical Resource Status Codes List. In addition to these inventories, the NWIC base maps show thirty-seven (37) recorded buildings or structures, and two recorded Districts, the Folger Estate Stable Historic District, P-41-002449, and the Green Gables, the Fleishhacker Estate, P-41-000738, within the proposed Town of Woodside HEU project area. The Caltrans Bridge Inventory Lists thirteen (13) bridges. See attached Bridge Listing.

At the time of Euroamerican contact, the Native Americans that lived in the area of the Town of Woodside HEU were speakers of the Ramaytush language, which is part of the Costanoan/Ohlone language family (Levy 1978:485). Using Milliken's study of various mission records, the proposed project area is located within the lands of the Olpen tribe, whose territory tribe held interior hill and valley lands of the Santa Cruz Mountains, the La Honda Creek portion of the San Gregorio watershed, and the Corte de la Madera Creek portion of the San Francisquito Creek watershed. (Milliken 1995: 249).

Based on an evaluation of the environmental setting and features associated with known sites, Native American resources in this part of San Mateo County have been found on ridges, midslope benches, in valleys, near intermittent and perennial watercourses and near areas populated by oak, buckeye, manzanita, and pine, as well as near a variety of plant and animal resources. The Town of Woodside HEU project area is located in San Mateo County and includes a portion of Santa Cruz Mountains, Kings Mountain, San Andreas Rift Zone, Jasper Ridge, and several creeks including, La Honda Creek, West Union Creek, McGarvey Gulch, Martin Creek, Alambique Creek, Corte De Madera Creek, Searsville Lake, Schilling Lake, Bear Creek, San Francisquito Creek, and several springs. Aerial maps indicate a heavily wooded and densely chapparraled Western half with a few roads, buildings and structures. The Eastern half, although still fairly wooded, is more densely populated by buildings structures and includes large areas of low grasses or bare ground. Given the similarity of these environmental factors, there is a high potential for unrecorded Native American resources to be within the proposed Town of Woodside HEU project area.

Review of historical literature and maps indicated historic-period activity within the Town of Woodside HEU project area. Early General Land Office Plat Maps and Rancho maps indicate several roads, houses, mills, bridges, fields, a Hotel, and a Tavern (1856, 1858, 1881). Early San Mateo County maps indicate the lands of numerous landholders, as well as, roads, and buildings (Bromfield 1894). With this information in mind, there is a high potential for unrecorded historic-period archaeological resources to be within the proposed Town of Woodside HEU project area.

The 1941 and 1961 Half Moon Bay USGS 15-minute topographic quadrangle depicts numerous buildings and structures within the Town of Woodside HEU project area. If present, these unrecorded buildings or structures meet the Office of Historic Preservation's minimum age standard that buildings, structures, and objects 45 years or older may be of historical value.

RECOMMENDATIONS:

1) There are forty-six (46) recorded archaeological resources in the proposed Town of Woodside HEU project area. There have been ninety-three (93) cultural resource studies covering approximately 1/3 of the Town of Woodside HEU project area. According to our

research there is a high potential of identifying Native American archaeological resources and a high potential of identifying historic-period archaeological resources in unsurveyed portions of the project area.

Given that the proposed Town of Woodside Housing Element Update project area covers such a large area with known sensitivity, and the proposed improvements will guide future projects, it is recommended that these future projects be considered on an individual basis under the Northwest Information Center's Project Review Program. This Program is organized to aid cities and counties in meeting their CEQA obligations on a project-by-project basis. These reviews result in project specific information and recommendations. Please contact the NWIC Coordinator at 707/588-8455 for additional information.

2) If archaeological resources are encountered **during construction,** work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. Project personnel should not collect cultural resources. Native American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

3) It is recommended that any identified cultural resources be recorded on DPR 523 historic resource recordation forms, available online from the Office of Historic Preservation's website: https://ohp.parks.ca.gov/?page_id=28351

4) We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at 916/373-3710.

5) Our research indicates that there are 34 recorded buildings and structures included in the OHP BERD within the Town of Woodside Housing Element Update. NWIC Base Maps show 37 recorded buildings and structures, and two recorded Districts, the Folger Estate Stable Historic District, and Green Gables, the Fleishhacker Estate District. The Caltrans Bridge Inventory also includes 13 bridges. Additionally, the project area has the potential to contain other unrecorded buildings or structures that meet the minimum age requirement.

Therefore, prior to commencement of project specific activities, it is recommended that the above listed resources, and any other ones that have yet to be inventoried, be assessed by a professional familiar with the architecture and history of San Mateo County. Please refer to the list of consultants who meet the Secretary of Interior's Standards at http://www.chrisinfo.org.

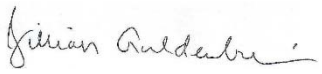
6) Review for possible historic-period buildings or structures has included only those sources listed in the attached bibliography and should not be considered comprehensive.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Thank you for using our services. Please contact this office if you have any questions, (707) 588-8455.

Sincerely,



Jillian Guldenbrein
Researcher

LITERATURE REVIEWED

In addition to archaeological maps and site records on file at the Northwest Information Center of the Historical Resources Information System, the following literature was reviewed:

Barrows, Henry D., and Luther A. Ingersoll
2005 *Memorial and Biographical History of the Coast Counties of Central California*. Three Rocks Research, Santa Cruz (Digital Reproduction of The Lewis Publishing Company, Chicago: 1893.)

Bowman, J.N.
1951 *Adobe Houses in the San Francisco Bay Region*. In Geologic Guidebook of the San Francisco Bay Counties, Bulletin 154. California Division of Mines, Ferry Building, San Francisco, CA.

Brabb, Earl E., Fred A. Taylor, and George P. Miller
1982 *Geologic, Scenic, and Historic Points of Interest in San Mateo County, California*. Miscellaneous Investigations Series, Map I-1257-B, 1:62,500. Department of the Interior, United States Geological Survey, Washington, D.C.

Bromfield, Davenport
1894 Official Map of San Mateo County, California

General Land Office
Survey Plat for Townships 5 and 6 South/Range 4 West.
1856 Rancho Canada De Raymundo
1858 Rancho El Corte de Madera
1881 Canada De Raymundo

Heizer, Robert F., editor
1974 *Local History Studies*, Vol. 18., "The Costanoan Indians." California History Center, DeAnza College, Cupertino, CA.

Helley, E.J., K.R. Lajoie, W.E. Spangle, and M.L. Blair
1979 *Flatland Deposits of the San Francisco Bay Region - Their Geology and Engineering Properties, and Their Importance to Comprehensive Planning*. Geological Survey Professional Paper 943. United States Geological Survey and Department of Housing and Urban Development.

Hope, Andrew
2005 *Caltrans Statewide Historic Bridge Inventory Update*. Caltrans, Division of Environmental Analysis, Sacramento, CA.

Hynding, Alan
1984 *From Frontier to Suburb: The Story of San Mateo Penninsula*. Star Publishing Company, San Mateo, CA.

Kroeber, A.L.
1925 *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 78, Smithsonian Institution, Washington, D.C. (Reprint by Dover Publications, Inc., New York, 1976)

Levy, Richard
1978 Costanoan. In *California*, edited by Robert F. Heizer, pp. 485-495. Handbook of North American Indians, vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Milliken, Randall
1995 *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area 1769-1810*. Ballena Press Anthropological Papers No. 43, Menlo Park, CA.

Myers, William A. (editor)
1977 *Historic Civil Engineering Landmarks of San Francisco and Northern California*. Prepared by The History and Heritage Committee, San Francisco Section, American Society of Civil Engineers. Pacific Gas and Electric Company, San Francisco, CA.

Nelson, N.C.
1909 *Shellmounds of the San Francisco Bay Region*. University of California Publications in American Archaeology and Ethnology 7(4):309-356. Berkeley. (Reprint by Kraus Reprint Corporation, New York, 1964)

Postel, Mitchell P.
1994 *San Mateo, A Centennial History.* Scottwall Associates, San Francisco, CA.

Roberts, George, and Jan Roberts
1988 *Discover Historic California*. Gem Guides Book Co., Pico Rivera, CA.

San Mateo County Historic Resources Advisory Board
1984 San Mateo County: Its History and Heritage. Second Edition. Division of Planning and Development Department of Environmental Management.

San Mateo County Planning and Development Department
n.d. "Historical and Archaeological Resources, Section 5" from the *San Mateo CountyGeneral Plan*.

State of California Department of Parks and Recreation
1976 *California Inventory of Historic Resources*. State of California Department of Parks and Recreation, Sacramento.

State of California Department of Parks and Recreation and Office of Historic Preservation
1988 *Five Views: An Ethnic Sites Survey for California*. State of California Department of Parks and Recreation and Office of Historic Preservation, Sacramento.

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2022 *Built Environment Resources Directory*. Listing by City (through September 23, 2022). State of California Office of Historic Preservation, Sacramento.

Thornton, Mark V.
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Woodbridge, Sally B.
1988 *California Architecture: Historic American Buildings Survey*. Chronicle Books, San Francisco, CA.

Works Progress Administration
1984 *The WPA Guide to California*. Reprint by Pantheon Books, New York. (Originally published as California: A Guide to the Golden State in 1939 by Books, Inc., distributed by Hastings House Publishers, New York.)

Yamada, Gayle K. and Dianne Fukami
2003 *Building a Community: The Story of Japanese Americans in San Mateo County.* AACP, Inc., San Mateo, CA.

**Note that the Office of Historic Preservation's *Historic Properties Directory* includes National Register, State Registered Landmarks, California Points of Historical Interest, and the California Register of Historical Resources as well as Certified Local Government surveys that have undergone Section 106 review.

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-003020	Voided - E-18 SMA	1975	Stephen A. Dietz	An archaeological reconnaissance of the 12.23 acre Ponderosa-Woodside project parcel near Redwood City, California (letter report)	Archaeological Consulting and Research Services, Inc.
S-003030	Voided - E-28 SMA	1976	Stephen A. Dietz	An archaeological reconnaissance of the 942 acre Wunderlich Park site located on State Highway 84 near Woodside, San Mateo County, California (letter report)	Archaeological Consulting & Research Services
S-003082	Voided - E-81 SMA	1970	Stephen A. Dietz and Thomas L. Jackson	An Archaeological and Historical Reconnaissance of a Portion of the San Mateo County Coastside	Adan E. Treganza Anthropology Museum, San Francisco State College
S-003127	Voided - E-132 SMA	1977	Thomas L. Jackson	Archaeological reconnaissance of the proposeed 17 acre residential subdivision, "Farm Hill Road Site", Redwood City, California (letter report)	Archaeological Consulting & Research Services, Inc.
S-003133	Voided - E-138 SMA	1974	Stephen A. Dietz	Archaeological Reconnaissance: Proposed Resubdivision and Construction Site of Single Family Dwelling of Mr. Atherton Phleger, San Mateo County, California	
S-003151	Voided - E-157 SMA	1980	Diane C. Watts	Archaeological Reconnaissance Report, 04-SM-84/280 21.5/3.3, Proposed Construction of a Park and Ride Facility near Woodside, San Mateo County 04210-104151	California Department of Transportation
S-005384	Other - E-1 SMA	1976	Mara Melandry	Archaeological Survey Report for Pipe Replacement and Slope Stabilization, 04-SM-35, Post Miles 11.64 and 12.0, 04210-392421	California Department of Transportation
S-006094	Voided - E-190 SMA	1980	Eldon D. Earnhandt	An Archaeological Survey of the Property Located at the Bottom of Edgewood Road Near the Old Rock Quarry.	

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-006196		1983	Peter M. Banks	An Investigation of the Cultural Resources within the Southern Watershed Parcel, near Woodside, San Mateo County, California (letter report)	California Archaeological Consultants, Inc.
S-007112		1985	Stephen A. Dietz	Report of Archaeological Investigations at the Woodside Store, Woodside, San Mateo County, California.	Archaeological Consulting and Research Services, Inc.
S-007345	Caltrans - 04354-114080	1985	Janis K. Offermann	Negative Archaeological Survey Report, guardrail and bridge approach railing project in San Mateo County, 04-SM-01-30.96, SM-84-16.52, SM-84-19.16, SM-84-19-89, SM-114-3-32, 04354-114080	California Department of Transportation
S-012388	Submitter - MRC-01-01-91	1991	Matthew R. Clark	An Archaeological Reconnaissance of the Lands of Thomson, on Skyline Boulevard, near Woodside, San Mateo County, California	MRC Consulting
S-012768		1991	Katherine M. Dowdall	Archaeological Survey Report, proposed replacement of the West Union Creek Bridge on SR 84 (Woodside Road), 04-SMA-84 P.M. 19.9 04-127290	Caltrans
S-013357		1991	Archaeological Resource Management	Cultural Resource Evaluation of a Parcel Located on Kings Mountain Road in the County of San Mateo	
S-013369		1991	Robert Cartier	Cultural Resource Evaluation for the Phleger Estate in the County of San Mateo	Archaeological Resource Management
S-013478	Submitter - MRC 1-01-92	1992	Matthew R. Clark	An Archaeological Reconnaissance of a Portion of the Jarvis Property on Skyline Boulevard, near Woodside, San Mateo County, California	MRC Consulting
S-013966		1992	Matthew R. Clark	Archaeological Reconnaissance of the "Weeks Driveway" in the La Honda Creek Open Space Preserve, Skyline Boulevard, San Mateo County, California	MRC Consulting
S-014404		1992		Cultural Resources Assessment, 2883 Woodside Road, Woodside, APN 073-090-410, APN 073-090-420	Cultural Resource Planning
S-014405		1992		Cultural Resources Assessment, Whiskey Hill Estates, Woodside, California	Cultural Resource Planning

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-015561		1992	Jeff A. Parsons	Report on Fieldwork: Archaeological Monitoring at the Moore Mountain Meadows Site CA-SMA-206, a Prehistoric Village of the Santa Cruz Mountains Region, Excavation and Grading for Future Garage Foundations	Archaeological Resrouce Service
S-015569	Submitter - A.R.S. Project 93-43	1993	Stephen Bryne	A Report of Archaeological Monitoring Performed at CA-SMA-206, Moore Mountain Meadow, 100 Canada Road, Woodside, San Mateo County, California	Archaeological Resource Service
S-016776	Submitter - MRC 01-01-95	1995	Matthew R. Clark	An Archaeological Reconnaissance of the Ward Property at 12350 Skyline Boulevard, Woodside, San Mateo County, California	MRC Consulting
S-016814		1994	Colin I. Busby	Archaeological Resources Assessment, Filoli Center, Visitor/Education Building Located near Woodside, San Mateo County, California, Case No. USE81-17, APN 067-270-040 (letter report)	Basin Research Associates
S-017277		1995	Matthew R. Clark	An Archaeological Reconnaissance of the Zion Half Moon Limited Partnership Property, Skyline Boulevard, Woodside, San Mateo County, California	MRC Consulting
S-017337		1995	Matthew R. Clark	An Archaeological Reconnaissance of Portions of the Pearson Property, 11860 La Honda Road, Woodside, San Mateo County, California	
S-017623		1995	Robert Cartier	Cultural Resource Evaluation, Lands of Platt, Portola Valley, California, County of San Mateo	Archaeological Resource Management
S-017639		1995	Robert Cartier	Cultural Resource Evaluation of the Woodside Priory EIR Project in Portola Valley, County of San Mateo	Archaeological Resource Management
S-018263		1995	Matthew R. Clark	Archaeological Monitoring and Data Recording on Portions of the Pearson Property, 11860 La Honda Road, Woodside, San Mateo County, California	
S-018421		1996	William Self	Archaeological Survey of Sky Londa Fire Station, San Mateo County, CA. (letter report)	William Self Associates, Inc.

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-018537		1996	Colin I. Busby	Archaeological Monitoring - Final Report, Filoli Center, Visitor/Education Building, Located near Woodside, San Mateo County, California	Basin Research Associates, Inc.
S-019200	Submitter - A.R.S. Project #95-54	1996	Katherine Flynn	A Cultural Resources Evaluation of the Property Located at 745 Mountain Home Road, Woodside, San Mateo County, CA.	Archaeological Resource Service
S-020220		1998	Elena Reese, Alan Leventhal, Viviana Bellifemine, Susan Morley, Rosemary Cambra, and Norma Sanchez	Archaeological Testing and Burial Recovery for CA-SMA-84: The Lego Site	Ohlone Families Consulting Services
S-021056	IC Record Search Nbr - 60800-98-515	1998		Cultural Resource Evaluation of the Phillips Brooks School Site Property in the City of Woodside, California	Archaeological Resource Management
S-021928		1999	Trish Fernandez and Sheri Brown	Sausal Creek Culvert Replacement Project, Cultural Resources Survey Report	Jones & Stokes Associates, Inc.
S-022075		1999	Lawrence G. Desmond	Report of a Cultural Resources Inventory at 17 Mountain Meadow Drive, Woodside, San Mateo County, California, APN 072-342-170	
S-022251		1999	Matthew R. Clark	An Archaeological Reconnaissance of a Portion of the Mumford Property at 2630 Bear Gulch Road, Near the Town of Woodside, San Mateo County, California	MRC Consulting
S-022384		1999	Carolyn Losee	Archaeological Survey for Jalalian Property, APN No. 072-230-080: Negative Results (letter report)	
S-022478		1999	Lynn Compas and Tracy Bakic	Positive Historic Property Survey Report for the Woodside Road Widening Project, Redwood City, San Mateo County, California	PAR Environmental Services, Inc.
S-022563		2000	Lawrence G. Desmond	Report of a Cultural Resources Inventory at APN-067-310-080, 12422 Skyline Boulevard, Woodside, San Mateo County, California	
S-022606	IC Record Search Nbr - 60800-99-817	1999		Cultural Resource Evaluation of the Sprint PCS Sand Hill Road and Hwy 280 Project in the County of San Mateo	Archaeological Resource Management

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-022661		2000	Lawerence G. Desmond	Report of a Cultural Resources Inventory at 1040 Bear Gulch Road, Woodside, 94062, San Mateo County, California APN-072-240-240	
S-022981		2000	Wiberg, Randy S.	Archaeological Reconnaissance of the Anker Property Project Area, 1401 Native Sons Road, Woodside, San Mateo County, California	Holman and Associates
S-023272		2000	Matthew R. Clark	An Archaeological Reconnaissance of the Tubbs Parcel (APN 067-032-030) at 13419 Skyline Boulevard, San Mateo County, California	MRC Consulting
S-023658		2001	William Self and Kimberley Popetz	Archaeological Survey and Cultural Resources Assessment of the Green School Project, Woodside, San Mateo County, California (letter report)	William Self Associates, Inc.
S-023902		2001	Bruce Beck	CDF Project Review Report for Archaeological and Historical Resources, Hill 18 2001 VMP, Project RXCZU-018 (California Department of Forestry)	
S-024406	Submitter - MRC 05-02-01	2001	Matthew Clark	An Archaeological Reconnaissance of a Portion of the Skymoon Ranch Property, 12650 Skyline Boulevard, Woodside, San Mateo County, California	MRC Consulting
S-024440		2001	Stacie Reutter	Cultural Resources Assessment for Hwy 35/84, Located on Morse Lane off Highway 35, Sky Londa, San Mateo County, California (letter report)	Garcia and Associates
S-025309		2002	Miley Paul Holman	Archaeological Field Inspection of the Sprint PCS Facility SF54XC250A (Caltrans Hillside), Woodside, San Mateo County, California (letter report)	Holman & Associates
S-025326		2001	John Nadolski	Archaeological Investigations for Proposed Projects at 7 Cell Tower Sites	Pacific Legacy, Inc.
S-025527		1999	Stuart Guedon	Cultural Resources Assessment, San Francisco Public Utilities Commission (SFPUC) Hetch Hetchy Chloramine Conversion Project, Proposed Interim Pulgas Water Temple Site Facility, Canada Road near Woodside, San Mateo County, California	

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-027671	Submitter - A.R.S. Project 99-53	2000	Cassandra Chattan	Results of an Archaeological Monitoring Program for the Octopus Holdings Project, Woodside, San Mateo County, CA.	Archaeological Resource Service
S-027930		2003	Kyle Brown, Adam Marlow, James Allan, and William Self	Cultural Resource Assessment of Alternative Routes for PG&E's Jefferson-Martin Transmission Line, San Mateo County, California	William Self Associates, Inc.
S-030906	Caltrans - Contract # 43A0089; Caltrans - EA 43-984433; Caltrans - Task Order: 01	2004	Christopher McMorris	Caltrans Historic Bridge Inventory Update: Concrete Arch Bridges, Contract: 43A0089, Task Order: 01, EA: 43-984433, Volume I: Report and Figures	JRP Historical Consulting
S-031594		2006	Miley Paul Holman	Cultural Resources Study of the Stillheart Project Near Woodside, San Mateo County, California (letter report)	Holman & Associates
S-031608		2006	Laura Jones	Preliminary Archaeological Assessment for a Property at 3411-17 Woodside Road, Woodside, California (letter report)	Stanford University
S-031972		2006	Carolyn Losee	Cultural Resources Analysis for Cingular Wireless Site SNFCCAC043: 5055 Farm Hill Boulevard, Woodside, CA 94062 (letter report)	Archaeological Resources Technology
S-033507	Agency Nbr - PLN2007-00101; IC Record Search Nbr - File No: 06-1632	2007	Laura Jones	PLN2007-00101/APN 074480010 at 3673 Sand Hill Road/Mark Bonino (letter report)	Stanford University

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-033511	Caltrans - EA 447600	2007	Laura Leach-Palm, Patricia Mikkelsen, Jerome King, Paul Brandy, Lindsay Hartman, and Bryan Larson	Cultural Resources Inventory of Caltrans District 4 Rural Conventional Highways in Alameda, Marin, Napa, San Mateo, Santa Clara, and Sonoma Counties	Far Western Anthropological Research Group, Inc.; JRP Historical Consulting

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-036650	Submitter - 36303693.03693; Submitter - Woodside Road LTE; Voided - S-36664	2005	Brian Hatoff	Collocation ("CO") Submission Packet FCC Form 621, Woodside Road LTE, Project Number 36303693.03693	URS Corporation
S-036650a		2009		Verizon Cellular Communications Tower Site-LTE Woodside Road, 1835 Valota Road (APN: 059-201-060), Redwood City, CA, 95061: Results of Architectural History Survey for Verizon Cellular Communications Tower Site	URS Corporation

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-036836	Voided - S-37099; Voided - S-37100	2009	Lee Panich, John Holson, and Alison Vanderslice	Historic Context and Archaeological/Architectural Survey Report for the Habitat Reserve Program, Alameda, San Mateo, Santa Clara, and Tuolumne Counties, California	Pacific Legacy, Inc.; Carey and Co, Inc.
S-036836a		2010	Lee Panich, John Holson, and Allison Vanderslice	Addndum I to the Historic Context and Archaeological/Architectural Survey Report for the Habitat Reserve Program, Alameda, San Mateo, Santa Clara, Tuolumne Counties, California	Pacific Legacy, Inc.; Carey & Co. Inc.
S-036836b		2010		Final Records Search Results Report for the Habitat Reserve Program, Alameda, San Mateo, Santa Clara, Stanislaus, and Tuolumne Counties, California	Pacific Legacy, Inc.
S-037241	Caltrans - EA 0A8721; OHP PRN - FHWA100414A; Voided - S-37260; Voided - S-37262	2010	Benjamin J. Harris, Maureen Zogg, and Christopher Caputo	Historic Property Survey Report, proposed replacement of Metal Beam Guardrails (MBGR) at various locations in San Mateo County, California, 04-SMA-VarVar, EA 04-0A8721	Caltrans, District 4
S-037241a				VOIDED; see S-52002	
S-037241b		2010	Benjamin J. Harris and Maureen Zogg	Archaeological Survey Report for the Proposed Metalbeam Guardrail Upgrade Project at Various Locations across San Mateo County, California, 04-SMA-VarVar, EA 04-0A8721	California Department of Transportation, District 4
S-037241c		2010	Benjamin J. Harris	Environmentally Sensitive Area (ESA) and Archaeological Monitoring Area (AMA) Action Plan for Two Locations Along State Route 1, San Mateo County, California, 04-SMA-01, PM 0.7 and 1.2, EA 04-0A8721; for the Proposed Metalbeam Guardrail Project at Various Locations Across San Mateo County, California, 04-SMA-VarVar, EA 04-0A8721	California Department of Transportation, District 4

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-037241d		2010	Benjamin J. Harris and Maureen Zogg	Extended Phase I Testing at CA-SMA-97 for the Proposed Metalbeam Guardrail 1-5 Upgrade Project, San Mateo County, California, 04-SMA-01, PM 1.20, EA: 04-0A8721	Caltrans
S-037269	Agency Nbr - SF-43376A	2010	Lorna Billat	Collocation ("CO") Submission Packet, FCC Form 621, Lawler Ranch Road, SF-43376A	Earth Touch, Inc.
S-037464		2010	Carrie D. Wills	Cultural Resources Records Search and Site Visit for AT&T Mobility, LLC Candidate CN5707 (Sharon Heights), Lawler Ranch Road, Menlo Park, San Mateo County, California. (letter report)	Michael Brandman Associates
S-038703		2012	Laura Jones, Julie Cain, David Daly, Sam Levy, Koji Ozawa, Max RoseFigura, Katie Turner, and Tim Wilcox	Archaeological and Geophysical Survey for SLAC National Laboratory, San Mateo County, California	Heritage Services - Stanford University
S-043490	Submitter - Project # CCL03301	2013	Lorna Billat	Collocation Submission Packet, Woodside & Moore, Project No.: CCL03301	EarthTouch, Inc
S-044022	OHP PRN - DOE 111107 A	2011		SLAC National Accelerator Laboratory, Menlo Park, CA, Section 106 Technical Report, Section 10, Klystron Gallery (Building 002)	Page & Turnbull
S-044022a		2011	Paul Golan and Susan K. Stratton	DOE111107A: Section 106 Consultation for the SLAC National Accelerator Laboratory Sector 10 Project, Findings of No Adverse Impacts	US Dept. of Energy; Office of Historic Preservation

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-046397		2014	Tim Spillane	Archaeological Overview and Assessment: Indigenous Sites of the GGNRA, 2014	BayArcheo
S-046560		2015	Stacey De Shazo	Historic Resource Evaluation of the property located at 1260 Westridge Drive, Portola Valley, San Mateo County, California	Evans & De Shazo, LLC
S-046611		2004	Lorna Billat	Collocation ("CO") Submission Packet, Alameda - Hwy 84, Project No.: CCL03302	EarthTouch, Inc.
S-046611a		2014	Dana E. Supernowicz,	Architectural Evaluation Study of the Alameda-Highway 84 Project, AT&T Mobility Site No. CCL03302, 2000 Woodside Road, San Mateo County, California	Historic Resource Associates
S-047413	OHP PRN - FCC_2015_0326_002 ; Submitter - 310475	2015	Stephen Geist and Colin Busby	FCC Form 621 Collocation Submission Packet ATT West Atherton Small Cell Network Project SCC-CC0001-01, 02, 04, 05, 06, 07, 09, 13, 14, 15, 16, 17, 20, 26, Atherton, Redwood City, & Woodside, San Mateo County, California / GE2G Project Number 310475	Geist Engineering & Environmental Group Inc.
S-047413a		2015	Carol Roland-Nawi	FCC_2015_0326_002; Atherton Small Cell Network Project, SCC-CC001-01, 02, 04, 05, 06, 07, 09, 13, 14, 15, 16, 17, 20, 26, Atherton, Redwood City & Woodside, San Mateo County, Collocation	Office of Historic Preservation

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-047598	Agency Nbr - FA 10095811; Submitter - 310560	2016	Carolyn Losee	Cultural Resources Investigation for AT&T Mobility CNU3381 "DT Woodside" 1600 Canada Lane, Woodside, San Mateo County, California 94062 (letter report)	Archaeological Resources Technology
S-047598a		2016	Carolyn Losee	FCC Form 621 Collocation (“CO”) Submission Packet, Existing Facility on a PG&E Utillity Pole Antenna Modification Undertaking, ATT Name: DT Woodside/AT&T ID: CNU3381/CCL03381/FA 10095811, 1600 Canada Lane, Woodside, San Mateo County, CA 94062	Geist Engineering & Environmental Group Inc
S-048582		2013	Melinda Pacheco Patrick, Jack Meyer, Naomi Scher, Jennifer Thomas, and Toni Webb	Archaeolgical Survey Report for the Pacific Gas and Electric Company Natural Gas Transmission Line 109 Edgewood Park Pipeline Replacement Project, San Mateo County, CA	Patrick GIS Group, Inc.; Fr Western Anthropological Research Group, Inc.; JRP Historical Consulting, LLC
S-048734		2016	Daniel Shoup	Cultural Resources Survey Report 600 Kebet Ridge Road Woodside, San Mateo County APN 075-321-220	Archaeological/Historical Consultants
S-048895		2013	Melinda Pacheco Patrick, Jack Meyer, Naomi Scher, and Jennifer Thomas	Archaeological Survey Report for the Pacific Gas and Electric Company Line 109 Farm Hill Pipeline Replacement Project, San Mateo County, California	Patrick GIS Group, Inc.; Far Western Anthropological Research Group, Inc.
S-048897		2013	Melinda Pacheco Patrick, Jack Meyer, Naomi Scher, and Jennifer Thomas	Archaeological Survey Report for the Pacific Gas and Electric Company Line 109 Sharon Heights Pipeline Replacement Project, San Mateo County, California	Patrick GIS Group, Inc.; Far Western Anthropological Research Group, Inc.
S-049066	Submitter - EA 04-235360; Submitter - EFIS 0414000032; Submitter - SR 84 PM 25.3-25.7; Submitter - US 101 PM 4.6-6.5	2015	Kathleen Kubal	Historic Property Survey Report: US 101/SR 84 (Woodside Road) Interchange Improvement Project, Project Approval/Environment Document Phase	URS Corporation
S-049066a		2015	Chandra Miller and Christopher McMorris	Historical Resources Evaluation Report: US 101/SR 84 (Woodside Road) Interchange Improvement Project, Project Approval/Environmental Document Phase	JRP Historical Consulting, LLC

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-049066b		2015	Karin G. Beck	Archaeological Survey Report: US 101/SR 84 (Woodside Road) Interchange Improveme Project Approval & Environmental Document Phase	URS Corporation
S-049066c		2015	Jay Rehor and Kathleen Kubal	Extended Phase I Report: US 101/SR 84 (Woodside Road) Interchange Improvement Project Project Approval/Environmental Document Phase	URS Corporation
S-049116	Agency Nbr - FA# CML 5029(031)	2016	Neal Kaptain	Historic Property Survey Report for the Middlefield/Woodside Intersection Improvements Project, Redwood City, San Mateo County, California	LSA Associates, Inc.
S-049116a		2016	Neal Kaptain	Archaeological Survey Report for the Middlefield/Woodside Intersection Improvements Project, Redwood City, San Mateo County, California	LSA Associates, Inc.
S-049116b		2016	Neal Kaptain	Extended Phase I Proposal for the Middlefield Road/Woodside Road (SR 84) Intersection Improvements Project	LSA Associates, Inc
S-049116c		2016	Neal Kaptain and Ryan Gross	Extended Phase I Report for the Middlefield/Woodside Intersection Improvements Project Redwood City, San Mateo County, California	LSA Associates, Inc
S-049625	OHP PRN - DOE_2016_0711_001	2016		SLAC National Accelerator Laboratory, San Mateo County, CA, Section 106 Technical Report, Trailer and Mobile Building Removal	Page & Turnbull, Inc.
S-049625a		2016	Julianne Polanco and Paul Golan	DOE_2016_0711_001, Section 106 Consultation for Removal of 33 Trailers and Mobile Buildings, SLAC National Accelerator Laboratory, Menlo Park, CA	California Office of Historic Preservation, SLAC National Accelerator Laboratory
S-049789	Caltrans - EA 04-0J670; Caltrans - EFIS 0414000024	2017	Kyle Rabellino and Douglas Bright	Historic Property Survey Report for the Maintenance Roadside Safety Improvement Project, San Francisco and San Mateo Counties, California, SF/101-l.7; SM-280-0.04, 1.6, 3.4 EA 00J670/EFIS 0414000024, State of California Department of Transportation District 4, Oakland, California	California Department of Transportation, District 4

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-049789a		2017	Kyle Rabellino	Archaeological Survey Report for the Maintenance Roadside Safety Improvement Project, San Francisco and San Mateo Counties, California, SF-101-l.7; SM-280-0.04, 1.6, 3.4 EA 04-0J670 I EFIS414000024, State of California Department of Transportation District 4, Oakland, California	California Department of Transportation, District 4
S-050472	OTIS Report Number - FCC_2016_0527_001 ; Submitter - TC# 137693	2016	Joseph Curran	Cultural Resource Investigation for the Proposed Verizon Wireless, Inc. Property at the Lawler Ranch Site, 10 Lawler Ranch Road, Menlo Park, California 94025 (letter report)	Tetra Tech, Inc.
S-050472a		2016	Erin King	FCC Form 620, New Tower ("NT") Submission Packet, Lawler Ranch, 10 Lawler Ranch Road, Menlo Park, California 94025	Tetra Tech, Inc.
S-050472b		2016	Julianne Polanco	FCC_2016_0527_001, Lawler Ranch, 10 Lawler Ranch Road, Menlo Park, San Mateo County, New Tower	Office of Historic Preservation
S-050517	OTIS Report Number - FCC_2016_1230_002 ; Submitter - 50517; Submitter - TCNS Number: 147151	2016	Johni Etheridge and MacKensie Cornelius	Archaeological Sensitivity Assessment, SN90XCDTUA/9CAX002889, Lawler Ranch Road and Sand Hill Road, Portola Valley, San Mateo County, California 94028	EBI Consulting, Inc.
S-050517a		2016	Melanie Ihle	Submission Packet, FCC Form 620, for proposed New Tower Project, Lawler Ranch Road and Sand Hill Road, Portola Valley, San Mateo County, California 94028, SN90XCDTUA/ 9CAX002889, EBI Project Number: 6116005106	EBI Consulting, Inc.
S-050517b		2017	Melanie Ihle and Julianne Polanco	FCC_2016_1230_002, SNP0XCDTUA/9CAX002889 [sic], Lawler Ranch Road and Sandy [sic] Hill Road, Portola Valley, San Mateo County, New Tower	EBI Consulting, Inc.; Office of Historic Preservation

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-050620	Agency Nbr - 10041O; OTIS Report Number - DOE_2017_0710_001	2017		SLAC National Accelerator Laboratory, San Mateo County, CA, Section 106 Technical Report, Linac Electrical Upgrade (10041O)	Page & Turnbull
S-050620a		2017	Paul Golan and Julianne Polanco	DOE_2017_0710_001, Section 106 Consultation for Linac Electrical Upgrades at Klystron Gallery, LCLS-II Program, SLAC National Accelerator Laboratory, Menlo Park, CA	SLAC National Accelerator Laboratory; Office of Historic Preservation
S-050649		2016	Dana E. Supernowicz	Record Seach Results for the Canada College Relocation Project, 4200 Farm Hill Boulevard, Redwood City, San Mateo County, California 94061 (letter report)	Historic Resource Associates
S-050649a		2016		Architectural Evaluation Study of the Canada College Relocation Project, Sprint Site No. FS25XC102, 4200 Farm Hill Boulevard, Woodside, San Mateo County, California 94061	Historic Resource Associates
S-050649b		2017	Dana E. Supernowicz	Collocation (“CO”) Submission Packet, FCC Form 621, Canada College Relocation/FS25XC102, 4200 Farm Hill Road, Woodside, CA 94061	EarthTouch, Inc.
S-050709	OTIS Report Number - FCC_2018_0516_008	2018	Carolyn Losée	Cultural Resources Investigation for AT&T Mobility CCL03301 “Woodside – Moore – JPA” North of Woodside Road, Redwood City, San Mateo County, California 94062 (letter report)	Archaeological Resources Technology
S-050709a		2018	Carolyn Losee	Section 106 Review, Proposed AT&T Mobility LLC Telecommunications Site, AT&T Mobility Services LLC, AT&T Site Number CNU3301/CCL03301, "Woodside - Moore - JPA", North of Woodside Road near Moore Road, Redwood City, California 94062	Diablo Green Consulting
S-050709b		2018	Julianne Polanco	[FCC_2018_0516_008] AT&T CCL03301 "Woodside-Moore-JPA" North of Woodside Road, Redwood City, Collocation	Office of Historic Preservation

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-051817	CAL FIRE - 1-19-00063 SMO	2018	Gina Caretti and Naomi Scher	Cultural Resources Inventory Report for PG&E's Line 109 Wunderlich County Park Timber Harvest Plan, San Mateo County, California	Far Western Anthropological Research Group, Inc.
S-051817a		2019	Ray A. Miller	An Archaeological Survey Report for the Wunderlich Timber Harvesting Plan, San Mateo County, California	North Coast Resource Management
S-052024		2016	Kathleen A. Crawford and Jason A. Coleman	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SF03130A (SF130 Woodside Fire), 3111 Woodside Road, Woodside, San Mateo County, California (letter report)	Environmental Assessment Specialists, Inc.
S-052024a		2016	Kathleen A. Crawford	Direct APE Historic Architectural Assessment for T-Mobile West, LLC, Candidate SF03130A (SF130 Woodside Fire), 3111 Woodside Road, Woodside, San Mateo County, California (letter report)	Environmental Assessment Specialists, Inc.
S-052238		2018	Stacey De Shazo	Historic Resource Evaluation For The Property Located At 176 Harcross Road, Woodside, San Mateo County	Evans & De Shazo, Inc
S-052493	OTIS Report Number - FCC_2018_0605_003 ; Submitter - EBI Project #6118003083	2018	Dana E. Supernowicz	Archaeological Sensitivity Assessment CRAN_RSFR_SAJO1_009, ROW Adjacent to Sand Hill Road, Menlo Park, San Mateo County, California 94028	EBI Consulting
S-052493a		2018	William Ross, Dana Supernowicz, and Aniela Travers	Submission Packet, FCC Form 621, for proposed Collocation Project, ROW Adjacent to Sand Hill Road, Menlo Park, San Mateo County, California, CRAN_RSFR_SAJO1_009/14307070 / SAJO1_009, EBI Project Number: 6118003083	EBI Consulting
S-052493b		2018	Julianne Polanco	[FCC_2018_0605_003] CRAN_RSFR_SAJO1_009, ROW Adjacent to Sand Hill Road, Menlo Park, San Mateo County, New Tower	Office of Historic Preservation

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-052928	OTIS Report Number - FCC_2019_0110_009 ; Submitter - EBI Project Number: 6118009495	2018	Elizabeth Wilk	Archaeological Assessment for Prior Disturbance Alameda-Hwy84/10095890/CCL03302, 2000 Woodside Road, Redwood City, San Mateo County, California, EBI Project Number: 6118009495, TCNS Number: 180601 (letter report)	EBI Consulting
S-052928a		2019	Tara Cubie and Elizabeth Wilk	Submission Packet, FCC Form 621, for proposed Collocation Project, 2000 Woodside Road, Redwood City, San Mateo County, California, Alameda - Hwy 84 / 10095890 / CCL03302, EBI Project Number: 6118009495	EBI Consulting
S-052928b		2019	Julianne Polanco	[FCC_2019_0110_009] Alameda - Hwy 84, 2000 Woodside Road, Redwood City, Collocation	Office of Historic Preservation
S-053447		2019	Sunshine Psota and Kevin Dobinson	Archaeological Survey Report For Bank Stabilization Along Redwood Creek At The Menlo Country Club, Woodside San Mateo County, California	Holman & Associates
S-053447a		2020	Sunshine Psota	Scope of Work and Cost Estimate for Monitoring at Menlo County Club Bank Stabilization Project, along Redwood Creek at the Menlo Country Club, Woodside, San Mateo County, California (letter report)	Holman and Associates
S-053447b		2020	Sunshine Psota	Results of Archaeological Monitoring for Bank Stabilization along Redwood Creek at the Menlo Country Club, Woodside, San Mateo County, California (letter report)	Holman & Associates
S-053771	CAL FIRE - 17-FP-CZU-2059	2018	Scott Stephenson and Sarah Brewer	An Archaeological Survey Report for the Teague Hill Neighborhood Shaded Fuel Break Project San Mateo County, California	Dudek
S-054053		2019	Robin Fies	Results of Cultural Resources Monitoring During Foundation Demolition for the 3793 Woodside Road Project, Woodside, San Mateo County, California.	Garcia and Associates (GANDA)
S-056042	Agency Nbr - FEMA-HMGP-5278-186-008	2022	Christopher Peske and Lisa Holm	Archaeological Investigation for the Hazardous Tree Removal for Fire Prevention Project, Woodside, San Mateo County, California (FEMA-HMGP-5278-186-008)	Pacific Legacy, Inc.

Report List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Report No.	Other IDs	Year	Author(s)	Title	Affiliation
S-056042a		2022	Julianne Polanco and David R. Cohen	FEMA_2022_0225_001, Hazardous Tree Removal for Fire Prevention Project, TY-HMGP-5278-186-008, Town of Woodside, San Mateo County	Office of Historic Preservation, FEMA

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-000004	CA-SMA-000206	Resource Name - SFSU-5; Other - ARS 92-25 and 93-43	Site	Prehistoric	AP04; AP05; AP09; AP15	1980 (Dietz, ACRS); 1992 (Jeff Parsons, Geo-Archaeology for ARS)
P-41-000087	CA-SMA-000084	Resource Name - [none]	Site	Prehistoric	AP04; AP09	1954 (Alan Brown, [none])
P-41-000166	CA-SMA-000166H	Resource Name - Independence Hall; Other - Scout Hall; Other - 129 Albion Ave; OHP Property Number - 005346; OHP PRN - NPS-78000772-0000; OHP PRN - 4062-0001-0000	Building	Historic	HP13	1977 (Frances Roesler, Sally J. Lemoin, Woodside Historical Resources Survey); 1979 (J. Cooper, [none])
P-41-000204	CA-SMA-000204	Resource Name - Jasper Ridge Site	Site	Prehistoric	AP02; AP11; AP15	1980 (Barb Bocek); 1984; 1985 (Barbara Bocek); 2010 (D. Daly, K. Rienhart, K. Turner, T. Wilcox, C Zuniga, Stanford University)
P-41-000249	CA-SMA-000253/H	Resource Name - Rattlesnake Rocks	Site	Prehistoric, Historic	AH04; AP04; AP05; AP14	1985 (Barbara Bocek, Stanford University); 2012 (D. Daly, L. Jones, K.Reinhart, K. Turner, C. Zuniga, Stanford University); 2015 (F. Becks, M. Bonomo, D. Daly, L. Jones, K. Ozawa, K. Turner, T. Wilcox, Stanford University)
P-41-000250	CA-SMA-000254/H	Resource Name - Bear Creek Site	Site	Prehistoric, Historic	AH06; AH07; AP02; AP04; AP15	1985 (Barbara Bocek, Dept of Anthropology, Stanford University); 2010 (D. Daly, L. Jones, C. Zuniga, Stanford University)
P-41-000251	CA-SMA-000255/H	Resource Name - SLAC-1; Other - Dennis Martin Upstream House	Site, Other	Prehistoric, Historic	AH04; AP02; AP15; HP26	1985 (Barbara Bocek, Stanford University); 2011 (D. Daly, K. Turner, Stanford University)
P-41-000252	CA-SMA-000256	Resource Name - SLAC-2	Site	Prehistoric	AP15; AP16	1985 (Barbara Bocek, Stanford University); 2010 (D. Daly, K. Ozawa, K. Reinhart, K. Turner, T. Wilcox, C. Zuniga, stanford University)

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-000253	CA-SMA-000257	Resource Name - SLAC-3	Site	Prehistoric	AP02; AP04; AP15	1985 (Barbara Bocek, Stanford University); 2012 (D. Daly, K. Ozawa, K. Turner, Stanford University)
P-41-000254	CA-SMA-000258	Resource Name - Big Biface Site	Site	Prehistoric	AP02; AP04	1985 (Barbara Bocek, Stanford University); 2010 (D. Daly, K. Reinhart, K. Turner, Y. Wilcox, C. Zuniga, Stanford University)
P-41-000257	CA-SMA-000261	Resource Name - Tree Farm	Site	Prehistoric	AP02	1985 (Barbara Bocek, Ted Bara, Stanford Uiniversity); 2011 (D. Daly, K. Turner, Stanford University)
P-41-000271	CA-SMA-000276	Resource Name - Todo El Mundo	Site	Prehistoric	AP02; AP15	1987 (Barb Bocek, Stanford University)
P-41-000277	CA-SMA-000327	Resource Name - The Christiani Site	Site	Prehistoric	AP02; AP09; AP15	1991 (Mark G. Hylkema, California Archaeological Consultants)
P-41-000293	CA-SMA-000289	Resource Name - Shadehouse Site	Site	Prehistoric	AP02	1988 (Barb Bocek, Bill Miller, Stanford University); 2012 (D. Daly, K. Ozawa, K. Reinhart, K. Turner, T. Wilcox, C.Zuniga, Stanford University)
P-41-000294	CA-SMA-000290	Resource Name - Treeland Nursery Site	Site	Prehistoric	AP15	1988 (Barb Bocek, Bill Miller, Stanford University); 2010 (D. Daly, K. Ozawa, K.Reinhart, K. Turner, T. Wilcox, C. Zuniga, Stanford University)
P-41-000295	CA-SMA-000291/H	Resource Name - Dennis Martin Site	Site	Prehistoric, Historic	AH04; AH16; AP02	1988 (Barb Bocek, Bill Miller, Stanford University); 2010 (D. Daly, K. Reinhart, K. Turner, T. Wilcox, C. Zuniga, Stanford University)
P-41-000304	CA-SMA-000308	Resource Name - Tree Farm #2; Other - C440	Site	Prehistoric	AP02	1990 (Barb Bocek, Stanford University); 2011 (D. Daly, K. Reinhart, K. Turner, T. Wilcox, C. Zuniga, Stanford University)
P-41-000435	CA-SMA-000348/H	Resource Name - ARS 96-54-01	Site	Prehistoric, Historic	AH04; AP15	1997 (Dea Bacchetti, Archaeological Resource Service)

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-000448	CA-SMA-000306	Resource Name - Chinese Lantern BRMs	Site	Prehistoric	AP04	1990 (Barbara Bocek, Stanford University)
P-41-000633		Resource Name - Bear Creek Bridge, Bridge #35-44; OHP Property Number - 005257; OHP PRN - 4027-0001-0000	Structure	Historic	HP18	1979 (Carroll Pursell, UCSB/California Inventory)
P-41-000634		Resource Name - Bridge #35-45; OHP Property Number - 005258; OHP PRN - 4027-0002-0000	Structure	Historic	HP19	1979 (Carroll Pursell, UCSB/California Inventory)
P-41-000635		Resource Name - Bridge #35-68 (San Francisquito Creek); Other - State Rt. 84 over Bear Gulch Creek at mp 19.50; OHP Property Number - 005259; OHP PRN - 4027-0003-0000	Structure	Historic	HP19	1979 (Carroll Pursell, UCSB/California Inventory)
P-41-000718		Resource Name - Woodside Store; OHP Property Number - 005348; OHP PRN - NPS-85001563-0000; OHP PRN - 4062-0003-0000; OHP PRN - SHL-0093-0000; Voided - C-345; OTIS Resource Number - 408303; Other - Woodside Store (Tripp Store); Other - Old Woodside Store	Building	Historic	HP06	1932 (Roscoe D. Wyatt, San Mateo County Chamber of Commerce); 1984 (A. Cody, P. Mikkelsen, [none]); 1985 (Virginia R. Geller, Arthur S. Keyes, San Mateo County Historic Resources); 1988 (Steve Dietz, [none])
P-41-000719		Resource Name - Main House; Other - 329 Albion Ave; OHP Property Number - 005349; OHP PRN - 4062-0004-0001	Building, Element of district	Historic	HP02	1986 ([none], [none])
P-41-000720		Resource Name - Terraced Garden and Lily Pond; Other - 329 Albion Ave; OHP Property Number - 005350; OHP PRN - 4062-0004-0002	Site, Element of district	Historic	HP29	1986 ([none], [none])
P-41-000721		Resource Name - Roman Pool, Watergardens; Other - 329 Albion Ave; OHP Property Number - 005351; OHP PRN - 4062-0004-0003	Site, Element of district	Historic	HP22; HP29	1985 ([none], [none])

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-000722		Resource Name - Main Drive; Other - 329 Albion Ave; OHP Property Number - 005352; OHP PRN - 4062-0004-0004	Structure, Element of district	Historic	HP37	([none], [none])
P-41-000723		Resource Name - Swimming Pool & Attendant Structures; Other - 329 Albion Ave; OHP Property Number - 005353; OHP PRN - 4062-0004-0005	Site, Element of district	Historic	HP04; HP22	1986 ([none], [none])
P-41-000724		Resource Name - Dairy House, Greene's Folly; Other - 329 Albion Ave; OHP Property Number - 005354; OHP PRN - 4062-0004-0006	Building, Element of district	Historic	HP04	1986 ([none], [none])
P-41-000725		Resource Name - Eleanor Fleishhaker Sloss House; Other - 329 Albion Ave; OHP Property Number - 005365; OHP PRN - 4062-0004-0007	Building, Element of district	Historic	HP02	1986 ([none], [none])
P-41-000726		Resource Name - Camperdown Elm Allee; Other - 329 Albion Ave; OHP Property Number - 005356; OHP PRN - 4062-0004-0008	Element of district	Historic	HP30; HP37	1986 ([none], [none])
P-41-000727		Resource Name - Butler's House, Groundskeeper's House; Other - 329 Albion Ave; OHP Property Number - 005357; OHP PRN - 4062-0004-0009	Building, Element of district	Historic	HP02	1986 ([none], [none])
P-41-000728		Resource Name - Earth Dam; Water Storage Lake; Pump House; Other - 329 Albion Ave; OHP Property Number - 005358; OHP PRN - 4062-0004-0010	Structure, Element of district	Historic	HP04; HP21; HP22	1986 ([none], [none])
P-41-000729		Resource Name - Victorian Farmhouse; Other - 329 Albion Ave; OHP Property Number - 005359; OHP PRN - 4062-0004-0011	Building, Site	Historic	HP02	1986 ([none], [none])

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-000730		Resource Name - Victorian Water Tower; Other - 329 Albion Ave; OHP Property Number - 005360; OHP PRN - 4062-0004-0012	Structure	Historic	HP11	1986 ([none], [none])
P-41-000731		Resource Name - Auto Barn; Other - 329 Albion Ave; OHP Property Number - 005361; OHP PRN - 4062-0004-0013	Building, Element of district	Historic	HP04	1986 ([none], [none])
P-41-000732		Resource Name - Greenhouse Remnants; Other - 329 Albion Ave; OHP Property Number - 005362; OHP PRN - 4062-0004-0014	Site, Element of district	Historic	HP04	1986 ([none], [none])
P-41-000733		Resource Name - David Fleishhacker House; Other - 329 Albion Ave; OHP Property Number - 005363; OHP PRN - 4062-0004-0015	Building, Element of district	Historic	HP02	1986 ([none], [none])
P-41-000734		Resource Name - Mortimer Fleishhacker III House; Other - 329 Albion Ave; OHP Property Number - 005364; OHP PRN - 4062-0004-0016	Building, Element of district	Historic	HP02	1986 ([none], [none])
P-41-000735		Resource Name - Fleishhacker Barn Remnant; Other - 329 Albion Ave; OHP Property Number - 005365; OHP PRN - 4062-0004-0017	Site, Element of district	Historic	HP04	1986 ([none], [none])
P-41-000736		Resource Name - Bella Gerstle Fleishhacker's Studio; Other - 329 Albion Ave; OHP Property Number - 005366; OHP PRN - 4062-0004-0018	Building, Element of district	Historic	HP04	1986 ([none], [none])
P-41-000737		Resource Name - Tennis Court; Other - 329 Albion Ave; OHP Property Number - 005367; OHP PRN - 4062-0004-0019	Structure, Element of district	Historic	HP39	1986 ([none], [none])

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-000738		Resource Name - Green Gables (Country Residence of Mortimer Fleishhacker); OHP Property Number - 005368; National Register - NPS-86002396-0000; Other - Green Gables (Fleishhacker Estate); OHP PRN - 4062-0004-9999	Building, Structure, District	Historic	HP02; HP04; HP21; HP22; HP29	1986 (Anne Bloomfield, [none])
P-41-001489	CA-SMA-000453H	Resource Name - Former Village of Searsville Site; Other - Sandhill Rd; OHP Property Number - 090341; OHP PRN - SHL-0474-0000; CHL - 474; Other - Town of Searsville; OTIS Resource Number - 487742	Site	Historic	AH16	1950 (F.M. Stanger, San Mateo County Historical Association); 1959 (Glenn A. Jackson); 1979 (Jim Arbuckle); 2020 (Lauren Jones, Heritage Services, Stanford University)
P-41-001490		Resource Name - Site of San Mateo County's First Sawmill; OHP Property Number - 090344; OHP PRN - SHL-0478-0000; CHL - 478	Site	Historic	AH16	1950 (F.M. Stranger, [none])
P-41-001502		Resource Name - Shine House; Other - Canada Rd; OHP Property Number - 091158; PHI - SPHI-SMA-014; Other - Byrne House	Building	Historic	HP02	1971 (John D. Brook Jr., Parks and Recreation)
P-41-001831		Resource Name - Bridge #35C-122 / Bear Creek Bridge; OHP Property Number - 114963; OHP PRN - DOE-41-86-0003-0000; OHP Z-number - FHWA860919Z	Structure	Historic	HP19	
P-41-001832		Resource Name - Bridge #35C-123 / Union Creek Bridge; OHP Property Number - 114964; OHP PRN - DOE-41-86-0004-0000; OHP PRN - FHWA860919Z	Structure	Historic	HP19	
P-41-002115	CA-SMA-000370	Resource Name - WSA-JM-1	Site	Prehistoric	AP02	2003 (Adam Marlow, Kyle Brown, William Self Associates, Inc.)

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-002198		Resource Name - Skeggs Point Scenic View	Other	Historic	HP29	2006 (Noah M. Stewart, Caltrans District 4)
P-41-002236	CA-SMA-000391H	Resource Name - PL-SFPUC-HP-01	Site	Historic	AH07; AH09	2009 (Marc Greenberg, Lee Panich, Pacific Legacy, Inc.)
P-41-002237	CA-SMA-000392H	Resource Name - PL-SFPUC-HP-02	Site	Historic	AH02; AH03; AH04; AH07	2009 (Marc Greenberg, Lee Panich, Pacific Legacy, Inc.)
P-41-002287		Resource Name - Daniel and Virginia Jackling	Building, Other	Historic	HP02	2011 (Jackie C. Young, Director, Planning and Building, Town of Woodside)
P-41-002301	CA-SMA-000401H	Resource Name - St. Dennis Cemetery; Other - St. Denis Cemetery	Site, Element of district	Historic	AH12; HP40	2011 (D.Daly, K.Turner, S.Weber, Stanford University)
P-41-002304	CA-SMA-000406H	Resource Name - Dennis Martin's Mill and Dump	Site	Historic	AH02; AH04; AH10	2011 (T.Cain, D.Daly, K.Turner, Stanford University)
P-41-002311	CA-SMA-000408H	Resource Name - Chinese Wall	Structure	Historic	AH07; AH11	2010 (D. Daly, K. Turner, Stanford University)
P-41-002314	CA-SMA-000409H	Resource Name - Hermit Site	Object, Site	Historic	AH03; AH04; AH09; AH11; AH16	2010 (D. Daly, K. Turner, T. Wilcox, C. Zuniga, Stanford University)
P-41-002315	CA-SMA-000410H	Resource Name - Zoology Cabin	Object, Site	Historic	AH16; HP15; HP45	2010 (D. Daly, K. Turner, T. Wilcox, C. Zuniga, Stanford University)
P-41-002383		Resource Name - Building 001: Accelerator Housing; Other - Building 001, SLAC National Accelerator Laboratory	Structure	Historic	HP11; HP14	2010 (Christina Dikas, Page & Turnbull)
P-41-002389		Resource Name - Building 002: Klystron Gallery; Other - Building 002, SLAC National Accelerator Laboratory	Building	Historic	HP14; HP39	2011 (Christina Dikas, Page & Turnbull)
P-41-002449		Resource Name - Folger Estate Stable Historic District; Other - 4040 Woodside Rd; OHP Property Number - 144475; OHP PRN - NPS-04000328-9999; Other - Jones Ranch; National Register - 41-0034	Building, District	Historic	HP33	2004 (Michael R. Corbett, [none]); 2018 (G. Caretti, Far Western Anthropological Research Group, Inc.)
P-41-002654		Resource Name - Canada College Building 5	Building, Element of district	Historic	HP15	2016 (Dana E. Supernowicz, Historic Resource Associates)

Resource List

NWIC File # 22-0712 Town of Woodside Housing Element Update

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by
P-41-002664		Resource Name - WS-01; Other - WS-01 Eucalyptus Grove; Other - Wunderlich County Park Eucalyptus Groves	Site, Other	Historic	AH03	2018 (G.Caretti, Far Western Anthropological Research Group, Inc.)
P-41-002665		Resource Name - WS-02; Other - Wunderlich County Park park-wide trail system; Other - Wunderlich Alambique, Loop, Madrone, Meadow, and Oak Trails	Structure	Historic	AH06; AH07; AH16; HP19; HP37	2018 (Gina Caretti, Far Western Anthropological Research Group, Inc.)
P-41-002666		Resource Name - WS-03; Other - Wunderlich County Park barbed wire fencing	Structure	Historic	AH11	2018 (Gina Caretti, Far Western Anthropological Research Group, Inc.)
P-41-002667		Resource Name - WS-04; Other - Wunderlich County Park Water Utility Features	Structure	Historic	AH06; AH10	2018 (Gina Caretti, Far Western Anthroplogical Research Group, Inc.)
P-41-002668		Resource Name - WS-05; Other - Wunderlich County Park concrete foundation site	Structure	Historic	AH02	2018 (Gina Caretti, Far Western Anthropological Research Group, Inc.)
P-41-002669		Resource Name - WS-06; Other - Wunderlich County Park storage container isolate	Other	Historic	AH10; AH16	2018 (Gina Caretti, Far Western Anthropological Research Group, Inc)
P-41-002670		Resource Name - WS-07; Other - Wunderlich County Park Sanitary Can Isolate	Other	Historic	AH04	2018 (Gina Caretti, Far Western Anthropological Research Group, Inc)
P-41-002681		Resource Name - Coonan Property; Other - 176 Harcross Road	Building, Other	Historic	AH03; HP02; HP04	2018 (Stacey De Shazo, Evans & De Shazo)
P-41-002684		Resource Name - T-Mobile West, LLC Candidate SF03130A (SF130 Woodside Fire)	Building	Historic	HP14	2016 (K. A. Crawford, Crawford Historic Services)
P-41-002693	CA-SMA-000439H	Resource Name - Jasper Ridge Park Period Dumps; Other - Jasper Ridge Archaeological Survey/Searsville Lake Project	Site	Historic	AH04	2014 (Ethan Aines, Nick Brown, Stanford Archaeology Center)
P-41-002695	CA-SMA-000441H	Resource Name - Camp Fremont Shooting Range; Other - Webb Ranch	Site	Historic	HP34	2017 (L.Conway, K.Ozawa, K. Reinhart, M.RoseFigura, S. Ubick, S. Weber, Stanford University)
P-41-002726	CA-SMA-000448H	Resource Name - TH-S-01	Site	Historic	AH02	2018 (S. Brewer, Dudek)

OHP BERD dated September 23, 2022

Primary Number	OTIS ID	Name	St #	St Name	City	Evaluation Info	Circa
41-001810	497439	ALLEN PEAK FIRE LOOKOUT STATION			WOODSIDE	4CM, 09/11/1996, ST.AG.-3540-0050	1966
41-000716	408301	INDEPENDENCE HALL	129	ALBION AVE	WOODSIDE	1S, 01/01/1978, 4062-0001-0000 | 1S, 08/03/1978, NPS-78000772-0000	1884
41-000719	408304	MAIN HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0001	1917
41-000720	408305	TERRACED GARDEN AND LILY POND	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0002	1912
41-000721	408306	ROMAN POOL, WATERGARDENS	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0003	1928
41-000722	408307	MAIN DRIVE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0004	1912
41-000723	408308	SWIMMING POOL & ATTENDANT STRUCTURES	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0005	1916
41-000724	408309	DAIRY HOUSE, GREENE`S FOLLY	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0006	1928
41-000725	408310	ELEANOR FLEISHHACKER SLOSS HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0007	1931
41-000726	408311	CAMPERDOWN ELM ALLEE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0008	1930
41-000727	408312	BUTLER`S HOUSE, GROUNDSKEEPER'S HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0009	1931
41-000728	408313	EARTH DAM	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0010	1913
41-000729	408314	VICTORIAN FARMHOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0011	1892
41-000730	408315	VICTORIAN WATER TOWER	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0012	1892

OHP BERD dated September 23, 2022

41-000731	408316	AUTO BARN	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0013	1907
41-000732	408317	GREENHOUSE REMNANTS	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0014	1915
41-000733	408318	DAVID FLEISHHACKER HOUSE	329	ALBION AVE	WOODSIDE	1D, 01/01/1986, 4062-0004-0015	1972
41-000734	408319	MORTIMER FLEISHHACKER III HOUSE	329	ALBION AVE	WOODSIDE	7R, , 4062-0004-0016	1962
41-000735	408320	FLEISHHACKER BARN REMNANT	329	ALBION AVE	WOODSIDE	7R, , 4062-0004-0017	1911
41-000736	408321	BELLA GERSTLE FLEISHHACKER'S STUDIO	329	ALBION AVE	WOODSIDE	7R, , 4062-0004-0018	1950
41-000737	408322	TENNIS COURT	329	ALBION AVE	WOODSIDE	7R, , 4062-0004-0019	1965
41-000738	408323	GREEN GABLES|COUNTRY HOUSE|FLEISHHACKER|MORTIMER	329	ALBION AVE	WOODSIDE	1S, 01/01/1986, 4062-0004-9999 | 1S, 09/26/1986, NPS-86002396-0000	1911-1935
41-001502	488361	SHINE HOUSE		CANADA RD	WOODSIDE	7P, 05/19/1971, SPHI-SMA-014	1882
41-000186	408302	Bourn-Roth Estate	86	CANADA RD	WOODSIDE	1CL, 02/08/1977, SHL-0907-0000 | 1S, 08/28/1975, 4062-0002-0000 | 1S, 08/28/1975, NPS-75000479-0000	1915
41-000718	408303	Woodside Store|Woodside Store Or Tripp Store	471	KING MOUNTAIN RD	WOODSIDE	1S, 07/18/1985, 4062-0003-0000 NPS-85001563-0000 | 1S, 07/18/1985, NPS-85001563-0000 | 3S, , 4062-0003-0000 | 7L, 03/29/1933, SHL-0093-0000	1854
41-001831	507092	BRIDGE #35C-122		MOUNTAIN DR	WOODSIDE	2S2, 10/19/1986, DOE-41-86-0003-0000 | 2S2,	1900

OHP BERD dated September 23, 2022

						10/19/1986, FHWA860919Z	
41-001832	507093	BRIDGE #35C-123		MOUNTAIN DR	WOODSIDE	2S2, 10/19/1986, DOE-41-86-0004-0000 | 2S2, 10/19/1986, FHWA860919Z	1903
	557903		17554	SKYLINE BLVD	WOODSIDE	6Y, 05/23/2003, DOE-43-03-0013-0000 | 6Y, 05/23/2003, HUD030516T	1929
	532955	SKEGGS POINT SCENIC VIEW		SR 35	WOODSIDE	6Y, 02/26/2007, FHWA070125A	1934
41-000633	408212	BEAR CREEK BRIDGE, BRIDGE #35-44		SR 84	WOODSIDE	7R, , 4027-0001-0000	1903
41-000634	408213	BRIDGE #35-45		SR 84	WOODSIDE	7R, , 4027-0002-0000	1904
41-002353	408214	SAN FRANCISQUITO CREEK BRIDGE, BRIDGE #35-68	SR 84	WOODSIDE	7N, , 4027-0003-0000	1903	9/23/2022
	668181	Woodside Fire Station No. 7	3111	Woodside Rd	Woodside	6Y, 09/05/2016, FCC_2016_0616_004	
	553762	FOLGER ESTATE STABLE HISTORIC DISTRICT	4040	WOODSIDE RD	WOODSIDE	1S, 04/16/2004, NPS-04000328-9999 | 3S, 02/06/2004, 41-0034	1905-1941

CALIFORNIA HISTORICAL RESOURCE STATUS CODES
(effective 5/1/2017)

1	**Listed in the National Register (NR) or the California Register (CR)**
1D	Contributor to a multi-component resource like a district listed in the NR by the Keeper. Listed in the CR.
1S	Individually listed in the NR by the Keeper. Listed in the CR.
1CD	Contributor to a multi-component resource listed in the CR by the SHRC.
1CS	Individually listed in the CR by the SHRC.
1CL	State Historical Landmarks (CHL) numbered 770 and above, or SHRC reevaluated CHLs that also meet CR criteria. Listed in the CR.
1CP	State Points of Historical Interest (CPHI) nominated after December 1997 and recommended for listing by the SHRC or SHRC reevaluated CPHIs that also meet CR criteria. Listed in the CR.
2	**Determined eligible for listing in the National Register (NR) or the California Register (CR)**
2B	Determined eligible for the NR both individually and as a contributor to a NR eligible multi-component resource like a district in a federal regulatory process. Listed in the CR.
2D	Contributor to a multi-component resource determined eligible for the NR by the Keeper. Listed in the CR.
2D2	Contributor to a multi-component resource determined eligible for NR by consensus through Section 106 process. Listed in the CR.
2D3	Contributor to a multi-component resource determined eligible for NR by Part I Tax Certification. Listed in the CR.
2D4	Contributor to a multi-component resource determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
2S	Individually determined eligible for NR by the Keeper. Listed in the CR.
2S2	Individually determined eligible for NR by consensus through Section 106 process. Listed in the CR.
2S3	Individually determined eligible for NR by Part I Tax Certification. Listed in the CR.
2S4	Individually determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
2CB	Determined eligible for CR both individually and as a contributor to a CR eligible multi-component resource by the SHRC.
2CD	Contributor to a multi-component resource determined eligible for CR by the SHRC.
2CS	Individually determined eligible for CR by the SHRC.
3	**Appears eligible for National Register (NR) or California Register (CR).**
3B	Appears eligible for NR both individually and as a contributor to a NR eligible multi-component resource like a district through survey evaluation.
3D	Appears eligible for NR as a contributor to a NR eligible multi-component resource through survey evaluation.
3S	Appears eligible for NR individually through survey evaluation.
3CB	Appears eligible for CR both individually and as a contributor to a CR eligible multi-component resource through survey evaluation.
3CD	Appears eligible for CR as a contributor to a CR eligible multi-component resource through survey evaluation.
3CS	Appears eligible for CR individually through survey evaluation.
4	**Appears eligible for National Register (NR) or State Historical Landmark (CHL) through PRC§ 5024**
4CM	State agency owned resource added to Master List - appears to meet NR and/or CHL criterion.
5	**Recognized as Historically Significant by Local Government**
5B	Locally significant both individually (listed, eligible, or appears eligible) and as contributor to a multi-component resource like a district that is locally listed, designated, determined eligible, or appears eligible through survey evaluation.
5D1	Contributor to a multi-component resource that is listed or designated locally.
5D2	Contributor to a multi-component resource that is eligible for local listing or designation.
5D3	Appears to be a contributor to a multi-component resource that appears eligible for local listing or designation.
5S1	Individually listed or designated locally.
5S2	Individually eligible for local listing or designation.
5S3	Appears to be individually eligible for local listing or designation through survey evaluation.
6	**Not Eligible for Listing or Designation as specified**
6C	Determined ineligible for or removed from California Register (CR) by the SHRC.
6CD	Determined ineligible for or removed from CR by the SHRC as a component of a CR listed multi-component resource. [Code to differentiate a resource that has more than one CR evaluation. Example, a resource that is on the CR as both contributor to a district and individually would still be on the CR if the district was removed/determined ineligible. This code would convey the change of a specific evaluation rather than the resource's CR status.]
6J	State Historic Landmarks (CHL) or State Points of Historical Interest (SPHI) determined ineligible for or removed as a CHL or SPHI by the SHRC.
6L	Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.
6T	Determined ineligible for NR through Part I Tax Certification process.
6U	Determined ineligible for NR pursuant to Section 106 without review by SHPO.
6W	Removed from NR by the Keeper.
6X	Determined ineligible for NR by the SHRC or the Keeper.
6Y	Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or local listing.
6Z	Found ineligible for NR, CR or local designation through survey evaluation.
6WM	Removed from Master List because no longer state owned.
6XM	Removed from Master List because of historic feature loss or further evaluation.
6YM	State agency owned resource determined ineligible for Master List.
7	**Not Evaluated for National Register (NR) or California Register (CR) or Needs Re-evaluation**
7E	Treated as eligible for the purpose of OHP review.
7J	Received by OHP for evaluation or action but not yet evaluated.
7K	Submitted to OHP for action but not reevaluated.
7L	State Historical Landmarks 1-769 – that do not meet CR criteria.
7M	Submitted to OHP but not evaluated - referred to NPS.
7N	Needs to be reevaluated - formerly coded as may become NR eligible with specific conditions.
7N1	Needs to be reevaluated (former status code 4) - may become NR eligible with restoration or other specific conditions.
7P	State Point of Historical Interests that do not meet CR criteria.
7R	Identified in Reconnaissance Level Survey or in an Area of Potential Effect (APE): Not evaluated.
7W	Submitted to OHP for action – withdrawn or inactive.

Caltrans Bridge Inventory, Hope 2005

Bridge	Name	Fac	City	Yr Blt	Notes
35 0044	WEST UNION CREEK	STATE ROUTE 84	Woodside	1903	Remains ineligible in 2004 survey.
35 0068	BEAR CREEK	STATE ROUTE 84	Woodside	1903	Remains ineligible in 2004 survey.
35 0230L	FARM HILL BLVD UC	STATE ROUTE 280	Woodside	1969	
35 0230R	FARM HILL BLVD UC	STATE ROUTE 280	Woodside	1969	
35 0231L	CANADA ROAD UC	STATE ROUTE 280	Woodside	1969	
35 0231R	CANADA ROAD UC	STATE ROUTE 280	Woodside	1969	
35 0232L	ROUTE 280/84 SEPARATION	STATE ROUTE 280 SB	Woodside	1969	
35 0232R	ROUTE 280/84 SEPARATION	STATE ROUTE 280 NB	Woodside	1969	
35 0242	EAST EQUESTRIAN UC	INTERSTATE 280	Woodside	1969	
35 0249	WOODSIDE EQUESTRIAN UC	INTERSTATE 280	Woodside	1968	
35C0055	ALEMBIQUE CREEK	PORTOLA RD	Woodside	1914	Does not meet significance criteria.
35C0122	BEAR CREEK	MOUNTAIN HOME RD	Woodside	1900	Remains eligible in 2004 survey.
35C0123	WEST UNION CREEK	KINGS MOUNTAIN RD	Woodside	1905	Remains eligible in 2004 survey.

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
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Ohlone-Costanoan

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Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
[Vacant]

COMMISSIONER
[**Vacant**]

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

December 1, 2022

Sage Schaan
Town of Woodside

Via Email to: sschaan@woodsidetown.org

Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, Woodside Housing Element Update Project, San Mateo County

Dear Sage Schaan:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties or projects.

Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

Public Resources Codes §21080.3.1 and §21080.3.2 requires public agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources as defined, for California Environmental Quality Act (CEQA) projects.

The law does not preclude local governments and agencies from initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

Best practice for the AB52 process and in accordance with Public Resources Code §21080.3.1(d), is to do the following:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The NAHC also recommends, but does not require that lead agencies include in their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential affect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

    - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE, such as known archaeological sites;
    - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
    - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
    - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

      All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.

3. The result of the Sacred Lands File (SFL) check conducted through the Native American Heritage Commission was positive. Please contact the tribes on the attached list for more information.

4. Any ethnographic studies conducted for any area including all or part of the potential APE; and

5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand well help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address:

Cody.Campagne@nahc.ca.gov.

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Tribal Consultation List
San Mateo County
12/1/2022

Amah MutsunTribal Band of Mission San Juan Bautista
Irene Zwierlein, Chairperson
3030 Soda Bay Road — Costanoan
Lakeport, CA, 95453
Phone: (650) 851 - 7489
Fax: (650) 332-1526
amahmutsuntribal@gmail.com

Costanoan Rumsen Carmel Tribe
Tony Cerda, Chairperson
244 E. 1st Street — Costanoan
Pomona, CA, 91766
Phone: (909) 629 - 6081
Fax: (909) 524-8041
rumsen@aol.com

Indian Canyon Mutsun Band of Costanoan
Ann Marie Sayers, Chairperson
P.O. Box 28 — Costanoan
Hollister, CA, 95024
Phone: (831) 637 - 4238
ams@indiancanyons.org

Indian Canyon Mutsun Band of Costanoan
Kanyon Sayers-Roods, MLD Contact
1615 Pearson Court — Costanoan
San Jose, CA, 95122
Phone: (408) 673 - 0626
kanyon@kanyonkonsulting.com

Muwekma Ohlone Indian Tribe of the SF Bay Area
Charlene Nijmeh, Chairperson
20885 Redwood Road, Suite 232 — Costanoan
Castro Valley, CA, 94546
Phone: (408) 464 - 2892
cnijmeh@muwekma.org

Muwekma Ohlone Indian Tribe of the SF Bay Area
Monica Arellano, Vice Chairwoman
20885 Redwood Road, Suite 232 — Costanoan
Castro Valley, CA, 94546
Phone: (408) 205 - 9714
monicavarellano@gmail.com

The Ohlone Indian Tribe
Andrew Galvan, Chairperson
P.O. Box 3388 — Bay Miwok
Fremont, CA, 94539 — Ohlone
Phone: (510) 882 - 0527 — Patwin
Fax: (510) 687-9393 — Plains Miwok
chochenyo@AOL.com

Wuksache Indian Tribe/Eshom Valley Band
Kenneth Woodrow, Chairperson
1179 Rock Haven Ct. — Foothill Yokut
Salinas, CA, 93906 — Mono
Phone: (831) 443 - 9702
kwood8934@aol.com

Tamien Nation
Quirina Luna Geary, Chairperson
PO Box 8053 — Costanoan
San Jose, CA, 95155
Phone: (707) 295 - 4011
qgeary@tamien.org

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Sections 65352.3, 65352.4 et seq. and Public Resources Code Sections 21080.3.1 for the proposed Woodside Housing Element Update Project, San Mateo County.

December 2, 2022

Quirina Luna Geary
PO Box 8053
San Jose, CA, 95155

Re: Native American and Tribal Consultation under SB 18 and AB 52

Dear Ms. Geary,

The Town of Woodside is preparing an update to the Housing Element of its General Plan ('Project'). The Planning Area for the Housing Element covers the corporate limits of the Town of Woodside as shown in the attached maps. Figure 1 depicts the 1,378-acre Planning Area, including parcels, building footprints, streams, lake/ponds, the Sphere of Influence, and the Town of Woodside boundary. Figure 2 shows the USGS 7.5" topographic quadrangles that covers the Planning Area.

The 2023-31 Woodside Housing Element is a comprehensive update to the Housing Element of the Woodside General Plan, undertaken to accommodate the Town's share of the regional housing need for the 2023 – 2031 planning period and to address new State law. The Housing Element Update includes an inventory of vacant and underutilized properties throughout the Town that are available for residential development, and it identifies actions the Town will take to diversify its housing stock and to increase affordability. In total, the inventory has a capacity for 408 housing units over the planning period, including 160 accessory dwelling units that would be constructed on existing single-family lots, 80 units for student and faculty on the Canada College site, 27 units at 773 Canada (including 16 townhomes and 11 single-family units), as well as multi-family development on Town-owned parcels on High Road and Runnymede Road.

This letter serves to invite consultation in accordance with California Government Code Sections 65352.3 – 65352.4 per Senate Bill 18 (SB 18). SB 18 requires local governments to conduct meaningful consultation with California Native American tribes prior to adopting an update to the General Plan, for the purpose of protecting, or mitigating impacts to, cultural places. To assist in your evaluation of the Project, the Town has requested a Sacred Lands File (SFL) check through the NAHC, the result of which was positive.

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Kindest Regards,

Sage Schaan, Interim Planning Director
Town of Woodside
Tel. 650-530-3432
Sschaan@woodsidetown.org

Attachments:

- Figure 1 - Planning Area Map
- Figure 2 - USGS 7.5' Quadrangle Map

December 2, 2022

Kanyon Sayers-Roods
1615 Pearson Court
San Jose, CA, 95122

Re: Native American and Tribal Consultation under SB 18 and AB 52

Dear Ms. Sayers-Roods,

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December 2, 2022

Kenneth Woodrow
1179 Rock Haven Ct.
Salinas, CA, 93906

Re: Native American and Tribal Consultation under SB 18 and AB 52

Dear Mr. Woodrow,

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November 4, 2022

Monica Arellano,
20885 Redwood Road, Suite 232
Castro Valley, CA, 94546

Re: Native American and Tribal Consultation under SB 18 and AB 52

Dear Ms. Arellano,

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November 4, 2022

Tony Cerda
Chairperson
244 E. 1st Street
Pomona, CA, 91766

Re: Native American and Tribal Consultation under SB 18 and AB 52

Dear Mr. Cerda,

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November 4, 2022

Andrew Galvan,
P.O. Box 3388
Fremont, CA, 94539

Re: Native American and Tribal Consultation under SB 18 and AB 52

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November 4, 2022

Charlene Nijmeh
Chairperson
20885 Redwood Road, Suite 232
Castro Valley, CA, 94546

Re: Native American and Tribal Consultation under SB 18 and AB 52

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November 4, 2022

Ann Marie Sayers
Chairperson
P.O. Box 28
Hollister, CA, 95024

Re: Native American and Tribal Consultation under SB 18 and AB 52

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November 4, 2022

Irenne Zwierlein
Chairperson
789 Canada Road
Woodside, CA, 94062

Re: Native American and Tribal Consultation under SB 18 and AB 52

Dear Ms. Zwierlein,

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Appendix D

GHG AND AIR QUALITY DATA

Woodside Existing Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Woodside Existing
Operational Year	2031
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	4.70
Precipitation (days)	41.8
Location	Woodside, CA, USA
County	San Mateo
City	Woodside
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1265
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.19

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
High School	3,930	1000sqft	90.2	3,930,000	0.00	0.00	—	—

Place of Worship	48.0	1000sqft	1.10	48,000	0.00	—	—	—
City Park	349	Acre	349	0.00	0.00	0.00	—	—
Strip Mall	2,091	1000sqft	48.0	2,091,000	0.00	—	—	—
Office Park	146	1000sqft	3.35	146,000	0.00	—	—	—
Golf Course	124	Acre	124	0.00	0.00	0.00	—	—
Apartments Low Rise	4.00	Dwelling Unit	0.25	4,240	0.00	—	12.0	—
Single Family Housing	1,907	Dwelling Unit	619	3,718,650	22,336,418	—	5,492	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	71.6	307	82.7	470	0.61	6.55	11.6	18.1	6.41	2.93	9.34	5,699	137,018	142,718	585	2.94	74.0	158,283
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13.6	254	79.9	90.6	0.58	6.02	11.6	17.6	6.01	2.93	8.94	5,699	135,116	140,816	585	2.97	55.9	156,371
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	41.3	280	75.1	273	0.55	5.78	11.0	16.8	5.71	2.79	8.50	5,699	127,718	133,417	584	2.93	63.3	148,966

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.53	51.0	13.7	49.8	0.10	1.05	2.01	3.06	1.04	0.51	1.55	944	21,145	22,089	96.8	0.49	10.5	24,663

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.97	4.59	2.73	38.7	0.11	0.05	11.6	11.6	0.05	2.93	2.98	—	11,583	11,583	0.39	0.37	18.6	11,722
Area	58.8	299	9.65	382	0.06	1.04	—	1.04	0.91	—	0.91	0.00	9,482	9,482	0.21	0.03	—	9,496
Energy	7.89	3.95	70.3	49.8	0.43	5.45	—	5.45	5.45	—	5.45	—	113,946	113,946	12.2	0.72	—	114,464
Water	—	—	—	—	—	—	—	—	—	—	—	732	2,007	2,739	75.4	1.82	—	5,168
Waste	—	—	—	—	—	—	—	—	—	—	—	4,967	0.00	4,967	496	0.00	—	17,378
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	55.4	55.4
Total	71.6	307	82.7	470	0.61	6.55	11.6	18.1	6.41	2.93	9.34	5,699	137,018	142,718	585	2.94	74.0	158,283
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.92	4.53	3.23	38.0	0.11	0.05	11.6	11.6	0.05	2.93	2.98	—	11,082	11,082	0.44	0.41	0.48	11,216
Area	0.74	245	6.37	2.71	0.04	0.51	—	0.51	0.51	—	0.51	0.00	8,081	8,081	0.15	0.02	—	8,089
Energy	7.89	3.95	70.3	49.8	0.43	5.45	—	5.45	5.45	—	5.45	—	113,946	113,946	12.2	0.72	—	114,464
Water	—	—	—	—	—	—	—	—	—	—	—	732	2,007	2,739	75.4	1.82	—	5,168
Waste	—	—	—	—	—	—	—	—	—	—	—	4,967	0.00	4,967	496	0.00	—	17,378
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	55.4	55.4
Total	13.6	254	79.9	90.6	0.58	6.02	11.6	17.6	6.01	2.93	8.94	5,699	135,116	140,816	585	2.97	55.9	156,371
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	4.74	4.36	2.98	35.9	0.11	0.05	11.0	11.1	0.05	2.79	2.84	—	10,874	10,874	0.41	0.39	7.86	11,008
Area	28.6	271	1.78	187	0.01	0.27	—	0.27	0.21	—	0.21	0.00	890	890	0.03	0.01	—	893
Energy	7.89	3.95	70.3	49.8	0.43	5.45	—	5.45	5.45	—	5.45	—	113,946	113,946	12.2	0.72	—	114,464
Water	—	—	—	—	—	—	—	—	—	—	—	732	2,007	2,739	75.4	1.82	—	5,168
Waste	—	—	—	—	—	—	—	—	—	—	—	4,967	0.00	4,967	496	0.00	—	17,378
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	55.4	55.4
Total	41.3	280	75.1	273	0.55	5.78	11.0	16.8	5.71	2.79	8.50	5,699	127,718	133,417	584	2.93	63.3	148,966
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.87	0.80	0.54	6.55	0.02	0.01	2.01	2.02	0.01	0.51	0.52	—	1,800	1,800	0.07	0.06	1.30	1,822
Area	5.23	49.5	0.32	34.1	< 0.005	0.05	—	0.05	0.04	—	0.04	0.00	147	147	0.01	< 0.005	—	148
Energy	1.44	0.72	12.8	9.09	0.08	1.00	—	1.00	1.00	—	1.00	—	18,865	18,865	2.01	0.12	—	18,951
Water	—	—	—	—	—	—	—	—	—	—	—	121	332	454	12.5	0.30	—	856
Waste	—	—	—	—	—	—	—	—	—	—	—	822	0.00	822	82.2	0.00	—	2,877
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.17	9.17
Total	7.53	51.0	13.7	49.8	0.10	1.05	2.01	3.06	1.04	0.51	1.55	944	21,145	22,089	96.8	0.49	10.5	24,663

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	0.01	0.01	< 0.005	0.07	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	20.7	20.7	< 0.005	< 0.005	0.03	20.9
Single Family Housing	4.96	4.58	2.72	38.6	0.11	0.05	11.5	11.6	0.05	2.92	2.97	—	11,562	11,562	0.39	0.37	18.6	11,701
Total	4.97	4.59	2.73	38.7	0.11	0.05	11.6	11.6	0.05	2.93	2.98	—	11,583	11,583	0.39	0.37	18.6	11,722
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	0.01	0.01	0.01	0.07	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	19.8	19.8	< 0.005	< 0.005	< 0.005	20.0
Single Family Housing	4.91	4.52	3.22	38.0	0.11	0.05	11.5	11.6	0.05	2.92	2.97	—	11,063	11,063	0.44	0.41	0.48	11,196

Total	4.92	4.53	3.23	38.0	0.11	0.05	11.6	11.6	0.05	2.93	2.98	—	11,082	11,082	0.44	0.41	0.48	11,216
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.95	2.95	< 0.005	< 0.005	< 0.005	2.99
Single Family Housing	0.86	0.80	0.54	6.54	0.02	0.01	2.01	2.01	0.01	0.51	0.52	—	1,797	1,797	0.07	0.06	1.30	1,819
Total	0.87	0.80	0.54	6.55	0.02	0.01	2.01	2.02	0.01	0.51	0.52	—	1,800	1,800	0.07	0.06	1.30	1,822

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	9,746	9,746	1.58	0.19	—	9,842

Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	293	293	0.05	0.01	—	296
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	9,985	9,985	1.62	0.20	—	10,084
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	1,727	1,727	0.28	0.03	—	1,744
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	8.38	8.38	< 0.005	< 0.005	—	8.47
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	6,591	6,591	1.07	0.13	—	6,657
Total	—	—	—	—	—	—	—	—	—	—	—	—	28,351	28,351	4.59	0.56	—	28,631
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	9,746	9,746	1.58	0.19	—	9,842
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	293	293	0.05	0.01	—	296
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	9,985	9,985	1.62	0.20	—	10,084
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	1,727	1,727	0.28	0.03	—	1,744
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	8.38	8.38	< 0.005	< 0.005	—	8.47
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	6,591	6,591	1.07	0.13	—	6,657

Total	—	—	—	—	—	—	—	—	—	—	—	—	28,351	28,351	4.59	0.56	—	28,631
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	1,614	1,614	0.26	0.03	—	1,630
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	48.5	48.5	0.01	< 0.005	—	48.9
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1,653	1,653	0.27	0.03	—	1,670
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	286	286	0.05	0.01	—	289
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	1.39	1.39	< 0.005	< 0.005	—	1.40
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	1,091	1,091	0.18	0.02	—	1,102
Total	—	—	—	—	—	—	—	—	—	—	—	—	4,694	4,694	0.76	0.09	—	4,740

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.77	2.38	43.3	36.4	0.26	3.29	—	3.29	3.29	—	3.29	—	51,716	51,716	4.58	0.10	—	51,860
Place of Worship	0.06	0.03	0.56	0.47	< 0.005	0.04	—	0.04	0.04	—	0.04	—	674	674	0.06	< 0.005	—	675
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Strip Mall	0.35	0.18	3.20	2.69	0.02	0.24	—	0.24	0.24	—	0.24	—	3,819	3,819	0.34	0.01	—	3,829
Office Park	0.10	0.05	0.93	0.78	0.01	0.07	—	0.07	0.07	—	0.07	—	1,111	1,111	0.10	< 0.005	—	1,114
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.6	25.6	< 0.005	< 0.005	—	25.7
Single Family Housing	2.60	1.30	22.3	9.47	0.14	1.80	—	1.80	1.80	—	1.80	—	28,249	28,249	2.50	0.05	—	28,328
Total	7.89	3.95	70.3	49.8	0.43	5.45	—	5.45	5.45	—	5.45	—	85,595	85,595	7.58	0.16	—	85,832
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.77	2.38	43.3	36.4	0.26	3.29	—	3.29	3.29	—	3.29	—	51,716	51,716	4.58	0.10	—	51,860
Place of Worship	0.06	0.03	0.56	0.47	< 0.005	0.04	—	0.04	0.04	—	0.04	—	674	674	0.06	< 0.005	—	675
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	0.35	0.18	3.20	2.69	0.02	0.24	—	0.24	0.24	—	0.24	—	3,819	3,819	0.34	0.01	—	3,829
Office Park	0.10	0.05	0.93	0.78	0.01	0.07	—	0.07	0.07	—	0.07	—	1,111	1,111	0.10	< 0.005	—	1,114
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.6	25.6	< 0.005	< 0.005	—	25.7
Single Family Housing	2.60	1.30	22.3	9.47	0.14	1.80	—	1.80	1.80	—	1.80	—	28,249	28,249	2.50	0.05	—	28,328
Total	7.89	3.95	70.3	49.8	0.43	5.45	—	5.45	5.45	—	5.45	—	85,595	85,595	7.58	0.16	—	85,832
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

High School	0.87	0.44	7.91	6.64	0.05	0.60	—	0.60	0.60	—	0.60	—	8,562	8,562	0.76	0.02	—	8,586
Place of Worship	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	112	112	0.01	< 0.005	—	112
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	632	632	0.06	< 0.005	—	634
Office Park	0.02	0.01	0.17	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	184	184	0.02	< 0.005	—	184
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.24	4.24	< 0.005	< 0.005	—	4.25
Single Family Housing	0.48	0.24	4.06	1.73	0.03	0.33	—	0.33	0.33	—	0.33	—	4,677	4,677	0.41	0.01	—	4,690
Total	1.44	0.72	12.8	9.09	0.08	1.00	—	1.00	1.00	—	1.00	—	14,171	14,171	1.25	0.03	—	14,211

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.74	0.37	6.37	2.71	0.04	0.51	—	0.51	0.51	—	0.51	0.00	8,081	8,081	0.15	0.02	—	8,089
Consumer Products	—	213	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	32.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landsca Equipment	58.0	53.8	3.28	379	0.02	0.53	—	0.53	0.40	—	0.40	—	1,401	1,401	0.06	0.01	—	1,406
Total	58.8	299	9.65	382	0.06	1.04	—	1.04	0.91	—	0.91	0.00	9,482	9,482	0.21	0.03	—	9,496
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.74	0.37	6.37	2.71	0.04	0.51	—	0.51	0.51	—	0.51	0.00	8,081	8,081	0.15	0.02	—	8,089
Consumer Products	—	213	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	32.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.74	245	6.37	2.71	0.04	0.51	—	0.51	0.51	—	0.51	0.00	8,081	8,081	0.15	0.02	—	8,089
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	33.0	33.0	< 0.005	< 0.005	—	33.0
Consumer Products	—	38.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.86	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	5.22	4.84	0.30	34.1	< 0.005	0.05	—	0.05	0.04	—	0.04	—	114	114	< 0.005	< 0.005	—	115
Total	5.23	49.5	0.32	34.1	< 0.005	0.05	—	0.05	0.04	—	0.04	0.00	147	147	0.01	< 0.005	—	148

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	250	472	722	25.7	0.62	—	1,550
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	2.88	5.44	8.31	0.30	0.01	—	17.8
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	297	561	857	30.5	0.73	—	1,839
Office Park	—	—	—	—	—	—	—	—	—	—	—	49.7	93.9	144	5.11	0.12	—	308
Golf Course	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.28	0.52	0.80	0.03	< 0.005	—	1.72
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	133	874	1,007	13.7	0.34	—	1,451
Total	—	—	—	—	—	—	—	—	—	—	—	732	2,007	2,739	75.4	1.82	—	5,168
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	250	472	722	25.7	0.62	—	1,550
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	2.88	5.44	8.31	0.30	0.01	—	17.8
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	297	561	857	30.5	0.73	—	1,839
Office Park	—	—	—	—	—	—	—	—	—	—	—	49.7	93.9	144	5.11	0.12	—	308

Golf Course	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.28	0.52	0.80	0.03	< 0.005	—	1.72
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	133	874	1,007	13.7	0.34	—	1,451
Total	—	—	—	—	—	—	—	—	—	—	—	732	2,007	2,739	75.4	1.82	—	5,168
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	41.4	78.2	120	4.26	0.10	—	257
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	0.48	0.90	1.38	0.05	< 0.005	—	2.95
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	49.1	92.8	142	5.05	0.12	—	304
Office Park	—	—	—	—	—	—	—	—	—	—	—	8.23	15.5	23.8	0.85	0.02	—	51.0
Golf Course	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.05	0.09	0.13	< 0.005	< 0.005	—	0.29
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	21.9	145	167	2.27	0.06	—	240
Total	—	—	—	—	—	—	—	—	—	—	—	121	332	454	12.5	0.30	—	856

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	2,753	0.00	2,753	275	0.00	—	9,633
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	147	0.00	147	14.7	0.00	—	516
City Park	—	—	—	—	—	—	—	—	—	—	—	16.2	0.00	16.2	1.62	0.00	—	56.6
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	1,183	0.00	1,183	118	0.00	—	4,140
Office Park	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.31	0.00	—	256
Golf Course	—	—	—	—	—	—	—	—	—	—	—	62.2	0.00	62.2	6.21	0.00	—	217
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	1.66	0.00	1.66	0.17	0.00	—	5.81
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	730	0.00	730	72.9	0.00	—	2,553
Total	—	—	—	—	—	—	—	—	—	—	—	4,967	0.00	4,967	496	0.00	—	17,378
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	2,753	0.00	2,753	275	0.00	—	9,633
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	147	0.00	147	14.7	0.00	—	516
City Park	—	—	—	—	—	—	—	—	—	—	—	16.2	0.00	16.2	1.62	0.00	—	56.6
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	1,183	0.00	1,183	118	0.00	—	4,140
Office Park	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.31	0.00	—	256

Golf Course	—	—	—	—	—	—	—	—	—	—	—	62.2	0.00	62.2	6.21	0.00	—	217
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	1.66	0.00	1.66	0.17	0.00	—	5.81
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	730	0.00	730	72.9	0.00	—	2,553
Total	—	—	—	—	—	—	—	—	—	—	—	4,967	0.00	4,967	496	0.00	—	17,378
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	456	0.00	456	45.6	0.00	—	1,595
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	24.4	0.00	24.4	2.44	0.00	—	85.4
City Park	—	—	—	—	—	—	—	—	—	—	—	2.68	0.00	2.68	0.27	0.00	—	9.37
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	196	0.00	196	19.6	0.00	—	685
Office Park	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.4
Golf Course	—	—	—	—	—	—	—	—	—	—	—	10.3	0.00	10.3	1.03	0.00	—	36.0
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.27	0.00	0.27	0.03	0.00	—	0.96
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	121	0.00	121	12.1	0.00	—	423
Total	—	—	—	—	—	—	—	—	—	—	—	822	0.00	822	82.2	0.00	—	2,877

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	15.2	15.2
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	26.6	26.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	55.4	55.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	15.2	15.2
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36

Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	26.6	26.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	55.4	55.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.51	2.51
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.16	2.16
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.41	4.41
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.17	9.17

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	3.36	3.72	2.88	1,220	26.5	29.3	22.7	9,615
Single Family Housing	2,060	2,079	1,869	742,790	16,229	16,380	14,727	5,853,186

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	2
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	2
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0

Pellet Wood Stoves	0
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	381
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	1526
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
7538852.25	2,512,951	9,322,500	3,107,500	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)

High School	17,439,100	204	0.0330	0.0040	161,369,213
Place of Worship	523,687	204	0.0330	0.0040	2,101,877
City Park	0.00	204	0.0330	0.0040	0.00
Strip Mall	17,867,539	204	0.0330	0.0040	11,915,718
Office Park	3,090,620	204	0.0330	0.0040	3,467,542
Golf Course	0.00	204	0.0330	0.0040	0.00
Apartments Low Rise	15,002	204	0.0330	0.0040	79,837
Single Family Housing	11,794,522	204	0.0330	0.0040	88,145,206

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
High School	130,494,235	0.00
Place of Worship	1,501,868	0.00
City Park	0.00	0.00
Strip Mall	154,885,642	0.00
Office Park	25,949,127	0.00
Golf Course	0.00	0.00
Apartments Low Rise	145,066	0.00
Single Family Housing	69,160,025	226,322,592

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
High School	5,109	—

Place of Worship	274	—
City Park	30.0	—
Strip Mall	2,196	—
Office Park	136	—
Golf Course	115	—
Apartments Low Rise	3.08	—
Single Family Housing	1,354	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
High School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
High School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
High School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
High School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Place of Worship	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Place of Worship	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Place of Worship	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Place of Worship	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Office Park	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Office Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Golf Course	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Golf Course	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	12.2	annual days of extreme heat
Extreme Precipitation	13.8	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	18.0	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A

Extreme Precipitation	4	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	4	1	1	4
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	7.52
AQ-PM	13.0
AQ-DPM	27.5
Drinking Water	53.9
Lead Risk Housing	42.9
Pesticides	25.4
Toxic Releases	28.0
Traffic	75.5
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	48.5
Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	33.2
Solid Waste	0.00
Sensitive Population	—
Asthma	5.91
Cardio-vascular	1.46
Low Birth Weights	93.0
Socioeconomic Factor Indicators	—
Education	3.87
Housing	12.3

Linguistic	7.38
Poverty	17.2
Unemployment	28.2

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	93.68664186
Employed	44.86077249
Median HI	99.87167971
Education	—
Bachelor's or higher	96.02207109
High school enrollment	100
Preschool enrollment	84.56306942
Transportation	—
Auto Access	87.47593995
Active commuting	47.61965867
Social	—
2-parent households	88.10470935
Voting	92.86539202
Neighborhood	—
Alcohol availability	92.01847812
Park access	16.55331708
Retail density	21.71179263
Supermarket access	28.65392018
Tree canopy	98.60130887

Housing	—
Homeownership	98.65263698
Housing habitability	95.00834082
Low-inc homeowner severe housing cost burden	45.32272552
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	90.15783395
Arthritis	0.0
Asthma ER Admissions	87.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	97.0
Cognitively Disabled	90.0
Physically Disabled	81.6
Heart Attack ER Admissions	94.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—

Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	18.4
SLR Inundation Area	0.0
Children	93.4
Elderly	4.2
English Speaking	98.1
Foreign-born	34.1
Outdoor Workers	55.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	94.0
Traffic Density	65.1
Traffic Access	23.0
Other Indices	—
Hardship	2.4
Other Decision Support	—
2016 Voting	93.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	10.0
Healthy Places Index Score for Project Location (b)	99.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Operations: Vehicle Data	Traffic data provided by Project transportation engineers (Parisi) on 9/18/2023. Data analysis was conducted for only home-based VMT.

Woodside Proposed Detailed Report

Table of Contents

1. Basic Project Information

    1.1. Basic Project Information

    1.2. Land Use Types

    1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

    2.4. Operations Emissions Compared Against Thresholds

    2.5. Operations Emissions by Sector, Unmitigated

4. Operations Emissions Details

    4.1. Mobile Emissions by Land Use

        4.1.1. Unmitigated

    4.2. Energy

        4.2.1. Electricity Emissions By Land Use - Unmitigated

        4.2.3. Natural Gas Emissions By Land Use - Unmitigated

    4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated
5.16. Stationary Sources
5.16.1. Emergency Generators and Fire Pumps
5.16.2. Process Boilers
5.17. User Defined
5.18. Vegetation
5.18.1. Land Use Change
5.18.1.1. Unmitigated
5.18.1. Biomass Cover Type
5.18.1.1. Unmitigated
5.18.2. Sequestration
5.18.2.1. Unmitigated
6. Climate Risk Detailed Report
6.1. Climate Risk Summary
6.2. Initial Climate Risk Scores
6.3. Adjusted Climate Risk Scores
6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Woodside Existing v2
Operational Year	2031
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	4.70
Precipitation (days)	41.8
Location	Woodside, CA, USA
County	San Mateo
City	Woodside
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1265
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.19

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
High School	3,930	1000sqft	90.2	3,930,000	0.00	0.00	—	—

Place of Worship	48.0	1000sqft	1.10	48,000	0.00	—	—	—
City Park	349	Acre	349	0.00	0.00	0.00	—	—
Strip Mall	2,091	1000sqft	48.0	2,091,000	0.00	—	—	—
Office Park	146	1000sqft	3.35	146,000	0.00	—	—	—
Golf Course	124	Acre	124	0.00	0.00	0.00	—	—
Apartments Low Rise	4.00	Dwelling Unit	0.25	4,240	0.00	—	12.0	—
Single Family Housing	2,206	Dwelling Unit	716	4,301,700	25,838,563	—	6,353	—
Apartments High Rise	75.0	Dwelling Unit	1.21	72,000	0.00	—	216	—
Apartments Mid Rise	49.0	Dwelling Unit	1.29	47,040	0.00	—	141	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	76.3	329	89.9	511	0.68	7.06	15.6	22.6	6.92	3.95	10.9	5,893	150,135	156,028	605	3.18	85.5	172,184
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.0	273	87.0	106	0.66	6.52	15.6	22.1	6.51	3.95	10.5	5,893	147,995	153,887	605	3.22	61.1	170,030

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	44.5	300	80.0	299	0.61	6.11	14.8	20.9	6.04	3.76	9.80	5,893	137,805	143,698	605	3.18	71.0	159,832
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.11	54.8	14.6	54.5	0.11	1.11	2.71	3.82	1.10	0.69	1.79	976	22,815	23,791	100	0.53	11.8	26,462

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.72	6.21	3.69	52.2	0.15	0.07	15.6	15.7	0.06	3.95	4.01	—	15,621	15,621	0.53	0.50	25.1	15,809
Area	61.2	319	12.1	407	0.08	1.23	—	1.23	1.10	—	1.10	0.00	12,359	12,359	0.27	0.03	—	12,376
Energy	8.33	4.17	74.1	51.4	0.45	5.76	—	5.76	5.76	—	5.76	—	119,995	119,995	12.8	0.75	—	120,539
Water	—	—	—	—	—	—	—	—	—	—	—	762	2,160	2,922	78.4	1.90	—	5,449
Waste	—	—	—	—	—	—	—	—	—	—	—	5,131	0.00	5,131	513	0.00	—	17,951
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.4	60.4
Total	76.3	329	89.9	511	0.68	7.06	15.6	22.6	6.92	3.95	10.9	5,893	150,135	156,028	605	3.18	85.5	172,184
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.66	6.13	4.36	51.4	0.15	0.07	15.6	15.7	0.06	3.95	4.01	—	14,946	14,946	0.59	0.55	0.65	15,126
Area	1.00	263	8.58	3.65	0.05	0.69	—	0.69	0.69	—	0.69	0.00	10,893	10,893	0.21	0.02	—	10,905
Energy	8.33	4.17	74.1	51.4	0.45	5.76	—	5.76	5.76	—	5.76	—	119,995	119,995	12.8	0.75	—	120,539
Water	—	—	—	—	—	—	—	—	—	—	—	762	2,160	2,922	78.4	1.90	—	5,449
Waste	—	—	—	—	—	—	—	—	—	—	—	5,131	0.00	5,131	513	0.00	—	17,951
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.4	60.4

Total	16.0	273	87.0	106	0.66	6.52	15.6	22.1	6.51	3.95	10.5	5,893	147,995	153,887	605	3.22	61.1	170,030
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.41	5.90	4.02	48.4	0.14	0.07	14.8	14.9	0.06	3.76	3.82	—	14,659	14,659	0.55	0.52	10.6	14,839
Area	29.7	290	1.94	199	0.01	0.28	—	0.28	0.22	—	0.22	0.00	991	991	0.04	0.01	—	994
Energy	8.33	4.17	74.1	51.4	0.45	5.76	—	5.76	5.76	—	5.76	—	119,995	119,995	12.8	0.75	—	120,539
Water	—	—	—	—	—	—	—	—	—	—	—	762	2,160	2,922	78.4	1.90	—	5,449
Waste	—	—	—	—	—	—	—	—	—	—	—	5,131	0.00	5,131	513	0.00	—	17,951
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.4	60.4
Total	44.5	300	80.0	299	0.61	6.11	14.8	20.9	6.04	3.76	9.80	5,893	137,805	143,698	605	3.18	71.0	159,832
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.17	1.08	0.73	8.84	0.03	0.01	2.71	2.72	0.01	0.69	0.70	—	2,427	2,427	0.09	0.09	1.75	2,457
Area	5.42	52.9	0.35	36.3	< 0.005	0.05	—	0.05	0.04	—	0.04	0.00	164	164	0.01	< 0.005	—	165
Energy	1.52	0.76	13.5	9.39	0.08	1.05	—	1.05	1.05	—	1.05	—	19,867	19,867	2.12	0.12	—	19,957
Water	—	—	—	—	—	—	—	—	—	—	—	126	358	484	13.0	0.31	—	902
Waste	—	—	—	—	—	—	—	—	—	—	—	849	0.00	849	84.9	0.00	—	2,972
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	10.0	10.0
Total	8.11	54.8	14.6	54.5	0.11	1.11	2.71	3.82	1.10	0.69	1.79	976	22,815	23,791	100	0.53	11.8	26,462

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	0.01	0.01	0.01	0.08	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	23.5	23.5	< 0.005	< 0.005	0.04	23.8
Single Family Housing	6.52	6.03	3.58	50.7	0.15	0.07	15.1	15.2	0.06	3.83	3.89	—	15,159	15,159	0.52	0.49	24.3	15,342
Apartments High Rise	0.11	0.10	0.06	0.82	< 0.005	< 0.005	0.24	0.25	< 0.005	0.06	0.06	—	245	245	0.01	0.01	0.39	248
Apartments Mid Rise	0.08	0.08	0.05	0.64	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	193	193	0.01	0.01	0.31	195
Total	6.72	6.21	3.69	52.2	0.15	0.07	15.6	15.7	0.06	3.95	4.01	—	15,621	15,621	0.53	0.50	25.1	15,809
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	0.01	0.01	0.01	0.08	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	22.5	22.5	< 0.005	< 0.005	< 0.005	22.8
Single Family Housing	6.46	5.95	4.23	49.9	0.14	0.07	15.1	15.2	0.06	3.83	3.89	—	14,504	14,504	0.57	0.54	0.63	14,679
Apartments High Rise	0.10	0.10	0.07	0.81	< 0.005	< 0.005	0.24	0.25	< 0.005	0.06	0.06	—	235	235	0.01	0.01	0.01	237
Apartments Mid Rise	0.08	0.08	0.05	0.63	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	184	184	0.01	0.01	0.01	187
Total	6.66	6.13	4.36	51.4	0.15	0.07	15.6	15.7	0.06	3.95	4.01	—	14,946	14,946	0.59	0.55	0.65	15,126
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.33	3.33	< 0.005	< 0.005	< 0.005	3.37

Single Family Housing	1.14	1.05	0.71	8.58	0.03	0.01	2.63	2.64	0.01	0.67	0.68	—	2,357	2,357	0.09	0.08	1.70	2,386
Apartments High Rise	0.02	0.02	0.01	0.14	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	37.3	37.3	< 0.005	< 0.005	0.03	37.8
Apartments Mid Rise	0.01	0.01	0.01	0.11	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	29.1	29.1	< 0.005	< 0.005	0.02	29.4
Total	1.17	1.08	0.73	8.84	0.03	0.01	2.71	2.72	0.01	0.69	0.70	—	2,427	2,427	0.09	0.09	1.75	2,457

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	9,746	9,746	1.58	0.19	—	9,842
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	293	293	0.05	0.01	—	296
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	9,985	9,985	1.62	0.20	—	10,084
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	1,727	1,727	0.28	0.03	—	1,744
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	8.38	8.38	< 0.005	< 0.005	—	8.47

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	7,625	7,625	1.23	0.15	—	7,700
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.02	< 0.005	—	144
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	93.4	93.4	0.02	< 0.005	—	94.3
Total	—	—	—	—	—	—	—	—	—	—	—	—	29,621	29,621	4.79	0.58	—	29,914
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	9,746	9,746	1.58	0.19	—	9,842
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	293	293	0.05	0.01	—	296
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	9,985	9,985	1.62	0.20	—	10,084
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	1,727	1,727	0.28	0.03	—	1,744
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	8.38	8.38	< 0.005	< 0.005	—	8.47
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	7,625	7,625	1.23	0.15	—	7,700
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.02	< 0.005	—	144
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	93.4	93.4	0.02	< 0.005	—	94.3

Total	—	—	—	—	—	—	—	—	—	—	—	—	29,621	29,621	4.79	0.58	—	29,914
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	1,614	1,614	0.26	0.03	—	1,630
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	48.5	48.5	0.01	< 0.005	—	48.9
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	1,653	1,653	0.27	0.03	—	1,670
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	286	286	0.05	0.01	—	289
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	1.39	1.39	< 0.005	< 0.005	—	1.40
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	1,262	1,262	0.20	0.02	—	1,275
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	23.7	23.7	< 0.005	< 0.005	—	23.9
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	15.5	15.5	< 0.005	< 0.005	—	15.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	4,904	4,904	0.79	0.10	—	4,953

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

High School	4.77	2.38	43.3	36.4	0.26	3.29	—	3.29	3.29	—	3.29	—	51,716	51,716	4.58	0.10	—	51,860
Place of Worship	0.06	0.03	0.56	0.47	< 0.005	0.04	—	0.04	0.04	—	0.04	—	674	674	0.06	< 0.005	—	675
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	0.35	0.18	3.20	2.69	0.02	0.24	—	0.24	0.24	—	0.24	—	3,819	3,819	0.34	0.01	—	3,829
Office Park	0.10	0.05	0.93	0.78	0.01	0.07	—	0.07	0.07	—	0.07	—	1,111	1,111	0.10	< 0.005	—	1,114
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.6	25.6	< 0.005	< 0.005	—	25.7
Single Family Housing	3.01	1.51	25.7	11.0	0.16	2.08	—	2.08	2.08	—	2.08	—	32,678	32,678	2.89	0.06	—	32,769
Apartments High Rise	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	212	212	0.02	< 0.005	—	212
Apartments Mid Rise	0.01	0.01	0.11	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01	—	138	138	0.01	< 0.005	—	139
Total	8.33	4.17	74.1	51.4	0.45	5.76	—	5.76	5.76	—	5.76	—	90,374	90,374	8.00	0.17	—	90,625
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	4.77	2.38	43.3	36.4	0.26	3.29	—	3.29	3.29	—	3.29	—	51,716	51,716	4.58	0.10	—	51,860
Place of Worship	0.06	0.03	0.56	0.47	< 0.005	0.04	—	0.04	0.04	—	0.04	—	674	674	0.06	< 0.005	—	675
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	0.35	0.18	3.20	2.69	0.02	0.24	—	0.24	0.24	—	0.24	—	3,819	3,819	0.34	0.01	—	3,829
Office Park	0.10	0.05	0.93	0.78	0.01	0.07	—	0.07	0.07	—	0.07	—	1,111	1,111	0.10	< 0.005	—	1,114

Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.6	25.6	< 0.005	< 0.005	—	25.7
Single Family Housing	3.01	1.51	25.7	11.0	0.16	2.08	—	2.08	2.08	—	2.08	—	32,678	32,678	2.89	0.06	—	32,769
Apartments High Rise	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	212	212	0.02	< 0.005	—	212
Apartments Mid Rise	0.01	0.01	0.11	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01	—	138	138	0.01	< 0.005	—	139
Total	8.33	4.17	74.1	51.4	0.45	5.76	—	5.76	5.76	—	5.76	—	90,374	90,374	8.00	0.17	—	90,625
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.87	0.44	7.91	6.64	0.05	0.60	—	0.60	0.60	—	0.60	—	8,562	8,562	0.76	0.02	—	8,586
Place of Worship	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	112	112	0.01	< 0.005	—	112
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	0.06	0.03	0.58	0.49	< 0.005	0.04	—	0.04	0.04	—	0.04	—	632	632	0.06	< 0.005	—	634
Office Park	0.02	0.01	0.17	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	184	184	0.02	< 0.005	—	184
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.24	4.24	< 0.005	< 0.005	—	4.25
Single Family Housing	0.55	0.27	4.70	2.00	0.03	0.38	—	0.38	0.38	—	0.38	—	5,410	5,410	0.48	0.01	—	5,425
Apartments High Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	35.0	35.0	< 0.005	< 0.005	—	35.1

Apartme Mid Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.9	22.9	< 0.005	< 0.005	—	23.0
Total	1.52	0.76	13.5	9.39	0.08	1.05	—	1.05	1.05	—	1.05	—	14,962	14,962	1.32	0.03	—	15,004

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.00	0.50	8.58	3.65	0.05	0.69	—	0.69	0.69	—	0.69	0.00	10,893	10,893	0.21	0.02	—	10,905
Consumer Products	—	228	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	34.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	60.2	55.9	3.51	403	0.02	0.54	—	0.54	0.41	—	0.41	—	1,466	1,466	0.06	0.01	—	1,471
Total	61.2	319	12.1	407	0.08	1.23	—	1.23	1.10	—	1.10	0.00	12,359	12,359	0.27	0.03	—	12,376
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.00	0.50	8.58	3.65	0.05	0.69	—	0.69	0.69	—	0.69	0.00	10,893	10,893	0.21	0.02	—	10,905
Consumer Products	—	228	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	—	34.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.00	263	8.58	3.65	0.05	0.69	—	0.69	0.69	—	0.69	0.00	10,893	10,893	0.21	0.02	—	10,905
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	44.5	44.5	< 0.005	< 0.005	—	44.5
Consumer Products	—	41.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	6.36	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	5.42	5.03	0.32	36.3	< 0.005	0.05	—	0.05	0.04	—	0.04	—	120	120	0.01	< 0.005	—	120
Total	5.42	52.9	0.35	36.3	< 0.005	0.05	—	0.05	0.04	—	0.04	0.00	164	164	0.01	< 0.005	—	165

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	250	472	722	25.7	0.62	—	1,550
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	2.88	5.44	8.31	0.30	0.01	—	17.8
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	297	561	857	30.5	0.73	—	1,839

Office Park	—	—	—	—	—	—	—	—	—	—	—	49.7	93.9	144	5.11	0.12	—	308
Golf Course	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.28	0.52	0.80	0.03	< 0.005	—	1.72
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	153	1,011	1,165	15.9	0.39	—	1,679
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	5.21	9.84	15.1	0.54	0.01	—	32.3
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.41	6.43	9.84	0.35	0.01	—	21.1
Total	—	—	—	—	—	—	—	—	—	—	—	762	2,160	2,922	78.4	1.90	—	5,449
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	250	472	722	25.7	0.62	—	1,550
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	2.88	5.44	8.31	0.30	0.01	—	17.8
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	297	561	857	30.5	0.73	—	1,839
Office Park	—	—	—	—	—	—	—	—	—	—	—	49.7	93.9	144	5.11	0.12	—	308
Golf Course	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.28	0.52	0.80	0.03	< 0.005	—	1.72

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	153	1,011	1,165	15.9	0.39	—	1,679
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	5.21	9.84	15.1	0.54	0.01	—	32.3
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.41	6.43	9.84	0.35	0.01	—	21.1
Total	—	—	—	—	—	—	—	—	—	—	—	762	2,160	2,922	78.4	1.90	—	5,449
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	41.4	78.2	120	4.26	0.10	—	257
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	0.48	0.90	1.38	0.05	< 0.005	—	2.95
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	49.1	92.8	142	5.05	0.12	—	304
Office Park	—	—	—	—	—	—	—	—	—	—	—	8.23	15.5	23.8	0.85	0.02	—	51.0
Golf Course	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.05	0.09	0.13	< 0.005	< 0.005	—	0.29
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	25.4	167	193	2.63	0.07	—	278
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	0.86	1.63	2.49	0.09	< 0.005	—	5.35
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	0.56	1.06	1.63	0.06	< 0.005	—	3.49
Total	—	—	—	—	—	—	—	—	—	—	—	126	358	484	13.0	0.31	—	902

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	2,753	0.00	2,753	275	0.00	—	9,633
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	147	0.00	147	14.7	0.00	—	516
City Park	—	—	—	—	—	—	—	—	—	—	—	16.2	0.00	16.2	1.62	0.00	—	56.6
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	1,183	0.00	1,183	118	0.00	—	4,140
Office Park	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.31	0.00	—	256
Golf Course	—	—	—	—	—	—	—	—	—	—	—	62.2	0.00	62.2	6.21	0.00	—	217
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	1.66	0.00	1.66	0.17	0.00	—	5.81
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	844	0.00	844	84.4	0.00	—	2,954
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	29.9	0.00	29.9	2.99	0.00	—	105
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	19.5	0.00	19.5	1.95	0.00	—	68.3
Total	—	—	—	—	—	—	—	—	—	—	—	5,131	0.00	5,131	513	0.00	—	17,951

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	2,753	0.00	2,753	275	0.00	—	9,633
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	147	0.00	147	14.7	0.00	—	516
City Park	—	—	—	—	—	—	—	—	—	—	—	16.2	0.00	16.2	1.62	0.00	—	56.6
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	1,183	0.00	1,183	118	0.00	—	4,140
Office Park	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.31	0.00	—	256
Golf Course	—	—	—	—	—	—	—	—	—	—	—	62.2	0.00	62.2	6.21	0.00	—	217
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	1.66	0.00	1.66	0.17	0.00	—	5.81
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	844	0.00	844	84.4	0.00	—	2,954
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	29.9	0.00	29.9	2.99	0.00	—	105
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	19.5	0.00	19.5	1.95	0.00	—	68.3
Total	—	—	—	—	—	—	—	—	—	—	—	5,131	0.00	5,131	513	0.00	—	17,951
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	456	0.00	456	45.6	0.00	—	1,595
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	24.4	0.00	24.4	2.44	0.00	—	85.4
City Park	—	—	—	—	—	—	—	—	—	—	—	2.68	0.00	2.68	0.27	0.00	—	9.37
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	196	0.00	196	19.6	0.00	—	685

Office Park	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.4
Golf Course	—	—	—	—	—	—	—	—	—	—	—	10.3	0.00	10.3	1.03	0.00	—	36.0
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.27	0.00	0.27	0.03	0.00	—	0.96
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	140	0.00	140	14.0	0.00	—	489
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	4.95	0.00	4.95	0.49	0.00	—	17.3
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.23	0.00	3.23	0.32	0.00	—	11.3
Total	—	—	—	—	—	—	—	—	—	—	—	849	0.00	849	84.9	0.00	—	2,972

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	15.2	15.2
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0

Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	30.8	30.8
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.52	0.52
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.34	0.34
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.4	60.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	15.2	15.2
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.19	0.19
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	30.8	30.8
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.52	0.52
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.34	0.34
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	60.4	60.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.51	2.51
Place of Worship	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.16	2.16
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Golf Course	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.10	5.10
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.09	0.09
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	10.0	10.0

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
High School	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Place of Worship	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Strip Mall	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Office Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Golf Course	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Low Rise	3.80	4.24	3.28	1,383	29.8	33.3	25.7	10,855
Single Family Housing	2,713	2,735	2,449	977,731	21,300	21,473	19,222	7,675,186
Apartments High Rise	43.5	44.3	35.3	15,486	341	347	277	121,568
Apartments Mid Rise	34.8	31.4	26.0	12,060	273	246	204	94,668

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Low Rise	—
Wood Fireplaces	0

Gas Fireplaces	2
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	2
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	441
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	1765
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments High Rise	—
Wood Fireplaces	0
Gas Fireplaces	38
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	37
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0

Pellet Wood Stoves	0
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	25
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	24
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
8960584.5	2,986,862	9,322,500	3,107,500	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)

High School	17,439,100	204	0.0330	0.0040	161,369,213
Place of Worship	523,687	204	0.0330	0.0040	2,101,877
City Park	0.00	204	0.0330	0.0040	0.00
Strip Mall	17,867,539	204	0.0330	0.0040	11,915,718
Office Park	3,090,620	204	0.0330	0.0040	3,467,542
Golf Course	0.00	204	0.0330	0.0040	0.00
Apartments Low Rise	15,002	204	0.0330	0.0040	79,837
Single Family Housing	13,643,794	204	0.0330	0.0040	101,965,560
Apartments High Rise	255,859	204	0.0330	0.0040	660,305
Apartments Mid Rise	167,161	204	0.0330	0.0040	431,399

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
High School	130,494,235	0.00
Place of Worship	1,501,868	0.00
City Park	0.00	0.00
Strip Mall	154,885,642	0.00
Office Park	25,949,127	0.00
Golf Course	0.00	0.00
Apartments Low Rise	145,066	0.00
Single Family Housing	80,003,678	261,807,893
Apartments High Rise	2,719,980	0.00
Apartments Mid Rise	1,777,054	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
High School	5,109	—
Place of Worship	274	—
City Park	30.0	—
Strip Mall	2,196	—
Office Park	136	—
Golf Course	115	—
Apartments Low Rise	3.08	—
Single Family Housing	1,566	—
Apartments High Rise	55.5	—
Apartments Mid Rise	36.2	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
High School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
High School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
High School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
High School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Place of Worship	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00

Place of Worship	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Place of Worship	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Place of Worship	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Office Park	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Office Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Golf Course	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Golf Course	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	12.2	annual days of extreme heat
Extreme Precipitation	13.8	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth

Wildfire	18.0	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	4	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A

Extreme Precipitation	4	1	1	4
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	7.52
AQ-PM	13.0
AQ-DPM	27.5
Drinking Water	53.9
Lead Risk Housing	42.9
Pesticides	25.4
Toxic Releases	28.0
Traffic	75.5

Effect Indicators	—
CleanUp Sites	0.00
Groundwater	48.5
Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	33.2
Solid Waste	0.00
Sensitive Population	—
Asthma	5.91
Cardio-vascular	1.46
Low Birth Weights	93.0
Socioeconomic Factor Indicators	—
Education	3.87
Housing	12.3
Linguistic	7.38
Poverty	17.2
Unemployment	28.2

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	93.68664186
Employed	44.86077249
Median HI	99.87167971
Education	—
Bachelor's or higher	96.02207109
High school enrollment	100

Preschool enrollment	84.56306942
Transportation	—
Auto Access	87.47593995
Active commuting	47.61965867
Social	—
2-parent households	88.10470935
Voting	92.86539202
Neighborhood	—
Alcohol availability	92.01847812
Park access	16.55331708
Retail density	21.71179263
Supermarket access	28.65392018
Tree canopy	98.60130887
Housing	—
Homeownership	98.65263698
Housing habitability	95.00834082
Low-inc homeowner severe housing cost burden	45.32272552
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	90.15783395
Arthritis	0.0
Asthma ER Admissions	87.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0

Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	97.0
Cognitively Disabled	90.0
Physically Disabled	81.6
Heart Attack ER Admissions	94.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	18.4
SLR Inundation Area	0.0
Children	93.4
Elderly	4.2
English Speaking	98.1
Foreign-born	34.1
Outdoor Workers	55.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	94.0
Traffic Density	65.1

Traffic Access	23.0
Other Indices	—
Hardship	2.4
Other Decision Support	—
2016 Voting	93.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	10.0
Healthy Places Index Score for Project Location (b)	99.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Operations: Vehicle Data	Traffic data provided by Project transportation engineers (Parisi) on 9/18/2023. Data analysis was conducted for only home-based VMT.

Appendix E

BIOLOGICAL RESOURCES REPORTS

Table of Contents

High Road Residential Project Biological Resources Report E-1
Cañada College Residential Project Biological Resources Report..... E-76
773 Cañada Road Residential Project Biological Resources Report..... E-159
Raymundo Road Biological Resources Report Report..... E-236

H. T. HARVEY & ASSOCIATES

Ecological Consultants

High Road Residential Project
Biological Resources Report

Project #4687-01

Prepared for:

Andrew Hill
Town of Woodside
P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

Prepared by:

H. T. Harvey & Associates

December 23, 2022

983 University Avenue, Building D • Los Gatos, CA 95032 • Ph: 408.458.3200

List of Abbreviated Terms

BMPs	best management practices
Cal-IPC	California Invasive Plant Council
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DBH	diameter at breast height
FESA	Federal Endangered Species Act
HMMP	habitat mitigation and monitoring plan
LSAA	Lake and Streambed Alteration Agreement
MBTA	Migratory Bird Treaty Act
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
OHW	ordinary high water
Porter-Cologne	Porter-Cologne Water Quality Control Act
RWQCB	Regional Water Quality Control Board
SWRCB	State Water Resources Control Board
Town	Town of Woodside
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VegCAMP	Vegetation Classification and Mapping Program

Table of Contents

Section 1. Introduction 1
1.1 Project Location 1
1.2 Project Description 1

Section 2. Methods 4
2.1 Background Review 4
2.2 Site Visit 4

Section 3. Regulatory Setting 5
3.1 Federal Regulations 5
3.1.1 Clean Water Act 5
3.1.2 Rivers and Harbors Act 5
3.1.3 Federal Endangered Species Act 6
3.1.4 Federal Migratory Bird Treaty Act 7
3.2 State Regulations 7
3.2.1 Porter-Cologne Water Quality Control Act 7
3.2.2 California Endangered Species Act 8
3.2.3 Native Plant Protection Act 8
3.2.4 California Environmental Quality Act 8
3.2.5 California Fish and Game Code 10
3.2.6 State Water Resources Control Board Stormwater Regulation 11
3.3 Local Regulations 12
3.3.1 Woodside Tree Protection Ordinance 12
3.3.2 Woodside Stream Corridor Protection Ordinance 13

Section 4. Environmental Setting 14
4.1 General Project Area Description 14
4.2 Biotic Habitats 14
4.2.1 Ornamental Woodland 14
4.2.2 California Annual Grassland 17
4.2.3 Coast Live Oak Woodland 18
4.2.4 Harding Grass Grassland 20
4.3 Adjacent Habitat Areas 20
4.4 Wildlife Movement 21

Section 5. Special-Status Species and Sensitive Habitats 23
5.1 Special-Status Plant Species 26
5.2 Special-Status Animal Species 30
5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats 40
5.3.1 Sensitive Natural Communities 40
5.3.2 Sensitive Vegetation Alliances 41
5.3.3 CDFW Riparian Habitat 41
5.3.4 Sensitive Habitats (Waters of the U.S./State) 41
5.3.5 Nonnative and Invasive Species 41

Section 6. Impacts and Mitigation Measures 42
6.1 Impacts on Special-Status Species 43
6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant) 43
6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation) 43
6.1.3 Impacts on Water Quality (Less than Significant) 46

6.1.4 Impacts on the Monarch Butterfly (Less than Significant) 47
6.1.5 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant) 48
6.1.6 Impacts on the White-Tailed Kite (Less than Significant) 49
6.1.7 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant with Mitigation) 49
6.1.8 Impacts on Common and Special-Status Roosting Bats (Less than Significant with Mitigation) 50
6.1.9 Impacts due to Bird Collisions (Less than Significant) 52
6.1.10 Impacts due to Increased Lighting (Less than Significant with Mitigation) 54
6.2 Impacts on Sensitive Communities 55
6.2.1 Impacts on Riparian Habitat or Other Sensitive Natural Communities (Less than Significant) 55
6.3 Impacts on Wetlands 56
6.4 Impacts on Wildlife Movement 56
6.4.1 Impacts on Wildlife Movement (Less than Significant) 56
6.4.2 Impacts on Nesting Birds (Less than Significant) 57
6.5 Impacts due to Conflicts with Local Policies: 57
6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant) 57
6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant with Mitigation) 58
6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan 59
6.7 Cumulative Impacts 60
Section 7. Compliance with Additional Laws and Regulations for Nesting Birds 61
Section 8. References 62

Figures

Figure 1. Vicinity Map 2
Figure 2. Project Site 3
Figure 3. Biotic Habitats 15
Figure 4. CNDDB-Mapped Records of Special-Status Plants 24
Figure 5. CNDDB-Mapped Records of Special-Status Animals 25

Tables

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site 27
Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site 32

Appendices

Appendix A. Plants Observed A-1
Appendix B. Special-Status Plants Considered but Rejected for Occurrence B-1

List of Preparers

Steve Rottenborn, Ph.D., Principal/Senior Wildlife Ecologist
Robin Carle, M.S., Project Manager/Senior Wildlife Ecologist
Katie Gallagher, M.S., Senior Plant and Wetlands Ecologist
Vanessa Morales, B.S., Plant and Wetlands Ecologist
Jane Lien, B.S., Wildlife Ecologist

Section 1. Introduction

This report describes the biological resources present in the area of the proposed High Road higher-density residential project, the potential impacts of the proposed project on biological resources, and measures necessary to reduce project impacts to less-than-significant levels under the California Environmental Quality Act (CEQA). This assessment is based on the project maps and description provided to H. T. Harvey & Associated by the Town of Woodside (Town) through October 2022.

1.1 Project Location

The 1.3-acre project site is located southwest of the intersection of High Road and Woodside Road in Woodside, California (Figures 1 and 2). The site is generally bounded by Woodside Road to the southeast, High Road to the north, and residential housing and Redwood Creek to the west. Surrounding areas consist of residential development. The project site is located on the *Palo Alto*, *California* 7.5-minute United States Geological Survey (USGS) quadrangle.

1.2 Project Description

The project proposes to construct residential housing on the project site at a density of approximately 10 units per acre.

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Figure 1. Vicinity Map
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December 2022

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Figure 2. Project Site
High Road Residential Project Biological Resources Report (4687-01)
December 2022

Section 2. Methods

2.1 Background Review

Prior to conducting field work, H. T. Harvey & Associates ecologists reviewed the project description and maps provided by the Town through October 2022; aerial images (Google Inc. 2022); a USGS topographic map; a National Wetlands Inventory map (2022); National Resources Conservation Service (NRCS) soil survey maps (2022); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (2022); and other relevant reports, scientific literature, and technical databases. For the purposes of this report, the *project vicinity* is defined as the area within a 5-mile radius surrounding the project site.

In addition, for plants, we reviewed all species on current California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3, and 4 lists (CNPS 2022a) occurring in the project region, which is defined as the *Palo Alto, California* USGS 7.5-minute quadrangle and surrounding eight quadrangles (*San Mateo*, *Redwood Point*, *Newark*, *Mountain View*, *Cupertino*, *Mindego Hill*, *La Honda*, and *Woodside*). In addition, we queried the CNDDB (2022) for natural communities of special concern that occur on the project site, and we perused records of birds reported in nearby areas, such along the Crystal Springs Trail and at Stulsaft Park, on eBird (Cornell Lab of Ornithology 2022) and on the Peninsula-Birding List Serve (2022).

2.2 Site Visit

H. T. Harvey & Associates senior plant and wetland ecologist Katie Gallagher, M.S., and plant and wetland ecologist Vanessa Morales, B.S., conducted a reconnaissance-level survey of the project site on November 8, 2022, and wildlife ecologist Jane Lien, B.S., conducted a reconnaissance-level survey of the project site on November 2, 2022. The purpose of the surveys was to provide an impact assessment specific to the proposed construction of the project, as described above. Specifically, surveys were conducted to (1) assess existing biotic habitats and plant and animal communities on the project site, (2) assess the project site for its potential to support special-status species and their habitats, and (3) identify potential jurisdictional and sensitive habitats, such as waters of the U.S./state and riparian habitat. K. Gallagher and V. Morales conducted a presence/absence survey for arcuate bush-mallow (*Malacothamnus arcuatus*) on the project site. J. Lien conducted a focused survey for roosting bats and signs of bat presence (e.g., guano and urine staining) in trees on the site, as well as a focused survey for nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*).

Section 3. Regulatory Setting

Biological resources on the project site are regulated by a number of federal, state, and local laws and ordinances, as described below.

3.1 Federal Regulations

3.1.1 Clean Water Act

The Clean Water Act (CWA) functions to maintain and restore the physical, chemical, and biological integrity of waters of the U.S., which include, but are not limited to, tributaries to traditionally navigable waters currently or historically used for interstate or foreign commerce, and adjacent wetlands. Historically, in non-tidal waters, U.S. Army Corps of Engineers (USACE) jurisdiction extends to the ordinary high water (OHW) mark, which is defined in Title 33, Code of Federal Regulations, Part 328.3. If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark to the outer edges of the wetlands. Wetlands that are not adjacent to waters of the U.S. are termed "isolated wetlands" and, depending on the circumstances, may be subject to USACE jurisdiction. In tidal waters, USACE jurisdiction extends to the landward extent of vegetation associated with salt or brackish water or the high tide line. The high tide line is defined in 33 Code of Federal Regulations Part 328.3 as "the line of intersection of the land with the water's surface at the maximum height reached by a rising tide." If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark or high tide line to the outer edges of the wetlands.

Construction activities within jurisdictional waters are regulated by the USACE. The placement of fill into such waters must comply with permit requirements of the USACE. No USACE permit will be effective in the absence of Section 401 Water Quality Certification. The State Water Resources Control Board (SWRCB) is the state agency (together with the Regional Water Quality Control Boards [RWQCBs]) charged with implementing water quality certification in California.

Project Applicability: The project site does not support wetland or aquatic habitats. Redwood Creek, located approximately 45 feet off-site to the northwest, would likely be considered jurisdictional waters of the U.S. under the CWA, but no project activities are proposed within the bed and banks of the creek. As a result, a permit from the USACE would not be required for the project.

3.1.2 Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 prohibits the creation of any obstruction to the navigable capacity of waters of the U.S., including discharge of fill and the building of any wharfs, piers, jetties, and other structures without Congressional approval or authorization by the Chief of Engineers and Secretary of the Army (33 U.S.C. 403).

Navigable waters of the U.S., which are defined in 33 CFR, Part 329.4, include all waters subject to the ebb and flow of the tide, and/or those which are presently or have historically been used to transport commerce. The shoreward jurisdictional limit of tidal waters is further defined in 33 CFR, Part 329.12 as "the line on the shore reached by the plane of the mean (average) high water." It is important to understand that the USACE does not regulate wetlands under Section 10, only the aquatic or open waters component of bay habitat, and that there is overlap between Section 10 jurisdiction and Section 404 jurisdiction. According to 33 CFR, Part 329.9, a waterbody that was once navigable in its natural or improved state retains its character as "navigable in law" even though it is not presently used for commerce as a result of changed conditions and/or the presence of obstructions. Historical Section 10 waters may occur behind levees in areas that are not currently exposed to tidal or muted-tidal influence, and meet the following criteria: (1) the area is presently at or below the mean high water line; (2) the area was historically at or below mean high water in its "unobstructed, natural state"; and (3) there is no evidence that the area was ever above mean high water.

As mentioned above, Section 404 of the CWA authorizes the USACE to issue permits to regulate the discharge of dredged or fill material into waters of the U.S. If a project also proposes to discharge dredged or fill material and/or introduce other potential obstructions in navigable waters of the U.S., a Letter of Permission authorizing these impacts must be obtained from the USACE under Section 10 of the Rivers and Harbors Act.

Project Applicability: No current or historical Section 10 Waters are present on or close to the project site, including in Redwood Creek located off-site to the northwest. Therefore, a Letter of Permission from the USACE is not required.

3.1.3 Federal Endangered Species Act

The Federal Endangered Species Act (FESA) protects federally listed wildlife species from harm or *take*, which is broadly defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." *Take* can also include habitat modification or degradation that directly results in death or injury of a listed wildlife species. An activity can be defined as *take* even if it is unintentional or accidental. Listed plant species are provided less protection than listed wildlife species. Listed plant species are legally protected from take under the FESA only if they occur on federal lands.

The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service have jurisdiction over federally listed, threatened, and endangered species under FESA. The USFWS also maintains lists of proposed and candidate species. Species on these lists are not legally protected under FESA, but may become listed in the near future and are often included in their review of a project.

Project Applicability: No suitable habitat for any federally endangered plant species is present on the project site.

The monarch butterfly (*Danaus plexippus*), a candidate for listing under FESA, may occur on the project site, and there is similarly some potential for the project to result in impacts on this species if it is present. No additional federally listed or candidate animal species occur or potentially occur on the project site.

3.1.4 Federal Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. Section 703, prohibits killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. The MBTA protects whole birds, parts of birds, and bird eggs and nests, and it prohibits the possession of all nests of protected bird species whether they are active or inactive. An *active* nest is defined as having eggs or young, as described by the USFWS in its June 14, 2018 memorandum "Destruction and Relocation of Migratory Bird Nest Contents". Nest starts (nests that are under construction and do not yet contain eggs) and inactive nests are not protected from destruction.

Project Applicability: All native bird species that occur on the project site are protected under the MBTA.

3.2 State Regulations

3.2.1 Porter-Cologne Water Quality Control Act

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. Each RWQCB makes decisions related to water quality for its region, and may approve, with or without conditions, or deny projects that could affect waters of the state. Their authority comes from the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne). Porter-Cologne broadly defines waters of the state as "any surface water or groundwater, including saline waters, within the boundaries of the state." Because Porter-Cologne applies to any water, whereas the CWA applies only to certain waters, California's jurisdictional reach overlaps and may exceed the boundaries of waters of the U.S. For example, Water Quality Order No. 2004-0004-DWQ states that "shallow" waters of the state include headwaters, wetlands, and riparian areas. Moreover, the San Francisco Bay Region RWQCB's Assistant Executive Director has stated that, in practice, the RWQCBs claim jurisdiction over riparian areas. Where riparian habitat is not present, such as may be the case at headwaters, jurisdiction is taken to the top of bank.

On April 2, 2019, the SWRCB adopted the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. In these new guidelines, riparian habitats are not specifically described as waters of the state but instead as important buffer habitats to streams that do conform to the State Wetland Definition. The *Procedures* describe riparian habitat buffers as important resources that may both be included in required mitigation packages for permits for impacts to waters of the state, as well as areas requiring permit authorization from the RWQCBs to impact.

Pursuant to the CWA, projects that are regulated by the USACE must also obtain a Section 401 Water Quality Certification permit from the RWQCB. This certification ensures that a proposed project will uphold state

water quality standards. Because California's jurisdiction to regulate its water resources is much broader than that of the federal government, proposed impacts on waters of the state require Water Quality Certification even if the area occurs outside of USACE jurisdiction. Moreover, the RWQCB may impose mitigation requirements even if the USACE does not. Under the Porter-Cologne, the SWRCB and the nine regional boards also have the responsibility of granting CWA National Pollutant Discharge Elimination System (NPDES) permits and Waste Discharge Requirements for certain point-source and non-point discharges to waters. These regulations limit impacts on aquatic and riparian habitats from a variety of urban sources.

Project Applicability: No waters of the state or riparian habitats regulated by the RWQCB are present on the project site. Redwood Creek and associated riparian habitat located off-site to the northwest would likely be considered waters of the state, but no impacts to these features will result from project activities. Therefore, a Section 401 permit or Waste Discharge Requirement from the RWQCB would not be required.

3.2.2 California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code, Chapter 1.5, Sections 2050-2116) prohibits the take of any plant or animal listed or proposed for listing as rare (plants only), threatened, or endangered. In accordance with CESA, the CDFW has jurisdiction over state-listed species (Fish and Game Code 2070). The CDFW regulates activities that may result in *take* of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not expressly included in the definition of *take* under the California Fish and Game Code. The CDFW, however, has interpreted *take* to include the "killing of a member of a species which is the proximate result of habitat modification."

Project Applicability: No suitable habitat is present on the project site for any state-listed plant or animal species. The mountain lion (*Puma concolor*), a candidate for listing under CESA, may occur on the site occasionally as a nonbreeder, but no impacts to individuals will result from the project.

3.2.3 Native Plant Protection Act

The Native Plant Protection Act (NPPA), enacted in 1977, allows plants to be designated as rare or endangered by the California Fish and Game Commission (Fish and Game Code Sections 1900–1913). The NPPA includes prohibitions on the take of such plants, with exceptions for certain activities. A total of 64 species, subspecies, and varieties of plants are considered "rare" by the NPPA.

Project Applicability: Suitable habitat is present on the project site for the state-rare Dudley's lousewort (*Pedicularis dudleyi*). This species could be affected by the project if it is present.

3.2.4 California Environmental Quality Act

CEQA is a state law that requires state and local agencies to document and consider the environmental implications of their actions and to refrain from approving projects with significant environmental effects if

there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects. CEQA requires the full disclosure of the environmental effects of agency actions, such as approval of a general plan update or the projects covered by that plan, on resources such as air quality, water quality, cultural resources, and biological resources. The State Resources Agency promulgated guidelines for implementing CEQA known as the State CEQA Guidelines.

Section 15380(b) of the State CEQA Guidelines provides that a species not listed on the federal or state lists of protected species may be considered rare if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definitions in the FESA and the CESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals. This section was included in the guidelines primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW or species that are locally or regionally rare.

The CDFW has produced three lists (amphibians and reptiles, birds, and mammals) of "species of special concern" that serve as "watch lists". Species on these lists are of limited distribution or the extent of their habitats has been reduced substantially, such that threat to their populations may be imminent. Thus, their populations should be monitored. They may receive special attention during environmental review as potential rare species, but do not have specific statutory protection. All potentially rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the CEQA Section 15380(b). The CNPS, a non-governmental conservation organization, has developed CRPRs for plant species of concern in California in the CNPS Inventory of Rare and Endangered Plants (CNPS 2022a). The CRPRs include lichens, vascular, and non-vascular plants, and are defined as follows:

- CRPR 1A Plants considered extinct.
- CRPR 1B Plants rare, threatened, or endangered in California and elsewhere.
- CRPR 2A Plants considered extinct in California but more common elsewhere.
- CRPR 2B Plants rare, threatened, or endangered in California but more common elsewhere.
- CRPR 3 Plants about which more information is needed - review list.
- CRPR 4 Plants of limited distribution-watch list.

The CRPRs are further described by the following threat code extensions:

- .1—seriously endangered in California;
- .2—fairly endangered in California;
- .3—not very endangered in California.

Although the CNPS is not a regulatory agency and plants on these lists have no formal regulatory protection, plants appearing as CRPR 1B or 2 are, in general, considered to meet CEQA's Section 15380 criteria, and adverse effects to these species may be considered significant. Impacts on plants that are listed by the CNPS on CRPR 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those of CRPR 1B or 2, impacts on them are less frequently considered significant.

Compliance with CEQA Guidelines Section 15065(a) requires consideration of natural communities of special concern, in addition to plant and wildlife species. Vegetation types of "special concern" are tracked in Rarefind (CNDDB 2022). Further, the CDFW ranks sensitive vegetation alliances based on their global (G) and state (S) rankings analogous to those provided in the CNDDB. Global rankings (G1–G5) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas S rankings are a reflection of the condition of a habitat within California. If an alliance is marked as a G1–G3, all of the associations within it would also be of high priority. The CDFW provides the Vegetation Classification and Mapping Program's (VegCAMP's) currently accepted list of vegetation alliances and associations (CDFW 2022).

Project Applicability: All potential impacts on biological resources will be considered during CEQA review of the project in the context of this biological resources report. Project impacts are discussed in Section 6 below.

3.2.5 California Fish and Game Code

Ephemeral and intermittent streams, rivers, creeks, dry washes, sloughs, blue line streams on USGS maps, and watercourses with subsurface flows fall under CDFW jurisdiction. Canals, aqueducts, irrigation ditches, and other means of water conveyance may also be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. A *stream* is defined in Title 14, California Code of Regulations Section 1.72, as "a body of water that follows at least periodically or intermittently through a bed or channel having banks and that supports fish and other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." Using this definition, CDFW extends its jurisdiction to encompass riparian habitats that function as a part of a watercourse. California Fish and Game Code Section 2786 defines *riparian habitat* as "lands which contain habitat which grows close to and which depends upon soil moisture from a nearby freshwater source." The lateral extent of a stream and associated riparian habitat that would fall under the jurisdiction of CDFW can be measured in several ways, depending on the particular situation and the type of fish or wildlife at risk. At minimum, CDFW would claim jurisdiction over a stream's bed and bank. Where riparian habitat is present, the outer edge of riparian vegetation is generally used as the line of demarcation between riparian and upland habitats.

Pursuant to California Fish and Game Code Section 1603, CDFW regulates any project proposed by any person that will "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds." California Fish and Game Code Section 1602 requires an entity to notify CDFW of any proposed activity that may modify a river, stream, or lake. If CDFW determines that proposed activities may substantially adversely affect fish and

wildlife resources, a Lake and Streambed Alteration Agreement (LSAA) must be prepared. The LSAA sets reasonable conditions necessary to protect fish and wildlife, and must comply with CEQA. The applicant may then proceed with the activity in accordance with the final LSAA.

Certain sections of the California Fish and Game Code describe regulations pertaining to protection of certain wildlife species. For example, Code Section 2000 prohibits take of any bird, mammal, fish, reptile, or amphibian except as provided by other sections of the code.

The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered *take* by the CDFW. Raptors (e.g., eagles, hawks, and owls) and their nests are specifically protected in California under Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the code or in accordance with regulations adopted by the commission. Activities resulting in mortality of non-game mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered *take* by the CDFW.

Project Applicability: No riparian habitat regulated by the CDFW occurs on the project site. Redwood Creek and associated riparian habitat located off-site to the northwest may be regulated by CDFW, but no impacts to this riparian habitat will result from activities under the project. Therefore, a CDFW LSAA would not be required for the project.

Most native bird, mammal, and other wildlife species that occur on the project site and in the immediate vicinity are protected under the California Fish and Game Code. Project impacts on these species are discussed in Section 6.

3.2.6 State Water Resources Control Board Stormwater Regulation

Construction Phase. Construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of stormwater pollutants under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and

maintained during the project and it must include the use of best management practices (BMPs) to protect water quality until the site is stabilized.

Standard permit conditions under the Construction General Permit requires that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors. Additionally, the Construction General Permit does not extend coverage to projects if stormwater discharge-related activities are likely to jeopardize the continued existence, or result in take of any federally listed endangered or threatened species.

Post-Construction Phase. In many Bay Area counties, including San Mateo County, projects must also comply with the California RWQCB, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (Water Board Order No. R2-2015-0049, as amended). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design that prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Project Applicability. The project will comply with the requirements of the NPDES Statewide Storm Water Permit and Statewide General Construction Permit. Therefore, construction-phase activities would not result in detrimental water quality effects on biological or regulated resources.

3.3 Local Regulations

3.3.1 Woodside Tree Protection Ordinance

According to the Town Municipal Code §153.434, no person is allowed to destroy any tree without a obtaining a permit. In addition, §153.437 states that significant trees are to be protected during site development and construction. Significant trees are defined (§153.005) by their circumference or diameter based on growth rates. Slow-growing trees are defined as alder (*Alnus rhombifolia*), big leaf maple (*Acer macrophyllum*), blue oak (*Quercus douglasii*), buckeye (*Aesculus californica*), Fremont cottonwood (*Populus fremontii*), madrone (*Arbutus menziesii*), and tan bark oak (*Lithocarpus densiflorus*). Slow-growing species are significant if the trunk is larger than 7.6 inches diameter at breast height (DBH), measured at 4 feet above grade. Fast-growing species are defined as black oak (*Quercus kelloggii*), California bay laurel (*Umbellularia californica*), coast live oak (*Quercus agrifolia*), coast redwood (*Sequoia sempervirens*), Douglas fir (*Pseudotsuga menziesii*), valley oak (*Quercus lobata*), and western sycamore (*Platanus racemosa*). Fast-growing species larger than 9.5 inches DBH are significant trees. All other species larger than 11.5 inches DBH are considered significant trees. Protection of significant trees includes both precautions during site development and construction and measures to limit adverse environmental effects. Protection during development and construction include at a minimum the installation of a fence around the drip line, restricted construction activity within the dripline as defined by the permit and supervised by a certified arborist,

and the posting of appropriate signage on the fence. Measures to limit adverse environmental effects include erosion control and soil and water retention. The town Planning Director may also require additional protective measures based on site conditions.

Project Applicability: The project will comply with the Town's tree replacement guidelines and policies for any trees that need to be removed.

3.3.2 Woodside Stream Corridor Protection Ordinance

No alteration or work in a stream corridor may occur without Planning Commission approval. A stream corridor is defined in the Municipal Code (§153.005) as the greater of two measurements: (1) a horizontal distance of 50 feet measured from each side of the centerline of the stream, or (2) a horizontal distance of 25 feet measured from the top of the stream bank. Municipal Code §153.440 limits activities within stream corridors to trails and certain conditional uses (e.g., pastures, bridges, and agriculture), and limits uses within the stream corridor as follows:

A. No removal of riparian vegetation is permitted within the stream corridor, except that required for the permitted and conditional uses.

B. No filling of the natural stream corridors or dumping of slash, debris, residue from parking or recreation areas, fertilizers, pesticides, herbicides, or liquid or solid waste is permitted.

C. All agricultural wastes, including manure, must be kept out of the stream corridor and disposed of in a manner which will prevent drainage from such wastes into the stream corridor.

D. No channelization or damming of streams or creeks is permitted, unless required or allowed by the Planning Commission.

E. Any alteration of, or work in, the stream corridor is subject to the approval of the Planning Commission except the work set forth in item A above or the removal of material which obstructs the normal flow of water within the stream channel.

F. No structure, including a fence, is permitted within the stream corridor. Cross fencing of the stream corridor shall be permitted subject to the issuance of a permit from the Town Engineer.

Project Applicability: No stream features are present on the project site. Due to the presence of Redwood Creek approximately 45 feet to the northwest, a *stream corridor* as defined under the Municipal Code (i.e., consisting of a buffer of 25 feet from top of bank or a 50-foot buffer from the centerline of the stream, whichever is greater) overlaps the project site. The project would need to comply with the Town's stream corridor protection ordinance, which includes guidance for allowable uses within the stream corridor.

Section 4. Environmental Setting

4.1 General Project Area Description

The project site is located in the Town of Woodside in San Mateo County, California (Figure 1). The climate in the project vicinity is coastal Mediterranean, with most rain falling in the winter and spring. Mild cool temperatures are common in the winter, and hot to mild temperatures are common in the summer. Climate conditions in the vicinity include a 30-year average of 22.6 inches of annual precipitation with a monthly average temperature range from 48.3ºF to 70.3ºF (PRISM Climate Group 2022). Elevations on the project site range from 143–182 feet above mean sea level (Google Inc. 2022). The NRCS has mapped two soil units on the project site: Accelerator-Fagan-Urban land complex, 5 to 15% slopes; and Orthents, cut and fill-Urban land complex, 5 to 75% slopes (NRCS 2022). Accelerator-Fagan-Urban land complex is a well-drained soil found on sandstone and siltstone slopes, and is composed of loam, clay loam, gravelly clay loam, and weathered bedrock about 45 inches deep (NRCS 2022). The Orthents urban land soils on the project site are well-drained and composed of alluvium from a variety of parent materials located uphill of the project site. Serpentine soils are mapped within 0.4 mile of the project site in the Woodside Hills neighborhood, but are not mapped on the site itself (Brabb et al 1998).

4.2 Biotic Habitats

The reconnaissance-level survey identified four biotic habitats on the project site: ornamental woodland, California annual grassland, coast live oak woodland, and Harding grass grassland (Figure 3). These biotic habitats are described in detail below. Plant species observed during the reconnaissance-level survey are listed in Appendix A.

4.2.1 Ornamental Woodland

Vegetation. Ornamental woodland (0.5 acre) consists of three distinct areas of the project site: an irrigated linear row of planted coast redwoods along Todo El Mundo Road; an irrigated linear row of recently planted coast live oaks and coast redwoods along Woodside Road (Photo 1); and a cluster of non-irrigated nonnative trees, mostly consisting of holly-leaf oaks (*Quercus ilex*), in the northeastern portion of the site. The majority of these trees are nonnative, with the exception of coast live oaks.

Photo 1. Ornamental woodland habitat on the project site.

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H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 3. Biotic Habitats
High Road Residential Project Biological Resources Report (4687-01)
December 2022

Along the linear row of redwoods along Todo El Mundo Road, most of the understory consists of redwood leaf duff with sparse cover of nonnative English ivy (*Hedera helix*) and cheeseweed (*Malva parviflora*) as well as native California bay saplings. A few immature nonnative European olive (*Olea europea*) and native California buckeye and coast live oak trees are present at the south end of this linear row. Occasional imported boulders and cut logs are interspersed among the redwoods.

The recently planted coast live oaks and redwoods along Woodside Road are all contained in cages, and appear to be roughly 10 years old. Most of the coast redwoods failed recently and still have dead leaves attached to the branches. This portion of the ornamental woodland is located on a terrace above the Harding grass grassland on the project site, on a slope that leads up to Woodside Road. The understory in this area is dominated by nonnative Harding grass (*Phalaris aquatica*), present in similar density to the adjacent Harding grass grassland on the site, as well as nonnative wild oats (*Avena* sp.), ripgut brome (*Bromus diandrus*), field hedgeparsley (*Torilis arvensis*), Italian thistle (*Carduus pycnocephalus*), fennel (*Foeniculum vulgare*), and French broom (*Genista monspessulana*). This habitat does not appear to be recently mown (as does the adjacent Harding grass grassland habitat, discussed below). This woodland is considered ornamental woodland instead of coast live oak woodland because of the lack of natural distribution (i.e., linear instead of random) and the typical lack of genetic diversity in planted stock.

The nonnative holly-leaf oaks in the northeastern portion of the site are distributed loosely and not irrigated. Other tree species that occur in this area include eucalyptus (*Eucalyptus* sp.), coast redwoods (likely planted), and one immature coast live oak. The understory is mostly leaf duff and nonnative annual grasses such as wild oats and bromes (*Bromus* sp.). Other species include the nonnative Bermuda buttercup (*Oxalis pes-caprae*) and native woody vines such as poison oak (*Toxicodendron diversilobum*) and California blackberry (*Rubus ursinus*).

Wildlife. Wildlife use of the ornamental woodland habitat on the project site is limited by human disturbance, the small extent of the habitat, and the low structural diversity of the vegetation. Many of the bird species that nest and forage in these woodlands are associated with surrounding developed and riparian habitats, including the resident Anna's hummingbird (*Calypte anna*), lesser goldfinch (*Spinus psaltria*), bushtit (*Psaltriparus minimus*), and American crow (*Corvus brachyrhynchos*). Common wintering birds such as yellow-rumped warblers (*Setophaga coronata*) will also forage in the trees, and golden-crowned sparrows (*Zonotrichia atricapilla*) and white-crowned sparrows (*Zonotrichia leucophrys*) will forage on the ground and in the limited herbaceous vegetation present below the trees. Raptors such as the red-tailed hawk (*Buteo jamaicensis*) or Cooper's hawk (*Accipter cooperii*), may forage for prey in ornamental woodlands on the site in small woodlands. The larger trees in these woodlands can potentially support up to one nest of raptors, though no old raptor nests were observed during the November 2022 site visit, suggesting that raptors have not nested in these trees in recent years

Common mammals such as native striped skunks (*Mephitis mephitis*) and nonnative Virginia opossums (*Didelphis virginiana*) will forage on fruit and seeds in ornamental woodland habitat on the site. The deer mouse (*Peromyscus maniculatus*) and California mouse (*Peromyscus californicus*) also forage in this habitat, and reptiles that occur in the adjacent grasslands, such as the western fence lizard (*Sceloporus occidentalis*) and gopher snake (*Pituophis catenifer*)

may forage or bask in sunny areas of this habitat where trees are less dense. No cavities or crevices were observed in the trees within this habitat that provide high-quality roosting habitat for bats.

4.2.2 California Annual Grassland

Photo 2. California annual grassland habitat on the project site.

Vegetation. California annual grassland (0.3 acre) on the project site is dominated by nonnative annual grasses such as ripgut brome and wild oats (Photo 2). This habitat was mown at the time of the November 2022 site visit. Other species present within this habitat include nonnative forbs such as bristly ox-tongue (*Helminthotheca echioides*) and yellow star-thistle (*Centaurea solstitialis*). Two small stands of immature valley oaks occur within the grassland habitat. Their understories are contiguous with the rest of the grassland habitat. Much of the flat grassland habitat in the northern portion of the site along High Road appeared disturbed from vehicular tire damage. Elsewhere on the site, this grassland habitat occurs on gradual-to-steep, north-facing slopes that lead up to Woodside Road.

Wildlife. Wildlife use of the grassland habitats on the project site (including California annual grassland and Harding grass grassland, discussed below) is limited due to human disturbances (e.g., mowing and adjacent vehicle traffic), the limited extent of the grassland area, and the isolation of this habitat from more extensive grasslands in the region. As a result, some of the wildlife species associated with extensive grasslands on the Peninsula, such as the grasshopper sparrow (*Ammodramus savannarum*), are absent from the grasslands on the project site.

Although grassland-associated bird species are not expected to occur on the project site, a number of resident bird species associated with surrounding developed and riparian areas will forage in the grassland habitat on the site. These include the native California towhee (*Melozone crissalis*), mourning dove (*Zenaida macroura*), dark-eyed junco (*Junco hyemalis*), black phoebe (*Sayornis nigricans*), and American crow. Several other species of birds may use the grassland habitats on the site during the nonbreeding season. These include the white-crowned sparrow and golden-crowned sparrow, which forage on the ground or in herbaceous vegetation, as well as the yellow-rumped warbler, which forages in trees and shrubs.

The sparse cover of grassland vegetation on the site, as well as disturbance from regular mowing, limit the availability of food resources for common species of mammals that occur in grassland habitats. Nevertheless, burrows of native Botta's pocket gophers (*Thomomys bottae*) are common in the grassland habitat on the project site. These fossorial mammal species are an important component of grassland communities, providing a prey base for diurnal raptors and terrestrial predators. Other rodent species that can potentially occur in the grassland habitat on the site include the native California vole (*Microtus californicus*) and deer mouse. Diurnal raptors such

as red-tailed hawks and red-shouldered hawks (*Buteo lineatus*) forage for these small mammals over grasslands during the day, and at night nocturnal raptors, such as barn owls (*Tyto alba*), will forage for nocturnal rodents, such as deer mice.

Other mammals such as the native striped skunk, raccoon (*Procyon lotor*), and coyote (*Canis latrans*), as well as the nonnative Virginia opossum and feral cat (*Felis catus*), will use the grassland habitat on the project site for foraging. Several reptile species also occur regularly in grassland habitats, including the western fence lizard, gopher snake, and southern alligator lizard (*Elgaria multicarinata*).

4.2.3 Coast Live Oak Woodland

Vegetation. Coast live oak woodland makes up 0.3 acre of the project site. This habitat is dominated by coast live oaks and occurs in two distinct areas of the project site.

Photo 3. Coast live oak woodland habitat on the project site with an understory of leaf duff, nonnative annual grasses, and native needlegrass bunches.

The narrow strip of coast live oak woodland located along Woodside Road consists of variably aged coast live oak individuals on the bank that leads up to the roadway. Some of the canopies of these trees overhang Woodside Road. Interspersed with the coast live oaks are several immature trees including nonnative European olive, strawberry tree (*Arbutus unedo*), and privet (*Ligustrum* sp.), as well as one small native valley oak and several native California bay saplings. Shrubs that occur in the midstory of this habitat include native toyon (*Heteromeles arbutifolia*) and nonnative French broom, which are present in low densities. The inner portion of the understory within a few feet of the coast live oak trunks is composed of mostly leaf duff with a few patches of English ivy and ripgut brome. The outer portion of the understory (i.e., not immediately around the trunks) consists of pavement along Woodside Road to the east and mostly leaf duff and nonnative annual grasses such as and wild oat and bromes, with numerous small and immature native needlegrass (*Stipa* sp.) bunches covering roughly 5–10% of the ground also present, to the west (Photo 3). The coast live oaks in this habitat are randomly dispersed and vary widely in size ranging from small to medium, indicating they were likely not planted. These trees may occur adjacent to Woodside Road because their roots gather moisture from the soil underneath the asphalt.

The second area of coast live oak habitat on the project site contains one large coast live oak (Photo 4) and several adjacent small-to-medium-sized coast live oaks. The single large oak tree's trunk diameter is roughly three feet and the canopy extends for 0.1 acre. This is uncommonly large for this species of oak as they typically rot from the inside before reaching this size, indicating that this individual is several hundred years old and in very good quality habitat. It is widely known that oak trees of this size support high biodiversity beyond plants and animals including fungi, slime molds, and microbes. Under the oak canopy is a midlevel canopy composed of native California bay saplings, poison oak, and holly-leaved cherry (*Prunus ilicifolia*). The understory consists

of mostly oak and bay leaf duff with a few scattered individuals of nonnative broad-leaved helleborine (*Epipactis helleborine*).

Photo 4. Coast live oak woodland habitat with a single very mature coast live oak individual on the project site.

Wildlife. Woodlands dominated by oaks, particularly oaks as massive and mature as the oak on the project site, typically support diverse animal communities in California. Coast live oaks provide abundant food resources, including acorns and invertebrates, as well as substantial shelter for animals in the form of cavities, crevices in bark, and complex branching growth. However, the patches of oak woodlands on the project site are limited in extent, with limited understory vegetation, and isolated from more extensive oak woodland habitat in the region by surrounding low-density rural residential development and roadways. As a result, this habitat provides fewer structural resources and foraging opportunities for wildlife species compared to more natural and/or more extensive oak woodlands in the region. Nevertheless, due to the high quality of this habitat on the site, the close proximity of riparian habitat associated with Redwood Creek (located approximately 45 feet to the northwest), and the presence of numerous remnant oaks in the urban forest of the surrounding residential development, a number of wildlife species associated with oak woodlands and tolerant of moderate levels of human disturbance are expected to utilize the coast live oak woodland habitat on the site for breeding and foraging.

Birds such as the chestnut-backed chickadee (*Poecile rufescens*), Anna's hummingbird, bushtit, Bewick's wren (*Thryomanes bewickii*), oak titmouse (*Baeolophus inornatus*), and California scrub-jay (*Aphelocoma californica*) may nest and forage in oaks on the project site. Other birds expected to use this habitat are the wintering hermit thrush (*Catharus guttatus*), ruby-crowned kinglet (*Regulus calendula*), Townsend's warbler (*Setophaga townsendi*), and golden-crowned sparrow. Raptors such as the Cooper's hawk may forage for prey in oak woodlands on the site in small numbers. It is possible that up to one pair of raptors could nest in the patches of oak woodland habitat on the site, but no active or inactive raptor nests were detected during the site visit, suggesting that raptors have not nested on the site in recent years.

Because the oak woodland habitat along Woodside Road contains only sparse understory cover and vegetation, amphibian and reptile species that are typically associated with dense leaf cover and coarse woody debris in wooded habitats are not expected to occur here. However, patch of oak woodland habitat associated with the massive coast live oak in the northwest portion of the site, also located approximately 45 feet from Redwood Creek, supports moderately dense understory vegetation and leaf litter that provides suitable habitat for these species. Common amphibians such as the Pacific tree frog (*Hyliola regilla*) and California slender salamander (*Batrachoseps attenuatus*) may take refuge in leaf duff and forage within this habitat.

Mammals, including the native bobcat (*Lynx rufus*), coyote, raccoon, and black-tailed deer (*Odocoileus hemionus*) as well as the nonnative eastern gray squirrel (*Sciurus carolinensis*) and Virginia opossum will forage in the oak woodland habitat on the project site. Additionally, several nests of the native San Francisco dusky footed woodrat, a California species of special concern, are present in this habitat on the project site, as are several burrows of Botta's pocket gophers. The deer mouse is also a common resident of oak woodlands. Diurnal raptors, such as the red-tailed hawk, will forage for small mammals on the project site during the day, and noctural raptors, such as the great horned owl (*Bubo virginianus*) will forage for nocturnal rodents at night. Cavities in the massive oak tree on the site may provide suitable roosting habitat for common species of bats, including the Yuma myotis (*Myotis yumanensis*) and California myotis (*Myotis californicus*). However, no sign of roosting bats (e.g., guano or urine staining) was observed at these cavities during the November 2022 site visit.

4.2.4 Harding Grass Grassland

Vegetation. Harding grass grassland makes up 0.2 acre of the project site (Photo 5). This habitat is dominated by the nonnative perennial bunchgrass Harding grass and the nonnative annual forb bristly ox-tongue. Other common species include nonnatives such as wild oats and prickly lettuce (*Lactuca serriola*). A single small northern California black walnut (*Juglans hindsii*) occurs on the margin of the grassland. This habitat was mown at the time of the November 2022 site visit; due to this disturbance, the annual wild oats consisted of only a light thatch layer and the Harding grass contained only fresh green leaves and very few remnants of last year's leaves. Harding grass grassland mostly occurs on a very gradual northwest-facing slope on the project site that appears to be composed of native fill, but it also extends upslope along a portion of the graded slope below Woodside Road that is possibly composed of nonnative fill (Photo 5). Because bristly ox-tongue is prevalent in this habitat and typically needs a minimal water source to thrive, it is very likely that this habitat is supported by runoff from the irrigated ornamental woodland located upslope adjacent to Woodside Road (Photo 5).

Photo 5. Harding grass grassland habitat on the project site.

Wildlife. Wildlife use of the Harding grass grassland on the project site is similar to the California annual grassland as described above.

4.3 Adjacent Habitat Areas

Redwood Creek is located approximately 45 feet northwest of the project site, opposite Todo El Mundo Road. This creek supported flowing water at the time of the November 2022 site visit; however, the site visit was conducted during a storm event which could have produced the observed flows. Thus, the creek could be perennial or intermittent. Riparian woodland habitat along Redwood Creek is dominated by coast live oaks and California bays rooted above and below the tops of banks. The understory of this habitat consists of sparse

nonnative annual grasses, with occasional native species such as poison oak and holly-leaved cherry. Most of the ground is covered in leaf duff. Redwood Creek is heavily incised with steep banks.

Riparian habitats in California generally support exceptionally rich animal communities and contribute disproportionately to landscape-level species diversity. The presence of at least seasonal (and often year-round) water and abundant invertebrates provide foraging opportunities for many species, and the diverse habitat structure provides cover and nesting opportunities. Leaf litter provides cover for California slender salamanders and Pacific tree frogs, among others. Several reptiles may also occur here, including the western fence lizard, western skink (*Eumeces skiltonianus*), and southern alligator lizard. Mammals such as the ornate shrew (*Sorex ornatus*), California vole, Audubon's cottontail (*Sylvilagus audubonii*), and San Francisco dusky-footed woodrat provide a prey base for mesopredators that forage here, such as the bobcat and coyote.

In addition to amphibians, reptiles, and mammals, the riparian corridor adjacent to the project site provides suitable foraging and breeding habitat for many of the bird species listed above, as well as the Pacific-slope flycatcher (*Empidonax difficilis*), black-headed grosbeak (*Pheucticus melanocephalus*), warbling vireo (*Vireo gilvus*), and yellow warbler (*Dendroica petechia*). Raptors such as red-shouldered hawks and Cooper's hawks nest within riparian corridors and forage there, as well as in adjacent habitats. Riparian habitats are also used heavily by migrant passerines and wintering birds.

4.4 Wildlife Movement

Wildlife movement within and in the vicinity of the project site takes many forms, and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and landscaped areas. Mammals of different species move within their home ranges, but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the project vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development surrounding the project site, there are currently no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site. Wildlife species may move through the area using cover and refugia as they find them available. Redwood Creek, which

eventually drains to the open waters of the San Francisco Bay, and its associated riparian corridor adjacent to the site serves as a movement corridor for several common and special-status species of birds fish, mammals, reptiles, and amphibians through the Woodside area. In addition, a number of birds, mammals, reptiles, and amphibians utilize the riparian corridor of Redwood Creek for movement purposes, as it provides sufficient vegetative cover preferred by these species when navigating across the landscape. Specifically, migratory passerines, rabbits, striped skunks, raccoons, Pacific treefrogs, and alligator lizards, amongst other species, are expected to move along this corridor adjacent to the project site.

Section 5. Special-Status Species and Sensitive Habitats

CEQA requires assessment of the effects of a project on species that are protected by state, federal, or local governments as "threatened, rare, or endangered"; such species are typically described as "special-status species". For the purpose of the environmental review of the project, special-status species have been defined as described below. Impacts on these species are regulated by some of the federal, state, and local laws and ordinances described in Section 3 above.

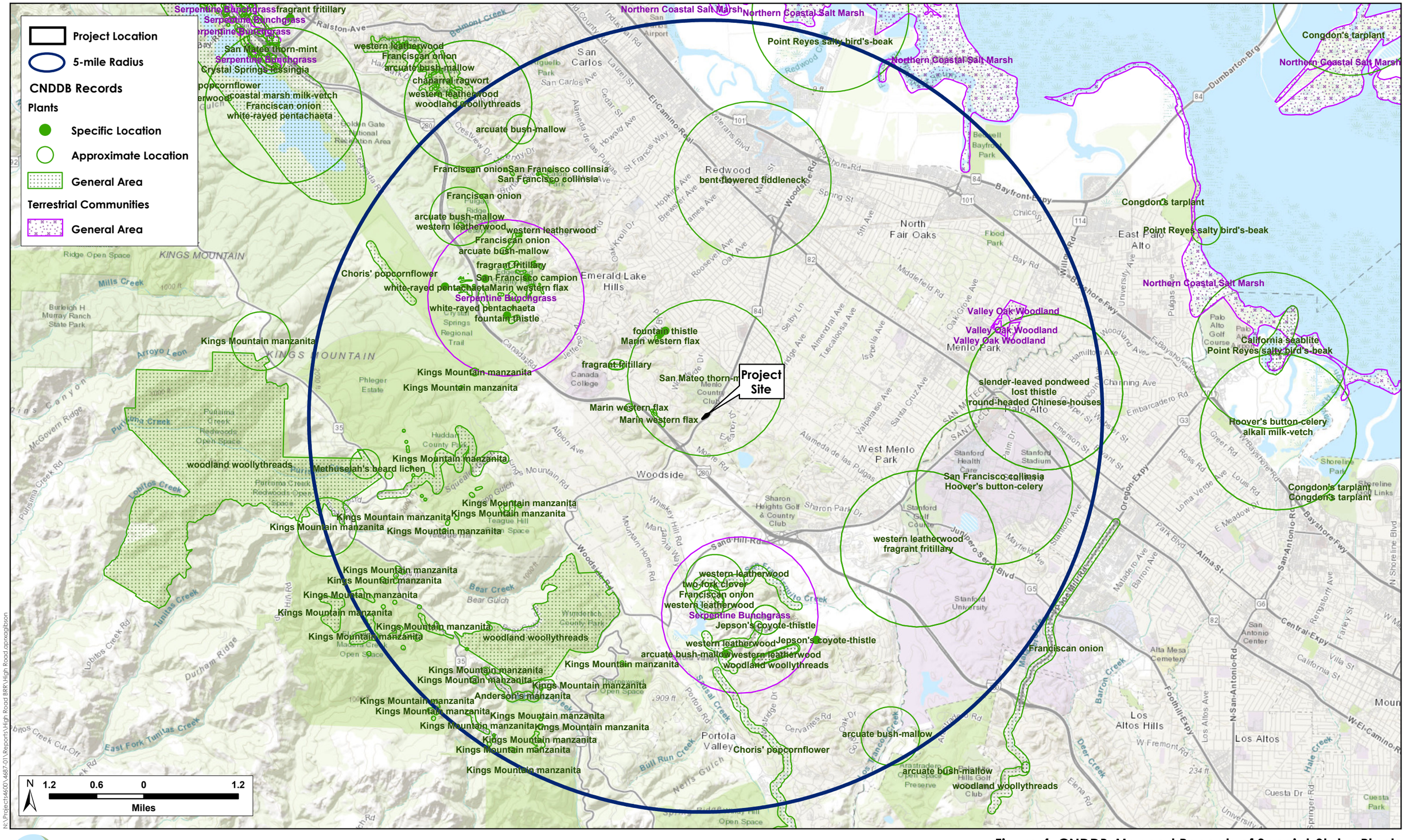
For purposes of this analysis, "special-status" plants are considered plant species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as CRPR 1A, 1B, 2, 3, or 4.

For purposes of this analysis, "special-status" animals are considered animal species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Information concerning threatened, endangered, and other special-status species that potentially occur on the project site was collected from several sources and reviewed by H. T. Harvey & Associates biologists as described in Section 2.1 above. Figure 4 depicts CNDDB records of special-status plant species in the general vicinity of the project site and Figure 5 depicts CNDDB records of special-status animal species. These generalized maps show areas where special-status species are known to occur or have occurred historically.



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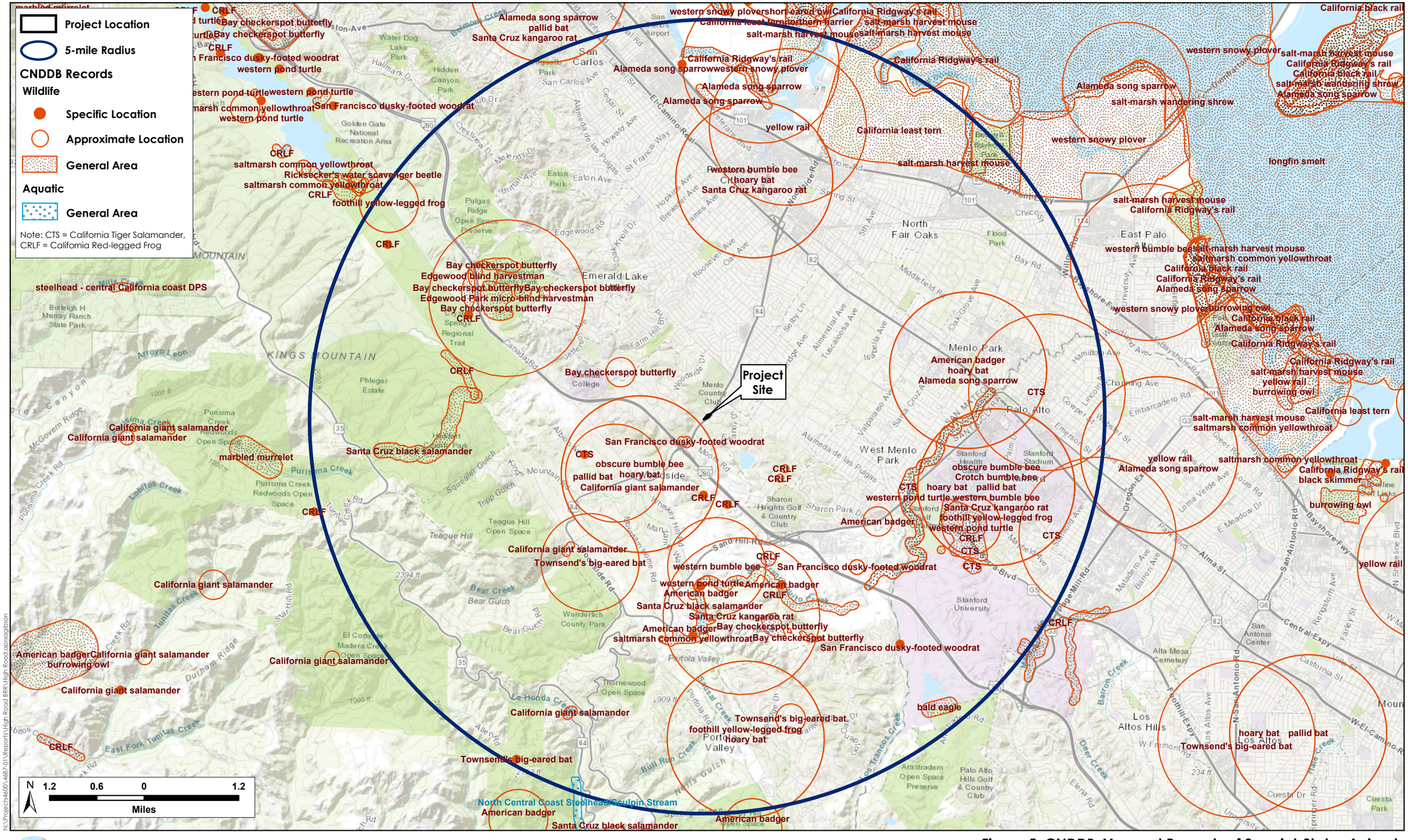
H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 4. CNDDB-Mapped Records of Special-Status Plants
High Road Residential Project Biological Resources Report (4687-01)
December 2022


Project Location
5-mile Radius
CNDDB Records
Wildlife
Specific Location
Approximate Location
General Area
Aquatic
General Area
Note: CTS = California Tiger Salamander, CRLF = California Red-legged Frog
Project Site
Alameda song sparrow
pallid bat
Santa Cruz kangaroo rat
western snowy plover
short-eared owl
California Ridgway's rail
California least tern
northern harrier
salt-marsh harvest mouse
Alameda song sparrow
western snowy plover
California Ridgway's rail
Alameda song sparrow
Alameda song sparrow
yellow rail
California least tern
western bumble bee
Crthoary bat
Santa Cruz kangaroo rat
salt-marsh harvest mouse
western snowy plover
salt-marsh harvest mouse
California Ridgway's rail
California black rail
salt-marsh harvest mouse
California Ridgway's rail
California black rail
salt-marsh wandering shrew
Alameda song sparrow
longfin smelt
western bumble bee
salt-marsh harvest mouse
saltmarsh common yellowthroat
California black rail
California Ridgway's rail
Alameda song sparrow
western snowy plower
burrowing owl
California black rail
Alameda song sparrow
California Ridgway's rail
California Ridgway's rail
salt-marsh harvest mouse
yellow rail
burrowing owl
California least tern
salt-marsh harvest mouse
saltmarsh common yellowthroat
yellow rail
Alameda song sparrow
saltmarsh common yellowthroat
California Ridgway's rail
black skimmer
burrowing owl
yellow rail
CRLF
Bay checkerspot butterfly
CRLF
Francisco dusky-footed woodrat
western pond turtle
western pond turtle
western pond turtle
San Francisco dusky-footed woodrat
marsh common yellowthroat
western pond turtle
CRLF
saltmarsh common yellowthroat
Ricksecker's water scavenger beetle
saltmarsh common yellowthroat
CRLF
foothill yellow-legged frog
CRLF
steelhead - central California coast DPS
Bay checkerspot butterfly
Edgewood blind harvestman
Bay checkerspot butterflyBay checkerspot butterfly
Edgewood Park micro-blind harvestman
Bay checkerspot butterfly
CRLF
CRLF
Bay checkerspot butterfly
western bumble bee
Crthoary bat
Santa Cruz kangaroo rat
western pond turtle
American badger
Santa Cruz black salamander
Santa Cruz kangaroo rat
American badger
Bay checkerspot butterfly
saltmarsh common yellowthroat
Bay checkerspot butterfly
San Francisco dusky-footed woodrat
American badger
hoary bat
Alameda song sparrow
CTS
Crotch bumble bee
hoary bat
pallid bat
western pond turtle
western bumble bee
Santa Cruz kangaroo rat
foothill yellow-legged frog
western pond turtle
American badger
CRLF
CTS
CTS
CTS
CRLF
CRLF
CRLF

5.1 Special-Status Plant Species

The CNPS (2022) and CNDDB (2022) identify 68 special-status plant species as potentially occurring in at least one of the nine USGS 7.5-minute quadrangles containing or surrounding the project site (for CNPS) or within the project vicinity (for CNDDB) (Appendix B). Of the 68 potentially occurring special-status plant species, 57 were determined to be absent from the project site for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or edaphic requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby extant records (Appendix B).

Suitable habitat, edaphic requirements, and elevation range are present on the project site for 11 special-status plant species; these species are addressed in greater detail in Table 1 below. Of the 11 special-status plant species for which suitable habitat is present on the site, only one – arcuate bush-mallow – would be detectable during a November survey, and the presence/absence survey conducted in November 2022 determined that this species is absent from the project site. The other 10 potentially occurring special-status plants are not detectable in November, and we were therefore unable to survey for them. Those additional special-status plant species that can potentially occur on the project site and for which presence/absence surveys could not be conducted in November 2022 are bent-flowered fiddleneck (*Amsinckia lunaris*), San Francisco wallflower (*Erysimum franciscanum*), fragrant fritillary (*Fritillaria liliacea*), harlequin lotus (*Hosackia gracilis*), bristly leptosiphon (*Leptosiphon aureus*), large-flowered leptosiphon (*Leptosiphon grandiflorus*), woolly-headed lessingia (*Lessingia hololeuca*), woodland woollythreads (*Monolopia gracilens*), Dudley's lousewort, and Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*).

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, Candidate, or Rare Species			
Dudley's lousewort (*Pedicularis dudleyi*)	CR, CRPR 1B.2	Maritime chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland, often in deep shady woods of older coast redwood forests (blooming period April to June)	**Could Potentially Occur.** Only moderately suitable grassland habitat to support this species is present on the project site, and most occurrences are known from more shaded and mesic habitats. Dudley's lousewort is known to occur at Portola Redwoods State Park approximately 12 miles south of the project site (CNDDB 2022). While the species is unlikely to occur on the project site approximately 12 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
CNPS-Listed Plant Species			
Bent-flowered fiddleneck (*Amsinckia lunaris*)	CRPR 1B.2	Coastal bluff scrub, cismontane woodland, valley and foothill grassland/oak woodland and chaparral (blooming period March to June).	**Could Potentially Occur**. Suitable grassland habitat to support this species is present on the project site. Bent-flowered fiddleneck is known to occur at Jasper Ridge Biological Preserve approximately 2.3 miles south of the project site (CNDDB 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
San Francisco wallflower (*Erysimum franciscanum*)	CRPR 4.2	Chaparral, coastal dunes, coastal scrub, and valley and foothill grassland habitats often on granitic or serpentine soils, sometimes on roadsides (blooming period March to June)	**Could Potentially Occur.** Suitable grassland habitat with thin, rocky soils to support this species is present on the project site, and the nearest documented historic occurrence is located 4.5 miles away above Crystal Springs Reservoir (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Fragrant fritillary (*Fritillaria liliacea*)	CRPR 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland, often in serpentine/oak woodland, serpentine bunchgrass grassland, sometimes in clays (blooming period February to March)	**Could Potentially Occur.** Suitable bunchgrass grassland habitat to support this species is present on the project site. Fragrant fritillary is known to occur on undeveloped land managed by the City of Redwood City approximately 1.3 miles to the west as well as at Edgewood Park approximately 2.3 miles to the northwest (CNDDB 2022, Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Harlequin lotus (*Hosackia gracilis*)	CRPR 4.2	Broadleaved upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, North Coast coniferous forest, valley and foothill grassland, often on roadsides (blooming period March to July)	**Could Potentially Occur.** Moderately suitable grassland habitat to support this species is present on the project site. Harlequin lotus is known to occur in the Peninsula Watershed approximately 8 miles north of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Bristly leptosiphon (*Leptosiphon aureus*)	CRPR 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland (blooming period April to July)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Bristly leptosiphon is known to occur by the Crystal Springs Watershed Adobe Gulch Powerline approximately 7.4 miles north of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Large-flowered leptosiphon (*Leptosiphon grandiflorus*)	CRPR 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland, usually on sandy soils (blooming period April to August)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Large-flowered leptosiphon is known to occur at a nonspecific location on the *La Honda* USGS 7.5-minute quadrangle 5–15 miles southwest of the project site (CNPS 2022), and a known population last observed in June 2022 is present in El Sereno Open Space Preserve approximately 21 miles to the south (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Woolly-headed lessingia (*Lessingia hololeuca*)	CRPR 3	Broadleaved upland forest, coastal scrub, lower montane coniferous forest, and valley and foothill grassland on clay or serpentine soils (blooming period June to October)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Woolly-headed lessingia is known to occur at Edgewood Park approximately 2.9 miles to the northwest (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Arcuate bush-mallow (*Malacothamnus arcuatus*)	CRPR 1B.2	Chaparral and cismontane woodland, sometimes on gravelly alluvial soils, or in any shrub or tree woodland that has recently burned (detectable year-round)	**Absent.** Arcuate bush-mallow has been documented in a wide variety of woody habitats, including oak woodland, and is most prevalent after wildland fires (Morse 2022). Arcuate bush-mallow is known to occur adjacent to Edgewood Park approximately 2.5 miles north of the project site (CNDDB 2022). However, no individuals were observed during a survey conducted during the November 2022 site visit. Determined to be absent.
Woodland woollythreads (*Monolopia gracilens*)	CRPR 1B.2	Grassy openings in broadleaved upland forest and chaparral, cismontane woodland, and valley and foothill grassland, in sandy to rocky soils, often in serpentine soils after burns (blooming period March to July)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Woodland woollythreads is known to occur at Edgewood Park approximately 2.9 miles to the northwest (CNDDB 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*)	CRPR 4.2	Broadleaved upland forest, chaparral, coastal prairie, valley and foothill grassland, and vernal pools in vernally mesic habitats (blooming period June to October)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Gairdner's yampah is known to occur in the Peninsula Watershed approximately 11.4 miles to the northwest (Calflora 2022). While Gairdner's yampah is unlikely to occur approximately 11.4 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

*Key to Status Abbreviations: State Rare (CR); California Rare Plant Rank (CRPR).

CRPR 1B = Rare, Threatened, or Endangered in California and elsewhere

CRPR 3 = Plants about which more information is needed (a review list)

CRPR 4 = Plants of limited distribution - Watch list

.2 = Moderately threatened in California (20-80% of occurrences threatened)

5.2 Special-Status Animal Species

The legal status and likelihood of occurrence on the project site of special-status animal species known to occur, or potentially occurring, in the surrounding region are presented in Table 2. Most of the special-status species listed in Table 2 are not expected to occur on the project site because it lacks suitable habitat, is outside the known range of the species, and/or is isolated from the nearest known extant populations by development or otherwise unsuitable habitat.

The following special-status species that are present in specialized habitats on the San Francisco Peninsula, or that occurred on or near the Peninsula historically but are no longer present, are absent from the project site due to a lack of suitable habitat and/or isolation of the site from populations by urbanization: the western bumble bee (*Bombus occidentalis*), Crotch bumble bee (*Bombus crotchii*), California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), western pond turtle (*Actinemys marmorata*), burrowing owl (*Athene cunicularia*), tricolored blackbird (*Agelaius tricolor*), Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*), loggerhead shrike (*Lanius ludovicianus*), and American badger (*Taxidea taxus*). The Bay checkerspot butterfly (*Euphydryas editha bayensis*) was reintroduced to Edgewood Park in 2011, but the number of individuals present has dwindled to the point that there is no reasonable expectation that any individuals would disperse to the project site, and the project site does not provide suitable serpentine grassland for the species. While bald eagles (*Haliaeetus leucocephalus*), golden eagles (*Aquila chrysaetos*), and peregrine falcons (*Falco peregrinus anatum*) may fly over the project site at times, none are expected to nest or forage on or close to the project site.

No aquatic habitats to support special-status fish species are present on the project site, and special-status fish species do not occur in Redwood Creek to the northwest. Thus, these species are absent from the project site and adjacent areas.

The mountain lion, a candidate for listing under CESA, as well as the Townsend's big-eared bat (*Corynorhinus townsendii*) and western red bat (*Lasiurus blossevillii*), which are California species of special concern, may also forage on (or in the case of bats, over) the project site. These species are not expected to den, roost, or breed on or immediately adjacent to the project site due to a lack of suitable habitat, and they will be affected very little, if at all, by the proposed project. In addition, the Vaux's swift (*Chaetura vauxi*), olive-sided flycatcher (*Contopus cooperi*), and yellow warbler (*Setophaga petechia*) are bird species that are considered a California species of special concern only when nesting; they may occasionally occur on or over the project site as nonbreeding transients, foragers, or migrants, but no suitable nesting habitat for these species occurs on or adjacent to the project site.

The monarch butterfly, white-tailed kite (*Elanus leucurus*), San Francisco dusky-footed woodrat, and pallid bat are addressed in greater detail in this report, because these species can potentially breed or occur on or

immediately adjacent to the project site and/or may be significantly impacted by the proposed project (see Section 6 *Impacts and Mitigation Measures* below).

Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, or Candidate Species			
Bay checkerspot butterfly (*Euphydryas editha bayensis*)	FT	Native grasslands on serpentine soils. Larval host plants are *Plantago erecta* and/or *Castilleja* sp. The flight season extends from late February to early May.	**Absent.** This species was historically abundant in Edgewood Park approximately 2.6 miles northwest of the project site. However, this local population was extirpated in the early 2000s. Reintroduction efforts commenced in 2011, and, while initially successful, with a high of 800 adults in 2014, only 47 adults were detected in the park during annual surveys in 2016 (Creekside Science 2016). Recent counts of adults detected during spring flight surveys were six in 2020, five in 2021, and eight in 2022, indicating that the population has dwindled further (C. Niederer, pers. comm.). Suitable habitat to support the Bay checkerspot butterfly (i.e. serpentine grassland habitat with larval host plants) is absent from the project site. Given how low the population at Edgewood Park is, and the lack of suitable larval or nectaring habitat (i.e., serpentine grassland) on the project site, there is no reasonable expectation that individuals would disperse to the project site.
Monarch butterfly (*Danaus plexippus*)	FC	Requires milkweeds (*Asclepias* spp.) for egg-laying and larval development, but adults obtain nectar from a wide variety of flowering plants in many habitats. Individuals congregate in winter roosts, primarily in Mexico and in widely scattered locations on the central and southern California coast.	**May be Present as Breeder.** The monarch butterfly occurs throughout the region primarily as a migrant. No larval host plants were observed on the project site during the November 2022 survey; however, portions of the site had been recently mown and milkweeds, if present, would not have been detectable. If milkweeds are present, monarch butterflies may breed on the project site from March through October. However, due to the limited size of the site and disturbance from mowing, only small numbers of monarch butterflies are expected to breed there, if any. Small numbers of individuals may forage throughout the project site, especially during spring and fall migration. However, the site does not provide high-quality foraging habitat for this species. While ostensibly suitable overwintering habitat for monarchs (i.e., Eucalyptus trees) is present on the site, no current or historical overwintering sites are known as far inland as the project site; the nearest known overwintering location is 10.8 miles to the north Coyote Point Park in San Mateo (Xerces Society 2022).

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Crotch bumble bee (*Bombus crotchii*)	SC	Open grassland and scrub habitats.	**Absent.** Although this species was historically found throughout the southern two-thirds of California, population declines and range contractions (25% relative to its historical range) have made this species very scarce in the region (CDFW 2019). There are no recent (i.e. after 1909) records on the San Francisco peninsula (Bumble Bee Watch 2022, CNDDB 2022, iNaturalist 2022), and CNDDB (2022) does not include even historical records from San Mateo County. Therefore, this species is not expected to occur on the project site.
Western bumble bee (*Bombus occidentalis*)	SC	Occurs in a variety of grassland, scrub, and open woodland habitats.	**Absent.** Although the species was historically found throughout much of central and northern California, including the project vicinity, it has been extirpated from much of its former range, and there are no recent records from San Mateo County or nearby areas (CDFW 2019, Bumble Bee Watch 2022, iNaturalist 2022). Therefore, this species is absent from the project site.
California tiger salamander (*Ambystoma californiense*)	FT, ST	Vernal or temporary pools in annual grasslands or open woodlands. Adults live terrestrially in small mammal burrows.	**Absent.** The California tiger salamander's range on the San Francisco Peninsula historically occurred barely as far northwest as Woodside, where there is a 1962 record from a location approximately 1.6 miles southeast of (and across Interstate 280 from) the project site (CNDDB 2022). That occurrence is considered "possibly extirpated" by CNDDB. The closest extant population is located in the vicinity of Lake Lagunita on the Stanford University Campus, approximately 3.5 miles to the southeast (CNDDB 2022). That population is located far beyond the known dispersal distance of the species, and is separated from the project site by extensive urbanization. Therefore, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
California red-legged frog (*Rana draytonii*)	FT, CSSC	Streams, freshwater pools, and ponds with emergent or overhanging vegetation.	**Absent.** No suitable aquatic breeding habitat for California red-legged frogs is present on the project site, and the reach of Redwood Creek adjacent to the site is too incised with limited cover to support suitable breeding habitat for this species. A number of records of this species are present in the Woodside area west of Interstate 280 (CNDDB 2022); however, this highway represents a barrier to dispersal that prevents individuals at these locations from reaching the project site. California red-legged frogs are also known to occur east of Interstate 280 in the Atherton Channel approximately 1.2 miles to the southeast (CNDDB 2022). Although 1.2 miles is within the dispersal capabilities of the species, the project site is isolated from this location by more than 1.0 mile of residential development, as well as Woodside Road, and California red-legged frogs are not expected to be able to traverse these barriers to reach the project site from the Atherton Channel. Thus, this species is determined to be absent from the project site.
San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)	FE, SE, SP	Occurs in a variety of habitats, including riparian areas; requires burrows for hibernation and frogs as a prey base.	**Absent**. The San Francisco garter snake occurs on the San Francisco Peninsula from just north of the San Francisco–San Mateo County line south to approximately the San Mateo–Santa Cruz County line. An intergrade zone composed of hybrids between the San Francisco garter snake and red-sided garter snake (*Thamnophis sirtalis sirtalis*) occurs from Palo Alto north to the Pulgas region near Upper Crystal Springs Reservoir (Barry 1994). No suitable aquatic breeding or foraging habitat occurs on the project site, and the reach of Redwood Creek adjacent to the site is too incised with limited cover to provide suitable breeding habitat for this species. San Francisco garter snakes are known to occur in the project vicinity, with an established population at Crystal Springs Reservoir approximately 5.5 miles to the northwest. Additional records of potential intergrades have been detected in aquatic habitats west of Cañada Road approximately 3.3 miles and 3.8 miles northwest of the project site (CNDDB 2022). However, all known occurrences are separated from the project site by Interstate 280, and individuals are not expected to successfully disperse across this busy roadway to reach the project site Thus, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Bald eagle (*Haliaeetus leucocephalus*)	SE, SP	Occurs mainly along seacoasts, rivers, and lakes; nests in tall trees or in cliffs, occasionally on electrical towers. Feeds mostly on fish.	**Absent.** Bald eagles are known to nest in the project vicinity at inland reservoirs and along the coast, including at Crystal Springs Reservoir approximately 6 miles north of the project site. However, no suitable nesting or foraging habitat for bald eagles is present on the project site. Determined to be absent.
Tricolored blackbird (*Agelaius tricolor*)	ST	Nests near fresh water in dense emergent vegetation.	**Absent.** In San Mateo County, the tricolored blackbird has bred in only a few scattered locations, and is absent from, or occurs only as a nonbreeder in, most of the County (Sequoia Audubon Society 2001). This species typically nests in extensive stands of tall emergent herbaceous vegetation in non-tidal freshwater marshes and ponds. No suitable nesting habitat is present on the project site or along Redwood Creek adjacent to the site, as no large patches of emergent vegetation, blackberry (*Rubus* sp.) stands, or other suitable vegetation are present. Further, this species (whose colonies are loud and conspicuous) has never been recorded nesting in the site vicinity (Cornell Lab of Ornithology 2022), and high levels of disturbance likely preclude nesting near the site. The site also does not provide suitable foraging habitat for this species.
Mountain lion (Southern California/Central Coast ESU) (*Puma concolor*)	SC	Has a large home range size and occurs in a variety of habitats. Natal dens are typically located in remote, rugged terrain far from human activity. May occasionally occur in areas near human development, especially during dispersal.	**May be Present as Nonbreeder.** In the project region, there are verified sightings reported on BAPP.org (2022) and numerous unpublished reports. This species occurs widely, though at low densities, throughout the Santa Cruz Mountains, and may disperse into lowland/valley floor areas. Mountain lions are not expected to regularly use the project site or establish a den on the site due to high levels of human activity and a lack of suitable denning habitat, but individuals may occur on the site as rare dispersants due to the site's location near the periphery of development in the Woodside area (i.e., only approximately 2.5 miles from Edgewood Park).
California Species of Special Concern			

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Western pond turtle (*Actinemys marmorata*)	CSSC	Permanent or nearly permanent water in a variety of habitats.	**Absent.** This species is known to occur in the project vicinity approximately 2.7 miles east of the project site in San Francisquito Creek, west of Interstate 280 (CNDDB 2022). Ostensibly suitable aquatic dispersal and foraging habitat is present in Redwood Creek 45 feet northwest of the project site. However, Redwood Creek lacks connectivity to known occurrences of the species, and the lack of deep pools with aquatic escape cover due the shallow depth of the creek, as well as a lack of basking habitat, make the habitat unsuitable for regular use by pond turtles. Further, because all known occurrences are separated from the project site by Interstate 280, individuals are not expected to successfully disperse across this busy roadway to reach the project site. Due to the absence of key habitat features in the adjacent creek, as well as the presence of Interstate 280 in between the site and known occurrences of the species, pond turtles are not expected to occur on the project site.
Northern harrier (*Circus cyaneus*)	CSSC (nesting)	Nests in marshes and moist fields, forages over open areas.	**Absent.** No suitable nesting or foraging habitat is present on the project site or in the surrounding vicinity, which is developed as a residential area. Determined to be absent.
Burrowing owl (*Athene cunicularia*)	CSSC	Nests and roosts in open grasslands and ruderal habitats with suitable burrows, usually those made by California ground squirrels.	**Absent.** No burrows of California ground squirrels are present on the project site to provide suitable nesting and roosting habitat for this species. Grasslands on the site provide ostensibly suitable foraging habitat; however, burrowing owls are not known to occur in the project vicinity (Cornell Lab of Ornithology 2022), and no individuals or sign were observed during the November 2022 site visit. Determined to be absent.
Vaux's swift (*Chaetura vauxi*)	CSSC (nesting)	Nest both in small colonies and as single pairs, occupying cavities in large snags, primarily in old-growth forests. They also occasionally use artificial cavities such as chimneys. Forage aerially.	**May be Present as Nonbreeder.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). However, no suitable large snags or residential chimneys are present on or near the project site, and this species is not expected to nest on, or in close enough proximity to the project site to be impacted by project activities. May forage aerially over the project site, especially during migration.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Olive-sided flycatcher (*Contopus cooperi*)	CSSC (nesting)	Breeds in mature, primarily coniferous, forests with open canopies, along forest edges in more densely vegetated areas, in recently burned forest habitats, and in selectively harvested landscapes.	**May be Present as Nonbreeder.** Known to nest throughout much of San Mateo County, including in the project vicinity (Sequoia Audubon 2001). However, no suitable coniferous forest nesting habitat is present on or adjacent to the project site. Occasional non-breeding individuals may forage on the site, especially during migration.
Loggerhead shrike (*Lanius ludovicianus*)	CSSC (nesting)	Nests in tall shrubs and dense trees; forages in grasslands, marshes, and ruderal habitats.	**Absent.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). Shrubs and trees on and adjacent to the project site provide ostensibly suitable nesting habitat for loggerhead shrikes; however grasslands on the site are too limited in extent to provide suitable foraging habitat. Further, the regional loggerhead shrike population has declined substantially in recent years, and this species is not expected to occur on the project site due to the limited extent of the available habitat. Rather, loggerhead shrikes that occur in the vicinity are expected to occur in higher-quality habitat to the north, such as at Edgewood Park, nearby. Determined to be absent.
Yellow warbler (*Setophaga petechia*)	CSSC (nesting)	Nests in riparian woodlands.	**May be Present as Nonbreeder.** No suitable nesting habitat for yellow warblers is present on or adjacent to the project site. The species is an abundant migrant throughout the project region during the spring and fall, when nonbreeding individuals may forage in woodland habitats on the site.
Grasshopper sparrow (*Ammodramus savannarum*)	CSSC (nesting)	Nests and forages in grasslands, meadows, fallow fields, and pastures.	**Absent.** Known to nest and occur in the project region primarily in grasslands and less frequently disturbed agricultural habitats, such as at Edgewood Park to the north (Cornell Lab of Ornithology 2022). No suitable nesting or foraging habitat for this species is present on the project site due to the limited extent of the grassland habitat and the presence of trees, which prefers more extensive grasslands without trees, is present on the project site.
Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*)	CSSC	Nests in pickleweed dominant salt marsh and adjacent ruderal habitat.	**Absent.** In the South San Francisco Bay, nests primarily in short pickleweed-dominated portions of diked/muted tidal salt marsh habitat and in adjacent ruderal habitats, and in extensive grasslands in the Santa Cruz Mountains (Rottenborn 2007). No suitable nesting or foraging habitat occurs on the project site.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Pallid bat (*Antrozous pallidus*)	CSSC	Forages over many habitats; roosts in caves, rock outcrops, buildings, and hollow trees.	**May be Present.** Historically, pallid bats were likely present in a number of locations throughout the project region, but their populations have declined in recent decades. However, no known recent (after 1960) records of maternity colonies of this species are present on or adjacent to the project site (CNDDB 2022, iNaturalist 2022). Suitable roosting habitat for pallid bats is present in cavities in the large coast live oak tree on the project site; however, high levels of disturbance in immediately surrounding areas reduces the likelihood that individuals would roost at this location. Individuals from colonies in the region (especially in the Santa Cruz Mountains to the west) could occasionally forage on the project site, and there is some potential (albeit low) that the species could roost on the site in the large coast live oak.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSSC	Roosts in caves and mine tunnels, and occasionally in deep crevices in trees such as redwoods or in abandoned buildings, in a variety of habitats.	**May be Present as Nonbreeder.** Townsend's big-eared bats are known to occur in the Santa Cruz Mountains to the southwest (iNaturalist 2022). Suitable cavernous roosting habitat is not present on the project site to support a roosting colony of this species, and high levels of human disturbance in surrounding areas further preclude roosting. Nevertheless, individuals from colonies in the region may occasionally forage over the open habitats on the project site.
Western red bat (*Lasiurus blossevillii*)	CSSC	Roosts in foliage in forest or woodlands, especially in or near riparian habitat.	**Low Potential for Occurrence.** Western red bats occur in the project vicinity in low numbers as migrants and winter residents, but this species does not breed in the region. Individual western red bats may roost in the foliage of trees virtually anywhere on the project site, but are expected to roost primarily in riparian areas elsewhere in the region. Occasional individuals may forage over the project site year-round.
San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*)	CSSC	Nests in a variety of habitats including riparian areas, oak woodlands, and scrub.	**Present.** Suitable habitat is present in oak woodland habitat on the project site, and three woodrat nests were detected on the ground under and near the largest coast live oak on the site during the focused survey in November 2022.
American badger (*Taxidea taxus*)	CSSC	Burrows in grasslands and occasionally in infrequently disked agricultural areas.	**Absent.** Known to occur in the project region primarily in extensive grasslands and scrub habitats north and west of the project site. Badgers are not expected to occur on the project site or establish a den on the site due to the site's location in an urban residential area. Determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
State Fully Protected Species			
American peregrine falcon (*Falco peregrinus anatum*)	SP	Forages in many habitats; nests on cliffs and tall bridges and buildings.	**Absent.** Peregrine falcons are not known or expected to nest on or near the project site due to a lack of suitable cliff-like habitat for nesting, and it would not forage on the site due to the absence of open habitats and suitable prey.
Golden eagle (*Aquila chrysaetos*)	SP	Breeds on cliffs or in large trees (rarely on electrical towers); forages in open areas.	**May be Present as Nonbreeder.** No suitable nesting habitat for golden eagles is present on the project site, and it would not forage on the site due to the absence of open habitats and suitable prey.
White-tailed kite (*Elanus leucurus*)	SP	Nests in tall shrubs and trees; forages in grasslands, marshes, and ruderal habitats.	**May be Present as Breeder.** White-tailed kites are common residents in open areas in the project vicinity. Trees in the coast live oak woodland habitat on the project site provide suitable nesting habitat for this species. No white-tailed kites or nests of this species were observed on or adjacent to the site during the November 2022 site visit; however, up to one pair of white-tailed kites may nest in trees on or adjacent to the project site. Individuals may forage on the site year-round.

Key to Abbreviations: Status: Federally Endangered (FE); Federally Threatened (FT); Federal Candidate for Listing (FC); State Endangered (SE); State Threatened (ST); State Candidate for Listing (SC); State Fully Protected (SP); California Species of Special Concern (CSSC).

5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats

Natural communities have been considered part of the Natural Heritage Conservation triad, along with plants and animals of conservation significance, since the state inception of the Natural Heritage Program in 1979. The CDFW determines the level of rarity and imperilment of vegetation types, and tracks sensitive communities in its Rarefind database (CNDDB 2022). Global rankings (G) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas state (S) rankings are a reflection of the condition of a habitat within California. Natural communities are defined using NatureServe's standard heritage program methodology as follows (Faber-Langendoen et al. 2012):

G1/S1: Critically imperiled

G2/S2: Imperiled

G3/S3: Vulnerable.

G4/S4: Apparently secure

G5/S4: Secure

In addition to tracking sensitive natural communities, the CDFW also ranks vegetation alliances, defined by repeating patterns of plants across a landscape that reflect climate, soil, water, disturbance, and other environmental factors (Sawyer et al. 2009). If an alliance is marked G1-G3, all of the vegetation associations within it will also be of high priority (CDFW 2022). The CDFW provides VegCAMP's currently accepted list of vegetation alliances and associations (CDFW 2022).

Impacts on CDFW sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, must be considered and evaluated under CEQA (Title 14, Division 6, Chapter 3, Appendix G of the California Code of Regulations). Furthermore, aquatic, wetland and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS.

5.3.1 Sensitive Natural Communities

A query of sensitive natural communities in the CNDDB (2022) identified five sensitive natural communities as occurring within the nine 7.5-minute USGS quadrangles containing or surrounding the project site: northern coastal salt marsh (Rank G3/S3.2), northern maritime chaparral (Rank G1/S1.2), serpentine bunchgrass (Rank G2/S2.2), valley needlegrass grassland (G3/S3.1), and valley oak woodland (G3/S2.1). The native needlegrass bunches beneath the canopies of coast live oak trees on the project site do not meet the definition of the *serpentine bunchgrass* natural community type due to the apparent absence of serpentine soils; rather, this habitat

corresponds to the *oak woodland* natural community type, which is not sensitive. No sensitive natural communities are present on the project site.

5.3.2 Sensitive Vegetation Alliances

None of the habitat types on the site represent or include sensitive vegetation alliances.

5.3.3 CDFW Riparian Habitat

Due to its rarity and disproportionately high habitat values and functions to wildlife, the CDFW considers riparian habitat to be sensitive. As described above in Section 3.2.4, the CDFW would likely claim jurisdiction over areas at, and below, the top of bank lines on either side of Redwood Creek adjacent to the project site, as well as its associated riparian habitat, located approximately 45 feet off-site to the northwest. However, riparian habitat associated with Redwood Creek does not extend onto the project site, and it would not be directly or indirectly impacted by project activities.

5.3.4 Sensitive Habitats (Waters of the U.S./State)

No wetlands or other waters of the U.S./state occur on the project site. Redwood Creek located approximately 45 feet off-site to the northwest would likely be considered jurisdictional waters of the U.S. up to the OHW mark, and the RWQCB may claim the banks of Redwood Creek, and riparian habitat rooted below top of bank, as waters of the state. However, these potentially jurisdictional areas are located entirely off-site.

5.3.5 Nonnative and Invasive Species

Several nonnative, invasive plant species occur on the project site. Of these, several have a "limited" rating by the Cal-IPC, indicating they are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic. These "limited" species on the project site are bristly ox-tongue and European olive. Species with a "moderate" rating by the Cal-IPC have substantial and apparent–but generally not severe–ecological impacts on physical processes, plant and animal communities, and vegetation structure, and that their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal, though establishment would be generally dependent on ecological disturbance are: fennel, field hedgeparsley, Italian thistle, Bermuda buttercup, ripgut brome, and Harding grass. Species with a "high" invasive rating by the Cal-IPC have the potential to cause severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal and establishment, and most are widely distributed ecologically (Cal-IPC 2022). On the project site, species with a "high" rating are English ivy, yellow star-thistle and French broom. Due to these species' ubiquity in the region, project activities are not expected to result in the spread of nonnative and invasive plant species.

Section 6. Impacts and Mitigation Measures

CEQA and the State CEQA Guidelines provide guidance in evaluating impacts of projects on biological resources and determining which impacts will be significant. The Act defines "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project."

Appendix G of State CEQA Guidelines provides a checklist of other potential impacts to consider when analyzing the significance of project effects. The impacts listed in Appendix G (Chapter IV) may or may not be significant, depending on the level of the impact. For biological resources, these impacts include whether the project would:

A. "have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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 state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means"

D. "interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites"

E. "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance"

F. "conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan"

Potential impacts on biological resources as a result of the proposed residential project were systematically evaluated at the project level based on the project description provided to us by the Town through October 2022. Based on this information, it is our understanding that all project impacts including grading, construction, staging, and access will occur within the limits of boundaries provided, and that all project impacts within this boundary will be permanent. For the purpose of this assessment, we have assumed that the proposed project would impact up to all 1.3 acres of the project site.

Potential impacts on existing biological resources were evaluated by comparing the quantity and quality of habitats present on the project site under baseline conditions to the anticipated conditions after implementation of the proposed project. Direct and indirect impacts on special-status species and sensitive natural communities were assessed based on the potential for the species, their habitat, or the natural community in question to be disturbed or enhanced following implementation of the proposed project.

6.1 Impacts on Special-Status Species: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant with Mitigation)

6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant)

Proposed project activities would result in the permanent removal of up to 0.5 acre of ornamental woodland, 0.3 acre of California annual grassland, 0.3 acre of coast live oak woodland, and 0.2 acre of Harding grass grassland on the project site. These impacts would reduce the extent of vegetation within the impact area and result in a reduction in the abundance of some of the common plant and wildlife species that occur there. However, the ornamental woodland, California annual grassland, coast live oak woodland, and Harding grass grassland habitats on the project site occur in a location in Woodside that has been subject to disturbance in the past, is regularly disturbed by human activities (such as mowing), and are surrounded by developed residential areas such that these habitats do not provide regionally rare or especially high-value habitat for native vegetation, wildlife, or special-status species. In addition, these habitats are abundant and widespread regionally, are not particularly sensitive, and are not especially valuable (from the perspective of providing important plant or wildlife habitat) or exemplary occurrences of these habitat types. Therefore, impacts on these habitats are considered less than significant under CEQA. Further, because the number of individuals of any common plant or animal species within these habitats, and the proportion of these species' regional populations that could be disturbed, is very small, the project's impacts would not substantially reduce regional populations of these species. Thus, these impacts do not meet the CEQA standard of having a *substantial* adverse effect and would not be considered significant under CEQA.

6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation)

Ten special-status plant species were determined to have some potential to occur on the project site. These species are Dudley's lousewort, a state rare and CRPR 1B.2 species; bent-flowered fiddleneck, fragrant fritillary, woodland woollythreads, CRPR 1B.2 species; woolly-headed lessingia, a CRPR 3 species; and San Francisco wallflower, harlequin lotus, bristly leptosiphon, large-flowered leptosiphon, and Gairdner's yampah, CRPR 4.2 species. These species could potentially occur in broadleaved upland forest habitats on the project site, but surveys for these species during the appropriate blooming period have not yet been performed to determine presence/absence. If any special-status plant species occur on the project site, the project could impact these plants due to disturbance or destruction of individuals and suitable habitat. Direct impacts could include grading

or filling areas supporting the species, trampling or crushing of plants, and soil compaction. Indirect impacts could include increased mobilization of dust onto plants, which can affect their photosynthesis and respiration, or changes to hydrology supporting these plants due to grading or construction in nearby habitats.

Conservation of special-status plant species is important because their populations contribute to preserving genetic resources and help ensure persistence of these rare species in the county and state. Due to the regional rarity of these species, impacts to more than 10% of a population (by individuals or occupied area) of state rare or CRPR List 1B species or more than 20% of a population of CRPR List 3 or 4 species could result in the loss of that population, thereby contributing to a reduction in the species' abundance and genetic resources. Such an impact would therefore be considered significant under CEQA. Impacts to 10% or less of a state rare or CRPR 1B population, or 20% or less of a CRPR 3 or 4 population, would not be expected to cause the extirpation of such a population as long as the remaining plants are avoided and protected.

Implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3 below will reduce these impacts to a less-than-significant level.

Mitigation Measure BIO-1. Pre-Activity Surveys for Special-Status Plants. Prior to initial ground disturbance for project-related activities, appropriately timed, presence/absence surveys for special-status plant species will be conducted by a qualified plant ecologist on the project site and within a 50-foot surrounding buffer to assess the presence or absence of these species. This buffer may be increased by the qualified plant ecologist depending on site-specific conditions and activities planned in the area, but will be at least 50 feet in width; if access to adjacent areas cannot be obtained, the plant ecologist will stand on the project site or other accessible areas and use binoculars or other means to look for special-status plants in the 50-foot surrounding buffer. Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust, such as grading; potential for project activities to alter hydrology supporting habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away. Based on the flowering periods of the potentially occurring species, surveys will need to occur at least three different times of year to ensure that they occur during appropriate periods for detecting these species: early spring from February to March, late spring from April to May, and summer from June to October. The surveys will be conducted in a year with sufficient precipitation to detect these species; alternatively, if these species are determined to be detectable in appropriate reference populations (regardless of precipitation), surveys for these species on the project site can be determined to be valid even if precipitation is well below average. Mowing must be avoided prior to the surveys so that these species can be detectable if present. If any special-status plants are detected, the plant ecologist will use any available means to determine the abundance and extent of the population, even if the population continues off-site.

If pre-activity surveys detect no special-status plants, then no further mitigation related to these species is necessary. If special-status plants are detected, then Mitigation Measures BIO-2, and BIO-3 if necessary, will be implemented.

Mitigation Measure BIO-2. Avoidance Buffers. To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent will design and construct the proposed project to completely avoid impacts on at least 90% of individuals in the populations of state rare or CRPR 1B plant species and/or at least 80% of individuals in the populations of CRPR 3 and 4 plant species on the project site or close enough to the site to be affected by the project. Avoided special-status plant populations will be protected by establishing and observing the identified buffer between plant populations and the impact area. All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, will be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around special-status plants to be avoided will be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site in question). This marking will be maintained intact and in good condition throughout project-related construction activities.

If complete avoidance is not feasible and more than 10% of a population (by occupied area or individuals) of state rare or CRPR 1B plant species, or more than 20% of a population of CRPR 3 or 4 plant species, will be impacted by the project as determined by a qualified plant ecologist, Mitigation Measure BIO-3 will be implemented.

Mitigation Measure BIO-3. Preserve and Manage Mitigation Populations. If avoidance of special-status plant species is not feasible and more than 10% of a population (by occupied area or individuals) of state rare or CRPR 1B plant species, or more than 20% of a population of CRPR 3 or 4 plant species would be impacted, compensatory mitigation will be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To compensate for impacts on these plants, off-site habitat occupied by the affected species will be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant affected, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10% significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to these species beyond the 10% significance threshold) or establish an entirely new population in suitable habitat.

Areas proposed to be preserved as compensatory mitigation for impacts to special-status plant species must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas will be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat will be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and will contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands will be ensured through an appropriate mechanism, such as a conservation easement or fee title purchase. A habitat mitigation and

monitoring plan (HMMP) will be developed by qualified plant or restoration ecologists and implemented for the mitigation lands. That plan will include, at a minimum, the following information:

- a summary of impacts to the special-status plant species in question, including impacts to its habitat, and the proposed mitigation;
- a description of the location and boundaries of the mitigation site and description of existing site conditions;
- a description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the species;
- a description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist);
- proposed management activities to maintain high-quality habitat conditions for the species;
- a description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria will include demonstration that any plant population fluctuations over the monitoring period of a minimum of 5 years for preserved populations and a minimum of 10 years for enhanced or established populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management);
- if a new population is established, the new population must contain at least 200 individuals or the same number of impacted individuals, whichever is greater, by year 5. This is to ensure the created population will be large enough to expect to persist and gain sufficient dedicated pollination services. If year 5 is a poor weather year for summer and fall-blooming annual plants and reference populations show a decline, this criteria can be measured in the next year occurring with average or better rainfall; and
- contingency measures for mitigation elements that do not meet performance criteria. For example, if by year 5 (or the next suitable rainfall year after year 5) of monitoring, the project is unable to establish a self-sustaining population of the required number of individuals as described above, the applicant shall preserve and manage an extant population of that same species under a revised HMMP.

Approval of the HMMP by the Town will be required before project impacts to special-status plant species occur.

6.1.3 Impacts on Water Quality (Less than Significant)

No direct impacts to Redwood Creek, which flows southwest to northeast approximately 45 feet from the project site, are proposed. Indirect impacts on water quality in the creek could potentially occur as a result of

project activities, which are located upslope of the creek. Additionally, minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downslope and downstream of construction activities.

Indirect impacts on water quality from construction of the project would be avoided and minimized by implementing erosion and sediment control measures, as well as BMPs for work near aquatic environments. In addition, construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of storm water pollutants under the NPDES *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of BMPs to protect water quality until the site is stabilized. Standard permit conditions under the Construction General Permit require that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors.

In many Bay Area counties, including San Mateo County, projects must also comply with the California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (Water Board Order No. R2-2015-0049). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design to prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site after construction has been completed. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Compliance with these permit requirements will minimize the potential for impacts on water quality due to increases in erosion, sedimentation, and turbidity as well as releases of pollutants into Redwood Creek located downslope of the project site. Therefore, project activities are not expected to result in substantial adverse indirect effects on water quality, and such impacts would be less than significant.

6.1.4 Impacts on the Monarch Butterfly (Less than Significant)

Project activities will permanently impact 0.5 acre of ornamental woodland, 0.3 acre of California annual grassland, 0.3 acre of coast live oak woodland, and 0.2 acre of Harding grass grassland that may be occupied by monarch butterflies. Given the small size of the project site and the lack of any evidence that it supports high densities of the larval host plant (milkweed), nectar plants, or an overwintering site, few, if any, monarch butterflies are expected to be present on the project site when work occurs. Nevertheless, project activities could result in the loss of larval host plants and adult nectar sources for monarch butterflies, and potentially also the loss of eggs, larvae, or pupae due to crushing by construction personnel or equipment, vegetation removal, excavations, and placement of soil stockpiles.

The proposed project would impact only a very small proportion of this species' regionally available habitat and this species' populations, and the number of individuals likely to be displaced by habitat disturbance and loss would be quite small with respect to the amount of suitable habitat available in the area. Thus, due to the abundance of suitable habitat in the project region, project activities are not expected to result in a substantial impact on breeding and foraging habitat for monarch butterflies. Therefore, the potential loss of small numbers of individual monarch butterflies as a result of the project, as well as the permanent loss of potential breeding and foraging habitat, would not rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on this species or its habitats under CEQA.

6.1.5 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant)

Several special-status bird and mammal species may occur on the project site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These are the Vaux's swift, olive-sided flycatcher, yellow warbler, mountain lion, Townsend's big-eared bat, and western red bat.

The Vaux's swift, olive-sided flycatcher, and yellow warbler (California species of special concern) are not expected to occur on or close to the project site as breeders due to the absence of suitable habitat, but individuals may occur occasionally as foragers during the nonbreeding season. Due to the site's location on the periphery of open space areas of the Santa Cruz Mountains, the mountain lion (a state candidate species) may briefly traverse the site as non-breeding dispersants or foragers, but individuals are not expected to linger for any length of time due to high levels of human activity. The Townsend's big-eared bat and western red bat (California species of special concern) may occur on the project site as occasional foragers, but are not expected to breed or roost on the project site due to a lack of suitable habitat and existing human activity on the site, and there are no known maternity colonies on or adjacent to the project site. Nevertheless, individuals could potentially forage over open grasslands in the project site on rare occasions.

Activities under the proposed project would have some potential to impact foraging habitats and/or disturb individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. Further, the project site does not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, impacts of the project will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant under CEQA.

6.1.6 Impacts on the White-Tailed Kite (Less than Significant)

The white-tailed kite (a state fully protected species) may nest in oak woodland habitat or landscape trees on and adjacent to the project site. Based on site observations, the areal extent of suitable habitats within and adjacent to the project site, and known nesting densities of this species, no more than one pair of white-tailed kites could potentially nest on or immediately adjacent to the project site. The project would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite. In addition, activities that occur during the nesting season and cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests (i.e., nests with eggs or young). Heavy ground disturbance, noise, and vibrations caused by project activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs that could be disturbed is very small (i.e., one pair), the impacts of project activities would represent a very small fraction of the regional population of this species. Therefore, neither the potential loss of individual white-tailed kites, nor the disturbance of nesting and foraging habitat, would rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat under CEQA. However, as discussed in Section 3 above, all native migratory birds, including raptors, are protected under the MBTA and California Fish and Game Code. Recommended measures to comply with these laws are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.1.7 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant with Mitigation)

Three nests of San Francisco dusky-footed woodrats are present in coast live oak woodland habitat on the project site. Woodrats from this community will also forage in oak woodland habitats on the project site.

Construction of the project could result in the injury or mortality of individual woodrats and disturbance or destruction of nests and young, leading to increased predation risk on woodrats flushed from nests, as a result of vegetation clearing and operation of equipment.

Although woodrats are abundant in the project region, especially in natural areas in the Santa Cruz Mountains, woodrats are very important ecologically in that they provide an important prey source for raptors (particularly owls) and for predatory mammals, and their nests also provide habitat for a wide variety of small mammals, reptiles, and amphibians. Thus, in our opinion, impacts of the project on three woodrat nests would be considered significant under CEQA.

Implementation of Mitigation Measures BIO-4 through BIO-6 below would reduce this impact to a less-than-significant level under CEQA.

Mitigation Measure BIO-4. Pre-Activity Survey. A qualified biologist will conduct a preconstruction survey for San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active woodrat nests are determined to be present in, or within 10 feet of, the impact areas, Measures 5 and 6 below will be implemented, as appropriate.

Mitigation Measure BIO-5. Avoidance Buffers. Active woodrat nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 10-foot buffer will be maintained between project activities and woodrat nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation (Measure 6 below) would represent a greater disturbance to the woodrats than the adjacent work activities.

Mitigation Measure BIO-6. Nest Relocation. If avoidance of active woodrat nests within and immediately adjacent to (within 10 feet of) the work areas is not feasible, then nest materials will be relocated to suitable habitat as close to the project area as possible (ideally, within or immediately adjacent to the project site).

- Prior to the start of construction activities, a qualified biologist will disturb the woodrat nest to the degree that all woodrats leave the nest and seek refuge outside of the construction area. Relocation efforts will avoid the peak nesting season (February–July) to the maximum extent feasible. Disturbance of the woodrat nest will be initiated no earlier than one hour before dusk to prevent the exposure of woodrats to diurnal predators. Subsequently, the biologist will dismantle and relocate the nest material by hand. During the deconstruction process, the biologist will attempt to assess if there are juveniles in the nest. If immobile juveniles are observed, the deconstruction process will be discontinued until a time when the biologist believes the juveniles will be capable of independent survival (typically after 2 to 3 weeks). A no-disturbance buffer will be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.

- Implementation of these measures would minimize impacts of the project on the San Francisco dusky-footed woodrat, and no compensatory mitigation (beyond the relocation of nest materials described above) would be necessary.

6.1.8 Impacts on Common and Special-Status Roosting Bats (Less than Significant with Mitigation)

Common bat species, such as the Yuma myotis, California myotis, and big brown bat (*Eptesicus fuscus*), as well as the pallid bat, a California species of special concern, can potentially roost in the large coast live oak tree on the project site. These species are grouped together because project impacts on these species will be similar, and because project avoidance and minimization measures for these species are also similar.

No evidence of a colony of roosting bats was detected in trees on the site during the November 2022 focused survey, but the presence of a large colony of a common species of roosting bats or a colony of pallid bats of any size within the large oak tree on the project site could not be ruled out. Thus, the removal of this tree has

the potential to result in the loss of a colony of roosting bats. When trees containing roosting colonies or individual bats are removed or modified, individual bats can be physically injured or killed, can be subjected to physiological stress from disturbance during torpor, or can face increased predation because of exposure during daylight. In addition, nursing young may be subjected to disturbance-related abandonment by their mothers. Impacts on a moderate-sized maternity colony of common species that have potential to occur on the site (i.e., at least 20 Yuma myotis, 20 California myotis, or 10 big brown bats), or impacts on a pallid bat colony of any type (i.e., a maternity or non-maternity colony) or size would be considered a substantial effect on these species as this could have a substantial effect on their regional populations.

The following measures to avoid and minimize impacts on common and special-status species of roosting bats during construction will reduce these impacts to less-than-significant levels under CEQA:

Mitigation Measure BIO-7. Initial Focused Survey. An initial focused survey will be conducted for roosting bats within the large oak tree on the project site during the maternity season (generally March 15 – August 31) of any given year prior to the year in which project construction will occur to determine presence or absence of a maternity colony, the species present, and an estimate of the colony size, if present. Because close inspection of potential roost features during the daytime would not be feasible, the focused survey shall consist of a dusk emergence survey when bats can be observed flying out of the roost. The purpose of this survey is to determine whether replacement roost habitat needs to be provided, as described under Mitigation Measure BIO-10 below. If no maternity colonies, or pallid bat colonies of any type, are observed during the initial focused survey, no compensatory mitigation will be necessary.

Mitigation Measure BIO-8. Bat Exclusion. Regardless of the results of the survey described in Mitigation Measure BIO-7, measures will be implemented to ensure that an active maternity colony is not present within the large coast live oak tree on the project site when construction commences.

If construction will commence during the bat maternity season (defined as March 15 to August 31), prior to the March 15 start of the maternity season in the year in which construction will commence, a qualified bat biologist will install appropriate exclusion devices on all roost habitat features (i.e., the crevices in the large oak tree) to allow any roosting bats to vacate the roost and prevent any bats from occupying these features before tree removal is initiated. One-way doors would be the most appropriate exclusion device to use on the tree cavities. Bird exclusion netting shall not be used because bats may become entangled in it and die. Installation of exclusion materials shall occur under the supervision of a qualified bat biologist, and then inspected once per month until the project is initiated, to ensure that the materials are in good working order. If exclusion materials become compromised, the applicant shall perform maintenance on these devices, as needed.

Alternatively, the contractor may remove the large coast live oak tree on the project site using a two-step tree removal process outside the maternity season (i.e., during the period from September 1 to March 14). Removal of the tree will take place during a period of warm weather when nighttime lows are not less than 45° F and during dry weather conditions when bats are most active. The first day of tree removal would involve the

removal of tree limbs that do not support roost habitat features, so that the tree and any roosting bats are sufficiently disturbed and thereby encouraged to vacate the tree. The tree may then be removed on the second day.

Mitigation Measure BIO-9. Pre-Activity Survey. In the event that installation of bat exclusion devices in the large coast live oak tree, or removal of the tree as described in Mitigation Measure BIO-8 above, does not occur prior to the bat maternity season, a pre-activity survey shall be conducted within seven days prior to the start of construction or tree removal. If such a survey detects no maternity colonies, construction or tree removal can commence. However, if a maternity colony is present, the qualified bat biologist will identify an appropriate disturbance-free buffer zone to be maintained until the end of the maternity season to avoid disturbing the roosting bats.

Mitigation Measure BIO-10. Compensatory Mitigation. If a maternity colony, as described above, or a pallid bat colony of any type (maternity or non-maternity) is determined to be present in the large coast live oak tree on the project site, replacement roost habitat that is appropriate to the species and replaces the same type of habitat that will be lost (e.g., day roost/maternity roost habitat) shall be provided, as determined by a qualified bat biologist. If a maternity colony, as described above, or a pallid bat colony of any type, are not observed during the initial focused survey, no replacement habitat will be warranted.

The nature of the replacement roost habitat (e.g., the design of an artificial roost structure) will be determined by a qualified bat biologist based on the number and species of bats detected during the initial maternity-season survey. Ideally, the roost structure should be installed on the project site. If replacement habitat cannot be placed on the site, it should be installed no more 100 feet from the site (or as close to the site as possible). Exact placement of replacement habitat shall be determined in consultation with a qualified bat biologist.

6.1.9 Impacts due to Bird Collisions (Less than Significant)

Under existing conditions, the project site consists of a mix of undeveloped areas dominated by grasslands, and several small oak and ornamental woodlands. Terrestrial land uses and habitat conditions in areas immediately surrounding the project site consist of low-density residential buildings with associated pedestrian walkways, roads, and landscape vegetation. These residential areas support many nonnative landscape trees and shrubs, which supports fewer of the resources required by native birds compared native vegetation, and the structural simplicity of the vegetation (without well-developed ground cover, understory, and canopy layers) in these developed areas further limits resources available to birds (Anderson et al. 1977, Mills et al. 1989).

Riparian habitat associated with Redwood Creek to the northwest provides somewhat higher quality habitat for native resident and migratory birds compared to the surrounding residential and landscaped areas. However, it does not provide particularly high-quality migratory stopover habitat, and only small numbers of migrants are expected to occur there.

Because the natural habitats on and adjacent to the site are limited in extent and of relatively lower quality compared to habitats in natural open space areas in the region, and the site is regularly disturbed by mowing, the number of individual landbirds that inhabit and regularly use vegetation on the project site at any given time is low under existing conditions. Particularly rare species or species of conservation concern are not expected to occur on the project site.

The extent and species of future landscape vegetation to be installed under the project is unknown. For the purpose of this assessment, we assume that while a number of the existing trees on the site may be removed, they would be replaced in accordance with the Town's tree protection requirements. Any trees and landscaped areas that will be planted on the site in the future are expected to provide similar habitat structure and foraging opportunities for landbirds compared to existing conditions, although the extent of grasslands on the site will likely be reduced following construction. Landbirds that will occur on the site and in the vicinity will be attracted to any trees and landscaped areas that are planted, and some will make use of new developed structures. These birds will move between the site and habitats in the surrounding vicinity (e.g., the open space areas to the north). As a result, no substantive changes in the number of songbirds inhabiting the project site are expected to result from the proposed project.

It is well documented that glass windows and building façades can result in injury or mortality of birds due to birds' collisions with these surfaces (Klem et al. 2009, Sheppard and Phillips 2015). Because birds do not perceive glass as an obstruction the way humans do, they may collide with glass when the sky or vegetation is reflected in glass (e.g., they see the glass as sky or vegetated areas); when transparent windows allow birds to perceive an unobstructed flight route through the glass (such as at corners); and when the combination of transparent glass and interior vegetation (such as in planted atria) results in attempts by birds to fly through glass to reach that vegetation. The greatest risk of avian collisions with buildings occurs in the area within 40–60 feet of the ground, because this is the area in which most bird activity occurs (San Francisco Planning Department 2011, Sheppard and Phillips 2015). Very tall buildings (e.g., buildings 500 feet or more high) may also pose a threat to birds that are migrating through the area, particularly to nocturnal migrants that may not see the buildings or that may be attracted to lights on the buildings (San Francisco Planning Department 2011).

Birds are likely to collide with glazing on building façades on the project site for the following reasons:

- It is possible that the project may incorporate trees and other landscaping immediately adjacent to glazing on a building's façades. Such vegetation is expected to attract birds. Once birds are using that vegetation, they may not perceive the glass as a solid structure. The vegetation would reflect in the glass of the building's façades, potentially causing birds to attempt to fly in to the reflected "vegetation" and strike the glass. As a result, some birds that are attracted to the trees and other landscaping that is adjacent to the glass façades are expected to collide with the glass.
- Night lighting associated with new buildings has some potential to disorient birds, especially during inclement weather when night migrating birds descend to lower altitudes. As a result, some birds moving through the project site at night may be disoriented by night lighting and potentially collide with buildings.

The extent to which the proposed new buildings and other structures will incorporate glazing on their façades is unknown, as these structures have not yet been designed. However, it is our understanding that while these buildings will incorporate some glazing on their facades, they will not be designed to incorporate extensive glazing. Because the buildings are expected to incorporate predominantly opaque facades with no extensive areas of glazing, birds will be better able to perceive the building facades as solid obstructions to flight than if the glassy surface appeared more uniform. Thus, the number and frequency of avian collisions with glass façades on the proposed buildings is expected to be low, and the project would not result in the loss of a substantial proportion of any species' Bay-area populations or any Bay-area bird community. Thus, according to CEQA standards, we would consider such impacts to be less than significant.

6.1.10 Impacts due to Increased Lighting (Less than Significant with Mitigation)

The project will result in the construction of buildings and other features (e.g., driveways, roads, and sidewalks) that will increase the amount of lighting on and around the project site. Lighting from the project would be the result of light fixtures illuminating buildings, building architectural lighting, driveway/road lighting, and pedestrian lighting. Depending on the location, direction, and intensity of exterior lighting, this lighting can potentially spill into adjacent areas, thereby resulting in an increase in lighting compared to existing conditions. The areas surrounding the site are primarily developed residential areas that do not support sensitive species that might be significantly impacted by illuminance from the project. However, riparian habitat along Redwood Creek is located 45 feet northwest of the project site, and there is potential for illuminance from the project to spill within this area.

Many animals are sensitive to light cues, which influence their physiology and shape their behaviors, particularly during the breeding season (Ringer 1972, de Molenaar et al. 2006). Artificial light has been used as a means of manipulating breeding behavior and productivity in captive birds for decades (de Molenaar et al. 2006), and has been shown to influence the territorial singing behavior of wild birds (Longcore and Rich 2004, Miller 2006, de Molenaar et al. 2006). While it is difficult to extrapolate results of experiments on captive birds to wild populations, it is known that photoperiod (the relative amount of light and dark in a 24-hour period) is an essential cue triggering physiological processes as diverse as growth, metabolism, development, breeding behavior, and molting (de Molenaar et al. 2006). This holds true for birds, mammals (Beier 2006), and other taxa as well, suggesting that increases in ambient light may interfere with these processes across a wide range of species, resulting in impacts on wildlife populations.

Artificial lighting may indirectly impact mammals and birds by increasing the nocturnal activity of predators like owls, hawks, and mammalian predators (Negro et al 2000, Longcore and Rich 2004, DeCandido and Allen 2006, Beier 2006). The presence of artificial light may also influence habitat use by rodents (Beier 2006) and by breeding birds (Rogers et al. 2006, de Molenaar et al. 2006), by causing avoidance of well-lit areas, resulting in a net loss of habitat availability and quality.

As discussed above, the project site and riparian habitat associated with Redwood Creek to the northwest do not provide particularly high-quality migratory stopover habitat, and only small numbers of migrants are

expected to occur there. Thus, project lighting has a lower potential to attract and/or disorient migrating birds during the spring and fall compared to buildings located in natural areas. New lighting on the project site is primarily expected to affect resident birds, which are primarily active during the day and generally more familiar with their surroundings (and less likely to be attracted by lights and collide with buildings) compared to migrating birds.

The wildlife species inhabiting the project site and surrounding areas, including riparian habitat along Redwood Creek, are already habituated to the existing artificial illuminance from a variety of urban and natural light sources that are found nearby. However, due to the ecological importance of the riparian and aquatic habitats along Redwood Creek and the wildlife communities they support, substantial increases in illuminance of Redwood Creek and its associated riparian and aquatic habitats could result in a potentially significant impact under CEQA by disrupting the natural behaviors of the species using these habitats. Although there is agreement throughout the literature that increases in illuminance can affect wildlife behavior, as described above, there is no quantitative level of illuminance increase (above ambient light) that is agreed upon as a threshold for significant impacts to animals. In our professional opinion, Mitigation Measure BIO-11 below would reduce this impact to a less-than-significant level under CEQA.

Mitigation Measure BIO-11. Shield Project Lighting. Due to the potential for lighting on the project site to affect wildlife species that occur in adjacent natural areas along Redwood Creek, all exterior lighting shall be fully shielded to block illumination from shining outward towards Redwood Creek to the northwest.

6.2 Impacts on Sensitive Communities: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant)

6.2.1 Impacts on Riparian Habitat or Other Sensitive Natural Communities (Less than Significant)

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (Faber-Langendoen2012), as described above in Section 5.3. Aquatic, wetland, and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS (see Section 6.3 below). Project impacts on sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, were considered and evaluated.

Redwood Creek flows from southwest to northeast adjacent to, but not through, the project site. The entirety of ground-disturbing project impacts will occur outside of the riparian corridor; thus, the proposed project will have no direct permanent or temporary impacts on riparian habitat. There is potential for indirect effects to occur within riparian areas downslope of the project site if runoff from the project increases in intensity or frequency due to the proposed project. However, required construction-period BMPs and post-construction

stormwater requirements will apply to the proposed project as discussed above in Section 6.1.3, and these requirements would avoid and reduce these impacts to a less-than-significant level.

No other sensitive natural communities are located on or adjacent to the project site, and thus, there will be no impacts to other sensitive natural communities as a result of the project.

6.3 Impacts on Wetlands: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Less than Significant)

No wetlands or other waters of the U.S./state are present on the project site. Redwood Creek located 45 feet downslope of the project site to the northwest supports other waters of the U.S./state, but does not support wetlands. The project will avoid all direct impacts on state or federally protected aquatic habitats within this creek.

Because Redwood Creek is located downslope of the project site, there is some potential for the project to result in indirect impacts on other waters of the U.S./state within this creek. However, the project will comply with required construction period BMPs and post-construction storm water requirements will apply to the project as discussed above in Section 6.1.3, and these requirements would minimize increases of peak discharge of storm drain water and to reduce runoff of pollutants to protect water quality, including during construction. Thus, with compliance with permit requirements, potential project impacts on other waters would be less than significant under CEQA.

6.4 Impacts on Wildlife Movement: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Less than Significant)

6.4.1 Impacts on Wildlife Movement (Less than Significant)

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

The project site surrounded by low-density urban residential development in Woodside. As a result, the proposed development of the project site would not result in the fragmentation of natural habitats. While some wildlife species that occur in nearby natural areas may move through the site when traveling through the area,

any wildlife species that currently move through surrounding residential areas would continue to be able to do so following project construction, and the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact is determined to be less than significant.

6.4.2 Impacts on Nesting Birds (Less than Significant)

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the project site or in immediately adjacent areas. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on and adjacent to the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). Thus, in our opinion, no mitigation measures are warranted to avoid and minimize project impacts on nesting birds under CEQA.

Nevertheless, several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. Recommended measures to ensure project compliance with the MBTA and California Fish and Game Code are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.5 Impacts due to Conflicts with Local Policies: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Less than Significant with Mitigation)

6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant)

The project may remove existing trees on the site, including significant trees as defined by the Town (see Section 3.3.1 above), and the applicant will submit a permit application for tree removal. In accordance with the Woodside Municipal Code, the provisions listed below would be required by the project, at a minimum, for trees to be protected on the site:

- Tree protection fencing and appropriate signage around the drip lines of trees to be protected
- Measures to effect erosion control, soil and water retention, and to limit adverse environmental effects
- Significant trees that will be impacted by the project will be replaced in accordance with all applicable laws, policies or guidelines, including Section 153.430 of the Woodside Municipal Code. Per Section 453.438 of

the Municipal Code, any significant trees shall be replaced with a California native tree species, be planted as near as possible to the original location, and will be of at least a 36-inch box or other minimum size as specified by the Planning Director. Replacement trees shall be planted within one year of removal or, in the case of removal to accommodate construction, prior to final inspection.

With the incorporation of the above measures to insure compliance with the Woodside Municipal Code, any potential impacts related to conflict with local policies or ordinances protecting trees would be less than significant.

6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant with Mitigation)

To protect the ecological functions and values of a stream, buffers are often prescribed between new development and the stream (or its banks or associated riparian habitat). These buffers provide habitat for plants and animals associated with the stream, provide habitat connectivity (i.e., areas used for wildlife movement, including flight paths for birds), reduce indirect effects of adjacent development (e.g., noise, lighting, human activity, or invasive species) on the natural stream and riparian habitats, allow for the possible future expansion of natural habitat, help to maintain site hydrology, and in some areas allow for runoff to be treated (e.g., by flowing through vegetated areas) before it enters the stream. In addition, vegetative communities within stream buffers may provide important refugia for animals associated with wetland and riparian habitats along the creek during flood events, when little to no such refugia may be present within the banks of the creek itself. In general, larger buffers protect more of the ecological functions and values of the stream than smaller buffers.

The Town's Stream Corridor Protection Ordinance states that a protected stream corridor extends a horizontal distance of 50 feet measured from each side of the centerline of the stream, or 25 feet measured from the top of bank, whichever is greater. A protected stream corridor is present along Redwood Creek located approximately 45 feet northwest of the project site, and this corridor overlaps the project site by several feet (Figure 3). In our opinion, based on the relatively low quality of the riparian habitat along Redwood Creek and the wildlife community present at this location (discussed in Section 4.3 above), the Town's specified 50-foot-wide corridor measured from the stream centerline is an appropriate buffer distance between new construction and Redwood Creek to maintain suitable riparian functions and values.

Under the proposed project, certain areas within the stream corridor on the project site would be modified in some way. Currently, these areas consist of coast live oak woodland, California annual grassland, and Harding grass grassland habitat (Figure 3), and the project would convert approximately 46 square feet of these habitats to developed land uses.

Under CEQA, owing to the importance of maintaining setbacks (and maintaining habitat quality within those setbacks) between new development and riparian habitat, impacts of encroachment into the protected stream corridor would be significant for the project (due to the ecological impacts of closer development to sensitive

riparian communities) if (a) new development is located any closer to the creek than existing conditions, or (b) changes in existing development or landscaping would result in substantial adverse effects on the ecological functions and values of the creek/riparian corridor. On the project site, all areas that fall within the protected stream corridor currently consist of coast live oak woodland, California annual grassland, and Harding grass grassland habitat. The removal of grassland and woodland habitat within the stream corridor would encroach closer to Redwood Creek compared to baseline conditions. However, in our opinion, due to both the extremely small area of proposed encroachment within the setback (46 square feet) and the relatively low quality of this riparian habitat, the proposed conversion of woodland and grassland areas to developed areas within the setback (1) is extremely marginal, such that the reduction in the setback by a few feet would not make a significant difference biologically to wildlife communities using the stream corridor; and (2) would not substantially degrade the ecological functions and values of the stream corridor due to the extremely small footprint of this impact. Therefore, it is our opinion that the project's encroachment into the stream corridor would not be considered a significant biological impact under CEQA.

However, the Town requires all projects to comply with the Town's adopted Stream Corridor Protection Ordinance. Under CEQA, the project would have a potentially significant impact from the perspective of conflicts with local policies if it is not in compliance with the Town's Stream Corridor Protection Ordinance related to alternation of the stream corridor (i.e., the conversion of coast live oak woodland, California annual grassland, and Harding grass grassland habitat to developed areas) or the construction of structures within the corridor. Implementation of Mitigation Measure BIO-5 below would reduce this conflict to a less-than-significant level.

Mitigation Measure BIO-5. Obtain Town Approval of Design. The applicant shall avoid conflicts with the Town's Stream Corridor Protection Ordinance in some combination of the following two ways:

(1) The project shall be designed so that it complies with the Stream Corridor Protection Ordinance by avoiding the modification of mixed oak woodland and the construction of structures within the protected stream corridor.

(2) The applicant shall obtain the Town's approval of the project design. Given our opinion that encroachment of the project by approximately 46 square feet within the stream corridor would not be considered a significant biological impact under CEQA, the Town may be willing to approve project impacts within the stream corridor.

6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan: Conflict with the provisions of an adopted habitat conservation plan,

natural community conservation plan, or other approved local, regional, or state habitat conservation plan (No Impact)

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans.

6.7 Cumulative Impacts (Less than Significant)

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in Woodside will result in impacts on the same habitat types and species that will be affected by the proposed project. The proposed project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the project in combination with other projects in the larger region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project; and compensatory mitigation and proactive conservation measures associated with each project. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

However, many projects in the region that impact resources similar to those impacted by the project will be subject to CEQA requirements. It is expected that such projects will mitigate their impacts on sensitive habitats and special-status species through the incorporation of mitigation measures and compliance with permit conditions.

Regardless of the magnitude and significance of cumulative impacts that result from other projects, the High Road Residential Project is not expected to have a substantial effect on biological resources, and would implement the mitigation measure described above to reduce impacts under CEQA to less than significant levels. Thus, provided that this project successfully incorporates the mitigation measure described in this biological resources report, the project will not have a cumulatively considerable contribution to cumulative effects on biological resources.

Section 7. Compliance with Additional Laws and Regulations for Nesting Birds

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. It is also possible that protected native birds could nest on the buildings on the site. The removal of vegetation or demolition of buildings supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). However, the following measures should be implemented to ensure that project activities do not violate the MBTA and California Fish and Game Code:

Measure 1. Avoidance of the Nesting Season. To the extent feasible, the initiation of commencement of demolition and construction activities should be scheduled to avoid the nesting season. If demolition and construction activities are initiated outside the nesting season, all potential demolition/construction impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.

Measure 2. Pre-Activity/Pre-Disturbance Surveys. If it is not possible to schedule the initiation of demolition and construction activities between September 1 and January 31, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. We recommend that these surveys be conducted no more than seven days prior to the initiation of demolition or construction activities. During this survey, the ornithologist will inspect all trees and other potential nesting habitats (e.g., trees, shrubs, and buildings) in and immediately adjacent to the impact areas for nests.

Measure 3. Non-Disturbance Buffers. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist will determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.

Measure 4. Inhibition of Nesting. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1). This will preclude the initiation of nests in this vegetation, and minimize the potential delay of the project due to the presence of active nests in these substrates.

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Appendix A. Plants Observed

Family	Scientific Name	Common Name	Cal-IPC Rank[1]
Cupressaceae	*Sequoia sempervirens*	coast redwood	
Lauraceae	*Umbellularia californica*	California bay	
Anacardiaceae	*Toxicodendron diversilobum*	poison oak	
Apiaceae	*Foeniculum vulgare**	fennel	Moderate
Apiaceae	*Torilis arvensis**	field hedgeparsely	Moderate
Araliaceae	*Hederal helix**	English ivy	High
Asteraceae	*Carduus pycnocephalus* ssp. *pycnocephalus**	Italian thistle	Moderate
Asteraceae	*Centaurea solstitialis**	yellow star-thistle	High
Asteraceae	*Helminthotheca echioides**	bristly ox-tongue	Limited
Asteraceae	*Lactuca serriola**	prickly lettuce	
Ericaceae	*Arbutus unedo**	strawberry tree	
Fabaceae	*Genista monspessulana**	French broom	High
Fagaceae	*Quercus agrifolia*	coast live oak	
	Quercus ilex	holly-leaf oak	
Fagaceae	*Quercus lobata*	valley oak	
Juglandaceae	*Juglans hindsii*	northern California black walnut	
Malvaceae	*Malva parviflora**	cheeseweed	
Myrtaceae	*Eucalyptus* sp.*	gum tree	
Oleaceae	*Ligustrum sp.*	privet	
Oleaceae	*Olea europaea**	European olive	Limited
Oxalidaceae	*Oxalis pes-caprae**	Bermuda buttercup	Moderate
Rosaceae	*Heteromeles arbutifolia*	toyon	
Rosaceae	*Prunus ilicifolia*	holly-leaved cherry	
Rosaceae	*Rubus ursinus*	California blackberry	
Sapindaceae	*Aesculus californica*	California buckeye	
Orchidaceae	*Epipactis helleborine**	broad-leaved helleborine	
Poaceae	*Avena* sp.*	wild oat	
Poaceae	*Bromus diandrus*	ripgut brome	Moderate
Poaceae	*Phalaris aquatica**	Harding grass	Moderate
Poaceae	*Stipa* sp.	needlegrass	

[1]Cal-IPC Ranks (Cal-IPC 2022):

- Watch List – These species are predicted to become invasive if no further actions are taken. Distribution may range from limited to widespread in specific regions.
- Limited – These species are invasive, but their ecological impacts are minor on a statewide level. They have low to moderate rates of colonization. Although their distribution is generally limited, these species may be locally persistent and problematic.
- Moderate – These species have substantial and apparent—but generally not severe—ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal. Distribution may range from limited to widespread.
- High – These species have severe ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal and establishment, and most are widely distributed.

*Nonnative or invasive species

Appendix B. Special-Status Plants Considered but Rejected for Occurrence

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
San Mateo thorn-mint	*Acanthomintha duttonii*		X		
Franciscan onion	*Allium peninsulare* var. *franciscanum*		X		
California androsace	*Androsace elongata* ssp. *acuta*				X
Anderson's manzanita	*Arctostaphylos andersonii*	X			
Kings Mountain manzanita	*Arctostaphylos regismontana*	X	X	X	
coastal marsh milk-vetch	*Astragalus pycnostachyus* var. *pycnostachyus*	X		X	X
alkali milk-vetch	*Astragalus tener* var. *tener*				X
Brewer's calandrinia	*Calandrinia breweri*	X			
Oakland star-tulip	*Calochortus umbellatus*				X
pink star-tulip	*Calochortus uniflorus*	X			
johnny-nip	*Castilleja ambigua* var. *ambigua*	X			X
Congdon's tarplant	*Centromadia parryi* ssp. *congdonii*				X
Point Reyes salty bird's-beak	*Chloropyron maritimum* ssp. *palustre*	X		X	X
fountain thistle	*Cirsium fontinale* var. *fontinale*	X	X		
lost thistle	*Cirsium praeteriens*			X	X
Santa Clara red ribbons	*Clarkia concinna* ssp. *automixa*	X			
round-headed Chinese-houses	*Collinsia corymbosa*	X		X	X
San Francisco collinsia	*Collinsia multicolor*	X			
clustered lady's-slipper	*Cypripedium fasciculatum*	X			
mountain lady's-slipper	*Cypripedium montanum*	X			
western leatherwood	*Dirca occidentalis*	X			
California bottle-brush grass	*Elymus californicus*	X			
San Mateo woolly sunflower	*Eriophyllum latilobum*	X	X		
Hoover's button-celery	*Eryngium aristulatum* var. *hooveri*	X	X		

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
Jepson's coyote-thistle	*Eryngium jepsonii*	X	X		
San Joaquin spearscale	*Extriplex joaquinana*		X		X
minute pocket moss	*Fissidens pauperculus*	X			
Hillsborough chocolate lily	*Fritillaria biflora* var. *ineziana*				X
short-leaved evax	*Hesperevax sparsiflora* var. *brevifolia*	X			X
Marin western flax	*Hesperolinon congestum*		X		
Loma Prieta hoita	*Hoita strobilina*	X			X
coast iris	*Iris longipetala*	X			
Contra Costa goldfields	*Lasthenia conjugens*				X
legenere	*Legenere limosa*	X			X
serpentine leptosiphon	*Leptosiphon ambiguus*		X		
broad-lobed leptosiphon	*Leptosiphon latisectus*	X			X
Crystal Springs lessingia	*Lessingia arachnoidea*		X		
spring lessingia	*Lessingia tenuis*	X			
arcuate bush-mallow	*Malacothamnus arcuatus*	X			
white-rayed pentachaeta	*Pentachaeta bellidiflora*				X
white-flowered rein orchid	*Piperia candida*	X			
Michael's rein orchid	*Piperia michaelii*	X			
Choris' popcornflower	*Plagiobothrys chorisianus* var. *chorisianus*	X			
Hickman's popcornflower	*Plagiobothrys chorisianus* var. *hickmanii*	X			
hairless popcornflower	*Plagiobothrys glaber*	X			X
Lobb's aquatic buttercup	*Ranunculus lobbii*	X			
Sanford's arrowhead	*Sagittaria sanfordii*	X			
Hoffmann's sanicle	*Sanicula hoffmannii*	X			
chaparral ragwort	*Senecio aphanactis*	X			
San Francisco campion	*Silene verecunda* ssp. *verecunda*		X		
long-styled sand-spurrey	*Spergularia macrotheca* var. *longistyla*	X			X
northern slender pondweed	*Stuckenia filiformis* ssp. *alpina*	X			X

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
California seablite	*Suaeda californica*	X		X	X
two-fork clover	*Trifolium amoenum*				X
Santa Cruz clover	*Trifolium buckwestiorum*	X			
saline clover	*Trifolium hydrophilum*				X
San Francisco owl's-clover	*Triphysaria floribunda*	X			
Methuselah's beard lichen	*Usnea longissima*				X

H. T. HARVEY & ASSOCIATES

Ecological Consultants

Cañada College Residential Project
Biological Resources Report

Project #4687-01

Prepared for:

Kevin Bryant
Town of Woodside
P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

Prepared by:

H. T. Harvey & Associates

January 6, 2023

983 University Avenue, Building D • Los Gatos, CA 95032 • Ph: 408.458.3200

List of Abbreviated Terms

BMPs	best management practices
Cal-IPC	California Invasive Plant Council
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DBH	diameter at breast height
FESA	Federal Endangered Species Act
HMMP	habitat mitigation and monitoring plan
LSAA	Lake and Streambed Alteration Agreement
MBTA	Migratory Bird Treaty Act
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
OHW	ordinary high water
Porter-Cologne	Porter-Cologne Water Quality Control Act
RWQCB	Regional Water Quality Control Board
SWRCB	State Water Resources Control Board
Town	Town of Woodside
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VegCAMP	Vegetation Classification and Mapping Program

Table of Contents

Section 1. Introduction 1
1.1 Project Location 1
1.2 Project Description 1

Section 2. Methods 4
2.1 Background Review 4
2.2 Site Visit 4

Section 3. Regulatory Setting 5
3.1 Federal Regulations 5
3.1.1 Clean Water Act 5
3.1.2 Rivers and Harbors Act 6
3.1.3 Federal Endangered Species Act 6
3.1.4 Federal Migratory Bird Treaty Act 7
3.2 State Regulations 7
3.2.1 Porter-Cologne Water Quality Control Act 7
3.2.2 California Endangered Species Act 8
3.2.3 Native Plant Protection Act 9
3.2.4 California Environmental Quality Act 9
3.2.5 California Fish and Game Code 11
3.2.6 State Water Resources Control Board Stormwater Regulation 12
3.3 Local Regulations 13
3.3.1 Woodside Tree Protection Ordinance 13
3.3.2 Woodside Stream Corridor Protection Ordinance 13

Section 4. Environmental Setting 15
4.1 General Project Area Description 15
4.2 Biotic Habitats 15
4.2.1 Developed 17
4.2.2 Coast Live Oak Woodland 18
4.2.3 California Annual Grassland 19
4.2.4 Ornamental Woodland 21
4.2.5 Serpentine Needlegrass Grassland 22
4.2.6 Harding Grass Grassland 22
4.2.7 Ephemeral Drainage 23
4.2.8 Depressional Seep Wetland 24
4.3 Wildlife Movement 24

Section 5. Special-Status Species and Sensitive Habitats 26
5.1 Special-Status Plant Species 29
5.2 Special-Status Animal Species 36
5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats 45
5.3.1 Sensitive Natural Communities 45
5.3.2 Sensitive Vegetation Alliances 46
5.3.3 CDFW Streams/Riparian Habitat 46
5.3.4 Sensitive Habitats (Waters of the U.S./State) 46
5.3.5 Nonnative and Invasive Species 46

Section 6. Impacts and Mitigation Measures 48
6.1 Impacts on Special-Status Species 49

6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant) 49
6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation) 49
6.1.3 Impacts on Water Quality (Less than Significant) 54
6.1.4 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant) 54
6.1.5 Impacts on the White-Tailed Kite (Less than Significant) 55
6.1.6 Impacts on Common Species of Roosting Bats (Less than Significant) 56
6.1.7 Impacts due to Bird Collisions (Less than Significant) 56
6.1.8 Impacts due to Increased Lighting (Less than Significant) 58
6.2 Impacts on Sensitive Communities 59
6.2.1 Impacts on Serpentine Needlegrass Grassland Habitat (Less than Significant with Mitigation) 59
6.3 Impacts on Wetlands 61
6.4 Impacts on Wildlife Movement 64
6.4.1 Impacts on Wildlife Movement (Less than Significant) 64
6.4.2 Impacts on Nesting Birds (Less than Significant) 64
6.5 Impacts due to Conflicts with Local Policies: 65
6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant) 65
6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant with Mitigation) 65
6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan 67
6.7 Cumulative Impacts 67
6.8 (Less than Significant) 67
Section 7. Compliance with Additional Laws and Regulations for Nesting Birds 69
Section 8. References 70

Figures

Figure 1. Vicinity Map 2
Figure 2. Project Site 3
Figure 3. Biotic Habitats 16
Figure 4. CNDDB-Mapped Records of Special-Status Plants 27
Figure 5. CNDDB-Mapped Records of Special-Status Animals 28

Tables

Table 1. Soils on the Project Site and their Textures, Drainage Classifications, and Parent Materials 15
Table 2. Summary of Biotic Habitat Acreages[1] by Location on the Project Site 17
Table 3. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site 30
Table 4. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site 37
Table 5. Summary of Special-Status Plants and Survey Periods by Location 51

Appendices

Appendix A. Plants Observed A-1
Appendix B. Special-Status Plants Considered but Rejected for Occurrence B-1

List of Preparers

Steve Rottenborn, Ph.D., Principal/Senior Wildlife Ecologist
Robin Carle, M.S., Project Manager/Senior Wildlife Ecologist
Katie Gallagher, M.S., Senior Plant and Wetlands Ecologist
Vanessa Morales, B.S., Plant and Wetlands Ecologist
Jane Lien, B.S., Wildlife Ecologist

Section 1. Introduction

This report describes the biological resources present in the area of the proposed Cañada College higher-density residential project, the potential impacts of the proposed project on biological resources, and measures necessary to reduce project impacts to less-than-significant levels under the California Environmental Quality Act (CEQA). This assessment is based on the project maps and description provided to H. T. Harvey & Associated by the Town of Woodside (Town) through October 2022.

1.1 Project Location

The project site is located at Cañada College in Woodside, California (Figure 1), and includes four separate locations where residential housing may be constructed, referred to as Sites 1–4 throughout this document as indicated on Figure 2. Cañada College is generally bounded by low-density residential housing to the northwest, low-density residential housing and undeveloped lands to the north, Farm Hill Boulevard to the east, and Interstate 280 to the south. Surrounding areas consist predominantly of low-density residential housing. The project site is located on the *Woodside*, *California* 7.5-minute United States Geological Survey (USGS) quadrangle.

1.2 Project Description

The project proposes to construct residential housing on the project site at a density of approximately 10 units per acre.

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Figure 1. Vicinity Map
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Figure 2. Project Site
Cañada College Residential Project Biological Resources Report (4687-01)
January 2023

Section 2. Methods

2.1 Background Review

Prior to conducting field work, H. T. Harvey & Associates ecologists reviewed the project description and maps provided by the Town through October 2022; aerial images (Google Inc. 2022); a USGS topographic map; a National Wetlands Inventory map (2022); National Resources Conservation Service (NRCS) soil survey maps (2022); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (2022); and other relevant reports, scientific literature, and technical databases. For the purposes of this report, the *project vicinity* is defined as the area within a 5-mile radius surrounding the project site.

In addition, for plants, we reviewed all species on current California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3, and 4 lists (CNPS 2022) occurring in the project region, which is defined as the *Woodside, California* USGS 7.5-minute quadrangle and surrounding eight quadrangles (*Montara Mountain*, *San Mateo*, *Redwood Point*, *Palo Alto*, *Mindego Hill*, *La Honda*, *San Gregorio*, and *Half Moon Bay*). In addition, we queried the CNDDB (2022) for natural communities of special concern that occur on the project site, and we perused records of birds reported in nearby areas, such along the Crystal Springs Trail, at Stulsaft Park, and at Edgewood Park, on eBird (Cornell Lab of Ornithology 2022) as well as on the Peninsula-Birding List Serve (2022).

2.2 Site Visit

H. T. Harvey & Associates senior plant and wetland ecologist Katie Gallagher, M.S., plant and wetland ecologist Vanessa Morales, B.S. conducted a reconnaissance-level survey of the project site on November 8, 2022, and wildlife ecologist Jane Lien, B.S., conducted a reconnaissance-level survey of the project site on November 2, 2022. The purpose of the surveys was to provide an impact assessment specific to the proposed construction of the project, as described above. Specifically, surveys were conducted to (1) assess existing biotic habitats and plant and animal communities on the project site, (2) assess the project site for its potential to support special-status species and their habitats, and (3) identify potential jurisdictional and sensitive habitats, such as waters of the U.S./state and riparian habitat. K. Gallagher and V. Morales conducted a presence/absence survey for arcuate bush-mallow (*Malacothamnus arcuatus*) and California bottle-brush grass (*Elymus californicus*) on the project site. J. Lien conducted a focused survey for roosting bats and signs of bat presence (e.g., guano and urine staining) in trees and buildings on the site, as well as a focused survey for nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*).

Section 3. Regulatory Setting

Biological resources on the project site are regulated by a number of federal, state, and local laws and ordinances, as described below.

3.1 Federal Regulations

3.1.1 Clean Water Act

The Clean Water Act (CWA) functions to maintain and restore the physical, chemical, and biological integrity of waters of the U.S., which include, but are not limited to, tributaries to traditionally navigable waters currently or historically used for interstate or foreign commerce, and adjacent wetlands. Historically, in non-tidal waters, U.S. Army Corps of Engineers (USACE) jurisdiction extends to the ordinary high water (OHW) mark, which is defined in Title 33, Code of Federal Regulations, Part 328.3. If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark to the outer edges of the wetlands. Wetlands that are not adjacent to waters of the U.S. are termed "isolated wetlands" and, depending on the circumstances, may be subject to USACE jurisdiction. In tidal waters, USACE jurisdiction extends to the landward extent of vegetation associated with salt or brackish water or the high tide line. The high tide line is defined in 33 Code of Federal Regulations Part 328.3 as "the line of intersection of the land with the water's surface at the maximum height reached by a rising tide." If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark or high tide line to the outer edges of the wetlands.

Construction activities within jurisdictional waters are regulated by the USACE. The placement of fill into such waters must comply with permit requirements of the USACE. No USACE permit will be effective in the absence of Section 401 Water Quality Certification. The State Water Resources Control Board (SWRCB) is the state agency (together with the Regional Water Quality Control Boards [RWQCBs]) charged with implementing water quality certification in California.

Project Applicability: The depressional seep wetland located on Site 3 may be considered jurisdictional waters of the U.S. under the CWA based on the presence of obligate hydrophytic vegetation and direct observations of hydrology (i.e., flowing surface water and seasonal inundation) (USACE 2008). While a jurisdictional delineation was not performed to determine if hydric soils (as a third parameter) are present, they are likely to occur based on the presence of strong obligate hydrophytic vegetation and clear hydrology. Therefore, we a Section 404 permit from the USACE may be necessary to authorize project impacts on this depressional seep wetland.

The unnamed, ephemeral drainage located on Site 2 may also be considered jurisdictional waters of the U.S. under the CWA based on the presence of OHW marks on opposing banks, regular flow, ephemeral hydrology

in most years, and indirect hydrologic connectivity to traditionally navigable waters (Crystal Springs Reservoir and eventually the San Francisco Bay). Therefore, a Section 404 permit from the USACE may also be necessary to authorize project impacts within this ephemeral drainage, up to the OHW marks.

No wetland or aquatic habitats are present on Sites 1 and 4. As a result, a permit from the USACE would not be required for proposed project activities at these locations.

3.1.2 Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 prohibits the creation of any obstruction to the navigable capacity of waters of the U.S., including discharge of fill and the building of any wharfs, piers, jetties, and other structures without Congressional approval or authorization by the Chief of Engineers and Secretary of the Army (33 U.S.C. 403).

Navigable waters of the U.S., which are defined in 33 CFR, Part 329.4, include all waters subject to the ebb and flow of the tide, and/or those which are presently or have historically been used to transport commerce. The shoreward jurisdictional limit of tidal waters is further defined in 33 CFR, Part 329.12 as "the line on the shore reached by the plane of the mean (average) high water." It is important to understand that the USACE does not regulate wetlands under Section 10, only the aquatic or open waters component of bay habitat, and that there is overlap between Section 10 jurisdiction and Section 404 jurisdiction. According to 33 CFR, Part 329.9, a waterbody that was once navigable in its natural or improved state retains its character as "navigable in law" even though it is not presently used for commerce as a result of changed conditions and/or the presence of obstructions. Historical Section 10 waters may occur behind levees in areas that are not currently exposed to tidal or muted-tidal influence, and meet the following criteria: (1) the area is presently at or below the mean high water line; (2) the area was historically at or below mean high water in its "unobstructed, natural state"; and (3) there is no evidence that the area was ever above mean high water.

As mentioned above, Section 404 of the CWA authorizes the USACE to issue permits to regulate the discharge of dredged or fill material into waters of the U.S. If a project also proposes to discharge dredged or fill material and/or introduce other potential obstructions in navigable waters of the U.S., a Letter of Permission authorizing these impacts must be obtained from the USACE under Section 10 of the Rivers and Harbors Act.

Project Applicability: No current or historical Section 10 Waters are present on or close to the project site, including in the ephemeral drainage located on Site 2. Therefore, a Letter of Permission from the USACE is not required.

3.1.3 Federal Endangered Species Act

The Federal Endangered Species Act (FESA) protects federally listed wildlife species from harm or *take*, which is broadly defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." *Take* can also include habitat modification or degradation that directly results in

death or injury of a listed wildlife species. An activity can be defined as *take* even if it is unintentional or accidental. Listed plant species are provided less protection than listed wildlife species. Listed plant species are legally protected from take under the FESA only if they occur on federal lands.

The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service have jurisdiction over federally listed, threatened, and endangered species under FESA. The USFWS also maintains lists of proposed and candidate species. Species on these lists are not legally protected under FESA, but may become listed in the near future and are often included in their review of a project.

Project Applicability: Suitable habitat is present on the project site for the federally endangered San Mateo thorn-mint (*Acanthomintha duttonii*) and federally threatened Marin western flax (*Hesperolinon congestum*), and these species could be affected by the project if they are present. However, because the project does not occur on federal lands, these federally listed plant species would not be subject to take prohibitions under FESA should they occur on the project site.

The monarch butterfly (*Danaus plexippus*), a candidate for listing under FESA, may occur on the project site as an occasional forager, and there is some potential for the project to result in impacts on this species if it is present. No additional federally listed or candidate animal species occur or potentially occur on the project site.

3.1.4 Federal Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. Section 703, prohibits killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. The MBTA protects whole birds, parts of birds, and bird eggs and nests, and it prohibits the possession of all nests of protected bird species whether they are active or inactive. An *active* nest is defined as having eggs or young, as described by the USFWS in its June 14, 2018 memorandum "Destruction and Relocation of Migratory Bird Nest Contents". Nest starts (nests that are under construction and do not yet contain eggs) and inactive nests are not protected from destruction.

Project Applicability: All native bird species that occur on the project site are protected under the MBTA.

3.2 State Regulations

3.2.1 Porter-Cologne Water Quality Control Act

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. Each RWQCB makes decisions related to water quality for its region, and may approve, with or without conditions, or deny projects that could affect waters of the state. Their authority comes from the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne). Porter-Cologne broadly defines waters of the state as "any surface water or groundwater, including saline waters, within the boundaries of the state." Because Porter-Cologne applies to any water, whereas the CWA applies only to certain waters, California's jurisdictional

reach overlaps and may exceed the boundaries of waters of the U.S. For example, Water Quality Order No. 2004-0004-DWQ states that "shallow" waters of the state include headwaters, wetlands, and riparian areas. Moreover, the San Francisco Bay Region RWQCB's Assistant Executive Director has stated that, in practice, the RWQCBs claim jurisdiction over riparian areas. Where riparian habitat is not present, such as may be the case at headwaters, jurisdiction is taken to the top of bank.

On April 2, 2019, the SWRCB adopted the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. In these new guidelines, riparian habitats are not specifically described as waters of the state but instead as important buffer habitats to streams that do conform to the State Wetland Definition. The *Procedures* describe riparian habitat buffers as important resources that may both be included in required mitigation packages for permits for impacts to waters of the state, as well as areas requiring permit authorization from the RWQCBs to impact.

Pursuant to the CWA, projects that are regulated by the USACE must also obtain a Section 401 Water Quality Certification permit from the RWQCB. This certification ensures that a proposed project will uphold state water quality standards. Because California's jurisdiction to regulate its water resources is much broader than that of the federal government, proposed impacts on waters of the state require Water Quality Certification even if the area occurs outside of USACE jurisdiction. Moreover, the RWQCB may impose mitigation requirements even if the USACE does not. Under the Porter-Cologne, the SWRCB and the nine regional boards also have the responsibility of granting CWA National Pollutant Discharge Elimination System (NPDES) permits and Waste Discharge Requirements for certain point-source and non-point discharges to waters. These regulations limit impacts on aquatic and riparian habitats from a variety of urban sources.

Project Applicability: On the project, site, waters of the state include all potential waters of the U.S. discussed in Section 3.1.1 above (i.e., the ephemeral drainage on Site 2 and the depressional seep wetland on Site 3). The RWQCB is likely to assert jurisdiction up to the top of bank lines on each side of the ephemeral drainage. Therefore, a Section 401 water quality certification from the RWQCB would likely be necessary to authorize project impacts within the ephemeral drainage (up to top of bank) and depressional seep wetland on Sites 2 and 3.

No waters of the state or riparian habitats regulated by the RWQCB are present on Sites 1 and 4. Therefore, a Section 401 permit or Waste Discharge Requirement from the RWQCB would not be required for project activities in these locations.

3.2.2 California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code, Chapter 1.5, Sections 2050-2116) prohibits the take of any plant or animal listed or proposed for listing as rare (plants only), threatened, or endangered. In accordance with CESA, the CDFW has jurisdiction over state-listed species (Fish and Game Code 2070). The CDFW regulates activities that may result in *take* of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not

expressly included in the definition of *take* under the California Fish and Game Code. The CDFW, however, has interpreted *take* to include the "killing of a member of a species which is the proximate result of habitat modification."

Project Applicability: Suitable habitat is present on the project site for the state-endangered San Mateo thorn-mint and the state threatened Marin western flax. These species could be affected by the project if they are present. The mountain lion (*Puma concolor*), a candidate for listing under CESA, may occur on the site occasionally as a nonbreeder, but no impacts to individuals of this species will result from the project.

3.2.3 Native Plant Protection Act

The Native Plant Protection Act (NPPA), enacted in 1977, allows plants to be designated as rare or endangered by the California Fish and Game Commission (Fish and Game Code Sections 1900–1913). The NPPA includes prohibitions on the take of such plants, with exceptions for certain activities. A total of 64 species, subspecies, and varieties of plants are considered "rare" by the NPPA.

Project Applicability: Suitable habitat is present on the project site for the state-rare Dudley's lousewort (*Pedicularis dudleyi*). This species could be affected by the project if it is present.

3.2.4 California Environmental Quality Act

CEQA is a state law that requires state and local agencies to document and consider the environmental implications of their actions and to refrain from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects. CEQA requires the full disclosure of the environmental effects of agency actions, such as approval of a general plan update or the projects covered by that plan, on resources such as air quality, water quality, cultural resources, and biological resources. The State Resources Agency promulgated guidelines for implementing CEQA known as the State CEQA Guidelines.

Section 15380(b) of the State CEQA Guidelines provides that a species not listed on the federal or state lists of protected species may be considered rare if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definitions in the FESA and the CESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals. This section was included in the guidelines primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW or species that are locally or regionally rare.

The CDFW has produced three lists (amphibians and reptiles, birds, and mammals) of "species of special concern" that serve as "watch lists". Species on these lists are of limited distribution or the extent of their habitats has been reduced substantially, such that threat to their populations may be imminent. Thus, their populations should be monitored. They may receive special attention during environmental review as potential

rare species, but do not have specific statutory protection. All potentially rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the CEQA Section 15380(b). The CNPS, a non-governmental conservation organization, has developed CRPRs for plant species of concern in California in the CNPS Inventory of Rare and Endangered Plants (CNPS 2022). The CRPRs include lichens, vascular, and non-vascular plants, and are defined as follows:

- CRPR 1A Plants considered extinct.
- CRPR 1B Plants rare, threatened, or endangered in California and elsewhere.
- CRPR 2A Plants considered extinct in California but more common elsewhere.
- CRPR 2B Plants rare, threatened, or endangered in California but more common elsewhere.
- CRPR 3 Plants about which more information is needed - review list.
- CRPR 4 Plants of limited distribution-watch list.

The CRPRs are further described by the following threat code extensions:

- .1—seriously endangered in California;
- .2—fairly endangered in California;
- .3—not very endangered in California.

Although the CNPS is not a regulatory agency and plants on these lists have no formal regulatory protection, plants appearing as CRPR 1B or 2 are, in general, considered to meet CEQA's Section 15380 criteria, and adverse effects to these species may be considered significant. Impacts on plants that are listed by the CNPS on CRPR 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those of CRPR 1B or 2, impacts on them are less frequently considered significant.

Compliance with CEQA Guidelines Section 15065(a) requires consideration of natural communities of special concern, in addition to plant and wildlife species. Vegetation types of "special concern" are tracked in Rarefind (CNDDB 2022). Further, the CDFW ranks sensitive vegetation alliances based on their global (G) and state (S) rankings analogous to those provided in the CNDDB. Global rankings (G1–G5) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas S rankings are a reflection of the condition of a habitat within California. If an alliance is marked as a G1–G3, all of the associations within it would also be of high priority. The CDFW provides the Vegetation Classification and Mapping Program's (VegCAMP's) currently accepted list of vegetation alliances and associations (CDFW 2022).

Project Applicability: All potential impacts on biological resources will be considered during CEQA review of the project in the context of this biological resources report. Project impacts are discussed in Section 6 below.

3.2.5 California Fish and Game Code

Ephemeral and intermittent streams, rivers, creeks, dry washes, sloughs, blue line streams on USGS maps, and watercourses with subsurface flows fall under CDFW jurisdiction. Canals, aqueducts, irrigation ditches, and other means of water conveyance may also be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. A *stream* is defined in Title 14, California Code of Regulations Section 1.72, as "a body of water that follows at least periodically or intermittently through a bed or channel having banks and that supports fish and other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." Using this definition, CDFW extends its jurisdiction to encompass riparian habitats that function as a part of a watercourse. California Fish and Game Code Section 2786 defines *riparian habitat* as "lands which contain habitat which grows close to and which depends upon soil moisture from a nearby freshwater source." The lateral extent of a stream and associated riparian habitat that would fall under the jurisdiction of CDFW can be measured in several ways, depending on the particular situation and the type of fish or wildlife at risk. At minimum, CDFW would claim jurisdiction over a stream's bed and bank. Where riparian habitat is present, the outer edge of riparian vegetation is generally used as the line of demarcation between riparian and upland habitats.

Pursuant to California Fish and Game Code Section 1603, CDFW regulates any project proposed by any person that will "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds." California Fish and Game Code Section 1602 requires an entity to notify CDFW of any proposed activity that may modify a river, stream, or lake. If CDFW determines that proposed activities may substantially adversely affect fish and wildlife resources, a Lake and Streambed Alteration Agreement (LSAA) must be prepared. The LSAA sets reasonable conditions necessary to protect fish and wildlife, and must comply with CEQA. The applicant may then proceed with the activity in accordance with the final LSAA.

Certain sections of the California Fish and Game Code describe regulations pertaining to protection of certain wildlife species. For example, Code Section 2000 prohibits take of any bird, mammal, fish, reptile, or amphibian except as provided by other sections of the code.

The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered *take* by the CDFW. Raptors (e.g., eagles, hawks, and owls) and their nests are specifically protected in California under Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the

code or in accordance with regulations adopted by the commission. Activities resulting in mortality of non-game mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered *take* by the CDFW.

Project Applicability: The depressional seep wetland on Site 3 is not a stream channel and lacks natural hydrological connectivity to natural riverine systems, both upstream and downstream (i.e., no streams flow into or out of the wetland). Therefore, the CDFW is not expected to claim jurisdiction over this wetland, and an LSAA from the CDFW would not be required for project activities on Site 3.

CDFW jurisdiction under Section 1602 of the California Fish and Game Code may extend up to the tops of bank of the ephemeral drainage on Site 2. Project impacts within these areas would likely require a LSAA from the CDFW.

No riparian habitat regulated by the CDFW occurs Sites 1 and 4. Therefore, a CDFW LSAA would not be required for project activities in these locations.

Most native bird, mammal, and other wildlife species that occur on the project site and in the immediate vicinity are protected under the California Fish and Game Code. Project impacts on these species are discussed in Section 6.

3.2.6 State Water Resources Control Board Stormwater Regulation

Construction Phase. Construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of stormwater pollutants under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of best management practices (BMPs) to protect water quality until the site is stabilized.

Standard permit conditions under the Construction General Permit requires that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors. Additionally, the Construction General Permit does not extend coverage to projects if stormwater discharge-related activities are likely to jeopardize the continued existence, or result in take of any federally listed endangered or threatened species.

Post-Construction Phase. In many Bay Area counties, including San Mateo County, projects must also comply with the California RWQCB, San Francisco Bay Region, Municipal Regional Stormwater NPDES

Permit (Water Board Order No. R2-2015-0049, as amended). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design that prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Project Applicability. The project will comply with the requirements of the NPDES Statewide Storm Water Permit and Statewide General Construction Permit. Therefore, construction-phase activities would not result in detrimental water quality effects on biological or regulated resources.

3.3 Local Regulations

3.3.1 Woodside Tree Protection Ordinance

According to the Town Municipal Code §153.434, no person is allowed to destroy any tree without a obtaining a permit. In addition, §153.437 states that significant trees are to be protected during site development and construction. Significant trees are defined (§153.005) by their circumference or diameter based on growth rates. Slow-growing trees are defined as alder (*Alnus rhombifolia*), big leaf maple (*Acer macrophyllum*), blue oak (*Quercus douglasii*), buckeye (*Aesculus californica*), Fremont cottonwood (*Populus fremontii*), madrone (*Arbutus menziesii*), and tan bark oak (*Lithocarpus densiflorus*). Slow-growing species are significant if the trunk is larger than 7.6 inches diameter at breast height (DBH), measured at 4 feet above grade. Fast-growing species are defined as black oak (*Quercus kelloggii*), California bay laurel (*Umbellularia californica*), coast live oak (*Quercus agrifolia*), coast redwood (*Sequoia sempervirens*), Douglas fir (*Pseudotsuga menziesii*), valley oak (*Quercus lobata*), and western sycamore (*Platanus racemosa*). Fast-growing species larger than 9.5 inches DBH are significant trees. All other species larger than 11.5 inches DBH are considered significant trees. Protection of significant trees includes both precautions during site development and construction and measures to limit adverse environmental effects. Protection during development and construction include at a minimum the installation of a fence around the drip line, restricted construction activity within the dripline as defined by the permit and supervised by a certified arborist, and the posting of appropriate signage on the fence. Measures to limit adverse environmental effects include erosion control and soil and water retention. The town Planning Director may also require additional protective measures based on site conditions.

Project Applicability: The project will comply with the Town's tree replacement guidelines and policies for any trees that need to be removed.

3.3.2 Woodside Stream Corridor Protection Ordinance

No alteration or work in a stream corridor may occur without Planning Commission approval. A stream corridor is defined in the Municipal Code (§153.005) as the greater of two measurements: (1) a horizontal distance of 50 feet measured from each side of the centerline of the stream, or (2) a horizontal distance of 25 feet measured from the top of the stream bank. Municipal Code §153.440 limits activities within stream

corridors to trails and certain conditional uses (e.g., pastures, bridges, and agriculture), and limits uses within the stream corridor as follows:

A. No removal of riparian vegetation is permitted within the stream corridor, except that required for the permitted and conditional uses.

B. No filling of the natural stream corridors or dumping of slash, debris, residue from parking or recreation areas, fertilizers, pesticides, herbicides, or liquid or solid waste is permitted.

C. All agricultural wastes, including manure, must be kept out of the stream corridor and disposed of in a manner which will prevent drainage from such wastes into the stream corridor.

D. No channelization or damming of streams or creeks is permitted, unless required or allowed by the Planning Commission.

E. Any alteration of, or work in, the stream corridor is subject to the approval of the Planning Commission except the work set forth in item A above or the removal of material which obstructs the normal flow of water within the stream channel.

F. No structure, including a fence, is permitted within the stream corridor. Cross fencing of the stream corridor shall be permitted subject to the issuance of a permit from the Town Engineer.

Project Applicability: An unnamed ephemeral drainage is present on Site 2. Therefore, a *stream corridor* as defined under the Municipal Code (i.e., consisting of a buffer of 25 feet from top of bank or a 50-foot buffer from the centerline of the stream, whichever is greater) overlaps the project site. The project would need to comply with the Town's stream corridor protection ordinance, which includes guidance for allowable uses within the stream corridor.

Section 4. Environmental Setting

4.1 General Project Area Description

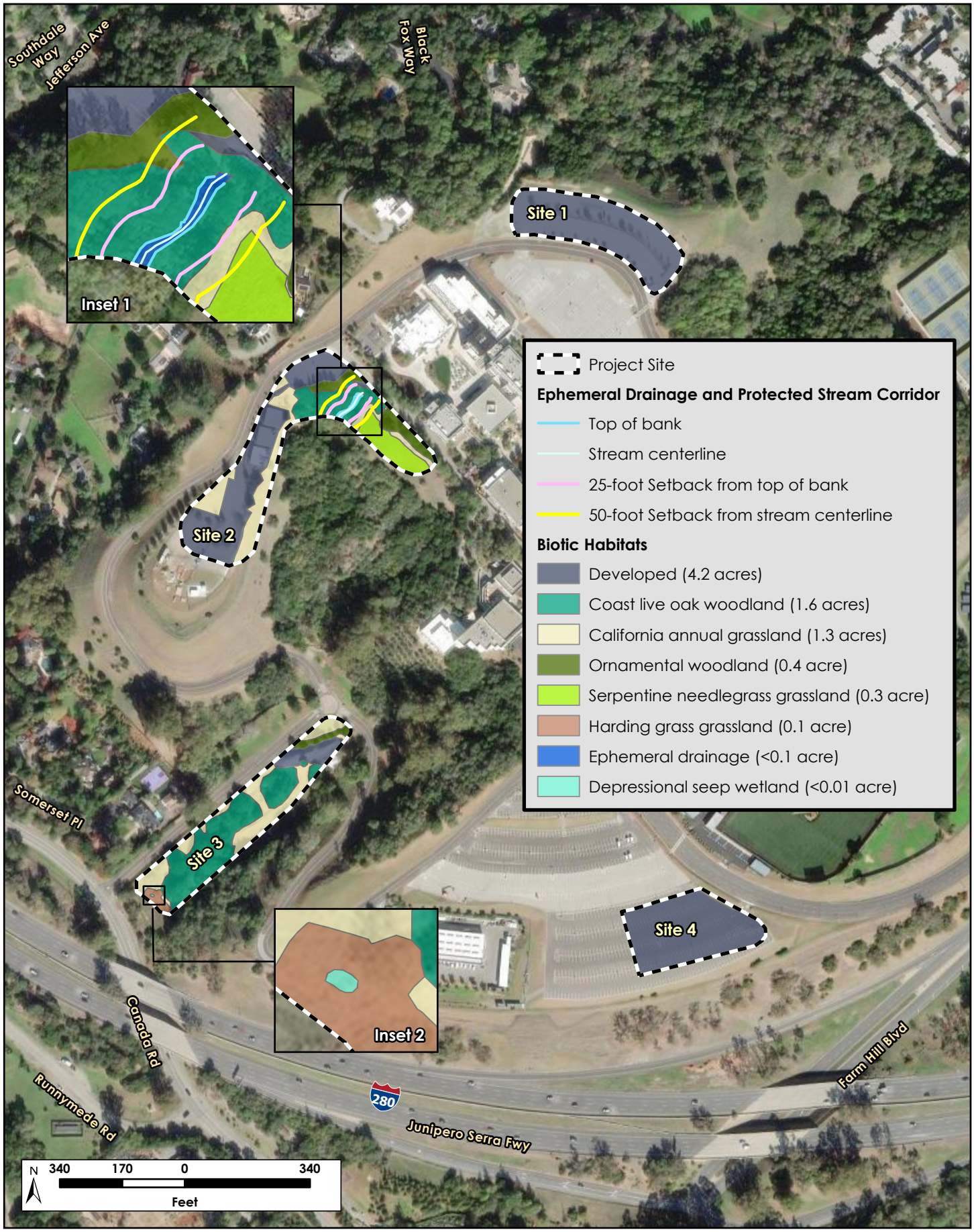
The project site is located in Woodside in San Mateo County, California (Figure 1). The climate in the project vicinity is coastal Mediterranean, with most rain falling in the winter and spring. Mild cool temperatures are common in the winter, and hot to mild temperatures are common in the summer. Climate conditions in the vicinity include a 30-year average of 22.6 inches of annual precipitation with a monthly average temperature range from 48.3ºF to 70.3ºF (PRISM Climate Group 2022). Elevations on the project site range from 606–730 feet above mean sea level (Google Inc. 2022). The NRCS has mapped five soil units on the project site (NRCS 2022) (Table 1). In addition, the USGS has mapped serpentine geology on the site (Brabb et al. 1998).

Table 1. Soils on the Project Site and their Textures, Drainage Classifications, and Parent Materials

Site(s)	Soil Unit Name	Soil Texture	Drainage Classification	Parent Material
1, 2, 3	Fagan loam, 15–50% slopes	Loam, clay loam, clay	Well drained	Residuum weathered from sandstone and shale
4	Orthents, cut and fill, 0–15% slopes	Loam	Well drained	Alluvium, sandstone
4	Orthents, cut and fill, 15–75% slopes	Variable	Well drained	Residuum from mountain slopes
2	Orthents, cut and fill-Urban land complex, 0–5% slopes	Variable	Well drained	Alluvium from flood plains, alluvial fans
1	Urban Land	N/A	N/A	N/A

4.2 Biotic Habitats

The reconnaissance-level survey identified eight biotic habitats on the project site: developed, coast live oak woodland, California annual grassland, ornamental woodland, serpentine needlegrass grassland, Harding grass grassland, ephemeral drainage, and depressional seep wetland (Figure 3). These biotic habitats are described in detail below, and Table 2 provides a summary of habitat acreages by location on the project site. Plant species observed during the reconnaissance-level survey are listed in Appendix A.



H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 3. Biotic Habitats
Cañada College Residential Project Biological Resources Report (4687-01)
January 2023

Table 2. Summary of Biotic Habitat Acreages[1] by Location on the Project Site

Biotic Habitat	Site 1	Site 2	Site 3	Site 4	Total
Developed	1.4 acres	1.3 acres	0.2 acre	1.3 acres	4.2 acres
Coast live oak woodland	N/A	0.5 acre	1.1 acres	N/A	1.6 acres
California annual grassland	N/A	0.6 acre	0.6 acre	<0.1 acre (863 ft²)	1.3 acres
Ornamental woodland	N/A	0.3 acre	0.1 acre	N/A	0.4 acre
Serpentine needlegrass grassland	N/A	0.3 acre	N/A	N/A	0.3 acre
Harding grass grassland	N/A	N/A	0.1 acre	N/A	0.1 acre
Ephemeral drainage	N/A	<0.1 acre (921 ft²)	N/A	N/A	<0.1 acre (921 ft²)
Depressional seep wetland	N/A	N/A	<0.1 acre (64 ft²)	N/A	<0.1 acre (64 ft²)
Total	1.4 acres	3.0 acres	2.0 acres	1.4 acres	7.8 acres

[1]Some rounding error exists with the acreages for California annual grassland on Sites 2 and 3. All acreage totals are correct, allowing for rounding error. Acreages less than 0.1 acre are also provided in square feet (ft²).

4.2.1 Developed

Photo 1. Developed areas of the project site.

Vegetation. Approximately 4.2 acres of the project site are developed as paved parking lots on Sites 1, 2, and 4 (Photo 1); irrigated landscaped vegetation on Sites 1 and 2; various facility buildings on Site 2; and a soil stockpile of an unknown source that is covered with white tarping on Site 3. The landscaped areas on Sites 1 and 2 include nonnative Callery pear (*Pyrus calleryana*) and other ornamental trees, with understories maintained as bare soil with occasional nonnative herbs such as prickly lettuce (*Lactuca serriola*), spotted spurge (*Euphorbia maculata*), four-leaved allseed (*Polycarpon tetraphyllum*), and red-stemmed filaree (*Erodium cicutarium*). Scattered native California poppies (*Eschscholzia californica*) are present along the soil stockpile on Site 3.

Wildlife. Developed areas of the project site serve as wildlife habitat only in a very limited capacity. The paved parking areas are likely to be used by wildlife during movements across the College grounds, and reptiles such as the western fence lizard (*Schoenoplectus occidentalis*) and gopher snake (*Pituophis catenifer*) may bask on the paved surface in order to raise their body temperature. The landscaped vegetation on Sites 1 and 2 supports wildlife species that are accustomed to urban environments and high levels of disturbance from human activities. These include the native mourning dove (*Zenaida macroura*), dark-eyed junco (*Junco hyemalis*), Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), lesser goldfinch (*Spinus psaltria*), and bushtit (*Psaltriparus*

minimus), which will utilize trees and other vegetation within landscaped areas for nesting. Mammals such as the native striped skunk (*Mephitis mephitis*) and nonnative Virginia opossum (*Didelphis virginiana*), house mouse (*Mus musclus*), and Norway rat (*Rattus norvegicus*) can also occur in developed and landscaped areas on the project site. No suitable habitat for roosting bats is present in the buildings on Site 2 or in landscape trees on Sites 1 and 2.

4.2.2 Coast Live Oak Woodland

Vegetation. Coast live oak woodland makes up 1.6 acre of the project site, and is located on Sites 2 and 3. This habitat is dominated by coast live oaks (*Quercus agrifolia*).

Photo 2. Coast live oak woodland habitat on imported soil piles on the project site.

On Site 2, a variably aged stand of coast live oaks is located along and upslope of a southwest-draining ravine supporting an ephemeral drainage (discussed in Section 4.2.7 below). Interspersed with the coast live oaks are several immature trees including nonnative European olive (*Olea europaea*) and native valley oak (*Quercus lobata*), and California bay (*Umbellularia californica*). Shrubs that occur in the midlevel canopy include native toyon *(Heteromeles arbutifolia*) as well as nonnative cotoneaster (*Cotoneaster* sp.), and French broom (*Genista monspessulana*). The understory is composed of mostly leaf duff with a few patches of nonnative oat (*Avena* sp.), ripgut brome (*Bromus diandrus*), Italian thistle (*Carduus pycnocephalus*), rose clover (*Trifolium hirtum*), and Bermuda buttercup (*Oxalis pes-caprae*).

On Site 3, a variably aged stand of coast live oaks is also present (Photo 2). The midlevel canopy is predominantly composed of native poison oak (*Toxicodendron diversilobum*), and coyote brush (*Baccharis pilularis*), as well as nonnative French broom. The understory is comprised mostly of leaf duff and nonnative species such as brome grasses (*Bromus* sp.), oat, fennel (*Foeniculum vulgare*), Harding grass (*Phalaris aquatica*), short-podded mustard (*Hirschfeldia incana*), and yellow star-thistle (*Centaurea solstitialis*). Coast live oaks located in the southwest corner of the site are rooted in piles of imported fill that are approximately 6 feet in diameter and 4 feet tall (Photo 2).

Wildlife. Woodlands dominated by oaks typically support diverse animal communities in California. Coast live oaks can provide abundant food resources, including acorns and invertebrates, as well as substantial shelter for animals in the form of cavities, crevices in bark, and complex branching growth. However, the patches of coast live oak woodland on the project site are limited in extent, with limited understory vegetation, and are isolated from more extensive oak woodlands in the region by surrounding low-density rural residential development and roadways. As a result, this habitat provides fewer structural resources and foraging opportunities for wildlife species compared to more natural and/or more extensive oak woodlands in the region. Nevertheless, due to the presence of small remnant oak woodlands in undeveloped areas interspersed in the surrounding low-density residential development, as well as the presence of numerous remnant oaks in the surrounding urban forest, a

number of wildlife species associated with oak woodlands and tolerant of moderate levels of human disturbance are expected to utilize the coast live oak woodland habitat on the site for breeding and foraging.

Birds such as the chestnut-backed chickadee (*Poecile rufescens*), Anna's hummingbird, bushtit, Bewick's wren (*Thryomanes bewickii*), oak titmouse (*Baeolophus inornatus*), and California scrub-jay (*Aphelocoma californica*), may nest and forage in oaks on the project site. Other birds expected to use this habitat are the wintering hermit thrush (*Catharus guttatus*), ruby-crowned kinglet (*Regulus calendula*), Townsend's warbler (*Setophaga townsendi*), and golden-crowned sparrow (*Zonotrichia atricapilla*). Diurnal raptors, such as the red-tailed hawk (*Buteo jamaicensis*) and red-shouldered hawk (*Buteo lineatus*), will forage for prey in oak woodlands on the project site in small numbers during the day, and noctural raptors, such as the great horned owl (*Bubo virginianus*) will forage for nocturnal rodents, such as the deer mouse (*Peromyscus californicus*), at night. It is possible that up to two pairs of raptors could nest in the patches of oak woodlands on the project site (one on Site 2 and one on Site 3), though no old raptor nests were observed during the November 2022 site visit, suggesting that raptors have not nested on the project site in recent years.

Leaf litter and fallen logs in the understory of oak woodlands on the site provide cover and foraging habitat for common amphibian species such as the California slender salamander (*Batrachoseps attenuatus*), western toad (*Anaxyrus boreas*), and Pacific tree frog (*Hyliola regilla*), which occur along streams and drainages in nearby areas. Reptiles such as the western fence lizard and northern alligator lizard (*Elgaria multicarinata*) are also expected to occur in this habitat. Mammals, including the native raccoon (*Procyon lotor*), coyote (*Canis latrans*), and black-tailed deer (*Odocoileus hemionus*) as well as the nonnative eastern gray squirrel (*Sciurus carolinensis*) and Virginia opossum will forage in the oak woodland habitat on the project site. No nests of the San Francisco dusky footed woodrat were observed on the site during the November 2022 site visit; however, several nests were present just outside the boundary of Site 3, and individuals from this community are expected to forage on the site. Roosting bats may occur in oak woodlands, but no cavities or crevices that provide high-quality roosting habitat for bats were observed in oaks on the site.

4.2.3 California Annual Grassland

Vegetation. California annual grassland (1.3 acres) is present on Sites 2, 3, and 4 (Photo 3). Dominant species in this habitat include nonnative annual grasses such as wild oat, foxtail barley (*Hordeum murinum*), and soft brome (*Bromus hordeaceus*), as well as weedy nonnative forbs such as short-podded mustard, prickly lettuce, farewell-to-spring (*Clarkia* sp.), Harding grass, field bindweed (*Convolvulus arvensis*), long-beaked filaree (*Erodium botrys*), field hedgeparsely (*Torillis arvensis*), and rose clover (*Trifolium hirtum*). Scattered native wildflowers in these areas include California poppy and woodrush tarplant (*Hemizonia congesta* ssp. *luzulifolia*).

On Site 2, California annual grassland is present on a hillside surrounding a staging area and several buildings. This habitat is co-dominated by the nonnative annual grasses described above, as well as dense yellow star-thistle.

On Site 3, a relatively large, dense patch of nonnative, highly invasive stinkwort (*Dittrichia graveolens*), which has recently become established on the San Francisco Peninsula, occurs in the California annual grassland habitat.

Scattered individuals of mature native blue elderberry (*Sambucus mexicana*) and remnant nonnative English walnut (*Juglans regia*) trees are also present.

On Site 4, two small slivers of habitat flanking the driveway to access the parking lot have been planted with needlegrass (*Stipa* sp.). However, these planted individuals did not establish well. Consequently, these habitat slivers are sparsely vegetated, and include occasional diminutive individuals of the nonnative annual grasses and forbs described above.

Photo 3. California annual grassland habitat on the project site.

Wildlife. Wildlife use of the grassland habitats on the project site is limited due to human-related disturbances (e.g., human activity associated with Cañada College), the limited extent of the grassland areas, and the isolation of this habitat from more extensive grasslands in the region (i.e., at Edgewood Park). As a result, some of the wildlife species that breed and regularly occur within extensive grasslands on the Peninsula, such as the grasshopper sparrow (*Ammodramus savannarum*), are absent from the grasslands on the project site or occur only as occasional foragers and migrants.

Although grassland-associated bird species are not expected to occur on the project site, a number of resident bird species associated with surrounding developed and woodland areas nest and forage in the grassland habitats on the site. These include the California towhee (*Melozone crissalis*), mourning dove, lesser goldfinch, dark-eyed junco, Anna's hummingbird, northern mockingbird (*Mimus polyglottos*), and American crow. Several other species of birds use this and other grassland habitats on the site during the nonbreeding season. These include the white-crowned sparrow (*Zonotrichia leucophrys*) and golden-crowned sparrow, which forage on the ground or in herbaceous vegetation, as well as the yellow-rumped warbler (*Setophaga coronata*), which forages in trees and shrubs.

Burrows of native Botta's pocket gophers (*Thomomys bottae*) are common in the California annual grassland habitat on the project site. These fossorial mammal species are an important component of grassland communities, providing a prey base for diurnal raptors and terrestrial predators that utilize this and other surrounding habitat types. Other small mammal species that can potentially occur in the grassland habitat on the site include native deer mice and California voles (*Microtus californicus*). Other mammals, such as the native striped skunk, raccoon, and coyote, as well as the nonnative Virginia opossum, will use the grassland habitat on the project site opportunistically for foraging. Several reptile species also occur regularly in grassland habitats, including the western fence lizard, gopher snake, and southern alligator lizard.

4.2.4 Ornamental Woodland

Photo 4. Ornamental woodland habitat on the project site.

Vegetation. Ornamental woodland covers 0.4 acre of the project site and is present on Sites 2 and 3 (Photo 5). This habitat consists of planted nonnative ornamental tree species including nonnative Aleppo pine (*Pinus halipensis*), European olive, and eucalyptus (*Eucalyptus* sp.), as well as planted native species such as California buckeye (*Aesculus californicus*) and coast live oak.

On Site 2, the ornamental woodland habitat is dominated by Aleppo pines. The midstory of this woodland consists mostly of nonnative cotoneaster while the understory consists of mostly pine needle duff with nonnative red brome (*Bromus rubens*) and foxtail barley.

On Site 3, the ornamental woodland consists of a linear row of planted immature native coast live oaks. This woodland is considered an ornamental woodland instead of a coast live oak woodland because of the lack of natural distribution (i.e., linear instead of random) and the typical lack of genetic diversity in planted stock. All areas of ornamental woodland are relatively flat or have a gradual southwest-facing slope.

Wildlife. Wildlife use of the ornamental woodland habitat on the project site is limited by human disturbance, the limited extent of the habitat, and the low structural diversity of the vegetation. Many of the bird species that nest and forage in these woodlands are associated with adjacent developed, grassland, and coast live oak woodland areas, including the house finch (*Haemorhous mexicanus*), lesser goldfinch, Anna's hummingbird, mourning dove, and northern mockingbird. Wintering birds such as the yellow-rumped warbler are also expected to forage here. In addition, due to the close proximity of woodland habitats located both on-site and off-site, a number of common bird species associated with oak woodlands, such as the oak titmouse and chestnut-backed chickadee, are expected utilize the ornamental woodland habitat on the site opportunistically for foraging. Raptors such as the Cooper's hawk (*Accipter cooperii*) may forage for avian prey in ornamental woodlands on the site in small numbers. The larger trees within these woodlands can potentially support nesting raptors, though no old raptor nests were observed during the November 2022 site visit, suggesting that raptors have not nested in these trees in recent years.

Common mammals such as native striped skunks and nonnative Virginia opossums will forage on fruit and seeds or take cover in ornamental woodland habitat on the site. The deer mouse will also forage in this habitat, and reptiles found in adjacent grassland and woodland habitats, such as the western fence lizard and gopher snake, will forage in ornamental woodland habitat. No cavities or crevices were observed in the trees within this habitat that provide high-quality roosting habitat for bats.

4.2.5 Serpentine Needlegrass Grassland

Photo 5. Serpentine needlegrass grassland habitat on the project site.

Vegetation. Serpentine needlegrass grassland (0.3 acre) is present in the eastern portion of Site 2 on a southwest-facing slope (Photo 4). This habitat is classified as "serpentine" due to the presence of serpentine geology on the site mapped by the USGS (Brabb et al. 1998) (see further discussion in Section 5.3.1 below). The dominant species present within this habitat is needlegrass, a native perennial bunchgrass that is known to withstand harsh root conditions in serpentine soils. The estimated cover of these serpentine needlegrass grasslands is between 25 and 30%. The needlegrass bunches are mostly mature with some small bunches intermixed. This variety in age structure indicates the grassland is naturally recruiting and is not diminishing in quality, as are other occurrences of needlegrass grassland in the surrounding region that struggle with stronger nonnative competition and the effects of nitrogen deposition. Native California poppy and nonnative short-podded mustard are present along the margins of this habitat. Other species present include nonnative rose clover, yellow star-thistle, Italian ryegrass (*Festuca perennis*), field bindweed, long-beaked filaree, and wild oat as well as native coyote brush and wavy-leaved soap plant (*Chlorogalum pomeridianum*). This grassland contains a thin fluffy thatch layer in the interstitial spaces between the needlegrass bunches that is composed primarily of frail fragments of wild oat.

Wildlife. Wildlife use of the serpentine needlegrass grassland on the project site is similar to that described for the California annual grassland, above, with the exception that fossorial mammals such as Botta's pocket gophers are absent from these areas due to shallow serpentine soils.

4.2.6 Harding Grass Grassland

Photo 6. Harding grass grassland habitat on the project site.

Vegetation. Harding grass grassland makes up 0.1 acre of the project site and is located on Site 3. This habitat is dominated by the nonnative perennial bunchgrass Harding grass (Photo 6). Other common species present include nonnatives such as annual wild oats, annual prickly lettuce, and perennial teasel (*Dipsacus fullonum*). The two native species present in this grassland are farewell-to-spring and Hooker's evening primrose (*Oenothera elata*). A single small walnut tree (*Juglans* sp.) occurs on the margin of the grassland. This habitat occurs on a very gradual southwest-facing slope that appears to be composed of native fill. Teasel and Hooker's evening primrose normally need at least a minimal water source to thrive; the depressional seep wetland (described below) is located within the middle of

the Harding grass grassland habitat and may either provide the appropriate hydrology for these species to thrive or share a common water source with these species.

Wildlife. Wildlife use of the Harding grass grasslands on the project site is similar to that described for the California annual grassland habitat above. No fossorial mammal species, such as Botta's pocket gophers, are present within this habitat.

4.2.7 Ephemeral Drainage

Photo 7. Ephemeral drainage habitat on the project site.

Vegetation. An ephemeral drainage makes up less than 0.1 acre (921 square feet) of the project site and flows in a southwesterly direction through Site 2 (Photo 7). This drainage is located along the bottom of a large ravine that extends onto the site from a culvert under a road to the north, and continues offsite to the southwest. No vegetation is rooted between the tops of banks of the drainage, but the canopies of coast live oaks from the surrounding coast live oak woodland (discussed in Section 4.2.2 above) overhang the drainage. The drainage contains large cobbles and some exposed bedrock from erosional scouring. Some woody debris from fallen oak branches has fallen across the drainage, but otherwise only leaf duff and rocks are present in the understory. Water was present during the November 2022 site visit, presumably resulting from stormwater runoff as the site visit occurred during a rain event. The lack of vegetation in the drainage indicates it typically supports ephemeral flows and only contains water during and immediately following storm events.

Wildlife. Wildlife use of vegetation along the ephemeral drainage is expected to be similar to that described for the surrounding coast live oak woodland described in Section 4.2.2 above, as the canopies of trees from this woodland overhang the drainage and no additional vegetation is present within this habitat. Wildlife use of the ephemeral stream that flows along this drainage is limited by the very brief duration of flow and lack of submerged, emergent, or streamside vegetation. Wildlife that use the adjacent habitats may occasionally forage in, drink from, or move along the ephemeral drainage, but no riparian-associated or aquatic wildlife species are expected to occur here. Lack of persistent flows preclude the presence of fishes, and no pools or other features hold water long enough to support successful breeding by amphibians.

4.2.8 Depressional Seep Wetland

Photo 8. Depressional seep wetland habitat on the project site.

Vegetation. A depressional seep wetland makes up less than 0.1 acre (64 square feet) of the project site and is located in a small, shallow depression roughly 6 feet in diameter within the Harding grass grassland on Site 3 (Photo 8). This wetland is dominated by Harding grass, but it also contains native tall flatsedge (*Cyperus eragrostis*) and nonnative pennyroyal (*Mentha pulegium*), two common hydrophytic plants (i.e., plants that only grow with a perennial water source). The soil in this habitat was consistently moist down to 10 inches, which is likely deeper than the recent storm event would have saturated, further suggesting the presence of a perennial water source. The water source for the depression is unconfirmed. This wetland is of poor habitat quality, due to its small size and the relatively high cover of nonnative plants.

Wildlife. Wildlife use of the depressional seep wetland on the project site is expected to be similar to that described for the surrounding Harding grass grassland habitat described in Section 4.2.6 above. Use of this wetland by aquatic wildlife is limited by the small size of the wetland and its shallow nature. Nevertheless, amphibians such as the Pacific treefrog and western toad may forage here, and may breed during years with sufficient precipitation to support extended ponding.

4.3 Wildlife Movement

Wildlife movement within and in the vicinity of the project site takes many forms, and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and landscaped areas. Mammals of different species move within their home ranges, but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the project vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development on and surrounding the project site, there are currently no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site. Wildlife species may move through the area using cover and refugia as they find them available. Open oak woodland, scrub, and grassland habitats in the surrounding region provide connectivity between regional natural areas for many common and special-status species of birds, fish, mammals, reptiles, and amphibians. However, the project site is not located within or on the periphery of these areas, and is instead surrounded by low-density residential development. Thus, the site does not provide connectivity between important habitats in the region, and thus does not represent key habitat supporting wildlife movement through the region.

Section 5. Special-Status Species and Sensitive Habitats

CEQA requires assessment of the effects of a project on species that are protected by state, federal, or local governments as "threatened, rare, or endangered"; such species are typically described as "special-status species". For the purpose of the environmental review of the project, special-status species have been defined as described below. Impacts on these species are regulated by some of the federal, state, and local laws and ordinances described in Section 3 above.

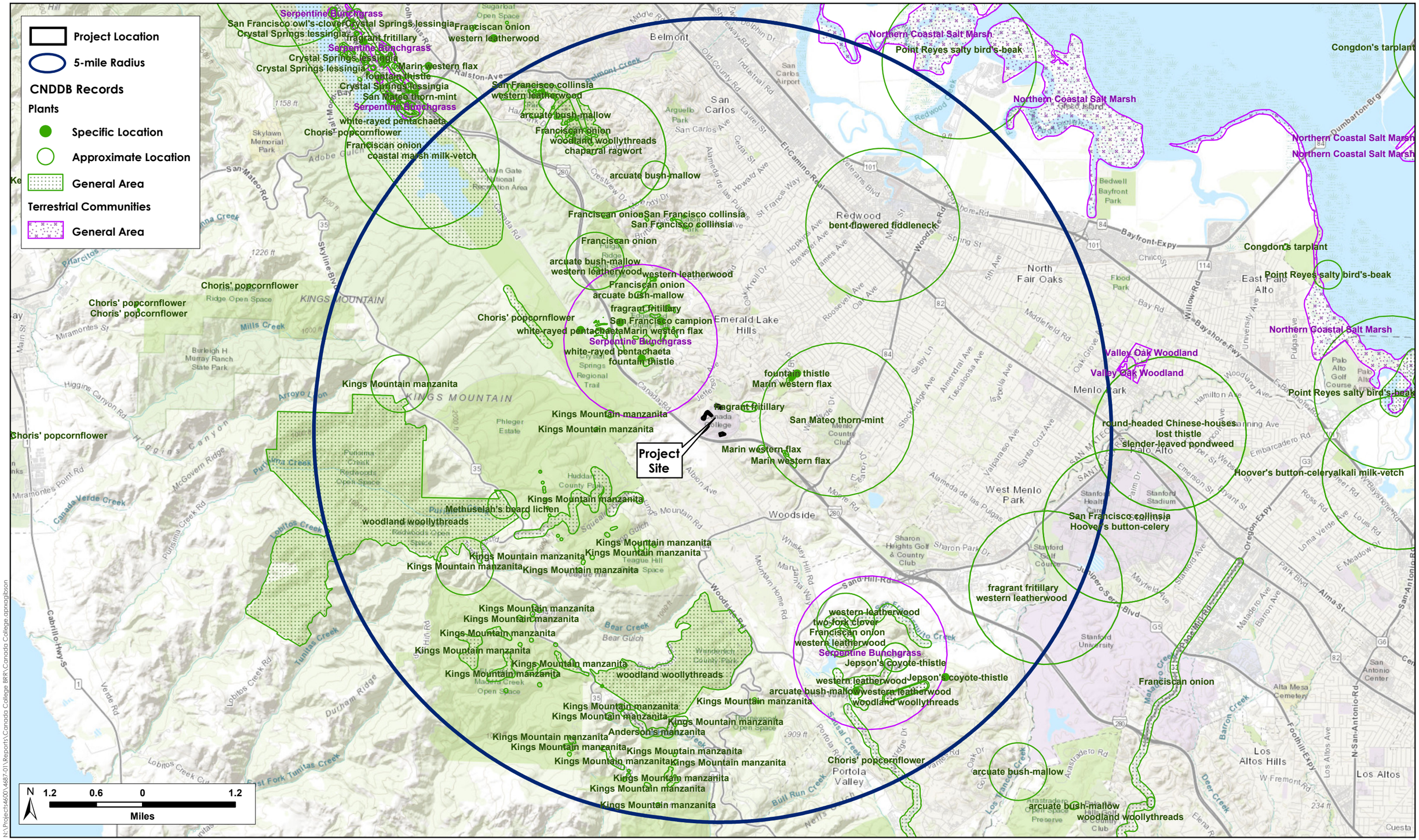
For purposes of this analysis, "special-status" plants are considered plant species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as CRPR 1A, 1B, 2, 3, or 4.

For purposes of this analysis, "special-status" animals are considered animal species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Information concerning threatened, endangered, and other special-status species that potentially occur on the project site was collected from several sources and reviewed by H. T. Harvey & Associates biologists as described in Section 2.1 above. Figure 4 depicts CNDDB records of special-status plant species in the general vicinity of the project site and Figure 5 depicts CNDDB records of special-status animal species. These generalized maps show areas where special-status species are known to occur or have occurred historically.


Project Location
5-mile Radius
CNDDB Records
Plants
Specific Location
Approximate Location
General Area
Terrestrial Communities
General Area
Project Site
Serpentine Bunchgrass
San Francisco owl's-clover
Crystal Springs lessingia
Crystal Springs lessingia
fragrant fritillary
Serpentine Bunchgrass
Crystal Springs lessingia
Crystal Springs lessingia
Marin western flax
fountain thistle
Crystal Springs lessingia
San Mateo thorn-mint
Serpentine Bunchgrass
white-rayed pentachaeta
Choris' popcornflower
Franciscan onion
coastal marsh milk-vetch
Franciscan onion
western leatherwood
San Francisco collinsia
western leatherwood
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Franciscan onion
woodland woollythreads
chaparral ragwort
arcuate bush-mallow
Franciscan onion
San Francisco collinsia
San Francisco collinsia
Franciscan onion
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fragrant fritillary
Choris' popcornflower
San Francisco campion
white-rayed pentachaeta
Marin western flax
Serpentine Bunchgrass
white-rayed pentachaeta
fountain thistle
Choris' popcornflower
Choris' popcornflower
Choris' popcornflower
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain manzanita
Choris' popcornflower
fountain thistle
Marin western flax
fragrant fritillary
San Mateo thorn-mint
Marin western flax
Marin western flax
Northern Coastal Salt Marsh
Point Reyes salty bird's-beak
Northern Coastal Salt Marsh
Congdon's tarplant
Northern Coastal Salt Marsh
Northern Coastal Salt Marsh
Redwood
bent-flowered fiddleneck
Congdon's tarplant
Point Reyes salty bird's-beak
Northern Coastal Salt Marsh
Valley Oak Woodland
Valley Oak Woodland
Point Reyes salty bird's-beak
round-headed Chinese-houses
lost thistle
slender-leaved pondweed
Hoover's button-celeryalkali milk-vetch
San Francisco collinsia
Hoover's button-celery
fragrant fritillary
western leatherwood
western leatherwood
two-fork clover
Franciscan onion
western leatherwood
Serpentine Bunchgrass
Jepson's coyote-thistle
western leatherwood
Jepson's coyote-thistle
arcuate bush-mallow
western leatherwood
woodland woollythreads
Franciscan onion
Choris' popcornflower
arcuate bush-mallow
arcuate bush-mallow
woodland woollythreads
Kings Mountain manzanita
Methuselah's beard lichen
woodland woollythreads
Kings Mountain manzanita
Kings Mountain manzanita
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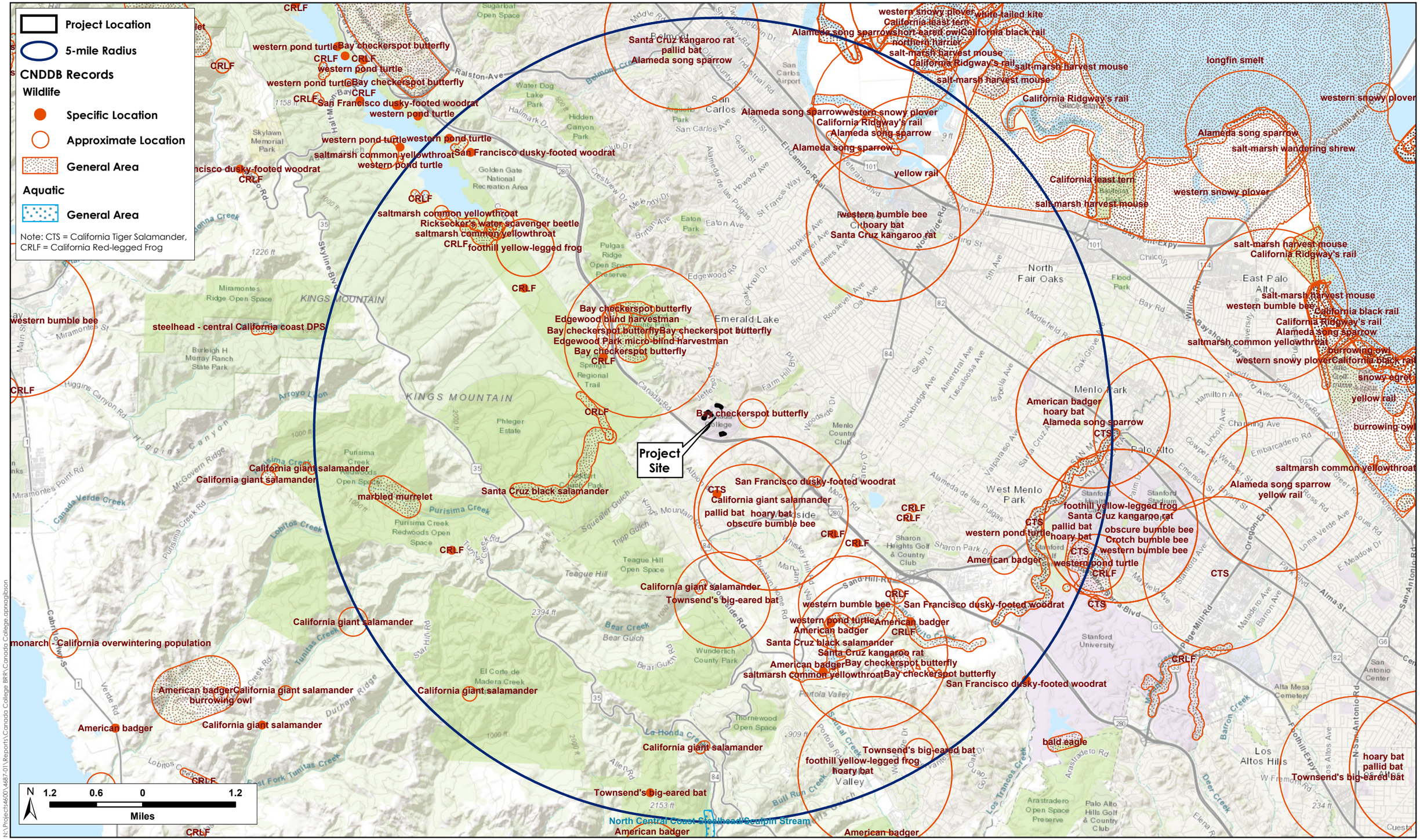
Kings Mountain manzanita



H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 5. CNDDB-Mapped Records of Special-Status Animals

Cañada College Residential Project Biological Resources Report (4687-01)
January 2023

5.1 Special-Status Plant Species

The CNPS (2022) and CNDDB (2022) identify 82 special-status plant species as potentially occurring in at least one of the nine USGS 7.5-minute quadrangles containing or surrounding the project site (for CNPS) or within the project vicinity (for CNDDB) (Appendix B). Of the 82 potentially occurring special-status plant species, 61 were determined to be absent from the project site for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or edaphic requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby extant records (Appendix B).

Suitable habitat, edaphic requirements, and elevation range are present on the project site for 21 special-status plant species; these species are addressed in greater detail in Table 1 below. Because the project site supports needlegrass grassland on Site 2 and the USGS maps serpentine geology on the site (Brabb et al. 1998), suitable habitat is present for special-status plant species that are known to occur in serpentine habitats (Safford and Miller 2020) and/or that are endemic to serpentine soils (Brabb et all 1998). Therefore, serpentine-associated special-status plant species are included in the list of species with potential to occur on the project site. Of the 21 special-status plant species for which suitable habitat is present on the site, the focused survey conducted in November 2022 determined that arcuate bush-mallow and California bottle-brush grass, which would have been detectable in November, are absent from the project site. The other 19 potentially occurring special-status plants are not detectable in November, and we were therefore unable to survey for them. Those additional special-status plant species that can potentially occur on the project site and for which focused surveys could not be conducted in November 2022 are San Mateo thorn-mint, bent-flowered fiddleneck (*Amsinckia lunaris*), western leatherwood (*Dirca occidentalis*), San Francisco wallflower (*Erysimum franciscanum*), fragrant fritillary (*Fritillaria liliacea*), Marin western flax, harlequin lotus (*Hosackia gracilis*), serpentine leptosiphon (*Leptosiphon ambiguus*), bristly leptosiphon (*Leptosiphon aureus*), large-flowered leptosiphon (*Leptosiphon grandiflorus*), Crystal Springs lessingia (*Lessingia arachnoidea*), woolly-headed lessingia (*Lessingia hololeuca*), marsh microseris (*Microseris paludosa*), woodland woollythreads (*Monolopia gracilens*), Dudley's lousewort, Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*), white-flowered rein orchid (*Piperia candida*), Hoffmann's sanicle (*Sanicula hoffmannii*), and Scouler's catchfly (*Silene scouleri* ssp. *scouleri*).

Table 3. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site

Name	Status[1]	Habitat, Blooming Period, and Serpentine Affinity[2]	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, Candidate, or Rare Species			
San Mateo thorn-mint (*Acanthomintha duttonii*)	FE, SE, CRPR 1B.1	Chaparral, valley and foothill grassland (blooming period April to June); Serpentine affinity: Strict Endemic	**Could Potentially Occur (Site 2).** Only moderately suitable grassland habitat to support this species is present on the project site. San Mateo thorn-mint is known to occur at Edgewood County Park approximately 1.6 miles northeast of the project site (CNDDB 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Marin western flax (*Hesperolinon congestum*)	FT, ST, CRPR 1B.1	Chaparral, valley and foothill grassland (blooming period April to July); Serpentine affinity: Strict Endemic	**Could Potentially Occur (Site 2).** Only moderately suitable grassland habitat to support this species is present on the project site. Marin western flax is known to occur at Stulsaft Park approximately 1.0 mile northwest of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Dudley's lousewort (*Pedicularis dudleyi*)	CR, CRPR 1B.2	Maritime chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland, often in deep shady woods of older coast redwood forests (blooming period April to June); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Only moderately suitable grassland habitat to support this species is present on the project site, and most occurrences are known from more shaded and mesic habitats. Dudley's lousewort is known to occur at Portola Redwoods State Park approximately 14 miles south of the project site (CNDDB 2022). While the species is unlikely to occur on the project site approximately 14 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
CNPS-Listed Plant Species			
Bent-flowered fiddleneck (*Amsinckia lunaris*)	CRPR 1B.2	Coastal bluff scrub, cismontane woodland, valley and foothill grassland/oak woodland and chaparral (blooming period March to June); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3)**. Suitable grassland and woodland habitat to support this species is present on the project site. Bent-flowered fiddleneck is known to occur at Jasper Ridge Biological Preserve approximately 3.1 miles southeast of the project site (CNDDB 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	Status[1]	Habitat, Blooming Period, and Serpentine Affinity[2]	Potential for Occurrence on the Project Site
Western leatherwood (*Dirca occidentalis*)	CRPR 1B.2	Broadleafed upland forest, chaparral, closed-cone coniferous forest, cismontane woodland, north coast coniferous forest, riparian forest, riparian woodland (blooming period January to March, sometimes April); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable oak woodland to support this species is present on the project site. Western leatherwood is known to occur on San Francisco Public Utilities Commission lands approximately 1.0 mile northwest of the project site (Calflora 2022). The survey performed in November 2022 was too early in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
California bottle-brush grass (*Elymus californicus*)	CRPR 4.3	North Coastal coniferous forest, closed-cone pine forest, redwood forest, Douglas-fir forest, mixed evergreen forest, foothill woodland (detectable year-round); Serpentine affinity: None	**Absent.** Suitable mesic woodland habitat to support this species is present on the project site. California bottle-brush grass is known to occur at the La Honda Open Space Preserve approximately 7 miles south of the project site, where it was recently observed in 2020 (Calflora 2022). However, no individuals were observed on the project site during a survey conducted during the November 2022 site visit, which was conducted at an appropriate time for the species to be detectable if present. Determined to be absent.
San Francisco wallflower (*Erysimum franciscanum*)	CRPR 4.2	Chaparral, coastal dunes, coastal scrub, and valley and foothill grassland habitats often on granitic or serpentine soils, sometimes on roadsides (blooming period March to June); Serpentine affinity: Strong Indicator	**Could Potentially Occur (Site 2).** Suitable grassland habitat with thin, rocky soils to support this species is present on the project site. San Francisco wallflower is known to occur 5.8 miles away adjacent to the Crystal Springs Watershed Adobe Gulch Creepy, where it was detected in 2008 (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Fragrant fritillary (*Fritillaria liliacea*)	CRPR 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland, often in serpentine/oak woodland, serpentine bunchgrass grassland, sometimes in clays (blooming period February to March); Serpentine affinity: Weak Indicator	**Could Potentially Occur (Site 2).** Suitable bunchgrass grassland habitat to support this species is present on the project site. Fragrant fritillary is known to occur in undeveloped land managed by the City of Redwood City approximately 0.4 mile to the northeast, and at Edgewood Park approximately 1.4 miles to the northwest (CNDDB 2022, Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	Status[1]	Habitat, Blooming Period, and Serpentine Affinity[2]	Potential for Occurrence on the Project Site
Harlequin lotus (*Hosackia gracilis*)	CRPR 4.2	Broadleaved upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, North Coast coniferous forest, valley and foothill grassland, often on roadsides (blooming period March to July); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable grassland and woodland habitat to support this species is present on the project site. Harlequin lotus is known to occur in the Peninsula Watershed approximately 8 miles to the north (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Serpentine leptosiphon (*Leptosiphon ambiguus*)	CRPR 4.2	Northern coastal scrub, foothill woodland, valley grassland (blooming period March to June); Serpentine affinity: Strict Endemic	**Could Potentially Occur (Site 2).** Suitable serpentine grassland habitat to support this species is present on the project site. Serpentine leptosiphon is known to occur on State property at the intersection of Interstate 280 and Farm Hill Road approximately 0.3 mile to the east (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Bristly leptosiphon (*Leptosiphon aureus*)	CRPR 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland (blooming period April to July); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable grassland habitat to support this species is present on the project site. Bristly leptosiphon is known to occur by the Crystal Springs Watershed Adobe Gulch Powerline approximately 6.2 miles north of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Large-flowered leptosiphon (*Leptosiphon grandiflorus*)	CRPR 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland, usually on sandy soils (blooming period April to August); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable grassland habitat to support this species is present on the project site. Large-flowered leptosiphon is known to occur in the *La Honda* 7.5-minute quadrangle 5–15 miles southwest of the project site (CNDDB 2022). A known population is also present at El Sereno Open Space Preserve approximately 21 miles to the south that was last observed in June 2022 (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	Status[1]	Habitat, Blooming Period, and Serpentine Affinity[2]	Potential for Occurrence on the Project Site
Crystal Springs lessingia (*Lessingia arachnoidea*)	CRPR 1B.2	Northern coastal scrub, foothill woodland, valley grassland (blooming period July to October); Serpentine affinity: Strict endemic	**Could Potentially Occur (Site 2).** Suitable serpentine grassland habitat to support this species is present on the project site. Crystal Springs lessingia is known to occur near Crystal Springs Reservoir approximately 5.7 miles northwest of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Woolly-headed lessingia (*Lessingia hololeuca*)	CRPR 3	Broadleafed upland forest, coastal scrub, lower montane coniferous forest, and valley and foothill grassland on clay or serpentine soils (blooming period June to October); Serpentine affinity: Strong Indicator	**Could Potentially Occur (Site 2).** Suitable grassland habitat to support this species is present on the project site. Woolly-headed lessingia is known to occur at Edgewood Park approximately 1.6 miles northwest of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Arcuate bush mallow (*Malacothamnus arcuatus*)	CRPR 1B.2	Chaparral, cismontane woodland (detectable year-round); Serpentine affinity: None	**Absent.** Arcuate bush-mallow has been documented in a wide variety of woody habitats, including oak woodland, and is most prevalent after wildland fires (Morse 2022). This species is known to occur adjacent to Edgewood Park approximately 1.6 miles north of the project site (CNDDB 2022). However, no individuals were observed during the November 2022 site visit, which was conducted at an appropriate time of year for the species to be detected. Determined to be absent.
Marsh microseris (*Microseris paludosa*)	CRPR 1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland (blooming period April to June); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Moderately suitable grassland habitat to support this species is present on the project site. Marsh microseris is known to occur on Cloverdale Ranch approximately 17 miles southwest of the project site (CNDDB 2022). While marsh microseris is unlikely to occur approximately 17 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	Status[1]	Habitat, Blooming Period, and Serpentine Affinity[2]	Potential for Occurrence on the Project Site
Woodland woollythreads (*Monolopia gracilens*)	CRPR 1B.2	Grassy openings in broadleaved upland forest and chaparral, cismontane woodland, and valley and foothill grassland, in sandy to rocky soils, often in serpentine soils after burns (blooming period March to July) Serpentine affinity: Weak Indicator	**Could Potentially Occur (Sites 2 & 3).** Suitable grassland habitat to support this species is present on the project site. This species is known to occur at Edgewood Park approximately 1.7 miles to the northwest (CNDDB 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*)	CRPR 4.2	Broadleaved upland forest, chaparral, coastal prairie, valley and foothill grassland, and vernal pools in vernally mesic habitats (blooming period June to October); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable grassland and woodland habitat to support this species is present on the project site. Gairdner's yampah is known to occur in the Peninsula Watershed approximately 10 miles northwest of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
White-flowered rein orchid (*Piperia candida*)	CRPR 1B.2	North Coast coniferous forest, lower montane coniferous forest, broadleaved upland forest (blooming period March to September); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable woodland habitat to support this species is present on the project site. White-flowered rein orchid is known to occur in the Los Trancos Open Space Preserve approximately 9.4 miles southeast of the project site (Calflora 2022). While white-flowered rein orchid is unlikely to occur approximately 9.4 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Hoffmann's sanicle (*Sanicula hoffmannii*)	CRPR 4.3	Northern Coastal scrub, coastal sage scrub, mixed evergreen forest, chaparral (blooming period March to May); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Moderately suitable evergreen oak woodland habitat to support this species is present on the project site. Hoffman's sanicle is known to occur at Butano State Park approximately 16 miles south of the project site. While Hoffman's sanicle is unlikely to occur approximately 16 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	Status[1]	Habitat, Blooming Period, and Serpentine Affinity[2]	Potential for Occurrence on the Project Site
Scouler's catchfly (*Silene scouleri* ssp. *scouleri*)	CRPR 2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland (blooming period June to August); Serpentine affinity: None	**Could Potentially Occur (Sites 2 & 3).** Suitable grassland habitat to support this species is present on the project site. Scouler's catchfly is known to occur in the *La Honda* USGS 7.5 minute-quadrangle 5–15 miles southwest of the project site (CNDDB 2022), and a known occurrence from 2008 is also present in the San Francisco Peninsula Watershed approximately 13 miles to the northwest (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

[1]Key to Status Abbreviations: Federally Endangered (FE); State Endangered (SE); State Threatened (ST); State Rare (CR); California Rare Plant Rank (CRPR).

CRPR 1B = Rare, Threatened, or Endangered in California and elsewhere

CRPR 2B = Rare, Threatened, or Endangered in California but more common elsewhere

CRPR 3 = Plants about which more information is needed (a review list)

CRPR 4 = Plants of limited distribution - Watch list

.1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 = Moderately threatened in California (20-80% of occurrences threatened / moderate degree and immediacy of threat)

.3 = Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

[2] Serpentine affinity levels are provided by Safford and Miller (2020). Those species without a category (i.e., N/A) are not included in the index and are presumed to have no serpentine affinity.

5.2 Special-Status Animal Species

The legal status and likelihood of occurrence on the project site of special-status animal species known to occur, or potentially occurring, in the surrounding region are presented in Table 2. Most of the special-status species listed in Table 2 are not expected to occur on the project site because it lacks suitable habitat, is outside the known range of the species, and/or is isolated from the nearest known extant populations by development or otherwise unsuitable habitat.

The following special-status species that are present in specialized habitats on the San Francisco Peninsula, or that occurred on or near the Peninsula historically but are no longer present, are absent from the project site due to a lack of suitable habitat and/or isolation of the site from populations by urbanization: the western bumble bee (*Bombus occidentalis*), Crotch bumble bee (*Bombus crotchii*), California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), western pond turtle (*Actinemys marmorata*), burrowing owl (*Athene cunicularia*), northern harrier (*Circus hudsonius*), tricolored blackbird (*Agelaius tricolor*), grasshopper sparrow, Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*), loggerhead shrike (*Lanius ludovicianus*) , and American badger (*Taxidea taxus*). The Bay checkerspot butterfly was reintroduced to Edgewood Park in 2011, but the number of individuals present has dwindled to the point that there is no reasonable expectation that any individuals would disperse to the project site. While bald eagles (*Haliaeetus leucocephalus*), golden eagles (*Aquila chrysaetos*), and peregrine falcons (*Falco peregrinus anatum*) may fly over the project site at times, none are expected to nest or forage on or close to the project site.

No aquatic habitats to support special-status fish species are present on the project site, and special-status fish species do not occur in the ephemeral drainage or depressional seep wetland on the project site. Thus, these species are absent from the project site and adjacent areas.

The mountain lion, a candidate for listing under CESA; the monarch butterfly, a candidate for listing under FESA; as well as the pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western red bat (*Lasiurus blossevillii*), and San Francisco dusky-footed woodrat, which are California species of special concern, may also forage on the project site. These species are not expected to den, roost, or breed on or immediately adjacent to the project site due to a lack of suitable habitat, and they will be affected very little, if at all, by the proposed project. In addition, the Vaux's swift (*Chaetura vauxi*), olive-sided flycatcher (*Contopus cooperi*), and yellow warbler (*Setophaga petechia*) are bird species that are considered California species of special concern only when nesting; they may occasionally occur on or over the project site as nonbreeding transients, foragers, or migrants, but no suitable nesting habitat for these species occurs on or adjacent to the project site.

The white-tailed kite (*Elanus leucurus*) is addressed in greater detail in this report, because this species can potentially breed or occur on or immediately adjacent to the project site and/or may be significantly impacted by the proposed project (see Section 6 *Impacts and Mitigation Measures* below).

Table 4. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, or Candidate Species			
Bay checkerspot butterfly (*Euphydryas editha bayensis*)	FT	Native grasslands on serpentine soils. Larval host plants are *Plantago erecta* and/or *Castilleja* sp. The flight season extends from late February to early May.	**Absent.** This species was historically abundant in Edgewood Park, approximately 1.1 miles northwest of the project site. However, this local population was extirpated in the early 2000s. Reintroduction efforts commenced in 2011, and, while initially successful, with a high of 800 adults in 2014, only 47 adults were detected in the park during annual surveys in 2016 (Creekside Science 2016). Recent counts of adults detected during spring flight surveys were six in 2020, five in 2021, and eight in 2022, indicating that the population has dwindled further (C. Niederer, pers. comm.). Suitable habitat to support the Bay checkerspot butterfly's larval host plants is present on the project site, but due to the limited size of the serpentine grassland patch and the declining status of nearby populations, a population of Bay checkerspot butterflies could not become established on the project site. Given how low the population at Edgewood Park is, and the limited extent of suitable habitat (i.e., serpentine grassland) on the project site, there is no reasonable expectation that individuals would disperse to the project site.
Monarch butterfly (*Danaus plexippus*)	FC	Requires milkweeds (*Asclepias* spp.) for egg-laying and larval development, but adults obtain nectar from a wide variety of flowering plants in many habitats. Individuals congregate in winter roosts, primarily in Mexico and in widely scattered locations on the central and southern California coast.	**May be Present as Nonbreeder (Sites 1–4).** The monarch butterfly occurs throughout the region primarily as a migrant. No larval host plants were observed on the project site during the November 2022 survey; thus, no suitable breeding habitat for this species is present on the project site. Small numbers of individuals may forage throughout the project site, especially during spring and fall migration. However, the site does not provide high-quality foraging habitat for this species. While ostensibly suitable overwintering habitat for monarchs (e.g., Eucalyptus trees) is present on the site, no current or historical overwintering sites are known as far inland as the project site; the nearest known overwintering location is 9.7 miles to the north at Coyote Point Park in San Mateo (Xerces Society 2022).

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Crotch bumble bee (*Bombus crotchii*)	SC	Open grassland and scrub habitats.	**Absent.** Although this species was historically found throughout the southern two-thirds of California, population declines and range contractions (25% relative to its historical range) have made this species very scarce in the region (CDFW 2019). There are no recent (i.e. after 1909) records on the San Francisco peninsula (Bumble Bee Watch 2022, CNDDB 2022, iNaturalist 2022), and CNDDB (2022) does not include even historical records from San Mateo County. Therefore, this species is not expected to occur on the project site.
Western bumble bee (*Bombus occidentalis*)	SC	Occurs in a variety of grassland, scrub, and open woodland habitats.	**Absent.** Although the species was historically found throughout much of central and northern California, including the project vicinity, it has been extirpated from much of its former range, and there are no recent records from San Mateo County or nearby areas (CDFW 2019, Bumble Bee Watch 2022, iNaturalist 2022). Therefore, this species is absent from the project site.
California tiger salamander (*Ambystoma californiense*)	FT, ST	Vernal or temporary pools in annual grasslands or open woodlands. Adults live terrestrially in small mammal burrows.	**Absent.** The California tiger salamander's range on the San Francisco Peninsula historically occurred barely as far northwest as Woodside, where there is a 1962 record from a location approximately 0.7 mile south of (and across Interstate 280 from) the project site (CNDDB 2022). That occurrence is considered "possibly extirpated" by CNDDB. The closest extant population is located in the vicinity of Lagunita on the Stanford University Campus, approximately 4.7 miles to the southeast (CNDDB 2022). That population is located far beyond the known dispersal distance of the species, and is separated from the project site by extensive urbanization. Therefore, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
California red-legged frog (*Rana draytonii*)	FT, CSSC	Streams, freshwater pools, and ponds with emergent or overhanging vegetation.	**Absent.** No suitable aquatic breeding habitat for California red-legged frogs is present on the project site, and the ephemeral drainage and depressional seep wetland habitats on the site do not pond water for sufficient periods to support breeding by this species. A number of records of this species are present in the Woodside area west of Interstate 280 (CNDDB 2022); however, this highway represents a barrier to dispersal that prevents individuals at these locations from reaching the project site. California red-legged frogs are also known to occur east of Interstate 280 approximately 2.5 miles southeast of the project site (CNDDB 2022), but this distance is outside the dispersal capabilities of the sites. Further, the project site is isolated from this location by several miles residential development, as well as Woodside Road, and California red-legged frogs are not expected to be able to traverse these barriers to reach the project site. Thus, the species is determined to be absent from the project site.
San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)	FE, SE, SP	Occurs in a variety of habitats, including riparian areas; requires burrows for hibernation and frogs as a prey base.	**Absent**. The San Francisco garter snake occurs on the San Francisco Peninsula from just north of the San Francisco–San Mateo County line south to approximately the San Mateo–Santa Cruz County line. An intergrade zone composed of hybrids between the San Francisco garter snake and red-sided garter snake (*Thamnophis sirtalis sirtalis*) occurs from Palo Alto north to the Pulgas region near Upper Crystal Springs Reservoir (Barry 1994). No suitable aquatic breeding or foraging habitat occurs on the project site, and the ephemeral drainage and depressional seep wetlands on the site do not pond water for sufficient periods to support this species. San Francisco garter snakes are known to occur in the project vicinity, with an established population at Crystal Springs Reservoir approximately 5 miles to the northwest. Additional records of potential intergrades have been detected in aquatic habitats west of Cañada Road approximately 1.5 miles and 2 miles northwest of the project site (CNDDB 2022). However, all known occurrences are separated from the project site by Interstate 280, and individuals are not expected to successfully disperse across this busy roadway or along the nearby Cañada Road undercrossing to reach the project site. Thus, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Bald eagle (*Haliaeetus leucocephalus*)	SE, SP	Occurs mainly along seacoasts, rivers, and lakes; nests in tall trees or in cliffs, occasionally on electrical towers. Feeds mostly on fish.	**Absent.** Bald eagles are known to nest in the project vicinity at inland reservoirs and along the coast, including at Crystal Springs Reservoir approximately 4.5 miles north of the project site. However, no suitable nesting or foraging habitat for bald eagles is present on the project site. Determined to be absent.
Tricolored blackbird (*Agelaius tricolor*)	ST	Nests near fresh water in dense emergent vegetation.	**Absent.** In San Mateo County, the tricolored blackbird has bred in only a few scattered locations, and is absent from, or occurs only as a nonbreeder in, most of the County (Sequoia Audubon Society 2001). This species typically nests in extensive stands of tall emergent herbaceous vegetation in non-tidal freshwater marshes and ponds. No suitable nesting habitat is present on the project site or along the ephemeral drainage adjacent to the site, as no large patches of emergent vegetation, blackberry (*Rubus* sp.) stands, or other suitable vegetation are present. Further, this species (whose colonies are loud and conspicuous) has never been recorded nesting in the site vicinity (Cornell Lab of Ornithology 2022), and high levels of disturbance likely preclude nesting near the site. The site also does not provide suitable foraging habitat for this species.
Mountain lion (Southern California/Central Coast ESU) (*Puma concolor*)	SC	Has a large home range size and occurs in a variety of habitats. Natal dens are typically located in remote, rugged terrain far from human activity. May occasionally occur in areas near human development, especially during dispersal.	**May be Present as Nonbreeder (Sites 1–4).** In the project region, there are verified sightings reported on BAPP.org (2022) and numerous unpublished reports. This species occurs widely, though at low densities, throughout the Santa Cruz Mountains, and may disperse into lowland/valley floor areas. Mountain lions are not expected to regularly use the project site or establish a den on the site due to high levels of human activity and a lack of suitable denning habitat, but individuals may occur on the site as rare dispersants due to the site's location near the periphery of development in the Woodside area (i.e., only approximately 1.1 miles from Edgewood Park).
California Species of Special Concern			

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Western pond turtle (*Actinemys marmorata*)	CSSC	Permanent or nearly permanent water in a variety of habitats.	**Absent.** This species is known to occur in the project vicinity approximately 2 miles northwest of the project site and 3 miles southeast of the project site west of Interstate 280, and in San Fancisquito Creek approximately 4.3 miles southeast of the project site east of Interstate 280 (CNDDB 2022, iNaturalist 2022). Ostensibly suitable aquatic dispersal and foraging habitat is present in the ephemeral drainage and depressional seep wetland habitats on the project site. However, the lack of deep pools with aquatic escape cover due the shallow depth of the drainage and wetland, as well as a lack of basking habitat, make these habitats unsuitable for regular use by pond turtles. Further, because all known occurrences are separated from the project site by several miles of urban development and/or Interstate 280, individuals are not expected to successfully disperse across these developed areas to reach the project site. Due to the absence of key habitat features in aquatic habitats on the site, as well as the presence of Interstate 280 and urban development in between the site and known occurrences of the species, pond turtles are not expected to occur on the project site.
Northern harrier (*Circus hudsonius*)	CSSC (nesting)	Nests in marshes and moist fields, forages over open areas.	**Absent.** No suitable nesting or foraging habitat is present on the project site or in the surrounding vicinity, which is developed as a residential area. Determined to be absent.
Burrowing owl (*Athene cunicularia*)	CSSC	Nests and roosts in open grasslands and ruderal habitats with suitable burrows, usually those made by California ground squirrels.	**Absent.** Burrows of California ground squirrels on the project site provide ostensibly suitable nesting and roosting habitat for this species, and grasslands on the site provide ostensibly suitable foraging habitat. However, burrowing owls are not known to occur in the project vicinity (Cornell Lab of Ornithology 2022), and no individuals or sign were observed during the November 2022 site visit. Determined to be absent.
Vaux's swift (*Chaetura vauxi*)	CSSC (nesting)	Nest both in small colonies and as single pairs, occupying cavities in large snags, primarily in old-growth forests. They also occasionally use artificial cavities such as chimneys. Forage aerially.	**May be Present as Nonbreeder (Sites 1–4).** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). However, no large trees with suitable cavities or residential chimneys are present on or near the project site, and this species is not expected to nest on, or in close enough proximity to the project site to be impacted by project activities. May forage aerially over the project site, especially during migration.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Olive-sided flycatcher (*Contopus cooperi*)	CSSC (nesting)	Breeds in mature, primarily coniferous, forests with open canopies, along forest edges in more densely vegetated areas, in recently burned forest habitats, and in selectively harvested landscapes.	**May be Present as Nonbreeder (Sites 2 & 3).** Known to nest throughout much of San Mateo County, including in the project vicinity (Sequoia Audubon Society 2001). However, no suitable coniferous forest nesting habitat is present on or adjacent to the project site. Occasional non-breeding individuals may forage in oak woodland habitat on the site, especially during migration.
Loggerhead shrike (*Lanius ludovicianus*)	CSSC (nesting)	Nests in tall shrubs and dense trees; forages in grasslands, marshes, and ruderal habitats.	**Absent.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). Shrubs and trees on and adjacent to the project site provide ostensibly suitable nesting habitat for loggerhead shrikes, and grasslands on the site provide ostensibly suitable foraging habitat. However, the regional loggerhead shrike population has declined substantially in recent years, and this species is not expected to occur on the project site due to the limited extent of the available habitat. Rather, loggerhead shrikes that occur in the vicinity are expected to occur in higher-quality habitat to the north, such as at Edgewood Park, nearby. Determined to be absent.
Yellow warbler (*Setophaga petechia*)	CSSC (nesting)	Nests in riparian woodlands.	**May be Present as Nonbreeder (Sites 1, 2 & 3).** No suitable nesting habitat for yellow warblers is present on or adjacent to the project site. The species is an abundant migrant throughout the project region during the spring and fall, when nonbreeding individuals may forage in trees and shrubs on the site.
Grasshopper sparrow (*Ammodramus savannarum*)	CSSC (nesting)	Nests and forages in grasslands, meadows, fallow fields, and pastures.	**Absent.** Known to nest and occur in the project region primarily in grasslands and less frequently disturbed agricultural habitats, such as at Edgewood Park to the north (Cornell Lab of Ornithology 2022). No suitable nesting or foraging habitat for this species is present on the project site due to the limited extent of the grassland habitat and the presence of trees, which prefers more extensive grasslands without trees, is present on the project site.
Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*)	CSSC	Nests in pickleweed dominant salt marsh and adjacent ruderal habitat.	**Absent.** In the South San Francisco Bay, nests primarily in short pickleweed-dominated portions of diked/muted tidal salt marsh habitat and in adjacent ruderal habitats, and in extensive grasslands in the Santa Cruz Mountains (Rottenborn 2007). No suitable nesting or foraging habitat occurs on the project site.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Pallid bat (*Antrozous pallidus*)	CSSC	Forages over many habitats; roosts in caves, rock outcrops, buildings, and hollow trees.	**May be Present as Nonbreeder (Sites 1–4).** Historically, pallid bats were likely present in a number of locations throughout the project region, but their populations have declined in recent decades. Pallid bats are not expected to roost in the buildings on the site because of existing, active human use, no trees that provide particularly large or high-quality cavities to support a roosting colony of this species are present on or close enough to the project site to be disturbed by work activities, and no known recent (after 1960) records of maternity colonies of this species are present on or adjacent to the project site (CNDDB 2022, iNaturalist 2022). Nevertheless, individuals from colonies in the region (especially in the Santa Cruz Mountains to the west) could occasionally forage on the project site.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSSC	Roosts in caves and mine tunnels, and occasionally in deep crevices in trees such as redwoods or in abandoned buildings, in a variety of habitats.	**May be Present as Nonbreeder (Sites 1–4).** Townsend's big-eared bats are known to occur in the Santa Cruz Mountains to the southwest (iNaturalist 2022). Suitable cavernous roosting habitat is not present in the project site to support a roosting colony of this species, and individuals are not expected to roost in buildings on the site because of existing, active human use. Individuals from colonies in the region may occasionally forage over the open habitats on the project site.
Western red bat (*Lasiurus blossevillii*)	CSSC	Roosts in foliage in forest or woodlands, especially in or near riparian habitat.	**Low Potential for Occurrence (Sites 1–4).** Western red bats occur in the project vicinity in low numbers as migrants and winter residents, but this species does not breed in the region. Individual western red bats may roost in the foliage of trees virtually anywhere on the project site, but are expected to roost primarily in riparian areas elsewhere in the region. Occasional individuals may forage over the project site year-round.
San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*)	CSSC	Nests in a variety of habitats including riparian areas, oak woodlands, and scrub.	**May be Present as Nonbreeder.** Suitable habitat is present in the oak woodlands on the project site. No woodrat nests were detected on the project site during the focused survey in November, 2022; however, several nests were present just outside the boundary of Site 3, and individuals from this community are expected to forage on the site occasionally.
American badger (*Taxidea taxus*)	CSSC	Burrows in grasslands and occasionally in infrequently disked agricultural areas.	**Absent.** Known to occur in the project region primarily in extensive grasslands and scrub habitats north and west of the project site. Badgers are not expected to occur on the project site or establish a den on the site due to the site's location in an urban residential area. Determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
State Fully Protected Species			
American peregrine falcon (*Falco peregrinus anatum*)	SP	Forages in many habitats; nests on cliffs and tall bridges and buildings.	**Absent.** Peregrine falcons are not known or expected to nest on or near the project site due to a lack of suitable cliff-like habitat for nesting, and it would not forage on the site due to the absence of open habitats and suitable prey. Determined to be absent.
Golden eagle (*Aquila chrysaetos*)	SP	Breeds on cliffs or in large trees (rarely on electrical towers); forages in open areas.	**Absent.** No suitable nesting habitat for golden eagles is present on the project site, and it would not forage on the site due to the absence of open habitats and suitable prey. Determined to be absent.
White-tailed kite (*Elanus leucurus*)	SP	Nests in tall shrubs and trees; forages in grasslands, marshes, and ruderal habitats.	**May be Present as Breeder (Sites 2 and 3).** White-tailed kites are common residents in open areas in the project vicinity. Trees in the mixed oak woodland habitat on and adjacent to the project site provide suitable nesting habitat for this species. No white-tailed kites or nests of this species were observed on or adjacent to the site during the November 2022 site visit; however, up to one pair of white-tailed kites may nest in trees on or adjacent to the project site. Individuals may forage in open habitats on and adjacent to the site year-round.

Key to Abbreviations: Status: Federally Endangered (FE); Federally Threatened (FT); Federal Candidate for Listing (FC); State Endangered (SE); State Threatened (ST); State Candidate for Listing (SC); State Fully Protected (SP); California Species of Special Concern (CSSC).

5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats

Natural communities have been considered part of the Natural Heritage Conservation triad, along with plants and animals of conservation significance, since the state inception of the Natural Heritage Program in 1979. The CDFW determines the level of rarity and imperilment of vegetation types, and tracks sensitive communities in its Rarefind database (CNDDB 2022). Global rankings (G) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas state (S) rankings are a reflection of the condition of a habitat within California. Natural communities are defined using NatureServe's standard heritage program methodology as follows (Faber-Langendoen et al. 2012):

G1/S1: Critically imperiled

G2/S2: Imperiled

G3/S3: Vulnerable.

G4/S4: Apparently secure

G5/S4: Secure

In addition to tracking sensitive natural communities, the CDFW also ranks vegetation alliances, defined by repeating patterns of plants across a landscape that reflect climate, soil, water, disturbance, and other environmental factors (Sawyer et al. 2009). If an alliance is marked G1-G3, all of the vegetation associations within it will also be of high priority (CDFW 2022). The CDFW provides VegCAMP's currently accepted list of vegetation alliances and associations (CDFW 2022).

Impacts on CDFW sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, must be considered and evaluated under CEQA (Title 14, Division 6, Chapter 3, Appendix G of the California Code of Regulations). Furthermore, aquatic, wetland and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS.

5.3.1 Sensitive Natural Communities

A query of sensitive natural communities in the CNDDB (2022) identified five sensitive natural communities as occurring within the nine 7.5-minute USGS quadrangles containing or surrounding the project site: northern coastal salt marsh (Rank G3/S3.2), northern maritime chaparral (Rank G1/S1.2), serpentine bunchgrass (Rank G2/S2.2), valley needlegrass grassland (G3/S3.1), and valley oak woodland (G3/S2.1). The project site supports needlegrass grassland on Site 3, and the USGS has mapped serpentine geology on the project site (Brabb et al 1998), validating the presence of serpentine bunchgrass. Thus, the stand of needlegrass on Site 3 is mapped as

serpentine needlegrass grassland, and meets the definition of the sensitive *serpentine bunchgrass* natural community type.

No additional sensitive natural communities are present on the project site.

5.3.2 Sensitive Vegetation Alliances

Areas of the site mapped as serpentine needlegrass grassland correspond to the "*Nassella pulchra* – *Avena* spp. – *Bromus* spp." alliance. This alliance is ranked as G3/S3? (Sawyer et al. 2009) and is therefore ranked as apparently secure at the globally and statewide level (CDFW 2022), with some uncertainty on the statewide ranking. While this alliance is not considered a sensitive vegetation alliance by this definition, this natural community type is still considered a sensitive alliance by the CDFW in VegCAMP (CDFW 2022).

5.3.3 CDFW Streams/Riparian Habitat

Due to its rarity and disproportionately high habitat values and functions to wildlife, the CDFW considers riparian habitat to be sensitive. As described above in Section 3.2.4, the CDFW would likely claim jurisdiction over areas at, and below, the top of bank lines on either side of the ephemeral drainage. However, because no trees, shrubs, or herbs are rooted within the bed and banks of the drainage, no riparian habitat associated with the ephemeral drainage is present on the project site. Thus, although the project will impact areas within CDFW jurisdiction, it will have no impact on riparian habitat.

5.3.4 Sensitive Habitats (Waters of the U.S./State)

The depressional seep wetland on Site 3 supports both wetland hydrology and hydrophytic vegetation. Due to the presence of a perennial water source, this wetland likely also supports hydric soils. Based on the results of the November 2022 reconnaissance-level survey, this depressional seep would likely be considered waters of the U.S. by the USACE and waters of the state by the RWQCB.

The ephemeral drainage on Site 2 contains OHW marks on opposing banks, regular flow, ephemeral hydrology in most years, and indirect hydrologic connectivity to traditionally navigable waters (Crystal Springs Reservoir and eventually San Francisco Bay). Therefore the drainage would likely qualify as other waters of the U. S. and waters of the state.

No wetlands or other waters of the U.S./state occur on Sites 1 and 4 on the project site.

5.3.5 Nonnative and Invasive Species

Several nonnative, invasive plant species occur on the project site. Of these, several have a "limited" rating by the Cal-IPC, indicating they are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic. These "limited" species on the project site are European olive and

curly dock. Species with a "moderate" rating, indicating that they have substantial and apparent–but generally not severe–ecological impacts on physical processes, plant and animal communities, and vegetation structure, and that their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal, though establishment would be generally dependent on ecological disturbance, are: Italian thistle, stinkwort, short-podded mustard, teasel, rose clover, pennyroyal, cotoneaster, ripgut brome, Italian rye grass, foxtail barely, and Harding grass. Species with a "high" invasive rating by the Cal-IPC have the potential to cause severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal and establishment, and most are widely distributed ecologically (Cal-IPC 2022). On the project site, species with a "high" rating include yellow star-thistle (*Centaurea solstitialis*), French broom (*Genista monspeliensis*), and red brome. Due to these species' ubiquity in the region, project activities are not expected to result in the spread of nonnative and invasive plant species.

Section 6. Impacts and Mitigation Measures

CEQA and the State CEQA Guidelines provide guidance in evaluating impacts of projects on biological resources and determining which impacts will be significant. The Act defines "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project."

Appendix G of State CEQA Guidelines provides a checklist of other potential impacts to consider when analyzing the significance of project effects. The impacts listed in Appendix G (Chapter IV) may or may not be significant, depending on the level of the impact. For biological resources, these impacts include whether the project would:

A. "have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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 state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means"

D. "interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites"

E. "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance"

F. "conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan"

Potential impacts on biological resources as a result of the proposed residential project were systematically evaluated at the project level based on the project description provided to us by the Town through October 2022. Based on this information, it is our understanding that all project impacts including grading, construction, staging, and access will occur within the limits of boundaries provided, and that all project impacts within this boundary will be permanent. For the purpose of this assessment, we have assumed that the proposed project would impact up to up to all 7.8 acres of the project site.

Potential impacts on existing biological resources were evaluated by comparing the quantity and quality of habitats present on the project site under baseline conditions to the anticipated conditions after implementation of the proposed project. Direct and indirect impacts on special-status species and sensitive natural communities were assessed based on the potential for the species, their habitat, or the natural community in question to be disturbed or enhanced following implementation of the proposed project.

6.1 Impacts on Special-Status Species: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant with Mitigation)

6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant)

Proposed project activities would result in the permanent removal of up to 4.2 acres of developed areas, 1.6 acres of coast live oak woodland, 1.3 acres of California annual grassland, 0.4 acre of ornamental woodland, and 0.1 acre of Harding grass grassland habitats on the project site. These impacts would reduce the extent of vegetation within the impact area and result in a reduction in the abundance of some of the common plant and wildlife species that occur there. However, the developed, coast live oak woodland, California annual grassland, ornamental woodland, and Harding grass grassland habitats on the project site occur in a location in Woodside that has been subject to disturbance in the past, is regularly disturbed by human activities (such as mowing), and are on the periphery of a developed residential area such that these habitats do not provide regionally rare or especially high-value habitat for native vegetation, wildlife, or special-status species. In addition, these habitats are abundant and widespread regionally, are not particularly sensitive, and are not especially valuable (from the perspective of providing important plant or wildlife habitat) or exemplary occurrences of these habitat types. Therefore, impacts on these habitats are considered less than significant under CEQA. Further, because the number of individuals of any common plant or animal species within these habitats, and the proportion of these species' regional populations that could be disturbed, is very small, the project's impacts would not substantially reduce regional populations of these species. Thus, these impacts do not meet the CEQA standard of having a *substantial* adverse effect and would not be considered significant under CEQA.

6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation)

No suitable habitat for special-status plant species occurs on Sites 1 and 4, and the project will have no impacts on special-status plants at these locations.

Nineteen special-status plant species were determined to have some potential to occur on Sites 2 and 3 on the project site. These species are San Mateo thorn-mint, state and federally endangered and a CRPR 1B.1 species; Marin western flax, state and federally threatened and a CRPR 1B.1 species; Dudley's lousewort, a state rare and CRPR 1B.2 species; bent-flowered fiddleneck, western leatherwood, Crystal Springs lessingia, white-flowered rein orchid, fragrant fritillary, marsh microseris, woodland woollythreads, CRPR 1B.2 species;

Scouler's catchfly, a CRPR 2B.2 species; woolly-headed lessingia, a CRPR 3 species; San Francisco wallflower, harlequin lotus, bristly leptosiphon, large-flowered leptosiphon; Gairdner's yampah, CRPR 4.2 species; and Hoffmann's sanicle, a CRPR 4.3 species. These species could potentially occur in broadleaved upland forest or grassland habitats on Sites 2 and 3 on the project site, but surveys for these species during the appropriate blooming periods have not yet been performed to determine presence/absence. If any special-status plant species occur at these locations on the project site, the project could impact these plants due to disturbance or destruction of individuals and suitable habitat. Direct impacts could include grading or filling areas supporting the species, trampling or crushing of plants, and soil compaction. Indirect impacts could include increased mobilization of dust onto plants, which can affect their photosynthesis and respiration, or changes to hydrology supporting these plants due to grading or construction in nearby habitats.

Conservation of special-status plant species is important because their populations contribute to preserving genetic resources and help ensure persistence of these rare species in the county and state. Due to the regional rarity of these species, impacts to more than 10% of a population (by individuals or occupied area) of state or federally listed, state rare, or CRPR List 1B or 2B species, or more than 20% of a population of CRPR List 3 or 4 species, could result in the loss of that population, thereby contributing to a reduction in the species' abundance and genetic resources. Such an impact would therefore be considered significant under CEQA. Impacts to 10% or less of a state or federally listed, state rare, or CRPR 1B or 2B population, or 20% or less of a CRPR 3 or 4 population, would not be expected to cause the extirpation of such a population as long as the remaining plants are avoided and protected.

Implementation of the Mitigation Measures BIO-1, BIO-2, and BIO-3 below will reduce these impacts to a less-than-significant level.

Mitigation Measure BIO-1. Pre-Activity Surveys for Special-Status Plants. Prior to initial ground disturbance for project-related activities at Sites 2 and 3, appropriately timed, presence/absence surveys for special-status plant species will be conducted by a qualified plant ecologist on the project site and within a 50-foot surrounding buffer to assess the presence or absence of these species. This buffer may be increased by the qualified plant ecologist depending on site-specific conditions and activities planned in the area, but will be at least 50 feet in width; if access to adjacent areas cannot be obtained, the plant ecologist will stand on the project site or other accessible areas and use binoculars or other means to look for special-status plants in the 50-foot surrounding buffer. Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust, such as grading; potential for project activities to alter hydrology supporting habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away. Based on the flowering periods of the potentially occurring species, surveys will need to occur at least three different times of year on Site 2 and two different times of year on Site 3 to ensure that they occur during appropriate periods for detecting these species: early spring from February to March (to detect fragrant fritillary and western leatherwood), late spring from April to May (to detect San Mateo thorn-mint, Marin western flax, Dudley's lousewort, bent-flowered fiddleneck, San Francisco wallflower, harlequin lotus, serpentine leptosiphon, bristly leptosiphon, large-flowered leptosiphon, marsh microseris, woodland

woollythreads, white-flowered rein orchid, and Hoffman's sanicle), and summer from July to August (to detect woolly-headed lessingia, Gairdner's yampah, Scouler's catchfly, and Crystal Springs lessingia) (Table 5). The surveys will be conducted in a year with sufficient precipitation to detect these species; alternatively, if these species are determined to be detectable in appropriate reference populations (regardless of precipitation), surveys for these species on the project site can be determined to be valid even if precipitation is well below average. Mowing must be avoided prior to the surveys so that these species can be detectable if present. If any special-status plants are detected, the plant ecologist will use any available means to determine the abundance and extent of the population, even if the population continues off-site.

Table 5. Summary of Special-Status Plants and Survey Periods by Location

Special-Status Plant Species	Blooming Period	Location
Late Winter (January to February)		
Western leatherwood	January – March, sometimes April	Sites 2 and 3
Early Spring (February to March)		
Fragrant fritillary	February – March	Site 2
Late Spring (April to May)		
Hoffmann's sanicle	March – May	Sites 2 and 3
Bent-flowered fiddleneck	March – June	Sites 2 and 3
San Francisco wallflower	March – June	Site 2
Serpentine leptosiphon	March – June	Site 2
Harlequin lotus	March – July	Sites 2 and 3
Woodland woollythreads	March – July	Sites 2 and 3
White-flowered rein orchid	March – September	Sites 2 and 3
San Mateo thorn-mint	April – June	Site 2
Dudley's lousewort	April – June	Sites 2 and 3
Marsh microseris	April – June	Sites 2 and 3
Marin western flax	April – July	Site 2
Bristly leptosiphon	April – July	Sites 2 and 3
Large-flowered leptosiphon	April – August	Sites 2 and 3
Summer (July to August)		
Scouler's catchfly	June – August	Sites 2 and 3
Woolly-headed lessingia	June – October	Site 2
Gairdner's yampah	June – October	Sites 2 and 3
Crystal Springs lessingia	July – October	Site 2

If pre-activity surveys detect no special-status plants, then no further mitigation related to these species is necessary. If special-status plants are detected, then Mitigation Measures BIO-2, and BIO-3 if necessary, will be implemented.

Mitigation Measure BIO-2. Avoidance Buffers. To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent will design and construct the proposed project to completely avoid impacts on at least 90% of individuals in the populations of state or federally listed, state rare, or CRPR 1B and 2B plant species and/or at least 80% of individuals in the populations of CRPR 3 and 4 plant species on the project site or close enough to the site to be affected by the project. Avoided special-status plant populations will be protected by establishing and observing the identified buffer between plant populations and the impact area. All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, will be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around special-status plants to be avoided will be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site in question). This marking will be maintained intact and in good condition throughout project-related construction activities.

If complete avoidance is not feasible and more than 10% of a population (by occupied area or individuals) of state or federally listed, state rare, or CRPR 1B or 2B plant species, or more than 20% of a population of CRPR 3 or 4 plant species, will be impacted by the project as determined by a qualified plant ecologist, Mitigation Measure BIO-3 will be implemented.

Mitigation Measure BIO-3. Preserve and Manage Mitigation Populations. If avoidance of special-status plant species is not feasible and more than 10% of a population (by occupied area or individuals) of state or federally listed, state rare, or CRPR 1B or 2B plant species, or more than 20% of a population of CRPR 3 or 4 plant species would be impacted, compensatory mitigation will be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To compensate for impacts on these plants, off-site habitat occupied by the affected species will be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant affected, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10% significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to these species beyond the 10% significance threshold) or establish an entirely new population in suitable habitat.

Areas proposed to be preserved as compensatory mitigation for impacts to special-status plant species must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas will be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat will be of equal or greater habitat quality compared to the impacted areas, as determined by

a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and will contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands will be ensured through an appropriate mechanism, such as a conservation easement or fee title purchase. A habitat mitigation and monitoring plan (HMMP) will be developed by qualified plant or restoration ecologists and implemented for the mitigation lands. That plan will include, at a minimum, the following information:

- a summary of impacts to the special-status plant species in question, including impacts to its habitat, and the proposed mitigation;
- a description of the location and boundaries of the mitigation site and description of existing site conditions;
- a description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the species;
- a description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist);
- proposed management activities to maintain high-quality habitat conditions for the species;
- a description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria will include demonstration that any plant population fluctuations over the monitoring period of a minimum of 5 years for preserved populations and a minimum of 10 years for enhanced or established populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management);
- if a new population is established, the new population must contain at least 200 individuals or the same number of impacted individuals, whichever is greater, by year 5. This is to ensure the created population will be large enough to expect to persist and gain sufficient dedicated pollination services. If year 5 is a poor weather year for summer and fall-blooming annual plants and reference populations show a decline, this criteria can be measured in the next year occurring with average or better rainfall; and
- contingency measures for mitigation elements that do not meet performance criteria. For example, if by year 5 (or the next suitable rainfall year after year 5) of monitoring, the project is unable to establish a self-sustaining population of the required number of individuals as described above, the applicant shall preserve and manage an extant population of that same species under a revised HMMP.

Approval of the HMMP by the Town will be required before project impacts to special-status plant species occur.

6.1.3 Impacts on Water Quality (Less than Significant)

Direct impacts on wetlands and other waters on the project site are discussed in Section 6.3 below. Indirect impacts on water quality in the ephemeral drainage on Site 2 and the depressional seep wetland on Site 3 could potentially occur as a result of project activities located along and upslope of these habitats. Additionally, minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downslope and downstream of construction activities.

Indirect impacts on water quality from construction of the project would be avoided and minimized by implementing erosion and sediment control measures, as well as BMPs for work near aquatic environments. In addition, construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of storm water pollutants under the NPDES *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of BMPs to protect water quality until the site is stabilized. Standard permit conditions under the Construction General Permit require that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors.

In many Bay Area counties, including San Mateo County, projects must also comply with the California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (Water Board Order No. R2-2015-0049). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design to prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site after construction has been completed. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Compliance with these permit requirements will minimize the potential for impacts on water quality due to increases in erosion, sedimentation, and turbidity as well as releases of pollutants into the ephemeral drainage on Site 2 and the depressional seep wetland on Site 3. Therefore, project activities are not expected to result in substantial adverse indirect effects on water quality, and such impacts would be less than significant.

6.1.4 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant)

Several special-status bird, mammal, and invertebrate species may occur on the project site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These are the monarch butterfly, Vaux's swift, olive-sided flycatcher, yellow warbler, mountain lion, Townsend's big-eared bat, western red bat, and San Francisco dusky-footed woodrat.

The monarch butterfly may occur as an occasional forager on the project site, but it is not expected to breed there due to the absence of larval host plants (i.e. milkweeds). The Vaux's swift, olive-sided flycatcher, and yellow warbler (California species of special concern) are not expected to occur on or close to the project site as breeders due to the absence of suitable habitat, but individuals may occur occasionally as foragers during the nonbreeding season. Due to the proximity to open space areas associated with Edgewood Park and the Santa Cruz Mountains, the mountain lion (a state candidate species) may briefly traverse the site as a non-breeding dispersant or forager, but individuals are not expected to linger for any length of time due to high levels of human activity. The Townsend's big-eared bat and western red bat (California species of special concern) may occur on the project site as occasional foragers, but are not expected to breed or roost on the project site due to a lack of suitable habitat and existing human activity in the buildings on the site, and there are no known maternity colonies on or adjacent to the project site. Nevertheless, individuals from more remote colonies could potentially forage over open grasslands in the project site on rare occasions. No nests of the San Francisco dusky-footed woodrat (a California species of special concern) are present on the project site; however, at least two nests are present in oak woodlands near Site 3, and individuals from this community may forage on Site 3 occasionally.

Activities under the proposed project would have some potential to impact foraging habitats and/or disturb individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. Further, the project site does not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, impacts of the project will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant under CEQA.

6.1.5 Impacts on the White-Tailed Kite (Less than Significant)

The white-tailed kite (a state fully protected species) may nest in oak woodland habitat or landscape trees on and adjacent to the project site. Based on site observations, the areal extent of suitable habitats within and adjacent to the project site, and known nesting densities of this species, no more than one pair of white-tailed kites could potentially nest on or immediately adjacent to the project site. The project would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite. In addition, activities that occur during the nesting season and cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests (i.e., nests with eggs or young). Heavy ground disturbance, noise, and vibrations caused by project activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs that could be disturbed is very small (i.e., one pair), the impacts of project activities would represent a very small fraction of the regional population of this species. Therefore, neither the

potential loss of individual white-tailed kites, nor the disturbance of nesting and foraging habitat, would rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat under CEQA. However, as discussed in Section 3 above, all native migratory birds, including raptors, are protected under the MBTA and California Fish and Game Code. Recommended measures to comply with these laws are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.1.6 Impacts on Common Species of Roosting Bats (Less than Significant)

Common bat species, such as the California myotis (*Myotis californicus*), can potentially roost in small numbers in trees on the project site. No evidence of a colony of roosting bats was detected in trees on the site during the November 2022 focused survey, but the presence of small numbers of common species of roosting bats could not be ruled out. The removal of trees on the site has the potential to result in the loss of a small colony of common species of roosting bats. When trees containing roosting colonies or individual bats are removed or modified, individual bats can be physically injured or killed, can be subjected to physiological stress from disturbance during torpor, or can face increased predation because of exposure during daylight. In addition, nursing young may be subjected to disturbance-related abandonment by their mothers. However, the trees present on the site only provide marginal habitat for roosting bats, and initial surveys concluded that if common species of roosting bats were to roost in these structures, they would occur only in small numbers. Therefore, the loss of the marginal habitat or a small number of individuals of common bat species would not have a *substantial* adverse effect on local and regional populations of these species, and thus would not constitute a significant impact under CEQA.

6.1.7 Impacts due to Bird Collisions (Less than Significant)

Under existing conditions, the project site consists of a mix of undeveloped areas (dominated by grasslands and oak woodlands) and developed areas (with parking lots, landscape vegetation, and small, single-story buildings). Terrestrial land uses and habitat conditions in immediately surrounding areas are similar to those on the project site and consist of buildings, landscaped areas, and small undeveloped grassland and woodland habitats associated with Cañada College. Areas surrounding the college predominantly consist of low-density residential properties with associated buildings, pedestrian walkways, roads, and landscape vegetation, as well as some limited areas of remnant grasslands and oak woodlands. Habitats in these surrounding areas are similar to those on the project site, with a mix of native and nonnative vegetation. Where native vegetation is present, it provides higher-quality habitat for native bird species. In contrast, the surrounding residential properties support many nonnative landscape trees and shrubs, which supports fewer of the resources required by native birds compared native vegetation, and the structural simplicity of the vegetation (without well-developed ground cover, understory, and canopy layers) in these areas further limits resources available to birds (Anderson et al. 1977, Mills et al. 1989).

Because the natural habitats on and adjacent to the project site are limited in extent and of relatively lower quality compared to habitats in natural open space areas in the region (e.g., at Edgewood Park to the north and

in the foothills of the Santa Cruz Mountains to the west), and the site is regularly disturbed by human activities, the number of individual landbirds that inhabit and regularly use vegetation on the project site at any given time is low under existing conditions. Particularly rare species or species of conservation concern are not expected to occur on the project site.

The extent and species of future landscape vegetation to be installed under the project is unknown. For the purpose of this assessment, we assume that while a number of the existing mature trees on the site may be removed, they would be replaced in accordance with the Town's tree protection requirements. Any trees and landscaped areas that will be planted on the site in the future are expected to provide similar habitat structure and foraging opportunities for landbirds compared to existing conditions, although the extent of grasslands on the site will likely be reduced following construction. Landbirds that will occur on the site and in the vicinity will be attracted to any trees and landscaped areas that are planted, and some will make use of new developed structures. These birds will move between the site and habitats in the surrounding vicinity (e.g., the open space areas to the north). As a result, no substantive changes in the number of songbirds inhabiting the project site are expected to result from the proposed project.

It is well documented that glass windows and building façades can result in injury or mortality of birds due to birds' collisions with these surfaces (Klem et al. 2009, Sheppard and Phillips 2015). Because birds do not perceive glass as an obstruction the way humans do, they may collide with glass when the sky or vegetation is reflected in glass (e.g., they see the glass as sky or vegetated areas); when transparent windows allow birds to perceive an unobstructed flight route through the glass (such as at corners); and when the combination of transparent glass and interior vegetation (such as in planted atria) results in attempts by birds to fly through glass to reach that vegetation. The greatest risk of avian collisions with buildings occurs in the area within 40–60 feet of the ground, because this is the area in which most bird activity occurs (San Francisco Planning Department 2011, Sheppard and Phillips 2015). Very tall buildings (e.g., buildings 500 feet or more high) may also pose a threat to birds that are migrating through the area, particularly to nocturnal migrants that may not see the buildings or that may be attracted to lights on the buildings (San Francisco Planning Department 2011).

Birds are likely to collide with glazing on building façades on the project site for the following reasons:

- It is possible that the project may incorporate trees and other landscaping immediately adjacent to glazing on a building's façades. Such vegetation is expected to attract birds. Once birds are using that vegetation, they may not perceive the glass as a solid structure. The vegetation would reflect in the glass of the building's façades, potentially causing birds to attempt to fly in to the reflected "vegetation" and strike the glass. As a result, some birds that are attracted to the trees and other landscaping that is adjacent to the glass façades are expected to collide with the glass.
- Night lighting associated with new buildings has some potential to disorient birds, especially during inclement weather when night migrating birds descend to lower altitudes. As a result, some birds moving through the project site at night may be disoriented by night lighting and potentially collide with buildings.

The extent to which the proposed new buildings and other structures will incorporate glazing on their façades is unknown, as these structures have not yet been designed. However, it is our understanding that while these buildings will incorporate some glazing on their facades, they will not be designed to incorporate extensive glazing. Because the buildings are expected to incorporate predominantly opaque facades with no extensive areas of glazing, birds will be better able to perceive the building facades as solid obstructions to flight than if the glassy surface appeared more uniform. Thus, the number and frequency of avian collisions with glass façades on the proposed buildings is expected to be low, and the project would not result in the loss of a substantial proportion of any species' Bay-area populations or any Bay-area bird community. Thus, according to CEQA standards, we would consider such impacts to be less than significant.

6.1.8 Impacts due to Increased Lighting (Less than Significant)

The project will result in the construction of buildings and other features (e.g., driveways, roads, and sidewalks) that will increase the amount of lighting on and around the project site. Lighting from the project would be the result of light fixtures illuminating buildings, building architectural lighting, driveway/road lighting, and pedestrian lighting. Depending on the location, direction, and intensity of exterior lighting, this lighting can potentially spill into adjacent natural areas, thereby resulting in an increase in lighting compared to existing conditions. The areas surrounding the site are primarily developed residential areas that do not support sensitive species that might be significantly impacted by illuminance from the project.

Many animals are sensitive to light cues, which influence their physiology and shape their behaviors, particularly during the breeding season (Ringer 1972, de Molenaar et al. 2006). Artificial light has been used as a means of manipulating breeding behavior and productivity in captive birds for decades (de Molenaar et al. 2006), and has been shown to influence the territorial singing behavior of wild birds (Longcore and Rich 2004, Miller 2006, de Molenaar et al. 2006). While it is difficult to extrapolate results of experiments on captive birds to wild populations, it is known that photoperiod (the relative amount of light and dark in a 24-hour period) is an essential cue triggering physiological processes as diverse as growth, metabolism, development, breeding behavior, and molting (de Molenaar et al. 2006). This holds true for birds, mammals (Beier 2006), and other taxa as well, suggesting that increases in ambient light may interfere with these processes across a wide range of species, resulting in impacts on wildlife populations.

Artificial lighting may indirectly impact mammals and birds by increasing the nocturnal activity of predators like owls, hawks, and mammalian predators (Negro et al 2000, Longcore and Rich 2004, DeCandido and Allen 2006, Beier 2006). The presence of artificial light may also influence habitat use by rodents (Beier 2006) and by breeding birds (Rogers et al. 2006, de Molenaar et al. 2006), by causing avoidance of well-lit areas, resulting in a net loss of habitat availability and quality.

As discussed above, the project site does not provide particularly high-quality migratory stopover habitat, and only small numbers of migrants are expected to occur there. Thus, project lighting has a lower potential to attract and/or disorient migrating birds during the spring and fall compared to buildings located in natural areas. New lighting on the project site is primarily expected to affect resident birds, which are primarily active

during the day and generally more familiar with their surroundings (and less likely to be attracted by lights and collide with buildings) compared to migrating birds.

The wildlife species inhabiting the project site and surrounding areas are already habituated to the existing artificial illuminance from a variety of light sources on the Cañada College campus, as well as surrounding residential properties. Based on the presence of existing surrounding development with associated light sources, as well as the small number of migrant birds expected to occur on the site, it is our opinion that any increase in illuminance on the site and in adjacent areas as a result of the proposed project would not rise to the CEQA standard of a substantial adverse effect on birds and other wildlife species, and impacts due to increased lighting would be considered less than significant.

6.2 Impacts on Sensitive Communities: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant with Mitigation)

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (Faber-Langendoen 2012), as described above in Section 5.3. Aquatic, wetland, and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS (see Section 6.3 below). Project impacts on sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, were considered and evaluated.

As discussed in Section 5.3.3, no riparian habitat occurs on the project site, and the project will have no impacts on sensitive riparian habitats. Project impacts on sensitive serpentine needlegrass grassland habitat are discussed in Section 6.2.1, and impacts on the ephemeral drainage and depressional seep wetland habitats are discussed in Section 6.3.

6.2.1 Impacts on Serpentine Needlegrass Grassland Habitat (Less than Significant with Mitigation)

The project would result in the permanent conversion of up to 0.3 acre of serpentine needlegrass grassland to developed areas on Site 2. These impacts would result in a reduction in the extent of native serpentine vegetation on the site. Direct impacts would include grading or filling areas supporting serpentine species, trampling or crushing of plants, and soil compaction. Indirect impacts would include increased mobilization of dust onto plants, which can affect their photosynthesis and respiration, changes to hydrology supporting these plants due to grading or construction in nearby habitats, and nitrogen deposition resulting from an increase in vehicle trips associated with the completed project.

Serpentine habitats support unique plant species composition, density, and distribution (Sauceda 2021), with high levels of species endemism and a number of species that have low sensitivity to climate change (Damschen

et al., 2012). Serpentine soils occupy only 0.68% (5.1 acres) of San Mateo County, and needlegrass-dominated grasslands represent an even smaller fraction of this area. As discussed in Section 4.2.5, the serpentine needlegrass grassland on the project site appears to be of high quality due to the variety in age structure, which indicates the grassland is naturally recruiting and is not diminishing in quality like many other needlegrass grasslands in San Mateo County that struggle with stronger nonnative competition and the effects of nitrogen deposition. Thus, the serpentine needlegrass grassland on the project site represents a relatively high-quality occurrence of this unique habitat type.

Due to the sensitivity of this habitat and its limited extent in San Mateo County, the loss of 0.3 acre of high-quality serpentine needlegrass grassland from construction of the project would result in a substantial loss of this habitat in the region. Therefore, these impacts are considered significant under CEQA. The implementation of Mitigation Measures BIO-4 and BIO-5 below will reduce these impacts to a less-than-significant level.

Mitigation Measure BIO-4. Avoidance of Serpentine Needlegrass Grassland. As mentioned in the introduction to the *Impacts* section above, we assumed for the purpose of this assessment that the project will impact up to the 7.8-acre area of the project site, including all areas of serpentine needlegrass grassland habitat on Site 2. Because the project has not yet been designed, it may be feasible for development to be planned in such a way that impacts to serpentine needlegrass grassland can be avoided altogether, or reduced so that not all of this habitat is impacted. When preparing detailed plans for development, the developer shall avoid impacts to serpentine needlegrass grassland, or at least minimize such impacts, to the extent practicable. If all impacts on this habitat are avoided, Mitigation Measure BIO-5 is not necessary. If any serpentine needlegrass grassland will be impacted, Mitigation Measure BIO-5 will be implemented.

Mitigation Measure BIO-5. Compensate for the Loss of Serpentine Needlegrass Grassland. To compensate for unavoidable effects to serpentine needlegrass grassland, the project shall protect, enhance, and manage serpentine communities outside of the project site at a 2:1 (impact : mitigation) ratio, on an acreage basis. Compensatory mitigation may be carried out through one or both of the following methods, in order of preference:

- Preservation via acquisition of land supporting serpentine communities via fee title or purchase of a conservation easement.
- Contribute to the management of existing serpentine communities (e.g., at Edgewood Park)
- The restoration or enhancement of previously existing or degraded serpentine communities
- The project proponent will develop a Habitat Mitigation and Management Plan (HMMP), describing the measures that will be taken to enhance and manage the mitigation lands and to monitor the effects of management on serpentine communities. That plan will include, at a minimum, the following:
- A summary of impacts to serpentine needlegrass grassland and the proposed mitigation

- A description of the location and boundaries of the mitigation site and description of existing site conditions
- A description of measures to be undertaken if necessary to enhance (e.g., through focused management) the mitigation site for serpentine communities
- Proposed management activities, such as managed grazing and management of invasive plants, to maintain high-quality serpentine communities
- A description of community monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. Determining specific performance/success criteria requires information regarding the specific mitigation site, its conditions, the biological resources present on the site, and the specific enhancement and management measures tailored to that site and its conditions. As a result, those specific criteria will be defined in the HMMP (rather than in this EIR). Nevertheless, the performance/success criteria described in the HMMP will ensure that the result of the mitigation is the management and protection of high-quality serpentine communities that adequately compensate for the functions and values of the impacted communities.
- A description of the management plan's adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria
- A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands

After mitigation has been provided for impacts to a specific area supporting serpentine needlegrass grassland from project construction, future (i.e., repetitive) impacts to that area will not require additional mitigation.

6.3 Impacts on Wetlands: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Less than Significant with Mitigation)

The unnamed ephemeral drainage on Site 2 may be considered jurisdictional waters of the U.S. based on the presence of OHW marks on opposing banks, regular flow, ephemeral hydrology in most years, and indirect hydrologic connectivity to traditionally navigable waters (Crystal Springs Reservoir and eventually the San Francisco Bay). The depressional seep wetland on Site 3 would likely be considered jurisdictional waters of the U.S. based on the presence of obligate hydrophytic vegetation and direct observations of hydrology (i.e., flowing surface water and seasonal inundation). Waters of the U.S. would likely include all areas up to the OHW marks of the drainage and wetland. Waters of the state would likely include all potential waters of the U.S., as well as all areas up to the top of bank lines on either side of the ephemeral drainage. Whether or not these areas are considered jurisdictional is subject to the determination of the USACE and/or RWQCB. For the purpose of our CEQA assessment, we are evaluating the significance of project impacts to these wetlands and other waters

ecologically, rather than from the perspective of whether or not impacts to the wetland would be subject to the Clean Water Act or Porter-Cologne Water Quality Control Act.

Approximately 921 square feet of ephemeral drainage habitat and 64 square feet of depressional seep wetland habitat is proposed to be permanently filled to support the construction of the project. Regardless of whether these wetlands are determined to be jurisdictional, they serve a variety of important functions, such as sediment stabilization, sediment/toxicant retention, and nutrient removal/transformation. These wetlands have some ecological value within the urban surroundings of the project site and surrounding vicinity. Even though the area of impacts is relatively small, wetlands are relatively scarce regionally, and even small wetland areas have disproportionate contributions to water quality, groundwater recharge, and watershed function in the region. For all of these reasons, permanent impacts on the ephemeral drainage and depressional seep wetland on the project site would be considered significant under CEQA. In addition, if these features are regulated by the USACE and/or RWQCB, permits from one or both agencies may be required before these wetlands are filled.

The implementation of Mitigation Measure BIO-6, and Mitigation Measure BIO-7 if necessary, would reduce project impacts on ephemeral drainage and depressional seep wetland habitats to a less-than-significant level. In addition, for any activity that results in fill of these habitats, the project proponent will obtain any necessary resource agency permits and comply with the conditions of those permits.

Mitigation Measure BIO-6. Project Redesign. As mentioned in the introduction to the *Impacts* section above, we assumed for the purpose of this assessment that the project will impact up to the entire 7.8-acre area of the project site, including all areas of ephemeral drainage habitat on Site 2 and depressional seep wetland habitat on Site 3. Because the project has not yet been designed, it may be feasible for development to be planned in such a way that impacts to ephemeral drainage and depressional seep wetland habitats can be avoided altogether, or reduced so that not all of these habitats are impacted. When preparing detailed plans for development, the developer shall avoid impacts to ephemeral drainage and depressional seep wetland habitats, or at least minimize such impacts, to the extent practicable. If all impacts on these habitats are avoided, Mitigation Measure BIO-7 is not necessary. If any wetlands will be impacted, Mitigation Measure BIO-7 will be implemented.

Mitigation Measure BIO-7. Provide Compensatory Mitigation for Stream and Wetland Impacts. To compensate for the permanent loss of stream habitat along the ephemeral drainage on Site 2 and wetland habitat within the depressional seep wetland on Site 3, stream and wetland habitat will be restored or created at a minimum ratio of 1:1 (compensation : impact) for impacts to the ephemeral drainage and 2:1 for impacts to the depressional seep wetland on an acreage basis. These ratios are not higher due to the relatively low quality of the ephemeral drainage and wetland habitats on the project site relative to more extensive, less fragmented habitats elsewhere on the San Francisco Peninsula, and are not lower due to the temporal loss of wetland functions and values that will result from the lag between project impacts to these habitats and the maturation of the mitigation habitat (discussed below).

Compensation for impacts to wetland habitat will be provided by creating or restoring wetland habitat so as to achieve the 2:1 (compensation : impact) ratio somewhere on the San Francisco Peninsula. No mitigation banks are currently available in the region.

Compensation for impacts to stream habitat will be provided by restoring or enhancing existing ephemeral, intermittent, or perennial stream habitat so as to achieve the 1:1 (compensation : impact) ratio somewhere on the San Francisco Peninsula. No mitigation banks are currently available in the region. Examples of stream restoration and enhancement options include planting riparian vegetation, erosion repair, stream bank repair and rehabilitation, and replacing concrete or riprap banks with earthen banks. The mitigation habitat may be hydrologically isolated from a stream as long as it is located within 300 feet of the stream, is not separated from the stream by development other than a trail or levee, and is dominated by native riparian trees.

A qualified biologist shall develop a "Stream and Wetland Mitigation and Monitoring Plan" describing the mitigation, which will contain the following components (or as otherwise modified by regulatory agency permitting conditions):

- Summary of habitat impacts and proposed mitigation ratios
- Goal of the restoration to achieve no net loss of habitat functions and values
- Location of mitigation site(s) and description of existing site conditions
- Mitigation design:
    - Existing and proposed site hydrology
    - Grading plan if appropriate, including bank stabilization or other site stabilization features
    - Soil amendments and other site preparation elements as appropriate
    - Planting plan
    - Irrigation and maintenance plan
    - Remedial measures and adaptive management
- Monitoring plan (including final and performance criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule). Success criteria will include quantifiable measurements of wetland vegetation type (e.g., dominance by natives) and extent appropriate for the restoration location, and provision of ecological functions and values equal to or exceeding those in the wetland habitat affected. At a minimum, success criteria will include following:
    - For stream mitigation, the mitigation site will improve and enhance instream ecologic, hydrologic, and geomorphic conditions, and improve overall stream and wetland functions and values, as determined by a qualified stream or restoration ecologist. If the mitigation incorporates riparian plantings, at Year 10 post-planting canopy closure at the mitigation site will be at least 60% of the canopy closure at a

nearby reference site (i.e., a site supporting the same habitat type as that being established at the mitigation site).

- For wetland mitigation, at least 75% of the wetland mitigation site will be dominated by native hydrophytic vegetation at Year 5 post-mitigation.

The Stream and Wetland Mitigation and Monitoring Plan must be approved by the Town of Woodside prior to the wetland impacts, and it must be implemented within one year following project impacts.

6.4 Impacts on Wildlife Movement: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Less than Significant)

6.4.1 Impacts on Wildlife Movement (Less than Significant)

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

The project site surrounded by low-density urban residential development in Woodside. As a result, the proposed development of the project site would not result in the fragmentation of natural habitats. While some wildlife species that occur in nearby natural areas may move through the site when traveling through the area, any wildlife species that currently move through surrounding residential areas would continue to be able to do so following project construction, and the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact is determined to be less than significant.

6.4.2 Impacts on Nesting Birds (Less than Significant)

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the project site or in immediately adjacent areas. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on and adjacent to the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on

their regional populations). Thus, in our opinion, no mitigation measures are warranted to avoid and minimize project impacts on nesting birds under CEQA.

Nevertheless, several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. Recommended measures to ensure project compliance with the MBTA and California Fish and Game Code are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.5 Impacts due to Conflicts with Local Policies: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Less than Significant with Mitigation)

6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant)

The project may remove existing trees on the site, including significant trees as defined by the Town (see Section 3.3.1 above), and the applicant will submit a permit application for tree removal. In accordance with the Woodside Municipal Code, the provisions listed below would be required by the project, at a minimum, for trees to be protected on the site:

- Tree protection fencing and appropriate signage around the drip lines of trees to be protected
- Measures to effect erosion control, soil and water retention, and to limit adverse environmental effects
- Significant trees that will be impacted by the project will be replaced in accordance with all applicable laws, policies or guidelines, including Section 153.430 of the Woodside Municipal Code. Per Section 453.438 of the Municipal Code, any significant trees shall be replaced with a California native tree species, be planted as near as possible to the original location, and will be of at least a 36-inch box or other minimum size as specified by the Planning Director. Replacement trees shall be planted within one year of removal or, in the case of removal to accommodate construction, prior to final inspection.

With the incorporation of the above measures to insure compliance with the Woodside Municipal Code, any potential impacts related to conflict with local policies or ordinances protecting trees would be less than significant.

6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant with Mitigation)

To protect the ecological functions and values of a stream, buffers are often prescribed between new development and the stream (or its banks or associated riparian habitat). These buffers provide habitat for plants and animals associated with the stream, provide habitat connectivity (i.e., areas used for wildlife movement, including flight paths for birds), reduce indirect effects of adjacent development (e.g., noise,

lighting, human activity, or invasive species) on the natural stream and riparian habitats, allow for the possible future expansion of natural habitat, help to maintain site hydrology, and in some areas allow for runoff to be treated (e.g., by flowing through vegetated areas) before it enters the stream. In addition, vegetative communities within stream buffers may provide important refugia for animals associated with wetland and riparian habitats along the creek during flood events, when little to no such refugia may be present within the banks of the creek itself. In general, larger buffers protect more of the ecological functions and values of the stream than smaller buffers.

The Town's Stream Corridor Protection Ordinance states that a protected stream corridor extends a horizontal distance of 50 feet measured from each side of the centerline of the stream, or 25 feet measured from the top of bank, whichever is greater. A protected stream corridor is present along the unnamed ephemeral drainage on Site 2, and this corridor overlaps the project site on either side of the drainage (Figure 3). In our opinion, based on the lack of the riparian habitat along the ephemeral drainage and the limited habitat value provided by this drainage to the wildlife community present at this location (discussed in Section 4.3 above), the Town's specified 50-foot-wide corridor measured from the stream centerline is an appropriate buffer distance between new construction and the ephemeral drainage to maintain suitable riparian functions and values.

Under the proposed project, the entire 0.3-acre area within the stream corridor that overlaps Site 2 would be modified in some way. The project would convert 0.2 acre of coast live oak woodland, 1,379 square feet of California annual grassland, 921 square feet of ephemeral drainage, 824 square feet of ornamental woodland, and 246 square feet of serpentine needlegrass grassland within the stream corridor to developed land uses.

Under CEQA, owing to the importance of maintaining setbacks (and maintaining habitat quality within those setbacks) between new development and riparian habitat, impacts of encroachment into the protected stream corridor would be significant for the project (due to the ecological impacts of closer development to sensitive riparian communities) if (a) new development is located any closer to the creek than existing conditions, or (b) changes in existing development or landscaping would result in substantial adverse effects on the ecological functions and values of the creek/riparian corridor. The removal of oak woodland, California annual grassland, ephemeral drainage, ornamental woodland, and serpentine needlegrass grassland habitat within the stream corridor would encroach closer to the ephemeral drainage compared to baseline conditions.

However, in our opinion, due to the lack of distinctive riparian vegetation along the drainage, and because the drainage does not support sensitive riparian-associated aquatic or terrestrial wildlife communities, the proposed conversion of natural habitats to developed areas within the setback would not substantially degrade the ecological functions and values of a stream corridor. Therefore, it is our opinion that the project's encroachment into the stream corridor would not be considered a significant biological impact under CEQA.

However, the Town requires all projects to comply with the Town's adopted Stream Corridor Protection Ordinance. Under CEQA, the project would have a potentially significant impact from the perspective of conflicts with local policies if it is not in compliance with the Town's Stream Corridor Protection Ordinance

related to alternation of the stream corridor (i.e., the conversion of natural areas to developed areas) or the construction of structures within the corridor. Implementation of Mitigation Measure BIO-8 below would reduce this conflict to a less-than-significant level.

Mitigation Measure BIO-8. Obtain Town Approval of Design. The applicant shall avoid conflicts with the Town's Stream Corridor Protection Ordinance in some combination of the following two ways:

(1) The project shall be designed so that it complies with the Stream Corridor Protection Ordinance by avoiding the modification of mixed oak woodland and the construction of structures within the protected stream corridor.

(2) The applicant shall obtain the Town's approval of the project design. Given our opinion that encroachment of the project by approximately 0.3 acre within the stream corridor would not be considered a significant biological impact under CEQA, the Town may be willing to approve project impacts within the stream corridor.

6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan: Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (No Impact)

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans.

6.7 Cumulative Impacts (Less than Significant)

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in Woodside will result in impacts on the same habitat types and species that will be affected by the proposed project. The proposed project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the project in combination with other projects in the larger region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project; and compensatory mitigation and proactive conservation measures associated with each project. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

However, many projects in the region that impact resources similar to those impacted by the project will be subject to CEQA requirements. It is expected that such projects will mitigate their impacts on sensitive habitats and special-status species through the incorporation of mitigation measures and compliance with permit conditions.

Regardless of the magnitude and significance of cumulative impacts that result from other projects, the Cañada College Residential project is not expected to have a substantial effect on biological resources, and would implement the mitigation measure described above to reduce impacts under CEQA to less than significant levels. Thus, provided that this project successfully incorporates the mitigation measure described in this biological resources report, the project will not have a cumulatively considerable contribution to cumulative effects on biological resources.

Section 7. Compliance with Additional Laws and Regulations for Nesting Birds

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. It is also possible that protected native birds could nest on the buildings on the site. The removal of vegetation or demolition of buildings supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). However, the following measures should be implemented to ensure that project activities do not violate the MBTA and California Fish and Game Code:

Measure 1. Avoidance of the Nesting Season. To the extent feasible, the initiation of commencement of demolition and construction activities should be scheduled to avoid the nesting season. If demolition and construction activities are initiated outside the nesting season, all potential demolition/construction impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.

Measure 2. Pre-Activity/Pre-Disturbance Surveys. If it is not possible to schedule the initiation of demolition and construction activities between September 1 and January 31, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. We recommend that these surveys be conducted no more than seven days prior to the initiation of demolition or construction activities. During this survey, the ornithologist will inspect all trees and other potential nesting habitats (e.g., trees, shrubs, and buildings) in and immediately adjacent to the impact areas for nests.

Measure 3. Non-Disturbance Buffers. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist will determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.

Measure 4. Inhibition of Nesting. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1). This will preclude the initiation of nests in this vegetation, and minimize the potential delay of the project due to the presence of active nests in these substrates.

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Appendix A. Plants Observed

Family	Scientific Name	Common Name	Cal-IPC Rank[1]
Pinaceae	*Pinus halepense**	Aleppo pine	
Anacardiaceae	*Toxicodendron diversilobum*	poison oak	
Apiaceae	*Torilis arvensis**	spreading hedgeparsely	
Asteraceae	*Baccharis pilularis* ssp. *consanguinea*	coyote bush	
Asteraceae	*Carduus pycnocephalus* ssp. *pycnocephalus**	Italian thistle	Moderate
Asteraceae	*Centaurea solstitialis**	yellow star-thistle	High
Asteraceae	*Dittrichia graveolens**	stinkwort	Moderate
Asteraceae	*Hemizonia congesta* ssp. *luzulifolia*	woodrush tarplant	
Asteraceae	*Sonchus* sp.*	sow thistle	
Brassicaceae	*Hirschfeldia incana**	short-podded mustard	Moderate
Cistaceae	*Cistus ladanifer**	gum cistus	
Convolvulaceae	*Convolvulus arvensis**	field bindweed	
Dipsacaceae	*Dipsacus fullonum**	wild teasel	Moderate
Fabaceae	*Vicia sativa* ssp. *sativa*	common vetch	
Fabaceae	*Genista monspessulana**	French broom	High
Fabaceae	*Melilotus* sp.*	sweetclover	
Fabaceae	*Trifolium hirtum**	rose clover	Moderate
Fagaceae	*Quercus agrifolia*	coast live oak	
Fagaceae	*Quercus lobata*	valley oak	
Geraniaceae	*Erodium botrys**	long-beaked filaree	
Lamiaceae	*Mentha pulegium**	pennyroyal	Moderate
Oleaceae	*Olea europaea**	European olive	Limited
Onagraceae	*Clarkia* sp.	farewell-to-spring	
Onagraceae	*Oenothera elata*	tall evening primrose	
Papaveraceae	*Eschscholzia californica*	California poppy	
Polygonaceae	*Rumex crispus**	curly dock	Limited
Rosaceae	*Cotoneaster* sp.*	cotoneaster	Moderate
Rosaceae	*Heteromeles arbutifolia*	toyon	
Sapindaceae	*Aesculus californica*	California buckeye	

Agavaceae	*Chlorogalum pomeridianum*	soap plant	
Cyperaceae	*Cyperus eragrostis*	lovegrass flatsedge	
Poaceae	*Avena* sp.*	wild oat	
Poaceae	*Bromus diandrus**	ripgut brome	Moderate
Poaceae	*Bromus rubens**	red brome	High
Poaceae	*Festuca perennis**	Italian rye grass	Moderate
Poaceae	*Hordeum murinum**	foxtail barley	Moderate
Poaceae	*Phalaris aquatica**	Harding grass	Moderate
Poaceae	*Stipa* sp.	needlegrass	

[1]Cal-IPC Ranks (Cal-IPC 2022):

- Watch List – These species are predicted to become invasive if no further actions are taken. Distribution may range from limited to widespread in specific regions.
- Limited – These species are invasive, but their ecological impacts are minor on a statewide level. They have low to moderate rates of colonization. Although their distribution is generally limited, these species may be locally persistent and problematic.
- Moderate – These species have substantial and apparent—but generally not severe—ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal. Distribution may range from limited to widespread.
- High – These species have severe ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal and establishment, and most are widely distributed.

*Nonnative or invasive species

Appendix B. Special-Status Plants Considered but Rejected for Occurrence

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records	Safford Index
Blasdale's bent grass	*Agrostis blasdalei*	X			X	
Franciscan onion	*Allium peninsulare* var. *franciscanum*		X			WI
California androsace	*Androsace elongate* ssp. *acuta*				X	
coast rockcress	*Arabis blepharophylla*	X			X	
Anderson's manzanita	*Arctostaphylos andersonii*	X				
Montara manzanita	*Arctostaphylos montarensis*	X			X	
Kings Mountain manzanita	*Arctostaphylos regismontana*	X	X	X		
ocean bluff milk-vetch	*Astragalus nuttallii* var. *nuttallii*	X		X	X	
coastal marsh milk-vetch	*Astragalus pycnostachyus* var. *pycnostachyus*	X		X	X	
Brewer's calandrinia	*Calandrinia breweri*	X				
Oakland star-tulip	*Calochortus umbellatus*				X	SI
pink star-tulip	*Calochortus uniflorus*	X				WI
Johnny-nip	*Castilleja ambigua* var. *ambigua*	X			X	
Congdon's tarplant	*Centromadia parryi* ssp. *congdonii*				X	
pappose tarplant	*Centromadia parryi* ssp. *parryi*	X	X		X	
Point Reyes salty bird's-beak	*Chloropyron maritimum* ssp. *palustre*	X		X	X	
San Francisco Bay spineflower	*Chorizanthe cuspidata* var. *cuspidata*	X				
Franciscan thistle	*Cirsium andrewsii*	X				WI
fountain thistle	*Cirsium fontinale* var. *fontinale*	X				SE
lost thistle	*Cirsium praeteriens*			X	X	
Santa Clara red ribbons	*Clarkia concinna* ssp. *automixa*	X				
round-headed Chinese-houses	*Collinsia corymbosa*	X		X	X	

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records	Safford Index
San Francisco collinsia	*Collinsia multicolor*	X				WI/IN
clustered lady's-slipper	*Cypripedium fasciculatum*	X				SI
mountain lady's-slipper	*Cypripedium montanum*	X				
San Mateo woolly sunflower	*Eriophyllum latilobum*	X				SE
Hoover's button-celery	*Eryngium aristulatum* var. *hooveri*	X		X	X	
Jepson's coyote-thistle	*Eryngium jepsonii*	X	X			
minute pocket moss	*Fissidens pauperculus*	X				
Hillsborough chocolate lily	*Fritillaria biflora* var. *ineziana*				X	BE
San Francisco gumplant	*Grindelia hirsutula* var. *maritima*				X	WI/IN
short-leaved evax	*Hesperevax sparsiflora* var. *brevifolia*	X				
Kellogg's horkelia	*Horkelia cuneata* var. *sericea*	X				
Point Reyes horkelia	*Horkelia marinensis*	X				
island tube lichen	*Hypogymnia schizidiata*	X		X		
coast iris	*Iris longipetala*	X				
perennial goldfields	*Lasthenia californica* ssp. *macrantha*	X			X	
legenere	*Legenere limosa*	X			X	
coast yellow leptosiphon	*Leptosiphon croceus*	X			X	
broad-lobed leptosiphon	*Leptosiphon latisectus*	X			X	WI
rose leptosiphon	*Leptosiphon rosaceus*	X		X	X	
spring lessingia	*Lessingia tenuis*	X				
Ornduff's meadowfoam	*Limnanthes douglasii* ssp. *ornduffii*	X		X	X	
San Mateo tree lupine	*Lupinus arboreus* var. *eximius*	X				
white-rayed pentachaeta	*Pentachaeta bellidiflora*				X	WI
Michael's rein orchid	*Piperia michaelii*	X				
Choris' popcornflower	*Plagiobothrys chorisianus* var. *chorisianus*	X				
Hickman's popcornflower	*Plagiobothrys chorisianus* var. *hickmanii*	X				

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records	Safford Index
Oregon polemonium	*Polemonium carneum*	X				
Hickman's cinquefoil	*Potentilla hickmanii*	X				
Lobb's aquatic buttercup	*Ranunculus lobbii*	X				
Sanford's arrowhead	*Sagittaria sanfordii*	X				
chaparral ragwort	*Senecio aphanactis*	X				
San Francisco campion	*Silene verecunda* ssp. *verecunda*		X			
northern slender pondweed	*Stuckenia filiformis* ssp. *alpina*	X			X	
two-fork clover	*Trifolium amoenum*				X	WI/IN
Santa Cruz clover	*Trifolium buckwestiorum*	X				
saline clover	*Trifolium hydrophilum*				X	
San Francisco owl's-clover	*Triphysaria floribunda*	X				WI
coastal triquetrella	*Triquetrella californica*	X		X		
Methuselah's beard lichen	*Usnea longissima*				X	

[1]Serpentine affinity levels are provided by Safford and Miller (2020). Those species without a category are not included in the index and are presumed to have no serpentine affinity.

SE = strict endemic

BE = broad endemic

SI = strong indicator

WI = weak indicator

WI/IN = weak indicator/indifferent

H. T. HARVEY & ASSOCIATES

Ecological Consultants

773 Cañada Road Residential Project
Biological Resources Report

Project #4687-01

Prepared for:

Kevin Bryant
Town of Woodside
P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

Prepared by:

H. T. Harvey & Associates

December 1, 2022

983 University Avenue, Building D • Los Gatos, CA 95032 • Ph: 408.458.3200

List of Abbreviated Terms

BMPs	best management practices
Cal-IPC	California Invasive Plant Council
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DBH	diameter at breast height
FESA	Federal Endangered Species Act
HMMP	habitat mitigation and monitoring plan
LSAA	Lake and Streambed Alteration Agreement
MBTA	Migratory Bird Treaty Act
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
OHW	ordinary high water
Porter-Cologne	Porter-Cologne Water Quality Control Act
RWQCB	Regional Water Quality Control Board
SWRCB	State Water Resources Control Board
Town	Town of Woodside
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VegCAMP	Vegetation Classification and Mapping Program

Table of Contents

Section 1. Introduction 1
1.1 Project Location 1
1.2 Project Description 1

Section 2. Methods 4
2.1 Background Review 4
2.2 Site Visit 4

Section 3. Regulatory Setting 5
3.1 Federal Regulations 5
3.1.1 Clean Water Act 5
3.1.2 Rivers and Harbors Act 5
3.1.3 Federal Endangered Species Act 6
3.1.4 Federal Migratory Bird Treaty Act 7
3.2 State Regulations 7
3.2.1 Porter-Cologne Water Quality Control Act 7
3.2.2 California Endangered Species Act 8
3.2.3 Native Plant Protection Act 8
3.2.4 California Environmental Quality Act 9
3.2.5 California Fish and Game Code 10
3.2.6 State Water Resources Control Board Stormwater Regulation 11
3.3 Local Regulations 12
3.3.1 Woodside Tree Protection Ordinance 12
3.3.2 Woodside Stream Corridor Protection Ordinance 13

Section 4. Environmental Setting 14
4.1 General Project Area Description 14
4.2 Biotic Habitats 14
4.2.1 California Annual Grassland 14
4.2.2 Developed 17
4.2.3 Ornamental Woodland 17
4.2.4 Valley Oak Woodland 18
4.2.5 Needlegrass Grassland 19
4.2.6 Coast Live Oak Woodland 20
4.3 Adjacent Habitat Areas 20
4.4 Wildlife Movement 21

Section 5. Special-Status Species and Sensitive Habitats 22
5.1 Special-Status Plant Species 25
5.2 Special-Status Animal Species 30
5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats 41
5.3.1 Sensitive Natural Communities 41
5.3.2 Sensitive Vegetation Alliances 42
5.3.3 CDFW Riparian Habitat 42
5.3.4 Sensitive Habitats (Waters of the U.S./State) 42
5.3.5 Nonnative and Invasive Species 42

Section 6. Impacts and Mitigation Measures 44
6.1 Impacts on Special-Status Species 45
6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant) 45

6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation) 45
6.1.3 Impacts on Water Quality (Less than Significant) 49
6.1.4 Impacts on the Monarch Butterfly (Less than Significant) 49
6.1.5 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant) 50
6.1.6 Impacts on the White-Tailed Kite (Less than Significant) 51
6.1.7 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant) 51
6.1.8 Impacts on Common Species of Roosting Bats (Less than Significant) 52
6.1.9 Impacts due to Bird Collisions (Less than Significant) 52
6.1.10 Impacts due to Increased Lighting (Less than Significant with Mitigation) 54
6.2 Impacts on Sensitive Communities 56
6.2.1 Impacts on Valley Oak Woodland and Needlegrass Grassland Habitats (Less than Significant) 56
6.3 Impacts on Wetlands 57
6.4 Impacts on Wildlife Movement 58
6.4.1 Impacts on Wildlife Movement (Less than Significant) 58
6.4.2 Impacts on Nesting Birds (Less than Significant) 58
6.5 Impacts due to Conflicts with Local Policies: 59
6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant) 59
6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant with Mitigation) 59
6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan 61
6.7 Cumulative Impacts 61
Section 7. Compliance with Additional Laws and Regulations for Nesting Birds 63
Section 8. References 64

Figures

Figure 1. Vicinity Map 2
Figure 2. Project Site 3
Figure 3. Biotic Habitats 15
Figure 4. CNDDB-Mapped Records of Special-Status Plants 23
Figure 5. CNDDB-Mapped Records of Special-Status Animals 24

Tables

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site 26
Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site 32

Appendices

Appendix A. Plants Observed A-1
Appendix B. Special-Status Plants Considered but Rejected for Occurrence B-1

List of Preparers

Steve Rottenborn, Ph.D., Principal/Senior Wildlife Ecologist
Robin Carle, M.S., Project Manager/Senior Wildlife Ecologist
Katie Gallagher, M.S., Senior Plant and Wetlands Ecologist
Vanessa Morales, B.S., Plant and Wetlands Ecologist
Jane Lien, B.S., Wildlife Ecologist

Section 1. Introduction

This report describes the biological resources present in the area of the proposed 773 Cañada Road higher-density residential project, the potential impacts of the proposed project on biological resources, and measures necessary to reduce project impacts to less-than-significant levels under the California Environmental Quality Act (CEQA). This assessment is based on the project maps and description provided to H. T. Harvey & Associated by the Town of Woodside (Town) through October 2022.

1.1 Project Location

The 5.0-acre project site is located at 773 Cañada Road in Woodside, California (Figures 1 and 2). The site is generally bounded by undeveloped lands to the northwest, a mix of residential housing and undeveloped lands to the northeast and southeast, and Cañada Road to the southwest (with Interstate 280 present immediately southwest of Cañada Road). Surrounding areas consist of undeveloped open space to the north and west and residential development to the east and south. The project site is located on the *Woodside*, *California* 7.5-minute United States Geological Survey (USGS) quadrangle.

1.2 Project Description

The project proposes to construct residential housing on the project site at a density of approximately 10 units per acre.

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Figure 1. Vicinity Map
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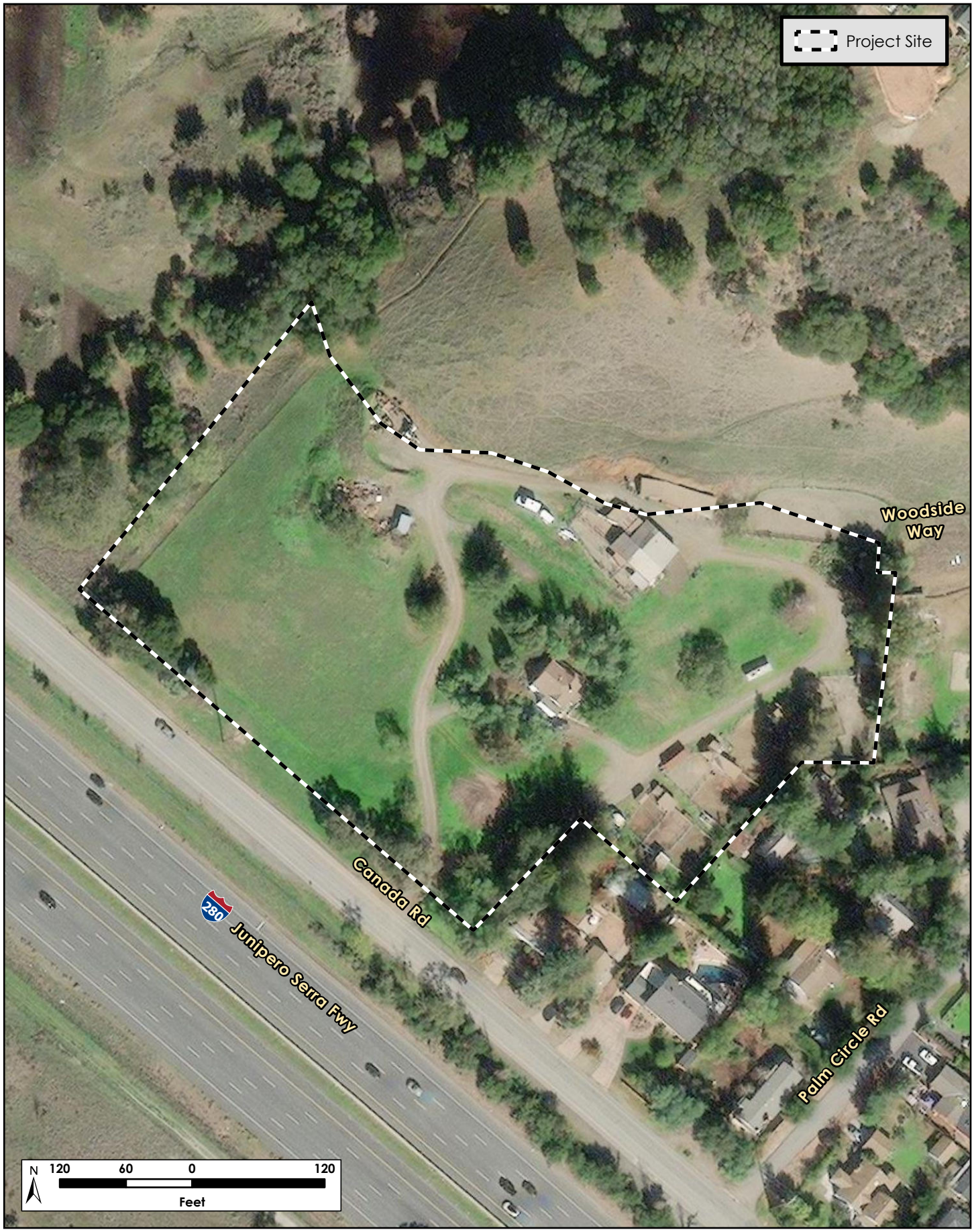

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Figure 2. Project Site
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December 2022

Section 2. Methods

2.1 Background Review

Prior to conducting field work, H. T. Harvey & Associates ecologists reviewed the project description and maps provided by the Town through October 2022; aerial images (Google Inc. 2022); a USGS topographic map; a National Wetlands Inventory map (2022); National Resources Conservation Service (NRCS) soil survey maps (2022); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (2022); and other relevant reports, scientific literature, and technical databases. For the purposes of this report, the *project vicinity* is defined as the area within a 5-mile radius surrounding the project site.

In addition, for plants, we reviewed all species on current California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3, and 4 lists (CNPS 2022a) occurring in the project region, which is defined as the *Woodside, California* USGS 7.5-minute quadrangle and surrounding eight quadrangles (*Montara Mountain*, *San Mateo*, *Redwood Point*, *Palo Alto*, *Mindego Hill*, *La Honda*, *San Gregario*, and *Half Moon Bay*). In addition, we queried the CNDDB (2022) for natural communities of special concern that occur on the project site, and we perused records of birds reported in nearby areas, such along the Crystal Springs Trail and at Edgewood Park, on eBird (Cornell Lab of Ornithology 2022) and on the Peninsula-Birding List Serve (2022).

2.2 Site Visit

H. T. Harvey & Associates senior plant and wetland ecologist Katie Gallagher, M.S., plant and wetland ecologist Vanessa Morales, B.S., and wildlife ecologist Jane Lien, B.S., conducted a reconnaissance-level survey of the project site on November 2, 2022. The purpose of the survey was to provide an impact assessment specific to the proposed construction of the project, as described above. Specifically, surveys were conducted to (1) assess existing biotic habitats and plant and animal communities on the project site, (2) assess the project site for its potential to support special-status species and their habitats, and (3) identify potential jurisdictional and sensitive habitats, such as waters of the U.S./state and riparian habitat. K. Gallagher and V. Morales conducted a focused survey for arcuate bush-mallow (*Malacothamnus arcuatus*) on the project site. J. Lien conducted a focused survey for roosting bats and signs of bat presence (e.g., guano and urine staining) in trees and buildings on the site, as well as a focused survey for nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*).

Section 3. Regulatory Setting

Biological resources on the project site are regulated by a number of federal, state, and local laws and ordinances, as described below.

3.1 Federal Regulations

3.1.1 Clean Water Act

The Clean Water Act (CWA) functions to maintain and restore the physical, chemical, and biological integrity of waters of the U.S., which include, but are not limited to, tributaries to traditionally navigable waters currently or historically used for interstate or foreign commerce, and adjacent wetlands. Historically, in non-tidal waters, U.S. Army Corps of Engineers (USACE) jurisdiction extends to the ordinary high water (OHW) mark, which is defined in Title 33, Code of Federal Regulations, Part 328.3. If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark to the outer edges of the wetlands. Wetlands that are not adjacent to waters of the U.S. are termed "isolated wetlands" and, depending on the circumstances, may be subject to USACE jurisdiction. In tidal waters, USACE jurisdiction extends to the landward extent of vegetation associated with salt or brackish water or the high tide line. The high tide line is defined in 33 Code of Federal Regulations Part 328.3 as "the line of intersection of the land with the water's surface at the maximum height reached by a rising tide." If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark or high tide line to the outer edges of the wetlands.

Construction activities within jurisdictional waters are regulated by the USACE. The placement of fill into such waters must comply with permit requirements of the USACE. No USACE permit will be effective in the absence of Section 401 Water Quality Certification. The State Water Resources Control Board (SWRCB) is the state agency (together with the Regional Water Quality Control Boards [RWQCBs]) charged with implementing water quality certification in California.

Project Applicability: The project site does not support wetland or aquatic habitats. An unnamed, ephemeral drainage located approximately 44 feet off-site to the northwest may be considered jurisdictional waters of the U.S. under the CWA, but no project activities are proposed within the bed and banks of the drainage. As a result, a permit from the USACE would not be required for the project.

3.1.2 Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 prohibits the creation of any obstruction to the navigable capacity of waters of the U.S., including discharge of fill and the building of any wharfs, piers, jetties, and other structures without Congressional approval or authorization by the Chief of Engineers and Secretary of the Army (33 U.S.C. 403).

Navigable waters of the U.S., which are defined in 33 CFR, Part 329.4, include all waters subject to the ebb and flow of the tide, and/or those which are presently or have historically been used to transport commerce. The shoreward jurisdictional limit of tidal waters is further defined in 33 CFR, Part 329.12 as "the line on the shore reached by the plane of the mean (average) high water." It is important to understand that the USACE does not regulate wetlands under Section 10, only the aquatic or open waters component of bay habitat, and that there is overlap between Section 10 jurisdiction and Section 404 jurisdiction. According to 33 CFR, Part 329.9, a waterbody that was once navigable in its natural or improved state retains its character as "navigable in law" even though it is not presently used for commerce as a result of changed conditions and/or the presence of obstructions. Historical Section 10 waters may occur behind levees in areas that are not currently exposed to tidal or muted-tidal influence, and meet the following criteria: (1) the area is presently at or below the mean high water line; (2) the area was historically at or below mean high water in its "unobstructed, natural state"; and (3) there is no evidence that the area was ever above mean high water.

As mentioned above, Section 404 of the CWA authorizes the USACE to issue permits to regulate the discharge of dredged or fill material into waters of the U.S. If a project also proposes to discharge dredged or fill material and/or introduce other potential obstructions in navigable waters of the U.S., a Letter of Permission authorizing these impacts must be obtained from the USACE under Section 10 of the Rivers and Harbors Act.

Project Applicability: No current or historical Section 10 Waters are present on or close to the project site, including in the adjacent ephemeral drainage located off-site to the northwest. Therefore, a Letter of Permission from the USACE is not required.

3.1.3 Federal Endangered Species Act

The Federal Endangered Species Act (FESA) protects federally listed wildlife species from harm or *take*, which is broadly defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." *Take* can also include habitat modification or degradation that directly results in death or injury of a listed wildlife species. An activity can be defined as *take* even if it is unintentional or accidental. Listed plant species are provided less protection than listed wildlife species. Listed plant species are legally protected from take under the FESA only if they occur on federal lands.

The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service have jurisdiction over federally listed, threatened, and endangered species under FESA. The USFWS also maintains lists of proposed and candidate species. Species on these lists are not legally protected under FESA, but may become listed in the near future and are often included in their review of a project.

Project Applicability: Suitable habitat is present on the project site for the federally endangered white-rayed pentachaeta (*Pentachaeta bellidiflora*), and this species could be affected by the project if it is present. However, because the project does not occur on federal lands, this federally listed plant species would not be subject to take prohibitions under FESA should it occur on the project site.

Suitable habitat to support a viable population of the federally threatened Bay checkerspot butterfly (*Euphydryas editha bayensis*) is absent from the project site. Although there is some potential for occasional individuals to disperse to the project site, the number of individuals in the reintroduced population at Edgewood Park is so low that there is no expectation that the species would disperse to the project site. The monarch butterfly (*Danaus plexippus*), a candidate for listing under FESA, may also occur on the project site, and there is similarly some potential for the project to result in impacts on this species if it is present. No additional federally listed or candidate animal species occur or potentially occur on the project site.

3.1.4 Federal Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. Section 703, prohibits killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. The MBTA protects whole birds, parts of birds, and bird eggs and nests, and it prohibits the possession of all nests of protected bird species whether they are active or inactive. An *active* nest is defined as having eggs or young, as described by the USFWS in its June 14, 2018 memorandum "Destruction and Relocation of Migratory Bird Nest Contents". Nest starts (nests that are under construction and do not yet contain eggs) and inactive nests are not protected from destruction.

Project Applicability: All native bird species that occur on the project site are protected under the MBTA.

3.2 State Regulations

3.2.1 Porter-Cologne Water Quality Control Act

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. Each RWQCB makes decisions related to water quality for its region, and may approve, with or without conditions, or deny projects that could affect waters of the state. Their authority comes from the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne). Porter-Cologne broadly defines waters of the state as "any surface water or groundwater, including saline waters, within the boundaries of the state." Because Porter-Cologne applies to any water, whereas the CWA applies only to certain waters, California's jurisdictional reach overlaps and may exceed the boundaries of waters of the U.S. For example, Water Quality Order No. 2004-0004-DWQ states that "shallow" waters of the state include headwaters, wetlands, and riparian areas. Moreover, the San Francisco Bay Region RWQCB's Assistant Executive Director has stated that, in practice, the RWQCBs claim jurisdiction over riparian areas. Where riparian habitat is not present, such as may be the case at headwaters, jurisdiction is taken to the top of bank.

On April 2, 2019, the SWRCB adopted the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. In these new guidelines, riparian habitats are not specifically described as waters of the state but instead as important buffer habitats to streams that do conform to the State Wetland Definition. The *Procedures* describe riparian habitat buffers as important resources that may both be included in required

mitigation packages for permits for impacts to waters of the state, as well as areas requiring permit authorization from the RWQCBs to impact.

Pursuant to the CWA, projects that are regulated by the USACE must also obtain a Section 401 Water Quality Certification permit from the RWQCB. This certification ensures that a proposed project will uphold state water quality standards. Because California's jurisdiction to regulate its water resources is much broader than that of the federal government, proposed impacts on waters of the state require Water Quality Certification even if the area occurs outside of USACE jurisdiction. Moreover, the RWQCB may impose mitigation requirements even if the USACE does not. Under the Porter-Cologne, the SWRCB and the nine regional boards also have the responsibility of granting CWA National Pollutant Discharge Elimination System (NPDES) permits and Waste Discharge Requirements for certain point-source and non-point discharges to waters. These regulations limit impacts on aquatic and riparian habitats from a variety of urban sources.

Project Applicability: No waters of the state or riparian habitats regulated by the RWQCB are present on the project site. The unnamed ephemeral drainage and associated riparian habitat located off-site to the northwest would likely be considered waters of the state, but no impacts to these features will result from project activities. Therefore, a Section 401 permit or Waste Discharge Requirement from the RWQCB would not be required.

3.2.2 California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code, Chapter 1.5, Sections 2050-2116) prohibits the take of any plant or animal listed or proposed for listing as rare (plants only), threatened, or endangered. In accordance with CESA, the CDFW has jurisdiction over state-listed species (Fish and Game Code 2070). The CDFW regulates activities that may result in *take* of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not expressly included in the definition of *take* under the California Fish and Game Code. The CDFW, however, has interpreted *take* to include the "killing of a member of a species which is the proximate result of habitat modification."

Project Applicability: Suitable habitat is present on the project site for the state-endangered white-rayed pentachaeta. This species could be affected by the project if it is present. The mountain lion (*Puma concolor*), a candidate for listing under CESA, and the state threatened tricolored blackbird (*Agelaius tricolor*) may occur on the site occasionally as nonbreeders, but no take of these species will result from the project.

3.2.3 Native Plant Protection Act

The Native Plant Protection Act (NPPA), enacted in 1977, allows plants to be designated as rare or endangered by the California Fish and Game Commission (Fish and Game Code Sections 1900–1913). The NPPA includes prohibitions on the take of such plants, with exceptions for certain activities. A total of 64 species, subspecies, and varieties of plants are considered "rare" by the NPPA.

Project Applicability: Suitable habitat is present on the project site for the state-rare Dudley's lousewort (*Pedicularis dudleyi*). This species could be affected by the project if it is present.

3.2.4 California Environmental Quality Act

CEQA is a state law that requires state and local agencies to document and consider the environmental implications of their actions and to refrain from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects. CEQA requires the full disclosure of the environmental effects of agency actions, such as approval of a general plan update or the projects covered by that plan, on resources such as air quality, water quality, cultural resources, and biological resources. The State Resources Agency promulgated guidelines for implementing CEQA known as the State CEQA Guidelines.

Section 15380(b) of the State CEQA Guidelines provides that a species not listed on the federal or state lists of protected species may be considered rare if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definitions in the FESA and the CESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals. This section was included in the guidelines primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW or species that are locally or regionally rare.

The CDFW has produced three lists (amphibians and reptiles, birds, and mammals) of "species of special concern" that serve as "watch lists". Species on these lists are of limited distribution or the extent of their habitats has been reduced substantially, such that threat to their populations may be imminent. Thus, their populations should be monitored. They may receive special attention during environmental review as potential rare species, but do not have specific statutory protection. All potentially rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the CEQA Section 15380(b). The CNPS, a non-governmental conservation organization, has developed CRPRs for plant species of concern in California in the CNPS Inventory of Rare and Endangered Plants (CNPS 2022a). The CRPRs include lichens, vascular, and non-vascular plants, and are defined as follows:

- CRPR 1A Plants considered extinct.
- CRPR 1B Plants rare, threatened, or endangered in California and elsewhere.
- CRPR 2A Plants considered extinct in California but more common elsewhere.
- CRPR 2B Plants rare, threatened, or endangered in California but more common elsewhere.
- CRPR 3 Plants about which more information is needed - review list.
- CRPR 4 Plants of limited distribution-watch list.

The CRPRs are further described by the following threat code extensions:

- .1—seriously endangered in California;
- .2—fairly endangered in California;
- .3—not very endangered in California.

Although the CNPS is not a regulatory agency and plants on these lists have no formal regulatory protection, plants appearing as CRPR 1B or 2 are, in general, considered to meet CEQA's Section 15380 criteria, and adverse effects to these species may be considered significant. Impacts on plants that are listed by the CNPS on CRPR 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those of CRPR 1B or 2, impacts on them are less frequently considered significant.

Compliance with CEQA Guidelines Section 15065(a) requires consideration of natural communities of special concern, in addition to plant and wildlife species. Vegetation types of "special concern" are tracked in Rarefind (CNDDB 2022). Further, the CDFW ranks sensitive vegetation alliances based on their global (G) and state (S) rankings analogous to those provided in the CNDDB. Global rankings (G1–G5) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas S rankings are a reflection of the condition of a habitat within California. If an alliance is marked as a G1–G3, all of the associations within it would also be of high priority. The CDFW provides the Vegetation Classification and Mapping Program's (VegCAMP's) currently accepted list of vegetation alliances and associations (CDFW 2022).

Project Applicability: All potential impacts on biological resources will be considered during CEQA review of the project in the context of this biological resources report. Project impacts are discussed in Section 6 below.

3.2.5 California Fish and Game Code

Ephemeral and intermittent streams, rivers, creeks, dry washes, sloughs, blue line streams on USGS maps, and watercourses with subsurface flows fall under CDFW jurisdiction. Canals, aqueducts, irrigation ditches, and other means of water conveyance may also be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. A *stream* is defined in Title 14, California Code of Regulations Section 1.72, as "a body of water that follows at least periodically or intermittently through a bed or channel having banks and that supports fish and other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." Using this definition, CDFW extends its jurisdiction to encompass riparian habitats that function as a part of a watercourse. California Fish and Game Code Section 2786 defines *riparian habitat* as "lands which contain habitat which grows close to and which depends upon soil moisture from a nearby freshwater source." The lateral extent of a stream and associated riparian habitat that would fall under the jurisdiction of CDFW can be measured in several ways, depending on the particular situation and the type of fish or wildlife at risk. At minimum, CDFW would claim jurisdiction over a stream's bed and bank. Where riparian habitat is present, the outer edge of riparian vegetation is generally used as the line of demarcation between riparian and upland habitats.

Pursuant to California Fish and Game Code Section 1603, CDFW regulates any project proposed by any person that will "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds." California Fish and Game Code Section 1602 requires an entity to notify CDFW of any proposed activity that may modify a river, stream, or lake. If CDFW determines that proposed activities may substantially adversely affect fish and wildlife resources, a Lake and Streambed Alteration Agreement (LSAA) must be prepared. The LSAA sets reasonable conditions necessary to protect fish and wildlife, and must comply with CEQA. The applicant may then proceed with the activity in accordance with the final LSAA.

Certain sections of the California Fish and Game Code describe regulations pertaining to protection of certain wildlife species. For example, Code Section 2000 prohibits take of any bird, mammal, fish, reptile, or amphibian except as provided by other sections of the code.

The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered *take* by the CDFW. Raptors (e.g., eagles, hawks, and owls) and their nests are specifically protected in California under Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the code or in accordance with regulations adopted by the commission. Activities resulting in mortality of non-game mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered *take* by the CDFW.

Project Applicability: No riparian habitat regulated by the CDFW occurs on the project site. The unnamed ephemeral drainage and associated riparian habitat located off-site to the northwest may be regulated by CDFW, but no impacts to this riparian habitat will result from activities under the project. Therefore, a CDFW LSAA would not be required for the project.

Most native bird, mammal, and other wildlife species that occur on the project site and in the immediate vicinity are protected under the California Fish and Game Code. Project impacts on these species are discussed in Section 6.

3.2.6 State Water Resources Control Board Stormwater Regulation

Construction Phase. Construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of stormwater pollutants under the

NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of best management practices (BMPs) to protect water quality until the site is stabilized.

Standard permit conditions under the Construction General Permit requires that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors. Additionally, the Construction General Permit does not extend coverage to projects if stormwater discharge-related activities are likely to jeopardize the continued existence, or result in take of any federally listed endangered or threatened species.

Post-Construction Phase. In many Bay Area counties, including Santa Clara County, projects must also comply with the California RWQCB, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (Water Board Order No. R2-2015-0049, as amended). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design that prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Project Applicability. The project will comply with the requirements of the NPDES Statewide Storm Water Permit and Statewide General Construction Permit. Therefore, construction-phase activities would not result in detrimental water quality effects on biological or regulated resources.

3.3 Local Regulations

3.3.1 Woodside Tree Protection Ordinance

According to the Town Municipal Code §153.434, no person is allowed to destroy any tree without a obtaining a permit. In addition, §153.437 states that significant trees are to be protected during site development and construction. Significant trees are defined (§153.005) by their circumference or diameter based on growth rates. Slow-growing trees are defined as alder (*Alnus rhombifolia*), big leaf maple (*Acer macrophyllum*), blue oak (*Quercus douglasii*), buckeye (*Aesculus californica*), Fremont cottonwood (*Populus fremontii*), madrone (*Arbutus menziesii*), and tan bark oak (*Lithocarpus densiflorus*). Slow-growing species are significant if the trunk is larger than 7.6 inches diameter at breast height (DBH), measured at 4 feet above grade. Fast-growing species are defined as black oak (*Quercus kelloggii*), California bay laurel (*Umbellularia californica*), coast live oak (*Quercus agrifolia*), coast redwood (*Sequoia sempervirens*), Douglas fir (*Pseudotsuga menziesii*), valley oak (*Quercus lobata*), and western sycamore (*Platanus racemosa*). Fast-growing species larger than 9.5 inches DBH are significant trees. All other species larger than

11.5 inches DBH are considered significant trees. Protection of significant trees includes both precautions during site development and construction and measures to limit adverse environmental effects. Protection during development and construction include at a minimum the installation of a fence around the drip line, restricted construction activity within the dripline as defined by the permit and supervised by a certified arborist, and the posting of appropriate signage on the fence. Measures to limit adverse environmental effects include erosion control and soil and water retention. The town Planning Director may also require additional protective measures based on site conditions.

Project Applicability: The project will comply with the Town's tree replacement guidelines and policies for any trees that need to be removed.

3.3.2 Woodside Stream Corridor Protection Ordinance

No alteration or work in a stream corridor may occur without Planning Commission approval. A stream corridor is defined in the Municipal Code (§153.005) as the greater of two measurements: (1) a horizontal distance of 50 feet measured from each side of the centerline of the stream, or (2) a horizontal distance of 25 feet measured from the top of the stream bank. Municipal Code §153.440 limits activities within stream corridors to trails and certain conditional uses (e.g., pastures, bridges, and agriculture), and limits uses within the stream corridor as follows:

A. No removal of riparian vegetation is permitted within the stream corridor, except that required for the permitted and conditional uses.

B. No filling of the natural stream corridors or dumping of slash, debris, residue from parking or recreation areas, fertilizers, pesticides, herbicides, or liquid or solid waste is permitted.

C. All agricultural wastes, including manure, must be kept out of the stream corridor and disposed of in a manner which will prevent drainage from such wastes into the stream corridor.

D. No channelization or damming of streams or creeks is permitted, unless required or allowed by the Planning Commission.

E. Any alteration of, or work in, the stream corridor is subject to the approval of the Planning Commission except the work set forth in item A above or the removal of material which obstructs the normal flow of water within the stream channel.

F. No structure, including a fence, is permitted within the stream corridor. Cross fencing of the stream corridor shall be permitted subject to the issuance of a permit from the Town Engineer.

Project Applicability: No stream features are present on the project site. Due to the presence of an unnamed ephemeral drainage approximately 44 feet to the northwest, a *stream corridor* as defined under the Municipal Code (i.e., consisting of a buffer of 25 feet from top of bank or a 50-foot buffer from the centerline of the stream, whichever is greater) overlaps the project site. The project would need to comply with the Town's stream corridor protection ordinance, which includes guidance for allowable uses within the stream corridor.

Section 4. Environmental Setting

4.1 General Project Area Description

The project site is located in the Town of Woodside in San Mateo County, California (Figure 1). The climate in the project vicinity is coastal Mediterranean, with most rain falling in the winter and spring. Mild cool temperatures are common in the winter, and hot to mild temperatures are common in the summer. Climate conditions in the vicinity include a 30-year average of 28.6 inches of annual precipitation with a monthly average temperature range from 41.7°F to 58.7°F (PRISM Climate Group 2022). Elevations on the project site range from 564–610 feet above mean sea level (Google Inc. 2022). The NRCS has mapped one soil unit on the project site: Fagan loam, 15–50% slopes (NRCS 2022). Fagan loam is a well-drained soil found on sandstone and shale slopes, and is composed of clay and loam materials (NRCS 2022). Serpentine soils are mapped within 0.4 mile of the project site near Edgewood Park, but are not mapped on the site itself (Brabb et al 1998).

4.2 Biotic Habitats

The reconnaissance-level survey identified six biotic habitats on the project site: California annual grassland, developed, ornamental woodland, valley oak woodland, needlegrass grassland, and coast live oak woodland (Figure 3). These biotic habitats are described in detail below. Plant species observed during the reconnaissance-level survey are listed in Appendix A.

4.2.1 California Annual Grassland

Photo 1. California annual grassland habitat on the project site.

Vegetation. California annual grassland (2.4 acres) is the dominant biotic habitat on the project site. This habitat occurs on gradual southwest-facing slopes on the project site, and it had been recently mown at the time of the November 2022 site visit (Photo 1). Dominant species in this habitat include nonnative annual grasses such as wild oat (*Avena* sp.), foxtail barley (*Hordeum murinum*), and soft brome (*Bromus hordeaceus*), as well as weedy nonnative forbs such as short-podded mustard (*Hirschfeldia incana*), prickly lettuce (*Lactuca serriola*), Harding grass (*Phalaris aquatica*), field bindweed (*Convolvulus arvensis*), and rose clover (*Trifolium hirtum*). A dense patch of woodrush tarplant (*Hemizonia congesta* ssp. *luzulifolia*), a common native forb, is located in the western portion of the project site among the nonnative annual grasses. Dispersed mature bunches of native perennial needlegrass (*Stipa* sp.) are also present in this area; however, the percent cover of these grasses is too low to be mapped as needlegrass grassland habitat (discussed below) (CNPS 2022b) and thus this area falls within California annual grassland. Scattered individuals of mature blue elderberry (*Sambucus mexicana*) and remnant English walnut (*Juglans regia*)

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H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 3. Biotic Habitats
773 Cañada Road Residential Project
Biological Resources Report (4687-01)
December 2022

trees are present within the California annual grassland habitat on the site. This habitat contains a number of plant species ranked by the California Invasive Plant Council (Cal-IPC) as being moderately invasive (Cal-IPC 2022); invasive species are discussed further in Section 5.3.5 below.

Wildlife. Wildlife use of California annual grassland habitat on the project site is limited due to human-related disturbances (e.g., due to mowing and human activity in adjacent developed areas), the limited extent of the grassland area, and the isolation of this habitat from more extensive grasslands in the region (i.e., at Edgewood Park). As a result, some of the wildlife species that breed and regularly occur within extensive grasslands on the Peninsula, such as the grasshopper sparrow (*Ammodramus savannarum*), are absent from the grasslands on the project site or occur only as occasional foragers and migrants.

Although grassland-associated bird species are not expected to occur on the project site, a number of resident bird species associated with surrounding developed and woodland areas nest and forage in the California annual grassland habitat on the site, which includes several scattered shrubs and trees. These include the California towhee (*Melozone crissalis*), mourning dove (*Zenaida macroura*), lesser goldfinch (*Spinus psaltria*), dark-eyed junco (*Junco hyemalis*), Anna's hummingbird (*Calypte anna*), northern mockingbird (*Mimus polyglottos*), and American crow (*Corvus brachyrhynchos*). Several other species of birds use the California annual grassland habitat on the site during the nonbreeding season. These include the white-crowned sparrow (*Zonotrichia leucophrys*) and golden-crowned sparrow (*Zonotrichia atricapilla*), which forage on the ground or in herbaceous vegetation, as well as the yellow-rumped warbler (*Setophaga coronata*), which forages in trees and shrubs.

The sparse cover of grassland vegetation on the site, as well as disturbance from regular mowing, limit the availability of food resources for common species of mammals that occur in grassland habitats. Nevertheless, burrows of native California ground squirrels (*Otospermophilus beecheyi*) and Botta's pocket gophers (*Thomomys bottae*) are common in the grassland habitat on the project site. These fossorial mammal species are an important component of grassland communities, providing a prey base for diurnal raptors and terrestrial predators. Other rodent species that can potentially occur in the grassland habitat on the site include the native California vole (*Microtus californicus*) and deer mouse (*Peromyscus maniculatus*). Diurnal raptors such as red-tailed hawks (*Buteo jamaicensis*) and red-shouldered hawks (*Buteo lineatus*) forage for these small mammals over grasslands during the day, and at night nocturnal raptors, such as barn owls (*Tyto alba*), will forage for nocturnal rodents, such as deer mice.

Other mammals such as the native striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), and coyote (*Canis latrans*), as well as the nonnative Virginia opossum (*Didelphis virginiana*) and feral cat (*Felis catus*), will use the grassland habitat on the project site for foraging. Black-tailed deer (*Odocoileus hemionus*) are also common in this habitat due to the site's location adjacent to extensive undeveloped open space areas to the northwest. Several reptile species also occur regularly in grassland habitats, including the western fence lizard (*Sceloporus occidentalis*), gopher snake (*Pituophis catenifer*), and southern alligator lizard (*Elgaria multicarinata*). Burrows of California ground squirrels on the project site provide refuges for these reptile species, as well as for common amphibians such as the western toad (*Anaxyrus boreas*) and Pacific tree frog (*Hyliola regilla*) that may breed in nearby ponds.

4.2.2 Developed

Vegetation. Approximately 1.3 acres of the site is developed with a residential home, a construction staging/dumping area, several gravel roads, a horse corral, an ornamental garden, stables, and an equipment shed (Photo 2). The staging/dumping area contains large areas of non-native fill and gravel of unknown origin that supports numerous ruderal forbs and grasses. Plant species growing in developed area on the site include native California poppy (*Eschscholzia californica*); nonnative wild radish (*Raphanus sativa*), wild oat, milk thistle (*Silybum marianum*), and European olive (*Olea europea*); and ornamental tobacco (*Nicotiana* sp.).

Photo 2. Developed areas of the project site support a home, stables, and an equipment shed.

Wildlife. Developed areas of the project site serve as wildlife habitat only in a very limited capacity, and most wildlife species that occur in these areas are tolerant of frequent human disturbances. Common wildlife species that are associated with developed areas and can occur in developed portions of the project site include the nonnative European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), house mouse (*Mus musculus*), and black rat (*Rattus rattus*), as well as the native western fence lizard, raccoon, and a variety of birds, including the Anna's hummingbird (*Calypte anna*), house finch (*Haemorhous mexicanus*), mourning dove, and northern mockingbird. The buildings on the project site may be attractive to certain bird species in the area that nest on buildings, such as the black phoebe (*Sayornis nigricans*), Bewick's wren (*Thryomanes bewickii*), mourning dove, and house finch. Open buildings on the site also provide potential roosting habitat for bats, such as the Mexican free-tailed bat and Yuma myotis (*Myotis yumamensis*). However, no signs of bat presence were observed during the focused survey. Because the buildings have active human use, only low numbers of bats (if any) are expected to roost there, and the buildings are not expected to be used by special-status bats, such as the pallid bat (*Antrozous pallidus*), as these species are extremely sensitive to disturbance. Nevertheless, small numbers of individual bats may occasionally roost in structures on the project site.

4.2.3 Ornamental Woodland

Vegetation. A 0.5-acre portion of the project site consists of ornamental tree species that were either landscaped or volunteered from nearby propagule sources (Photo 3). These include nonnative eucalyptus (*Eucalyptus* sp.), European olive, and wattle (*Acacia* sp.) trees, as well as locally nonnative coast redwoods.

Wildlife. Wildlife use of the ornamental woodland habitat on the project site is limited by human disturbance, the limited extent of the habitat, and the low structural diversity of the vegetation. Many of the bird species that nest and forage in these woodlands are associated with adjacent developed and grassland areas, including the house finch, lesser goldfinch, Anna's hummingbird, mourning dove, and northern mockingbird. In addition, due to the close proximity of woodland habitats located both on-site and off-site, a number of common bird

species associated with oak woodlands, such as the oak titmouse (*Baeolophus inornatus*) and chestnut-backed chickadee (*Poecile rufescens*), are expected utilize the ornamental woodland habitat on the site opportunistically for foraging. Raptors such as the Cooper's hawk may forage for prey in ornamental woodlands on the site in small numbers. The larger trees within these woodlands can potentially support up to one nest of raptors, though no old raptor nests were observed during the November 2022 site visit, suggesting that raptors have not nested in these trees in recent years. However, trees in woodlands located off-site to the northwest, northeast, and southwest provide higher-quality nesting habitat for Cooper's hawks and other raptors compared to the ornamental trees on the site, which occur in smaller patches (as opposed to in a larger woodland area).

Photo 3. Ornamental woodland habitat on the project site.

Common mammals such as native striped skunks and nonnative Virginia opossums will forage on fruit and seeds in ornamental woodland habitat on the site, and nonnative fox squirrels (*Sciurus niger*) were observed nesting in these trees. The deer mouse and California mouse (*Peromyscus californicus*) also forage in this habitat, and reptiles found in adjacent grassland habitat, such as the western fence lizard and gopher snake, will forage in ornamental woodland habitat. No cavities or crevices were observed in the trees within this habitat that provide high-quality roosting habitat for bats.

4.2.4 Valley Oak Woodland

Vegetation. Valley oak woodland makes up 0.4 acre of the project site (Photo 4). This habitat is located in several small patches along the site's southwestern and southeastern boundaries, and is dominated by native valley oaks with occasional coast live oaks, and leaf duff and nonnative annual grasses such as wild oats in the understory.

Photo 4. Valley oak woodland habitat along Cañada Road on the project site.

Wildlife. Woodlands dominated by oaks typically support diverse animal communities in California. Valley oaks provide cavities, bark crevices, and complex branching growth that create shelter for wildlife species, and these trees produce mast crops that are an important food source for many birds and mammals. However, the patches of valley oak woodland on the project site are limited in extent, with limited understory vegetation. As a result, this habitat provides fewer structural resources and foraging opportunities for wildlife species compared to more natural and/or more extensive oak woodlands in the region. Nevertheless, due to the close proximity of more extensive oak

woodland habitat off-site to the northwest, northeast, and southwest, a number of wildlife species associated with oak woodlands are expected utilize the valley oak woodland habitat on the site for breeding and foraging.

Birds such as the California scrub-jay (*Aphelocoma californica*), Bewick's wren, chestnut-backed chickadee, and oak titmouse may nest and forage in oaks on the project site. Other birds expected to use this habitat are the wintering ruby-crowned kinglet (*Regulus calendula*) and Townsend's warbler (*Setophaga townsendi*). Raptors such as the Cooper's hawk may forage for prey in oak woodlands on the site in small numbers. It is possible that up to one pair of raptors could nest in the patches of oak woodland habitat on the site, but no active or inactive raptor nests were detected during the site visit, suggesting that raptors have not nested on the site in recent years. As discussed for ornamental woodlands above, higher-quality nesting habitat for Cooper's hawks and other raptors is present in nearby areas off-site compared to the trees on the site, which occur in smaller patches (as opposed to in a larger woodland area).

Because the oak woodland habitat on the site contains only sparse understory cover and vegetation, amphibian and reptile species that are typically associated with dense leaf cover and coarse woody debris in wooded habitats are not expected to occur here. Reptiles associated with the adjacent grassland habitat, such as the western fence lizard and gopher snake, may forage in these woodland patches. Mammals that forage in grasslands on the site such as the native striped skunk and black-tailed deer and nonnative Virginia opossum and feral cat are expected to forage in this habitat. No cavities or crevices were observed in oaks on the site that provide high-quality roosting habitat for bats.

4.2.5 Needlegrass Grassland

Photo 5. Needlegrass grassland on the project site.

Vegetation. Needlegrass grassland (0.3 acre) is present in the western portion of the project site on west-facing slopes, generally in steeper areas compared to areas supporting California annual grassland, and had been recently mown at the time of the November 2022 site visit (Photo 5). The dominant species present within this habitat is needlegrass, a native perennial bunchgrass. The low density and diminutive stature of the intermixed nonnative weedy species indicates that the mowing has perhaps been well-timed, possibly resulting in a beneficial effect on the habitat by reducing non-native competition. The needlegrass bunches are mostly mature with some small bunches intermixed. This variety in age structure indicates the grassland is naturally recruiting and is not diminishing in quality like other needlegrass grasslands in the surrounding region that struggle with stronger non-native competition and the effects of nitrogen deposition. Native California poppy and nonnative short-podded mustard are present along the margins of this habitat. Other species present include field bindweed, coyote bush (*Baccharis pilaris*), and wild oat. This grassland contains a thin fluffy thatch layer in the interstitial spaces

between the needlegrass mounds, composed primarily of mown frail fragments of wild oat, which are common in lower-quality and weedier needlegrass grassland habitats.

Wildlife. Wildlife use of needlegrass grasslands on the project site is similar to wildlife use of California annual grasslands, as described above.

4.2.6 Coast Live Oak Woodland

Vegetation. Approximately 0.2 acre of coast live oak woodland habitat is present in three small patches in the western portion of the project site along Cañada Road and along the site's northwestern boundary (Photo 6). These woodland areas are dominated by coast live oaks, with several individual wattle trees and a planted privet (*Ligustrum* sp.) tree also present. The understory is mainly composed of leaf duff, short-podded mustard, and wild oats. Construction debris is also present under the oak canopy along Cañada Road.

Photo 6. Coast live oak woodland habitat along Cañada Road on the project site.

Wildlife. Wildlife use of coast live oak woodlands on the project site is similar to wildlife use of valley oak woodlands, as described above. A single nest of San Francisco dusky-footed woodrats is present on the ground in the patch of coast live oak woodland in the northwestern corner of the project site.

4.3 Adjacent Habitat Areas

The project site is located adjacent to an unnamed ephemeral drainage, which supports coast live oak riparian woodland habitat just outside the northwestern boundary of the project site. This riparian woodland is characterized by coast live oaks that appear mature in age but maintain very tall and thin stature, which is likely a result of their very dense distribution One mature willow (*Salix* sp.) and one mature Monterey cypress (*Hesperocyparis macrocarpa*) tree also occur within the riparian habitat. The understory in this habitat is composed primarily of cotoneaster (*Cotoneaster* sp.) shrubs and leaf duff with some annual grasses and widely scattered forbs such as ripgut brome (*Bromus diandrus*), wild oat, prickly lettuce, hedgeparsley (*Torilis arvensis*), and Italian thistle (*Carduus pycnocephalus*).

Riparian habitats in California generally support exceptionally rich animal communities and contribute disproportionately to landscape-level species diversity. However, the riparian woodland adjacent to the project site is very similar in vegetation and structure to the coast live oak woodlands that occur on the project site, and wildlife use of this woodland is expected to be similar to that described for coast live oak woodland above. Wildlife use of the ephemeral stream that flows through this riparian area is limited by the very brief duration of flow and lack of well-developed riparian vegetation with dense understory structure and wetland habitats. Wildlife that use the adjacent habitats may occasionally forage, drink from, or move through the ephemeral

drainage, but no animal species that are typically considered "riparian-associated" species are expected to occur here.

4.4 Wildlife Movement

Wildlife movement within and in the vicinity of the project site takes many forms, and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and landscaped areas. Mammals of different species move within their home ranges, but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the project vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development on and immediately southeast and northeast of the site, there are currently no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site. Wildlife species may move through the area using cover and refugia as they find them available. Open oak woodland, scrub, and grassland habitats to the northwest, which connect to Edgewood Park, Pulgas Ridge Open Space Preserve, and Waterdog Lake and Open Space Preserve, provide connectivity between regional natural areas for many common and special-status species of birds, fish, mammals, reptiles, and amphibians. Specifically, migratory passerines, rabbits, striped skunks, raccoons, Pacific treefrogs, and alligator lizards, amongst other species, are expected to move through these habitats adjacent to the project site. Because the project site is located on the periphery of these areas, some of these wildlife species may occasionally occur on the site itself. However, the site does not provide connectivity between important habitats in the region, and thus does not represent key habitat supporting wildlife movement through the region.

Section 5. Special-Status Species and Sensitive Habitats

CEQA requires assessment of the effects of a project on species that are protected by state, federal, or local governments as "threatened, rare, or endangered"; such species are typically described as "special-status species". For the purpose of the environmental review of the project, special-status species have been defined as described below. Impacts on these species are regulated by some of the federal, state, and local laws and ordinances described in Section 3 above.

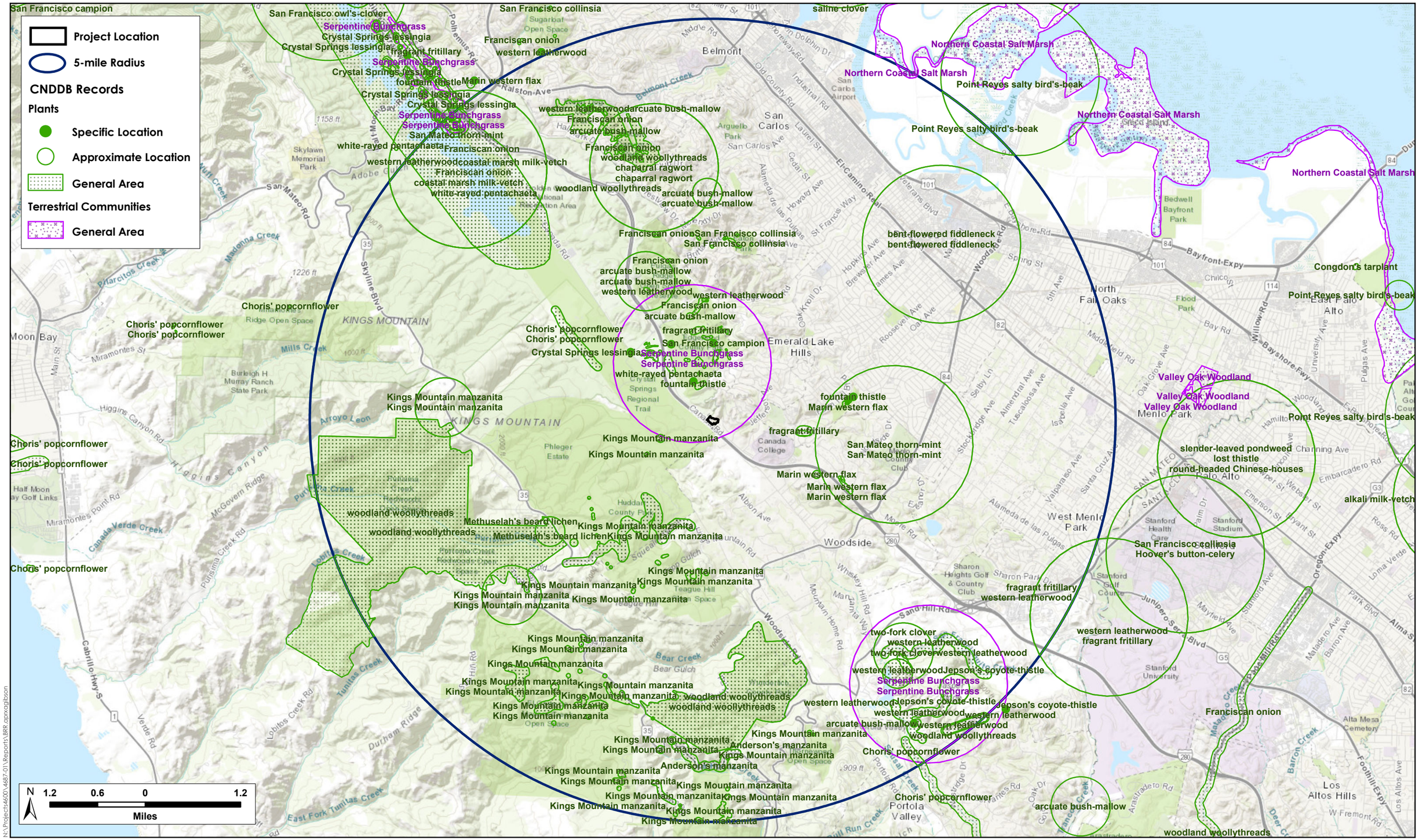
For purposes of this analysis, "special-status" plants are considered plant species that meet one or more of the following criteria:

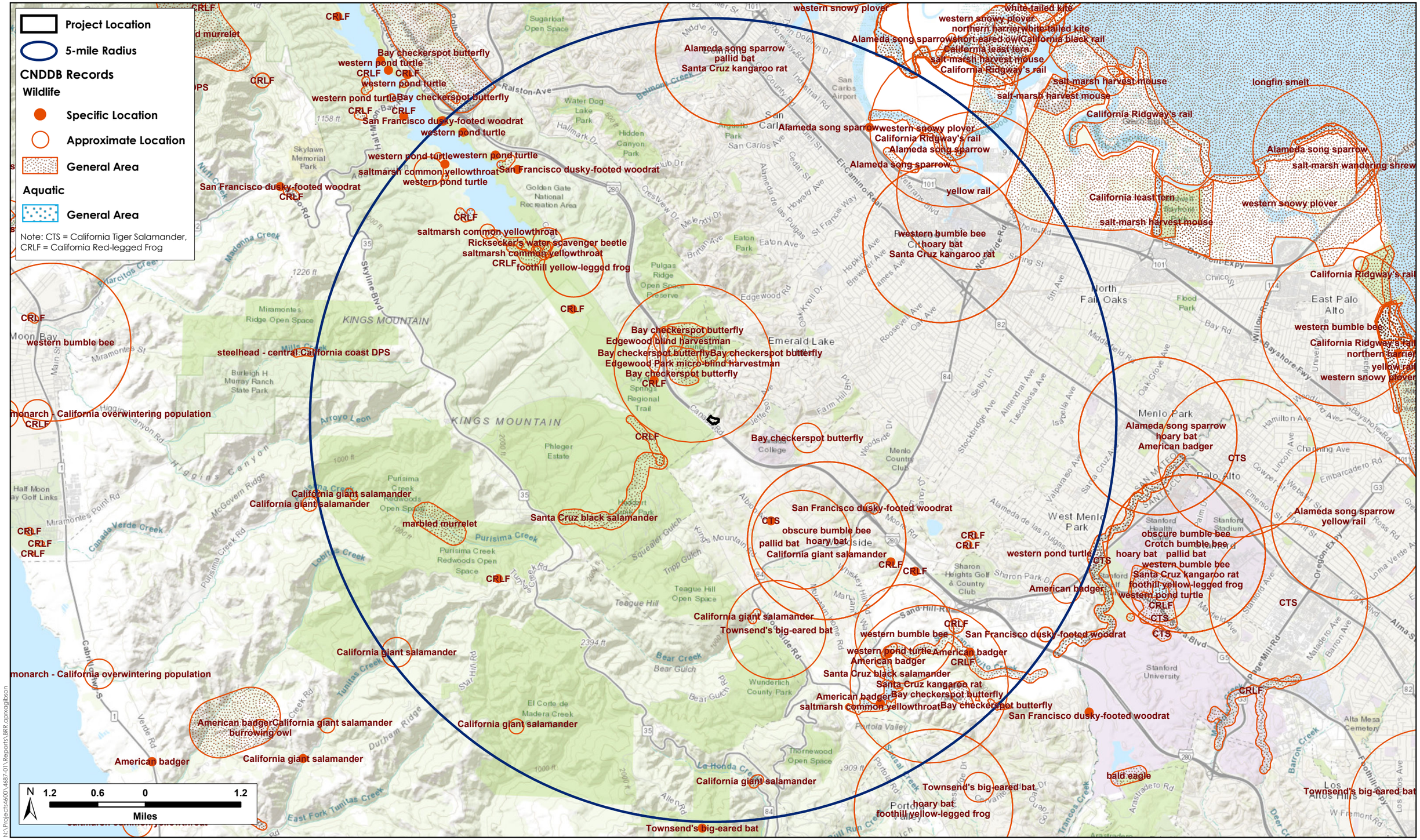
- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as CRPR 1A, 1B, 2, 3, or 4.

For purposes of this analysis, "special-status" animals are considered animal species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Information concerning threatened, endangered, and other special-status species that potentially occur on the project site was collected from several sources and reviewed by H. T. Harvey & Associates biologists as described in Section 2.1 above. Figure 4 depicts CNDDB records of special-status plant species in the general vicinity of the project site and Figure 5 depicts CNDDB records of special-status animal species. These generalized maps show areas where special-status species are known to occur or have occurred historically.


Project Location
5-mile Radius
CNDDB Records
Plants
Specific Location
Approximate Location
General Area
Terrestrial Communities
General Area
San Francisco campion
San Francisco owl's-clover
Serpentine Bunchgrass
Crystal Springs lessingia
Crystal Springs lessingia
fragrant fritillary
Serpentine Bunchgrass
Crystal Springs lessingia
fountain thistle
Marin western flax
Crystal Springs lessingia
Crystal Springs lessingia
Serpentine Bunchgrass
Serpentine Bunchgrass
San Mateo thorn-mint
white-rayed pentachaeta
Franciscan onion
western leatherwood
coastal marsh milk-vetch
Franciscan onion
coastal marsh milk-vetch
white-rayed pentachaeta
San Francisco collinsia
Franciscan onion
western leatherwood
Franciscan onion
arcuate bush-mallow
western leatherwood
arcuate bush-mallow
Franciscan onion
woodland woollythreads
chaparral ragwort
chaparral ragwort
arcuate bush-mallow
arcuate bush-mallow
woodland woollythreads
Franciscan onion
San Francisco collinsia
San Francisco collinsia
Franciscan onion
arcuate bush-mallow
arcuate bush-mallow
western leatherwood
western leatherwood
Franciscan onion
arcuate bush-mallow
Choris' popcornflower
Choris' popcornflower
fragrant fritillary
San Francisco campion
Crystal Springs lessingia
Serpentine Bunchgrass
Serpentine Bunchgrass
white-rayed pentachaeta
fountain thistle
Choris' popcornflower
Choris' popcornflower
Choris' popcornflower
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain manzanita
fountain thistle
Marin western flax
fragrant fritillary
San Mateo thorn-mint
San Mateo thorn-mint
Marin western flax
Marin western flax
Marin western flax
saline clover
Northern Coastal Salt Marsh
Northern Coastal Salt Marsh
Point Reyes salty bird's-beak
Northern Coastal Salt Marsh
Point Reyes salty bird's-beak
Northern Coastal Salt Marsh
Congdon's tarplant
Point Reyes salty bird's-beak
Valley Oak Woodland
Valley Oak Woodland
Valley Oak Woodland
Point Reyes salty bird's-beak
slender-leaved pondweed
lost thistle
round-headed Chinese-houses
alkali milk-vetch
San Francisco collinsia
Hoover's button-celery
fragrant fritillary
western leatherwood
western leatherwood
fragrant fritillary
two-fork clover
western leatherwood
two-fork clover
western leatherwood
western leatherwood
Jepson's coyote-thistle
Serpentine Bunchgrass
Serpentine Bunchgrass
western leatherwood
Jepson's coyote-thistle
Jepson's coyote-thistle
western leatherwood
western leatherwood
arcuate bush-mallow
western leatherwood
woodland woollythreads
Franciscan onion
Kings Mountain manzanita
Anderson's manzanita
Kings Mountain manzanita
Anderson's manzanita
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain



H. T. HARVEY & ASSOCIATES
Ecological Consultants

Figure 5. CNDDB-Mapped Records of Special-Status Animals

773 Cañada Road Residential Project
Biological Resources Report (4687-01)
December 2022

5.1 Special-Status Plant Species

The CNPS (2022) and CNDDB (2022) identify 82 special-status plant species as potentially occurring in at least one of the nine USGS 7.5-minute quadrangles containing or surrounding the project site (for CNPS) or within the project vicinity (for CNDDB) (Appendix B). Of the 82 potentially occurring special-status plant species, 68 were determined to be absent from the project site for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or edaphic requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby extant records (Appendix B).

Needlegrass grassland is often associated with serpentine soils and the presence of serpentine-associated special-status plants; however, serpentine soils have not been mapped on the project site (NRCS 2022). Thus, while certain special-status plants are often associated with needlegrass grasslands, the habitat on the project site may not be suitable for many of these plant species due to a lack of suitable edaphic conditions (i.e., serpentine soils). Thus, for the purpose of this analysis, we excluded plant species classified as serpentine endemics from potential presence on the project site due to a lack of suitable soils, despite the presence of needlegrass grassland in which these species often occur (Brabb et al. 1998). Appendix B lists these plants along with the basis for the determination of absence.

Suitable habitat, edaphic requirements, and elevation range are present on the project site for 14 special-status plant species; these species are addressed in greater detail in Table 1 below. Of the 14 special-status plant species for which suitable habitat is present on the site, the focused survey conducted in November 2022 determined that arcuate bush-mallow, which would have been detectable in November, is absent from the project site. The other 13 potentially occurring special-status plants are not detectable in November, and we were therefore unable to survey for them. Those additional special-status plant species that can potentially occur on the project site and for which focused surveys could not be conducted in November 2022 are bent-flowered fiddleneck (*Amsinckia lunaris*), San Francisco wallflower (*Erysimum franciscanum*), fragrant fritillary (*Fritillaria liliacea*), harlequin lotus (*Hosackia gracilis*), bristly leptosiphon (*Leptosiphon aureus*), large-flowered leptosiphon (*Leptosiphon grandiflorus*), woolly-headed lessingia (*Lessingia hololeuca*), marsh microseris (*Microseris paludosa*), woodland woollythreads (*Monolopia gracilens*), Dudley's lousewort, white-rayed pentachaeta, Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*) and Scouler's catchfly (*Silene scouleri* ssp. *scouleri*).

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, Candidate, or Rare Species			
Dudley's lousewort (*Pedicularis dudleyi*)	CR, CRPR 1B.2	Maritime chaparral, cismontane woodland, North Coast coniferous forest, and valley and foothill grassland, often in deep shady woods of older coast redwood forests (blooming period April to June)	**Could Potentially Occur.** Only moderately suitable grassland habitat to support this species is present on the project site, and most occurrences are known from more shaded and mesic habitats. Dudley's lousewort is known to occur at Portola Redwoods State Park approximately 14 miles south of the project site (CNDDB 2022). While the species is unlikely to occur on the project site approximately 14 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
White-rayed pentachaeta (*Pentachaeta bellidiflora*)	FE, SE, CRPR 1B.1	Cismontane woodland and valley grassland in open dry rocky slopes and grassy areas, often on soils derived from serpentine bedrock (blooming period March to May)	**Could Potentially Occur.** Suitable grassland habitat with thin, rocky soils to support this species is present on the project site. This species is known to occur at Edgewood Park along Interstate 280 within 1.0 mile of the project site (CNDDB 2022, Calflora 2022). A focused survey for this species was not performed in 2022 as the site visit did not occur during the species' blooming period.
CNPS-Listed Plant Species			
Bent-flowered fiddleneck (*Amsinckia lunaris*)	CRPR 1B.2	Coastal bluff scrub, cismontane woodland, valley and foothill grassland/oak woodland and chaparral (blooming period March to June).	**Could Potentially Occur**. Suitable grassland habitat to support this species is present on the project site. Bent-flowered fiddleneck is known to occur at Portola Redwoods State Park approximately 14 miles to the south of the project site (CNDDB 2022). While bent-flowered fiddleneck is unlikely to occur approximately 14 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
San Francisco wallflower (*Erysimum franciscanum*)	CRPR 4.2	Chaparral, coastal dunes, coastal scrub, and valley and foothill grassland habitats often on granitic or serpentine soils, sometimes on roadsides (blooming period March to June)	**Could Potentially Occur.** Suitable grassland habitat with thin, rocky soils to support this species is present on the project site. However, the nearest documented occurrences within the last 20 years are located 8.2 miles away adjacent to the Crystal Springs Golf Course (Calflora 2022). While San Francisco wallflower is unlikely to occur more than 8 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Fragrant fritillary (*Fritillaria liliacea*)	CRPR 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland, often in serpentine/oak woodland, serpentine bunchgrass grassland, sometimes in clays (blooming period February to March)	**Could Potentially Occur.** Suitable bunchgrass grassland habitat to support this species is present on the project site. Fragrant fritillary is known to occur at Edgewood Park approximately 0.7 mile to the north as well as along Farm Hill Boulevard approximately 1.1 mile to the east (CNDDB 2022, Calflora 2022). A focused survey for this species was not performed in 2022 as the site visit did not occur during the species' blooming period.
Harlequin lotus (*Hosackia gracilis*)	CRPR 4.2	Broadleaved upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, North Coast coniferous forest, valley and foothill grassland, often on roadsides (blooming period March to July)	**Could Potentially Occur.** Suitable grassland and woodland habitat to support this species is present on the project site. Harlequin lotus is known to occur in the Peninsula Watershed approximately 8 miles to the north of the project site (Calflora 2022). While harlequin lotus is unlikely to occur approximately 8 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Bristly leptosiphon (*Leptosiphon aureus*)	CRPR 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland (blooming period April to July)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Bristly leptosiphon is known to occur in the Peninsula Watershed approximately 8 miles to the north of the project site (Calflora 2022). While bristly leptosiphon is unlikely to occur approximately 8 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Large-flowered leptosiphon (*Leptosiphon grandiflorus*)	CRPR 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland, usually on sandy soils (blooming period April to August)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Large-flowered leptosiphon is known to occur in the El Sereno Open Space Preserve approximately 21 miles to the south of the project site (Calflora 2022). While large-flowered leptosiphon is unlikely to occur approximately 21 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Woolly-headed lessingia (*Lessingia hololeuca*)	CRPR 3	Broadleafed upland forest, coastal scrub, lower montane coniferous forest, and valley and foothill grassland on clay or serpentine soils (blooming period June to October)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Woolly-headed lessingia is known to occur at Edgewood Park approximately 0.8 mile to the north of the project site (Calflora 2022). A focused survey for this species was not performed in 2022 as the site visit did not occur during the species' blooming period.
Arcuate bush-mallow (*Malacothamnus arcuatus*)	CRPR 1B.2	Chaparral and cismontane woodland, sometimes on gravelly alluvial soils, or in any shrub or tree woodland that has recently burned (detectable year-round)	**Absent.** Arcuate bush-mallow has been documented in a wide variety of woody habitats, including oak woodland, and is most prevalent after wildland fires (Morse 2022). Arcuate bush-mallow is known to occur adjacent to Edgewood Park approximately 0.4 mile north of the project site (CNDDB 2022). However, no individuals were observed during a survey conducted during the November 2022 site visit. Determined to be absent.
Marsh microseris (*Microseris paludosa*)	CRPR 1B.2	Cismontane woodland, closed-cone coniferous forest, coastal scrub, valley and foothill grassland (blooming period April to June, occasionally until July)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Marsh microseris is known to occur on Cloverdale Ranch approximately 17 miles southwest of the project site (CNDDB 2022). While marsh microseris is unlikely to occur approximately 21 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Woodland woollythreads (*Monolopia gracilens*)	CRPR 1B.2	Grassy openings in broadleaved upland forest and chaparral, cismontane woodland, and valley and foothill grassland, in sandy to rocky soils, often in serpentine soils after burns (blooming period March to July)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. This species is known to occur at Edgewood Park approximately 1.0 mile to the north (CNDDB 2022). A focused survey for this species was not performed in 2022 as the site visit did not occur during the species' blooming period.
Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*)	CRPR 4.2	Broadleaved upland forest, chaparral, coastal prairie, valley and foothill grassland, and vernal pools in vernally mesic habitats (blooming period June to October)	**Could Potentially Occur.** Suitable grassland and woodland habitat to support this species is present on the project site. Gairdner's yampah is known to occur in the Peninsula Watershed approximately 8 miles to the north of the project site (Calflora 2022). While Gairdner's yampah is unlikely to occur approximately 8 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Scouler's catchfly (*Silene scouleri* ssp. *scouleri*)	CRPR 2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland (blooming period sometimes March to May, usually June to August, and occasionally through September)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Scouler's catchfly is known to occur on Cloverdale Ranch approximately 17 miles southwest of the project site (CNDDB 2022). While Scouler's catchfly is unlikely to occur approximately 17 miles from the nearest known population, the survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

*Key to Status Abbreviations: Federally Endangered (FE); State Endangered (SE); State Rare (CR); California Rare Plant Rank (CRPR).

CRPR 1B = Rare, Threatened, or Endangered in California and elsewhere

CRPR 2B = Rare, Threatened, or Endangered in California but more common elsewhere

CRPR 3 = Plants about which more information is needed (a review list)

CRPR 4 = Plants of limited distribution - Watch list

.1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 = Moderately threatened in California (20-80% of occurrences threatened)

5.2 Special-Status Animal Species

The legal status and likelihood of occurrence on the project site of special-status animal species known to occur, or potentially occurring, in the surrounding region are presented in Table 2. Most of the special-status species listed in Table 2 are not expected to occur on the project site because it lacks suitable habitat, is outside the known range of the species, and/or is isolated from the nearest known extant populations by development or otherwise unsuitable habitat.

The following special-status species that are present in specialized habitats on the San Francisco Peninsula, or that occurred on or near the Peninsula historically but are no longer present, are absent from the project site due to a lack of suitable habitat and/or isolation of the site from populations by urbanization: the western bumble bee (*Bombus occidentalis*), Crotch bumble bee (*Bombus crotchii*), California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), southwestern pond turtle (*Emys pallida*), burrowing owl (*Athene cunicularia*), and loggerhead shrike (*Lanius ludovicianus*). The Bay checkerspot butterfly was reintroduced to Edgewood Park in 2011, but the number of individuals present has dwindled to the point that there is no reasonable expectation that any individuals would disperse to the project site. While bald eagles (*Haliaeetus leucocephalus*) may fly over the project site at times, none are expected to nest or forage on or close to the project site.

No aquatic habitats to support special-status fish species are present on the project site or in adjacent areas, such as along the ephemeral drainage to the northwest. Thus, these species are absent from the project site and adjacent areas.

Special-status bird species that may occasionally occur on the project site as nonbreeding foragers, but that do not nest on the site, are the northern harrier (*Circus hudsonius*), golden eagle (*Aquila chrysaetos*) peregrine falcon (*Falco peregrinus anatum*), tricolored blackbird, and Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*). The mountain lion, a candidate for listing under CESA, as well as the pallid bat, Townsend's big-eared bat (*Corynorhinus townsendii*), western red bat (*Lasiurus blossevillii*), and American badger (*Taxidea taxus*), which are California species of special concern, may also forage on the project site. These species are not expected to den, roost, or breed on or immediately adjacent to the project site due to a lack of suitable habitat, and they will be affected very little, if at all, by the proposed project. In addition, the Vaux's swift (*Chaetura vauxi*), olive-sided flycatcher (*Contopus cooperi*), yellow warbler (*Setophaga petechia*), and grasshopper sparrow are bird species that are considered a California species of special concern only when nesting; they may occur occasionally in grasslands on the project site as nonbreeding transients, foragers, or migrants, but no suitable nesting habitat for these species occurs on or adjacent to the project site.

The Bay checkerspot butterfly, monarch butterfly, white-tailed kite (*Elanus leucurus*), and San Francisco dusky-footed woodrat are addressed in greater detail in this report, because these species can potentially breed or

occur on or immediately adjacent to the project site and/or may be significantly impacted by the proposed project (see Section 6 *Impacts and Mitigation Measures* below).

Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, or Candidate Species			
Bay checkerspot butterfly (*Euphydryas editha bayensis*)	FT	Native grasslands on serpentine soils. Larval host plants are *Plantago erecta* and/or *Castilleja* sp. The flight season extends from late February to early May.	**Not Expected to Occur.** This species was historically abundant in Edgewood Park approximately 0.4 mile northwest of the project site. However, this local population was extirpated in the early 2000s. Reintroduction efforts commenced in 2011, and, while initially successful, with a high of 800 adults in 2014, only 47 adults were detected in the park during annual surveys in 2016 (Creekside Science 2016). Recent counts of adults detected during spring flight surveys were six in 2020, five in 2021, and eight in 2022, indicating that the population has dwindled further (C. Niederer, pers. comm.). Suitable habitat to support the Bay checkerspot butterfly's larval host plants is present on the project site, but due to the limited size of the project site, disturbance by mowing, and the declining status of nearby populations, a population of Bay checkerspot butterflies could not become established on the project site. Given how low the population at Edgewood Park is, and the lack of high-quality habitat (i.e., serpentine grassland) on the project site, there is no reasonable expectation that individuals would disperse to the project site.
Monarch butterfly (*Danaus plexippus*)	FC	Requires milkweeds (*Asclepias* spp.) for egg-laying and larval development, but adults obtain nectar from a wide variety of flowering plants in many habitats. Individuals congregate in winter roosts, primarily in Mexico and in widely scattered locations on the central and southern California coast.	**May be Present as Breeder.** The monarch butterfly occurs throughout the region primarily as a migrant. No larval host plants were observed on the project site during the November 2022 survey; however, the site had been recently mown and milkweeds, if present, would not have been detectable. If milkweeds are present, monarch butterflies may breed on the project site from March through October. However, due to the limited size of the site and disturbance from mowing, only small numbers of monarch butterflies are expected to breed there, if any. Small numbers of individuals may forage throughout the project site, especially during spring and fall migration. However, the site does not provide high-quality foraging habitat for this species. No suitable overwintering habitat for monarchs (e.g., Eucalyptus trees) is present on the site, and no current or historical overwintering sites are known as far inland as the project site; the nearest known overwintering location is 9.8 miles to the north Coyote Point Park in San Mateo (Xerces Society 2022).

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Crotch bumble bee (*Bombus crotchii*)	SC	Open grassland and scrub habitats.	**Absent.** Although this species was historically found throughout the southern two-thirds of California, population declines and range contractions (25% relative to its historical range) have made this species very scarce in the region (CDFW 2019). There are no recent (i.e. after 1909) records on the San Francisco peninsula (Bumble Bee Watch 2022, CNDDB 2022, iNaturalist 2022), and CNDDB (2022) does not include even historical records from San Mateo County. Therefore, this species is not expected to occur on the project site.
Western bumble bee (*Bombus occidentalis*)	SC	Occurs in a variety of grassland, scrub, and open woodland habitats.	**Absent.** Although the species was historically found throughout much of central and northern California, including the project vicinity, it has been extirpated from much of its former range, and there are no recent records from San Mateo County or nearby areas (CDFW 2019, Bumble Bee Watch 2022, iNaturalist 2022). Therefore, this species is absent from the project site.
California tiger salamander (*Ambystoma californiense*)	FT, ST	Vernal or temporary pools in annual grasslands or open woodlands. Adults live terrestrially in small mammal burrows.	**Absent.** The California tiger salamander's range on the San Francisco Peninsula historically occurred barely as far northwest as Woodside, where there is a 1962 record from a location approximately 1.5 miles southeast of (and across Interstate 280 from) the project site (CNDDB 2022). That occurrence is considered "possibly extirpated" by CNDDB. The closest extant population is located in the vicinity of Lagunita on the Stanford University Campus, approximately 6 miles to the southeast (CNDDB 2022). That population is located far beyond the known dispersal distance of the species, and is separated from the project site by extensive urbanization. Therefore, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
California red-legged frog (*Rana draytonii*)	FT, CSSC	Streams, freshwater pools, and ponds with emergent or overhanging vegetation.	**Absent.** No suitable aquatic breeding habitat for California red-legged frogs is present on the project site. A number of records of this species are present in the Woodside area west of Interstate 280, including a known breeding pond approximately 0.9 mile to the northwest and a record along West Union Creek approximately 0.7 mile to the southwest (CNDDB 2022). No records are present in the project vicinity east of Interstate 280 (CNDDB 2022). A review of aerial photos identified three potential breeding ponds east of Interstate 280 160–410 feet north and northwest of the project site (Google Inc. 2022). These ponds hold water from approximately December to May, but only in very wet years (i.e., during recent wet seasons in 2010–2011, 2015–2016, and 2016-2017) (Google Inc. 2022). Because all known occurrences of California red-legged frogs in the vicinity are separated from the site by Interstate 280, individuals are not expected to successfully disperse across this busy roadway, or along the nearby Cañada Road or Edgewood Road undercrossings, to breed in the nearby ponds and potentially reach the project site. In addition, because California red-legged frogs are strongly associated with ponds that hold water annually (as opposed to only in very wet years), they are not expected to establish a population within the ponds adjacent to the site. Thus, this species is determined to be absent from the project site and adjacent areas.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)	FE, SE, SP	Occurs in a variety of habitats, including riparian areas; requires burrows for hibernation and frogs as a prey base.	**Absent**. The San Francisco garter snake occurs on the San Francisco Peninsula from just north of the San Francisco–San Mateo County line south to approximately the San Mateo–Santa Cruz County line. An intergrade zone composed of hybrids between the San Francisco garter snake and red-sided garter snake (*Thamnophis sirtalis sirtalis*) occurs from Palo Alto north to the Pulgas region near Upper Crystal Springs Reservoir (Barry 1994). No suitable aquatic breeding or foraging habitat occurs on the project site. San Francisco garter snakes are known to occur in the project vicinity, with an established population at Crystal Springs Reservoir approximately 4 miles to the northwest. Additional records of potential intergrades have been detected in aquatic habitats west of Cañada Road approximately 0.9 mile and 1.4 miles northwest of the project site (CNDDB 2022). However, all known occurrences are separated from the project site by Interstate 280, and individuals are not expected to successfully disperse across this busy roadway or along the nearby Cañada Road or Edgewood Road undercrossings to reach the project site. Further, because the ponds located 160–410 feet north and northwest of the site only pond water through the winter in very wet years, and cannot support a breeding population of red-legged frogs (the primary prey of the San Francisco garter snake) due to their short ponding duration, these ponds do not provide suitable habitat for San Francisco garter snakes. Thus, this species is determined to be absent.
Bald eagle (*Haliaeetus leucocephalus*)	SE, SP	Occurs mainly along seacoasts, rivers, and lakes; nests in tall trees or in cliffs, occasionally on electrical towers. Feeds mostly on fish.	**Absent.** Bald eagles are known to nest in the project vicinity at inland reservoirs and along the coast, including at Crystal Springs Reservoir approximately 4 miles north of the project site. However, no suitable nesting or foraging habitat for bald eagles is present on the project site. Determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Tricolored blackbird (*Agelaius tricolor*)	ST	Nests near fresh water in dense emergent vegetation.	**May be Present as Nonbreeder.** In San Mateo County, the tricolored blackbird has bred in only a few scattered locations, and is absent from, or occurs only as a nonbreeder in, most of the County (Sequoia Audubon Society 2001). This species typically nests in extensive stands of tall emergent herbaceous vegetation in non-tidal freshwater marshes and ponds. No suitable nesting habitat is present on the project site or along the ephemeral drainage adjacent to the site, as no large patches of emergent vegetation, blackberry (*Rubus* sp.) stands, or other suitable vegetation are present. Ostensibly suitable nesting habitat is present in emergent vegetation located in the seasonal ponds 160–410 feet north and northwest of the project site; however, this species (whose colonies are loud and conspicuous) has never been recorded nesting in the site vicinity (Cornell Lab of Ornithology 2022), and high levels of disturbance likely preclude nesting near the site. Thus, this species is expected to occur on the site only occasionally and in low numbers as a nonbreeding forager, if at all.
Mountain lion (Southern California/Central Coast ESU) (*Puma concolor*)	SC	Has a large home range size and occurs in a variety of habitats. Natal dens are typically located in remote, rugged terrain far from human activity. May occasionally occur in areas near human development, especially during dispersal.	**May be Present as Nonbreeder.** In the project region, there are verified sightings reported on BAPP.org (2022) and numerous unpublished reports. This species occurs widely, though at low densities, throughout the Santa Cruz Mountains, and may disperse into lowland/valley floor areas. Mountain lions are not expected to regularly use the project site or establish a den on the site due to high levels of human activity and a lack of suitable denning habitat, but individuals may occur on the site as rare dispersants due to the site's location on the periphery of extensive natural areas that connect with Edgewood Park.
California Species of Special Concern			

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Southwestern pond turtle (*Emys pallida*)	CSSC	Permanent or nearly permanent water in a variety of habitats.	**Absent.** This species is known to occur in the project vicinity approximately 1.4 miles northwest of the project site, west of Interstate 280 (iNaturalist 2022). Ostensibly suitable aquatic foraging habitat is present in three seasonal ponds located 160–410 feet north and northwest of the project site (Google Inc. 2022). However, these ponds hold water from approximately December to May, only in very wet years (i.e., during recent wet seasons in 2010–2011, 2015–2016, and 2016-2017) (Google Inc. 2022)**.** Further, because all known occurrences are separated from the project site by Interstate 280, individuals are not expected to successfully disperse across this busy roadway or along the nearby Cañada Road or Edgewood Road undercrossings to reach the project site. Due to the absence of year-round water in these ponds, as well as the presence of Interstate 280 in between the site and known occurrences of the species, pond turtles are not expected to occur on the project site.
Northern harrier (*Circus cyaneus*)	CSSC (nesting)	Nests in marshes and moist fields, forages over open areas.	**May be Present as Nonbreeder.** No suitable nesting habitat is present on the project site or in the surrounding vicinity. This species is a common winter resident in open grassland and scrub habitats the project vicinity, such as at Edgewood Park (Cornell Lab of Ornithology 2022), and individuals may forage on the project site during migration and winter.
Burrowing owl (*Athene cunicularia*)	CSSC	Nests and roosts in open grasslands and ruderal habitats with suitable burrows, usually those made by California ground squirrels.	**Absent.** Burrows of California ground squirrels on the project site provide ostensibly suitable nesting and roosting habitat for this species, and grasslands on the site provide ostensibly suitable foraging habitat. However, burrowing owls are not known to occur in the project vicinity (Cornell Lab of Ornithology 2022), and no individuals or sign were observed during the November 2022 site visits. Determined to be absent.
Vaux's swift (*Chaetura vauxi*)	CSSC (nesting)	Nest both in small colonies and as single pairs, occupying cavities in large snags, primarily in old-growth forests. They also occasionally use artificial cavities such as chimneys. Forage aerially.	**May be Present as Nonbreeder.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). However, no large trees with suitable cavities or residential chimneys are present on or near the project site, and this species is not expected to nest on, or in close enough proximity to the project site to be impacted by project activities. May forage aerially over the project site, especially during migration.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Olive-sided flycatcher (*Contopus cooperi*)	CSSC (nesting)	Breeds in mature, primarily coniferous, forests with open canopies, along forest edges in more densely vegetated areas, in recently burned forest habitats, and in selectively harvested landscapes.	**May be Present as Nonbreeder.** Known to nest throughout much of San Mateo County, including in the project vicinity (Sequoia Audubon 2001). However, no suitable coniferous forest nesting habitat is present on or adjacent to the project site. Occasional non-breeding individuals may forage on the site, especially during migration.
Loggerhead shrike (*Lanius ludovicianus*)	CSSC (nesting)	Nests in tall shrubs and dense trees; forages in grasslands, marshes, and ruderal habitats.	**Absent.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). Shrubs and trees on and adjacent to the project site provide ostensibly suitable nesting habitat for loggerhead shrikes, and grasslands on the site provide ostensibly suitable foraging habitat. However, the regional loggerhead shrike population has declined substantially in recent years, and this species is not expected to occur on the project site due to the limited extent of the available habitat. Rather, loggerhead shrikes that occur in the vicinity are expected to occur in higher-quality habitat to the north, such as at Edgewood Park, nearby. Determined to be absent.
Yellow warbler (*Setophaga petechia*)	CSSC (nesting)	Nests in riparian woodlands.	**May be Present as Nonbreeder.** No suitable nesting habitat for yellow warblers is present on or adjacent to the project site. The species is an abundant migrant throughout the project region during the spring and fall, when nonbreeding individuals may forage in woodland habitats on the site.
Grasshopper sparrow (*Ammodramus savannarum*)	CSSC (nesting)	Nests and forages in grasslands, meadows, fallow fields, and pastures.	**May be Present as Nonbreeder.** Known to nest and occur in the project region primarily in grasslands and less frequently disturbed agricultural habitats, such as at Edgewood Park to the north (Cornell Lab of Ornithology 2022). No suitable nesting habitat for this species is present on the project site due to the limited extent of the grassland habitat and the presence of trees, which prefers to nest in more extensive grasslands without trees, is present on the project site. Small numbers of individuals may forage in grasslands on the project site during migration.
Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*)	CSSC	Nests in pickleweed dominant salt marsh and adjacent ruderal habitat.	**May be Present as Nonbreeder.** In the South San Francisco Bay, nests primarily in short pickleweed-dominated portions of diked/muted tidal salt marsh habitat and in adjacent ruderal habitats (Rottenborn 2007). No suitable nesting habitat occurs on the project site. Individuals of several savannah sparrow subspecies, including *alaudinus*, may forage on the project site during migration and winter.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Pallid bat (*Antrozous pallidus*)	CSSC	Forages over many habitats; roosts in caves, rock outcrops, buildings, and hollow trees.	**May be Present as Nonbreeder.** Historically, pallid bats were likely present in a number of locations throughout the project region, but their populations have declined in recent decades. Pallid bats are not expected to roost in the buildings on the site because of existing, active human use, and no trees that provide particularly large or high-quality cavities to support a roosting colony of this species are present on or close enough to the project site to be disturbed by work activities, and no known recent (after 1960) records of maternity colonies of this species are present on or adjacent to the project site (CNDDB 2022, iNaturalist 2022). Nevertheless, individuals from colonies in the region (especially in the Santa Cruz Mountains to the west) could occasionally forage on the project site.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSSC	Roosts in caves and mine tunnels, and occasionally in deep crevices in trees such as redwoods or in abandoned buildings, in a variety of habitats.	**May be Present as Nonbreeder.** Townsend's big-eared bats are known to occur in the Santa Cruz Mountains to the southwest (iNaturalist 2022). Suitable cavernous roosting habitat is not present in the project site to support a roosting colony of this species, and individuals are not expected to roost in buildings on the site because of existing, active human use. Individuals from colonies in the region may occasionally forage over the open habitats on the project site.
Western red bat (*Lasiurus blossevillii*)	CSSC	Roosts in foliage in forest or woodlands, especially in or near riparian habitat.	**Low Potential for Occurrence.** Western red bats occur in the project vicinity in low numbers as migrants and winter residents, but this species does not breed in the region. Individual western red bats may roost in the foliage of trees virtually anywhere on the project site, but are expected to roost primarily in riparian areas elsewhere in the region. Occasional individuals may forage over the project site year-round.
San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*)	CSSC	Nests in a variety of habitats including riparian areas, oak woodlands, and scrub.	**Present.** Suitable habitat is present in the small oak woodland in the northwestern corner of the project site, and a single woodrat nest was detected on the ground in coast live oak woodland habitat on the site during the focused survey in November 2022.
American badger (*Taxidea taxus*)	CSSC	Burrows in grasslands and occasionally in infrequently disked agricultural areas.	**May be Present as Nonbreeder.** Known to occur in the project region primarily in extensive grasslands and scrub habitats north and west of the project site. Badgers are not expected to regularly use the project site or establish a den on the site due to high levels of human activity, but, individuals may occur on the site as rare dispersants or foragers due to the site's location on the periphery of open habitats in the region.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
State Fully Protected Species			
American peregrine falcon (*Falco peregrinus anatum*)	SP	Forages in many habitats; nests on cliffs and tall bridges and buildings.	**May be Present as Nonbreeder.** Peregrine falcons are not known or expected to nest on or near the project site due to a lack of suitable cliff-like habitat for nesting. However, this species may occasionally forage in open areas such as the project site during the nonbreeding season, though always at low densities.
Golden eagle (*Aquila chrysaetos*)	SP	Breeds on cliffs or in large trees (rarely on electrical towers); forages in open areas.	**May be Present as Nonbreeder.** No suitable nesting habitat for golden eagles is present on the project site. This species occurs in the project vicinity as an occasional forager, primarily during migration and winter (Cornell Lab of Ornithology 2022). The project site provides only very limited foraging habitat for this species due to its small size, and golden eagles are expected to forage on the site rarely, if at all.
White-tailed kite (*Elanus leucurus*)	SP	Nests in tall shrubs and trees; forages in grasslands, marshes, and ruderal habitats.	**May be Present as Breeder.** White-tailed kites are common residents in open areas in the project vicinity. Trees in the mixed oak woodland habitat on and adjacent to the project site provide suitable nesting habitat for this species. No white-tailed kites or nests of this species were observed on or adjacent to the site during the November 2022 site visit; however, up to one pair of white-tailed kites may nest in trees on or adjacent to the project site. Individuals may forage in open habitats on and adjacent to the site year-round.

Key to Abbreviations: Status: Federally Endangered (FE); Federally Threatened (FT); Federal Candidate for Listing (FC); State Endangered (SE); State Threatened (ST); State Candidate for Listing (SC); State Fully Protected (SP); California Species of Special Concern (CSSC).

5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats

Natural communities have been considered part of the Natural Heritage Conservation triad, along with plants and animals of conservation significance, since the state inception of the Natural Heritage Program in 1979. The CDFW determines the level of rarity and imperilment of vegetation types, and tracks sensitive communities in its Rarefind database (CNDDB 2022). Global rankings (G) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas state (S) rankings are a reflection of the condition of a habitat within California. Natural communities are defined using NatureServe's standard heritage program methodology as follows (Faber-Langendoen et al. 2012):

G1/S1: Critically imperiled

G2/S2: Imperiled

G3/S3: Vulnerable.

G4/S4: Apparently secure

G5/S4: Secure

In addition to tracking sensitive natural communities, the CDFW also ranks vegetation alliances, defined by repeating patterns of plants across a landscape that reflect climate, soil, water, disturbance, and other environmental factors (Sawyer et al. 2009). If an alliance is marked G1-G3, all of the vegetation associations within it will also be of high priority (CDFW 2022). The CDFW provides VegCAMP's currently accepted list of vegetation alliances and associations (CDFW 2022).

Impacts on CDFW sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, must be considered and evaluated under CEQA (Title 14, Division 6, Chapter 3, Appendix G of the California Code of Regulations). Furthermore, aquatic, wetland and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS.

5.3.1 Sensitive Natural Communities

A query of sensitive natural communities in the CNDDB (2022) identified five sensitive natural communities as occurring within the nine 7.5-minute USGS quadrangles containing or surrounding the project site: northern coastal salt marsh (Rank G3/S3.2), northern maritime chaparral (Rank G1/S1.2), serpentine bunchgrass (Rank G2/S2.2), valley needlegrass grassland (G3/S3.1), and valley oak woodland (G3/S2.1). Needlegrass grassland on the project site does not meet the definition of the *serpentine bunchgrass* natural community type due to the apparent absence of serpentine soils; however, this habitat corresponds to the *valley needlegrass grassland* natural

community type. Valley oak woodland habitat on the project site corresponds to the valley oak woodland natural community type. No additional sensitive natural communities are present on the project site.

5.3.2 Sensitive Vegetation Alliances

Areas of the site mapped as valley oak woodland are dominated by valley oaks and would correspond to the "*Quercus lobata* Woodland" alliance. Although all *Quercus lobata* associations (71.040.00) are considered to be G3/S3, this alliance is considered sensitive by the CDFW in VegCAMP (CDFW 2022).

Areas of the site mapped as needlegrass grassland correspond to the "*Nassella pulchra* – *Avena* spp. – *Bromus* spp." alliance. This alliance is ranked as G3/S3? (Sawyer et al. 2009) and is therefore ranked as apparently secure at the globally and statewide level (CDFW 2022), with some uncertainty on the statewide ranking. While this alliance is not considered a sensitive vegetation alliance by this definition, this natural community type is still considered a sensitive alliance by the CDFW in VegCAMP (CDFW 2022).

5.3.3 CDFW Riparian Habitat

Due to its rarity and disproportionately high habitat values and functions to wildlife, the CDFW considers riparian habitat to be sensitive. As described above in Section 3.2.4, the CDFW would likely claim jurisdiction over areas at, and below, the top of bank lines on either side of the ephemeral drainage, as well as its associated riparian habitat, located approximately 44 feet off-site to the northwest. However, riparian habitat associated with the ephemeral drainage does not extend onto the project site, and it would not be directly or indirectly impacted by project activities.

5.3.4 Sensitive Habitats (Waters of the U.S./State)

No wetlands or other waters of the U.S./state occur on the project site. The unnamed, ephemeral drainage located approximately 44 feet off-site to the northwest would likely be considered jurisdictional waters of the U.S. up to the OHW mark, and the RWQCB may claim the banks of the drainage, and riparian habitat rooted below top of bank, as waters of the state. However, these potentially jurisdictional areas are located entirely off-site.

5.3.5 Nonnative and Invasive Species

Several nonnative, invasive plant species occur on the project site. Of these, the following have a "moderate" rating, indicating that they have substantial and apparent–but generally not severe–ecological impacts on physical processes, plant and animal communities, and vegetation structure, and that their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal, though establishment would be generally dependent on ecological disturbance: short-podded mustard, Harding grass, rose clover, wall barely (*Hordeum murinum*), Italian thistle, and stinkwort (*Dittrichia graveolens*). Species with a "high" invasive rating by the Cal-IPC have the potential to cause severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal and establishment, and most are widely distributed ecologically (Cal-IPC

2022). On the project site, species with a "high" rating include yellow starthistle (*Centaurea solstitialis*) and French broom (*Genista monspeliensis*). Due to these species' ubiquity in the region, project activities are not expected to result in the spread of nonnative and invasive plant species.

Section 6. Impacts and Mitigation Measures

CEQA and the State CEQA Guidelines provide guidance in evaluating impacts of projects on biological resources and determining which impacts will be significant. The Act defines "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project."

Appendix G of State CEQA Guidelines provides a checklist of other potential impacts to consider when analyzing the significance of project effects. The impacts listed in Appendix G (Chapter IV) may or may not be significant, depending on the level of the impact. For biological resources, these impacts include whether the project would:

A. "have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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 state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means"

D. "interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites"

E. "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance"

F. "conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan"

Potential impacts on biological resources as a result of the proposed residential project were systematically evaluated at the project level based on the project description provided to us by the Town through October 2022. Based on this information, it is our understanding that all project impacts including grading, construction, staging, and access will occur within the limits of boundaries provided, and that all project impacts within this boundary will be permanent. For the purpose of this assessment, we have assumed that the proposed project would impact all 5.0 acres of the project site.

Potential impacts on existing biological resources were evaluated by comparing the quantity and quality of habitats present on the project site under baseline conditions to the anticipated conditions after implementation of the proposed project. Direct and indirect impacts on special-status species and sensitive natural communities were assessed based on the potential for the species, their habitat, or the natural community in question to be disturbed or enhanced following implementation of the proposed project.

6.1 Impacts on Special-Status Species: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant with Mitigation)

6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant)

Proposed project activities would result in the permanent removal of 2.4 acres of California annual grassland, 1.3 acres of developed areas, 0.5 acre of ornamental woodland, and 0.2 acre of coast live oak woodland habitats on the project site. These impacts would reduce the extent of vegetation within the impact area and result in a reduction in the abundance of some of the common plant and wildlife species that occur there. However, the California annual grassland, developed, ornamental woodland, and coast live oak woodland habitats on the project site occur in a location in Woodside that has been subject to disturbance in the past, is regularly disturbed by human activities (such as mowing), and are on the periphery of a developed residential area such that these habitats do not provide regionally rare or especially high-value habitat for native vegetation, wildlife, or special-status species. In addition, these habitats are abundant and widespread regionally, are not particularly sensitive, and are not especially valuable (from the perspective of providing important plant or wildlife habitat) or exemplary occurrences of these habitat types. Therefore, impacts on these habitats are considered less than significant under CEQA. Further, because the number of individuals of any common plant or animal species within these habitats, and the proportion of these species' regional populations that could be disturbed, is very small, the project's impacts would not substantially reduce regional populations of these species. Thus, these impacts do not meet the CEQA standard of having a *substantial* adverse effect and would not be considered significant under CEQA.

6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation)

Thirteen special-status plant species were determined to have some potential to occur on the project site. These species are Dudley's lousewort, a state rare and CRPR 1B.2 species; white-rayed pentachaeta, state and federally endangered and a CRPR 1B.1 species; bent-flowered fiddleneck, fragrant fritillary, marsh microseris, woodland woollythreads, CRPR 1B.2 species; Scouler's catchfly, a CRPR 2B.2 species; woolly-headed lessingia, a CRPR 3 species; and San Francisco wallflower, harlequin lotus, bristly leptosiphon, large-flowered leptosiphon; and Gairdner's yampah, CRPR 4.2 species. These species could potentially occur in grassland habitats on the project site, but focused surveys for these species during the appropriate blooming period have not yet been performed to determine presence/absence. If any special-status plant species occur on the project site, the project could

impact these plants due to disturbance or destruction of individuals and suitable habitat. Direct impacts could include grading or filling areas supporting the species, trampling or crushing of plants, and soil compaction. Indirect impacts could include increased mobilization of dust onto plants, which can affect their photosynthesis and respiration, or changes to hydrology supporting these plants due to grading or construction in nearby habitats.

Conservation of special-status plant species is important because their populations contribute to preserving genetic resources and help ensure persistence of these rare species in the county and state. Due to the regional rarity of these species, impacts to more than 10% of a population (by individuals or occupied area) of state or federally listed, state rare, or CRPR List 1B or 2B species or more than 20% of a population of CRPR List 3 or 4 species could result in the loss of that population, thereby contributing to a reduction in the species' abundance and genetic resources. Such an impact would therefore be considered significant under CEQA. Impacts to 10% or less of a state or federally listed, state rare, or CRPR 1B or 2B population, or 20% or less of a CRPR 3 or 4 population, would not be expected to cause the extirpation of such a population as long as the remaining plants are avoided and protected.

Implementation of the Mitigation Measures BIO-1, BIO-2, and BIO-3 below will reduce these impacts to a less-than-significant level.

Mitigation Measure BIO-1. Pre-Activity Surveys for Special-Status Plants. Prior to initial ground disturbance for project-related activities, appropriately timed, focused surveys for special-status plant species will be conducted by a qualified plant ecologist on the project site and within a 50-foot surrounding buffer to assess the presence or absence of these species. This buffer may be increased by the qualified plant ecologist depending on site-specific conditions and activities planned in the area, but will be at least 50 feet in width; if access to adjacent areas cannot be obtained, the plant ecologist will stand on the project site or other accessible areas and use binoculars or other means to look for special-status plants in the 50-foot surrounding buffer. Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust, such as grading; potential for project activities to alter hydrology supporting habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away. Based on the flowering periods of the potentially occurring species, surveys will need to occur at least three different times of year to ensure that they occur during appropriate periods for detecting these species: early spring from February to March, late spring from April to May, and summer from June to October. The surveys will be conducted in a year with sufficient precipitation to detect these species; alternatively, if these species are determined to be detectable in appropriate reference populations (regardless of precipitation), surveys for these species on the project site can be determined to be valid even if precipitation is well below average. Mowing must be avoided prior to the surveys so that these species can be detectable if present. If any special-status plants are detected, the plant ecologist will use any available means to determine the abundance and extent of the population, even if the population continues off-site.

If pre-activity surveys detect no special-status plants, then no further mitigation related to these species is necessary. If special-status plants are detected, then Mitigation Measures BIO-2, and BIO-3 if necessary, will be implemented.

Mitigation Measure BIO-2. Avoidance Buffers. To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent will design and construct the proposed project to completely avoid impacts on at least 90% of individuals in the populations of federally listed, state rare, or CRPR 1B and 2B plant species and/or at least 80% of individuals in the populations of CRPR 3 and 4 plant species on the project site or close enough to the site to be affected by the project. Avoided special-status plant populations will be protected by establishing and observing the identified buffer between plant populations and the impact area. All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, will be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around special-status plants to be avoided will be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site in question). This marking will be maintained intact and in good condition throughout project-related construction activities.

If complete avoidance is not feasible and more than 10% of a population (by occupied area or individuals) of federally listed, state rare, or CRPR 1B or 2B plant species, or more than 20% of a population of CRPR 3 or 4 plant species, will be impacted by the project as determined by a qualified plant ecologist, Mitigation Measure BIO-3 will be implemented.

Mitigation Measure BIO-3. Preserve and Manage Mitigation Populations. If avoidance of special-status plant species is not feasible and more than 10% of a population (by occupied area or individuals) of federally listed, state rare, or CRPR 1B or 2B plant species, or more than 20% of a population of CRPR 3 or 4 plant species would be impacted, compensatory mitigation will be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To compensate for impacts on these plants, off-site habitat occupied by the affected species will be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant affected, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10% significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to these species beyond the 10% significance threshold) or establish an entirely new population in suitable habitat.

Areas proposed to be preserved as compensatory mitigation for impacts to special-status plant species must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas will be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat will be of equal or greater habitat quality compared to the impacted areas, as determined by

a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and will contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands will be ensured through an appropriate mechanism, such as a conservation easement or fee title purchase. A habitat mitigation and monitoring plan (HMMP) will be developed by qualified plant or restoration ecologists and implemented for the mitigation lands. That plan will include, at a minimum, the following information:

- a summary of impacts to the special-status plant species in question, including impacts to its habitat, and the proposed mitigation;
- a description of the location and boundaries of the mitigation site and description of existing site conditions;
- a description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the species;
- a description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist);
- proposed management activities to maintain high-quality habitat conditions for the species;
- a description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria will include demonstration that any plant population fluctuations over the monitoring period of a minimum of 5 years for preserved populations and a minimum of 10 years for enhanced or established populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management);
- if a new population is established, the new population must contain at least 200 individuals or the same number of impacted individuals, whichever is greater, by year 5. This is to ensure the created population will be large enough to expect to persist and gain sufficient dedicated pollination services. If year 5 is a poor weather year for summer and fall-blooming annual plants and reference populations show a decline, this criteria can be measured in the next year occurring with average or better rainfall; and
- contingency measures for mitigation elements that do not meet performance criteria. For example, if by year 5 (or the next suitable rainfall year after year 5) of monitoring, the project is unable to establish a self-sustaining population of the required number of individuals as described above, the applicant shall preserve and manage an extant population of that same species under a revised HMMP.

Approval of the HMMP by the Town will be required before project impacts to special-status plant species occur.

6.1.3 Impacts on Water Quality (Less than Significant)

No direct impacts to the unnamed ephemeral drainage, which flows northeast to southwest approximately 44 feet from the project site, are proposed. Indirect impacts on water quality in the drainage could potentially occur as a result of project activities, which are located upslope of the drainage. Additionally, minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downslope and downstream of construction activities.

Indirect impacts on water quality from construction of the project would be avoided and minimized by implementing erosion and sediment control measures, as well as BMPs for work near aquatic environments. In addition, construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of storm water pollutants under the NPDES *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of BMPs to protect water quality until the site is stabilized. Standard permit conditions under the Construction General Permit require that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors.

In many Bay Area counties, including San Mateo County, projects must also comply with the California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (Water Board Order No. R2-2015-0049). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design to prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site after construction has been completed. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Compliance with these permit requirements will minimize the potential for impacts on water quality due to increases in erosion, sedimentation, and turbidity as well as releases of pollutants into the ephemeral drainage located downslope of the project site. Therefore, project activities are not expected to result in substantial adverse indirect effects on water quality, and such impacts would be less than significant.

6.1.4 Impacts on the Monarch Butterfly (Less than Significant)

Project activities will permanently impact 0.3 acre of needlegrass grassland that may be occupied by Bay checkerspot butterflies and monarch butterflies, as well as 2.4 acres of California annual grassland, 0.5 acre of ornamental woodland, 0.4 acre of valley oak woodland, and 0.2 acre of coast live oak woodland that may be occupied by monarch butterflies. Given the small size of the project site and the lack of any evidence that it

supports high densities of the larval host plant (milkweed) or nectar plants, few, if any, monarch butterflies are expected to be present on the project site when work occurs. Nevertheless, project activities could result in the loss of larval host plants and adult nectar sources for monarch butterflies, and potentially also the loss of eggs, larvae, or pupae due to crushing by construction personnel or equipment, vegetation removal, excavations, and placement of soil stockpiles.

The proposed project would impact only a very small proportion of this species' regionally available habitat and this species' populations, and the number of individuals likely to be displaced by habitat disturbance and loss would be quite small with respect to the amount of suitable habitat available in the area. Thus, due to the abundance of suitable habitat in the project region, project activities are not expected to result in a substantial impact on breeding and foraging habitat for monarch butterflies. Therefore, the potential loss of small numbers of individual monarch butterflies as a result of the project, as well as the permanent loss of potential breeding and foraging habitat, would not rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on this species or its habitats under CEQA.

6.1.5 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant)

Several special-status bird and mammal species may occur on the project site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These are the northern harrier, Vaux's swift, olive-sided flycatcher, yellow warbler, tricolored blackbird, Bryant's savannah sparrow, grasshopper sparrow, American peregrine falcon, golden eagle, mountain lion, American badger, pallid bat, Townsend's big-eared bat, and western red bat.

The northern harrier, Vaux's swift, olive-sided flycatcher, and yellow warbler (California species of special concern) as well as the tricolored blackbird (a state threatened species) are not expected to occur on or close to the project site as breeders due to the absence of suitable habitat, but individuals may occur occasionally as foragers during the nonbreeding season. The Bryant's savannah sparrow (a California species of special concern) breeds in marshes along the San Francisco Bay to the north, and individuals may forage in California annual grassland on the project site during the nonbreeding season. Similarly, the grasshopper sparrow (a California species of special concern) breeds in expansive grassland habitats to the north, and individuals may occasionally forage in grasslands in the project site during migration. The American peregrine falcon and golden eagle (state fully protected species) are not expected to nest on the project site due to a lack of suitable habitat, though individuals may occasionally forage on the project site in small numbers. Due to the site's location on the periphery of open space areas associated with Edgewood Park and the Santa Cruz Mountains, the mountain lion (a state candidate species) and American badger (a California species of special concern) may briefly traverse the site as non-breeding dispersants or foragers, but they are not expected to linger for any length of time due to high levels of human activity. The pallid bat, Townsend's big-eared bat, and western red bat (California species of special concern) may occur on the project site as occasional foragers, but are not expected to breed or roost on the project site due to a lack of suitable habitat and existing human activity in the buildings on the site, and there are no known maternity colonies on or adjacent to the project site. Nevertheless, individuals from more remote colonies could potentially forage over open grasslands in the project site on rare occasions.

Activities under the proposed project would have some potential to impact foraging habitats and/or disturb individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. Further, the project site does not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, impacts of the project will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant under CEQA.

6.1.6 Impacts on the White-Tailed Kite (Less than Significant)

The white-tailed kite (a state fully protected species) may nest in oak woodland habitat or landscape trees on and adjacent to the project site. Based on site observations, the areal extent of suitable habitats within and adjacent to the project site, and known nesting densities of this species, it is likely that no more than one pair of white-tailed kites could potentially nest on or immediately adjacent to the project site. The project would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite. In addition, activities that occur during the nesting season and cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests (i.e., nests with eggs or young). Heavy ground disturbance, noise, and vibrations caused by project activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs that could be disturbed is very small (i.e., one pair), the impacts of project activities would represent a very small fraction of the regional population of this species. Therefore, neither the potential loss of individual white-tailed kites, nor the disturbance of nesting and foraging habitat, would rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat under CEQA. However, as discussed in Section 3 above, all native migratory birds, including raptors, are protected under the MBTA and California Fish and Game Code. Recommended measures to comply with these laws are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.1.7 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant)

A single nest of San Francisco dusky-footed woodrats is present in coast live oak woodland habitat in the northwest corner of the project site. Several additional nests of this species are present in oak woodland habitat off-site to the northwest along the unnamed ephemeral drainage. Woodrats from this community will forage in oak woodland habitats on the project site. However, due to the limited extent of valley oak and coast live oak woodlands on the project site, as well as the limited available cover present in these areas, woodrats are expected to occur on the site only in very low numbers (i.e., one or two individuals, at most).

Construction of the project could result in the injury or mortality of individual woodrats and disturbance or destruction of nests and young, leading to increased predation risk on woodrats flushed from nests, as a result of vegetation clearing and operation of equipment. However, the amount of occupied habitat being affected is small, and the number of individuals that would be disturbed is very low based on the low densities of woodrats observed.

In our opinion, impacts of the project on, at most, one or two individual woodrats would not be considered significant under CEQA; the San Francisco dusky-footed woodrat is abundant in suitable habitat in the region, so the project's impacts would affect only a very small proportion of the regional population of the species. Thus, in our opinion, no mitigation measures are warranted to avoid and minimize project impacts on woodrats under CEQA.

6.1.8 Impacts on Common Species of Roosting Bats (Less than Significant)

Common bat species, such as the Mexican free-tailed bat, can potentially roost in small numbers in buildings on the project site. No evidence of a colony of roosting bats was detected in buildings on the site during the November 2022 focused survey, but the presence of a small colony of a common species of roosting bats could not be ruled out. The demolition of structures on the site has the potential to result in the loss of a small colony of common species of roosting bats. When structures containing roosting colonies or individual bats are removed or modified, individual bats can be physically injured or killed, can be subjected to physiological stress from disturbance during torpor, or can face increased predation because of exposure during daylight. In addition, nursing young may be subjected to disturbance-related abandonment by their mothers. However, the buildings present on the site only provide marginal habitat for roosting bats, and initial surveys concluded that if common species of roosting bats were to roost in these structures, they would occur only in small numbers. Therefore, the loss of the marginal habitat or a small number of individuals of common bat species would not have a *substantial* adverse effect on local and regional populations of these species, and thus would not constitute a significant impact under CEQA.

6.1.9 Impacts due to Bird Collisions (Less than Significant)

Under existing conditions, the project site consists of a mix of undeveloped areas dominated by grasslands, several small oak and ornamental woodlands, and developed areas with buildings. Terrestrial land uses and habitat conditions in areas immediately surrounding the project site consist of low-density residential buildings with associated pedestrian walkways, roads, and landscape vegetation to the northeast and southeast; extensive undeveloped open space to the northwest; and major roadways to the southwest. Undeveloped areas, including oak woodlands and grasslands, are interspersed with the low-density residential buildings to the northeast and southeast, and extensive open space areas associated with the foothills of the Santa Cruz Mountains are present west of Interstate 280. Native vegetation in these open space areas includes native scrub and grassland vegetation as well as mature native trees, especially native oaks. This vegetation supports relatively high densities and diversity of native bird species, and some of these birds will use the vegetation on the project site opportunistically due to the site's close proximity to these open space areas. In contrast, the residential areas to

the northeast and southeast support many nonnative landscape trees and shrubs, which supports fewer of the resources required by native birds compared native vegetation, and the structural simplicity of the vegetation (without well-developed ground cover, understory, and canopy layers) in these developed areas further limits resources available to birds (Anderson et al. 1977, Mills et al. 1989).

Because the natural habitats on the site are limited in extent and of relatively lower quality compared to habitats in surrounding natural open space areas, and the site is regularly disturbed by human activities and mowing, the number of individual landbirds that inhabit and regularly use vegetation on the project site at any given time is low under existing conditions despite the periodic use of the site by birds that inhabit nearby open space areas. Particularly rare species or species of conservation concern are not expected to occur in the project site.

The extent and species of future landscape vegetation to be installed under the project is unknown. For the purpose of this assessment, we assume that while a number of the existing mature trees on the site may be removed, they would be replaced in accordance with the Town's tree protection requirements. Any trees and landscaped areas that will be planted on the site in the future are expected to provide similar habitat structure and foraging opportunities for landbirds compared to existing conditions, although the extent of grasslands on the site will likely be reduced following construction. Landbirds that will occur on the site and in the vicinity will be attracted to any trees and landscaped areas that are planted, and some will make use of new developed structures. These birds will move between the site and habitats in the surrounding vicinity (e.g., the open space areas to the north). As a result, no substantive changes in the number of songbirds inhabiting the project site are expected to result from the proposed project.

It is well documented that glass windows and building façades can result in injury or mortality of birds due to birds' collisions with these surfaces (Klem et al. 2009, Sheppard and Phillips 2015). Because birds do not perceive glass as an obstruction the way humans do, they may collide with glass when the sky or vegetation is reflected in glass (e.g., they see the glass as sky or vegetated areas); when transparent windows allow birds to perceive an unobstructed flight route through the glass (such as at corners); and when the combination of transparent glass and interior vegetation (such as in planted atria) results in attempts by birds to fly through glass to reach that vegetation. The greatest risk of avian collisions with buildings occurs in the area within 40–60 feet of the ground, because this is the area in which most bird activity occurs (San Francisco Planning Department 2011, Sheppard and Phillips 2015). Very tall buildings (e.g., buildings 500 feet or more high) may also pose a threat to birds that are migrating through the area, particularly to nocturnal migrants that may not see the buildings or that may be attracted to lights on the buildings (San Francisco Planning Department 2011).

Birds are likely to collide with glazing on building façades on the project site for the following reasons:

- It is possible that the project may incorporate trees and other landscaping immediately adjacent to glazing on a building's façades. Such vegetation is expected to attract birds. Once birds are using that vegetation, they may not perceive the glass as a solid structure. The vegetation would reflect in the glass of the building's façades, potentially causing birds to attempt to fly in to the reflected "vegetation" and strike the glass. As

a result, some birds that are attracted to the trees and other landscaping that is adjacent to the glass façades are expected to collide with the glass.

- Night lighting associated with new buildings has some potential to disorient birds, especially during inclement weather when night migrating birds descend to lower altitudes. As a result, some birds moving through the project site at night may be disoriented by night lighting and potentially collide with buildings.

The extent to which the proposed new buildings and other structures will incorporate glazing on their façades is unknown, as these structures have not yet been designed. However, it is our understanding that while these buildings will incorporate some glazing on their facades, they will not be designed to incorporate extensive glazing. Because the buildings are expected to incorporate predominantly opaque facades with no extensive areas of glazing, birds will be better able to perceive the building facades as solid obstructions to flight than if the glassy surface appeared more uniform. Thus, the number and frequency of avian collisions with glass façades on the proposed buildings is expected to be low, and the project would not result in the loss of a substantial proportion of any species' Bay-area populations or any Bay-area bird community. Thus, according to CEQA standards, we would consider such impacts to be less than significant.

6.1.10 Impacts due to Increased Lighting (Less than Significant with Mitigation)

The project will result in the construction of buildings and other features (e.g., driveways, roads, and sidewalks) that will increase the amount of lighting on and around the project site. Lighting from the project would be the result of light fixtures illuminating buildings, building architectural lighting, driveway/road lighting, and pedestrian lighting. Depending on the location, direction, and intensity of exterior lighting, this lighting can potentially spill into adjacent natural areas, thereby resulting in an increase in lighting compared to existing conditions. Areas to the northeast and southeast are primarily developed residential areas that do not support sensitive species that might be significantly impacted by illuminance from the project, and areas to the southwest (across Interstate 280) are not located close enough to the project site to be affected by an increase in lighting. However, the open space areas located to the northwest (in the direction of Edgewood Park) provide suitable habitat for a variety of wildlife species, and are close enough to the project site to be affected by an increase in lighting.

Many animals are sensitive to light cues, which influence their physiology and shape their behaviors, particularly during the breeding season (Ringer 1972, de Molenaar et al. 2006). Artificial light has been used as a means of manipulating breeding behavior and productivity in captive birds for decades (de Molenaar et al. 2006), and has been shown to influence the territorial singing behavior of wild birds (Longcore and Rich 2004, Miller 2006, de Molenaar et al. 2006). While it is difficult to extrapolate results of experiments on captive birds to wild populations, it is known that photoperiod (the relative amount of light and dark in a 24-hour period) is an essential cue triggering physiological processes as diverse as growth, metabolism, development, breeding behavior, and molting (de Molenaar et al. 2006). This holds true for birds, mammals (Beier 2006), and other taxa as well, suggesting that increases in ambient light may interfere with these processes across a wide range of species, resulting in impacts on wildlife populations.

Artificial lighting may indirectly impact mammals and birds by increasing the nocturnal activity of predators like owls, hawks, and mammalian predators (Negro et al 2000, Longcore and Rich 2004, DeCandido and Allen 2006, Beier 2006). The presence of artificial light may also influence habitat use by rodents (Beier 2006) and by breeding birds (Rogers et al. 2006, de Molenaar et al. 2006), by causing avoidance of well-lit areas, resulting in a net loss of habitat availability and quality.

Wildlife species inhabiting the sensitive habitats to the northwest are already habituated to the existing artificial illuminance from a variety of urban and natural light sources that are found nearby. However, due to the ecological importance of these habitats and the wildlife communities they support, substantial increases in illuminance of these natural areas could result in a potentially significant impact under CEQA by disrupting the natural behaviors of the species using these habitats. Although there is agreement throughout the literature that increases in illuminance can affect wildlife behavior, as described above, there is no quantitative level of illuminance increase (above ambient light) that is agreed upon as a threshold for significant impacts to animals. In our professional opinion, implementation of Mitigation Measure BIO-4 below would reduce this impact to a less-than-significant level under CEQA.

Mitigation Measure BIO-4. Minimize Project Lighting. Due to the potential for lighting on the project site to affect wildlife species that occur on the site and in adjacent natural areas, the project will implement the following measures to minimize lighting on the site.

- All exterior lighting shall be fully shielded to block illumination from shining outward towards open space areas located to the northwest.
- To the maximum extent feasible, up-lighting (i.e., lighting that projects upward above the fixture) shall be avoided in the project design. All lighting shall be fully shielded to block illumination from shining upward above the fixture.

  If up-lighting cannot be avoided in the project design, up-lights shall be shielded and/or directed such that no luminance projects above/beyond objects at which they are directed (e.g., trees and buildings) and such that the light would not shine directly into the eyes of a bird flying above the object. If the objects themselves can be used to shield the lights from the sky beyond, no substantial adverse effects on migrating birds are anticipated.
- Fixtures shall comply with lighting zone LZ-1, *Low Ambient*, as recommended by the International Dark-Sky Association (2011) for rural and low-density residential areas. The allowed total initial luminaire lumens for the project site is 1.25 lumens per square foot of hardscape, and the BUG rating for individual fixtures shall not exceed B2 or G1, as follows:
  - B2: 1,000 lumens high (60–80 degrees), 2,500 lumens mid (30–60 degrees), 1,000 lumens low (0–30 degrees)

- G1 (asymmetrical fixtures): 100 lumens forward very high (80–90 degrees), 100 lumens backlight very high (80–90 degrees), 1,800 lumens forward high (60–80 degrees), and 500 lumens backlight high (60–80 degrees) for asymmetrical fixtures or 1,800 lumens backlight high for quadrilateral symmetrical fixtures.

In addition, the maximum allowed luminaire lumens (initial lamp lumens for a lamp, multiplied by the number of lamps in the luminaire) for unshielded luminaires at one entry per building is 420 lumens, and for additional unshielded luminaires on the project site is 315 lumens. The maximum allowed luminaire lumens for fully shielded luminaires is 1,260 lumens. Landscape lighting and shielded directional flood lighting are not allowed.

- Exterior lighting shall be minimized (i.e., total outdoor lighting lumens shall be reduced by at least 30% or extinguished, consistent with recommendations from the International Dark-Sky Association [2011]) from 10:00 p.m. until sunrise, except as needed for safety and City code compliance.

6.2 Impacts on Sensitive Communities: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant)

6.2.1 Impacts on Valley Oak Woodland and Needlegrass Grassland Habitats (Less than Significant)

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (Faber-Langendoen2012), as described above in Section 5.3. Aquatic, wetland, and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS (see Section 6.3 below). Project impacts on sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, were considered and evaluated.

An unnamed ephemeral drainage flows from northeast to southwest adjacent to, but not through, the project site. The entirety of ground-disturbing project impacts will occur outside of the riparian corridor; thus, the proposed project will have no direct permanent or temporary impacts on riparian habitat. There is potential for indirect effects to occur within riparian areas downslope of the project site if runoff from the project increases in intensity or frequency due to the proposed project. However, required construction-period BMPs and post-construction stormwater requirements will apply to the proposed project as discussed above in Section 6.1.3, and these requirements would avoid and reduce these impacts to a less-than-significant level.

The project would result in the permanent conversion of 0.4 acre of valley oak woodland (G3/S2.1) and 0.3 acre of valley needlegrass grassland (G3/S3.1) to urban-suburban land uses on the project site. These impacts would result in a reduction in the extent of native valley oak woodland and needlegrass grassland vegetation on the site, as well as associated mature native valley oak trees and native grasses. Direct impacts would include

grading or filling areas supporting valley oak woodland and needlegrass grassland species, trampling or crushing of plants, and soil compaction. Indirect impacts would include increased mobilization of dust onto plants, which can affect their photosynthesis and respiration, and changes to hydrology supporting these plants due to grading or construction in nearby habitats.

Areas of valley oak woodland on the project site are limited in extent and intermixed with other tree species, such as coast live oak, and thus represent lower-quality habitat compared to more pristine and extensive valley oak woodlands in the surrounding region. Due to the limited extent of proposed project impacts on valley oak woodlands on the project site, and because these woodlands do not represent a particularly valuable (from the perspective of providing important plant or wildlife habitat) or exemplary occurrence of this habitat type, these impacts would not result in a substantial loss of this habitat in the region, and are considered less than significant under CEQA.

Needlegrass grasslands on the project site are similarly limited in extent. As discussed in Section 4.2.5, this grassland appears to be of fairly high quality due to the variety in age structure, which indicates the grassland is naturally recruiting and is not diminishing in quality like other needlegrass grasslands in the surrounding region that struggle with stronger non-native competition and the effects of nitrogen deposition. Perennial native grasslands, such as needlegrass grasslands, are generally declining and are relatively scarce in California due to conversion to other habitat types and invasion by nonnative plants. Thus, the needlegrass grassland on the project site represents a relatively high-quality occurrence of this habitat type. Nevertheless, this habitat on the project site is limited in extent and fragmented, and the loss of 0.3 acre of fragmented needlegrass grassland would not result in a substantial loss of this habitat in the region. Therefore, these impacts are considered less than significant under CEQA.

6.3 **Impacts on Wetlands**: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Less than Significant)

No wetlands or other waters of the U.S./state are present on the project site. An unnamed ephemeral drainage located 44 feet downslope of the project site to the northwest supports other waters of the U.S./state, but does not support wetlands. The project will avoid all direct impacts on state or federally protected aquatic habitats within this ephemeral drainage.

Because the off-site ephemeral drainage is located downslope of the project site, there is some potential for the project to result in indirect impacts on other waters of the U.S./state within this drainage. However, the project will comply with required construction period BMPs and post-construction storm water requirements will apply to the project as discussed above in Section 6.1.3, and these requirements would minimize increases of peak discharge of storm drain water and to reduce runoff of pollutants to protect water quality, including during

construction. Thus, with compliance with permit requirements, potential project impacts on other waters would be less than significant under CEQA.

6.4 Impacts on Wildlife Movement: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Less than Significant)

6.4.1 Impacts on Wildlife Movement (Less than Significant)

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

The project site is situated on the edge of urban residential development in Woodside. As a result, the proposed development of the project site would not result in the fragmentation of natural habitats. While some wildlife species that occur in nearby natural areas may move through the site when traveling through the area, they will continue to be able to move between Edgewood Park to the north and the Santa Cruz Mountains to the west (e.g., via the Edgewood Road and Cañada Road undercrossings) following construction of the new residences on the property. Thus, any wildlife species that currently move through surrounding open space areas would continue to be able to do so following project construction, and the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact is determined to be less than significant.

6.4.2 Impacts on Nesting Birds (Less than Significant)

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the project site or in immediately adjacent areas. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on and adjacent to the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). Thus, in our opinion, no mitigation measures are warranted to avoid and minimize project impacts on nesting birds under CEQA.

Nevertheless, several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. The removal of vegetation

supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. Recommended measures to ensure project compliance with the MBTA and California Fish and Game Code are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.5 Impacts due to Conflicts with Local Policies: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Less than Significant with Mitigation)

6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant)

The project may remove existing trees on the site, including significant trees as defined by the Town (see Section 3.3.1 above), and the applicant will submit a permit application for tree removal. In accordance with the Woodside Municipal Code, the provisions listed below would be required by the project, at a minimum, for trees to be protected on the site:

- Tree protection fencing and appropriate signage around the drip lines of trees to be protected
- Measures to effect erosion control, soil and water retention, and to limit adverse environmental effects

Significant trees that will be impacted by the project will be replaced in accordance with all applicable laws, policies or guidelines, including Section 153.430 of the Woodside Municipal Code. Per Section 453.438 of the Municipal Code, any significant trees shall be replaced with a California native tree species, be planted as near as possible to the original location, and will be of at least a 36-inch box or other minimum size as specified by the Planning Director. Replacement trees shall be planted within one year of removal or, in the case of removal to accommodate construction, prior to final inspection.

With the incorporation of the above measures to insure compliance with the Woodside Municipal Code, any potential impacts related to conflict with local policies or ordinances protecting trees would be less than significant.

6.5.2 Impacts Due to Encroachment into the Stream/Riparian Corridor (Less than Significant with Mitigation)

To protect the ecological functions and values of a stream, buffers are often prescribed between new development and the stream (or its banks or associated riparian habitat). These buffers provide habitat for plants and animals associated with the stream, provide habitat connectivity (i.e., areas used for wildlife movement, including flight paths for birds), reduce indirect effects of adjacent development (e.g., noise, lighting, human activity, or invasive species) on the natural stream and riparian habitats, allow for the possible future expansion of natural habitat, help to maintain site hydrology, and in some areas allow for runoff to be treated (e.g., by flowing through vegetated areas) before it enters the stream. In addition, vegetative communities within stream buffers may provide important refugia for animals associated with wetland and riparian habitats along the creek during flood events, when little to no such refugia may be present within the

banks of the creek itself. In general, larger buffers protect more of the ecological functions and values of the stream than smaller buffers.

The Town's Stream Corridor Protection Ordinance states that a protected stream corridor extends a horizontal distance of 50 feet measured from each side of the centerline of the stream, or 25 feet measured from the top of bank, whichever is greater. A protected stream corridor is present along the unnamed ephemeral drainage located approximately 44 feet northwest of the project site, and this corridor overlaps the project site by several feet (Figure 3). In our opinion, based on the relatively low quality of the riparian habitat along the ephemeral drainage and the wildlife community present at this location (discussed in Section 4.3 above), the Town's specified 50-foot-wide corridor measured from the stream centerline is an appropriate buffer distance between new construction and the ephemeral drainage to maintain suitable riparian functions and values.

Under the proposed project, certain areas within the stream corridor on the project site would be modified in some way. Currently, these areas consist of coast live oak woodland habitat (Figure 3), and the project would convert approximately 29 square feet of coast live oak woodland to developed land uses.

Under CEQA, owing to the importance of maintaining setbacks (and maintaining habitat quality within those setbacks) between new development and riparian habitat, impacts of encroachment into the protected stream corridor would be significant for the project (due to the ecological impacts of closer development to sensitive riparian communities) if (a) new development is located any closer to the creek than existing conditions, or (b) changes in existing development or landscaping would result in substantial adverse effects on the ecological functions and values of the creek/riparian corridor. On the project site, all areas that fall within the protected stream corridor currently consist of coast live oak woodland habitat. The removal of oak woodland habitat within the stream corridor would encroach closer to the ephemeral drainage compared to baseline conditions. However, in our opinion, due to both the extremely small area of proposed encroachment within the setback (29 square feet) and the relatively low quality of this riparian habitat, the proposed conversion of coast live oak woodland to developed areas within the setback (1) is extremely marginal, such that the reduction in the setback by a few feet would not make a significant difference biologically to wildlife communities using the stream corridor; and (2) would not substantially degrade the ecological functions and values of the stream corridor due to the extremely small footprint of this impact. Therefore, it is our opinion that the project's encroachment into the stream corridor would not be considered a significant biological impact under CEQA.

However, the Town requires all projects to comply with the Town's adopted Stream Corridor Protection Ordinance. Under CEQA, the project would have a potentially significant impact from the perspective of conflicts with local policies if it is not in compliance with the Town's Stream Corridor Protection Ordinance related to alternation of the stream corridor (i.e., the conversion of coast live oak woodland to developed areas) or the construction of structures within the corridor. Implementation of Mitigation Measure BIO-5 below would reduce this conflict to a less-than-significant level.

Mitigation Measure BIO-5. Obtain Town Approval of Design. The applicant shall avoid conflicts with the Town's Stream Corridor Protection Ordinance in some combination of the following two ways:

(1) The project shall be designed so that it complies with the Stream Corridor Protection Ordinance by avoiding the modification of mixed oak woodland and the construction of structures within the protected stream corridor.

(2) The applicant shall obtain the Town's approval of the project design. Given our opinion that encroachment of the project by approximately 29 square feet within the stream corridor would not be considered a significant biological impact under CEQA, the Town may be willing to approve project impacts within the stream corridor.

6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan: Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (No Impact)

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans.

6.7 Cumulative Impacts (Less than Significant)

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in Woodside will result in impacts on the same habitat types and species that will be affected by the proposed project. The proposed project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the project in combination with other projects in the larger region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project; and compensatory mitigation and proactive conservation measures associated with each project. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

However, many projects in the region that impact resources similar to those impacted by the project will be subject to CEQA requirements. It is expected that such projects will mitigate their impacts on sensitive habitats

and special-status species through the incorporation of mitigation measures and compliance with permit conditions.

Regardless of the magnitude and significance of cumulative impacts that result from other projects, the 773 Cañada Road Residential Project is not expected to have a substantial effect on biological resources, and would implement the mitigation measure described above to reduce impacts under CEQA to less than significant levels. Thus, provided that this project successfully incorporates the mitigation measure described in this biological resources report, the project will not have a cumulatively considerable contribution to cumulative effects on biological resources.

Section 7. Compliance with Additional Laws and Regulations for Nesting Birds

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. It is also possible that protected native birds could nest on the buildings on the site. The removal of vegetation or demolition of buildings supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). However, the following measures should be implemented to ensure that project activities do not violate the MBTA and California Fish and Game Code:

Measure 1. Avoidance of the Nesting Season. To the extent feasible, the initiation of commencement of demolition and construction activities should be scheduled to avoid the nesting season. If demolition and construction activities are initiated outside the nesting season, all potential demolition/construction impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.

Measure 2. Pre-Activity/Pre-Disturbance Surveys. If it is not possible to schedule the initiation of demolition and construction activities between September 1 and January 31, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. We recommend that these surveys be conducted no more than seven days prior to the initiation of demolition or construction activities. During this survey, the ornithologist will inspect all trees and other potential nesting habitats (e.g., trees, shrubs, and buildings) in and immediately adjacent to the impact areas for nests.

Measure 3. Non-Disturbance Buffers. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist will determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.

Measure 4. Inhibition of Nesting. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1). This will preclude the initiation of nests in this vegetation, and minimize the potential delay of the project due to the presence of active nests in these substrates.

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Appendix A. Plants Observed

Family	Scientific Name	Common Name	Cal-IPC Rank[1]
Cupressaceae	*Sequoia sempervirens*	coast redwood	
Pinaceae	*Cedrus deodara**	deodar cedar	
Asteraceae	*Baccharis pilularis* ssp. *consanguinea*	coyote bush	
Asteraceae	*Carduus pycnocephalus* ssp. *pycnocephalus**	Italian thistle	Moderate
Asteraceae	*Centaurea solstitialis**	yellow star-thistle	High
Asteraceae	*Dittrichia graveolens**	stinkwort	Moderate
Asteraceae	*Hemizonia congesta* ssp. *luzulifolia*	woodrush tarplant	
Asteraceae	*Lactuca serriola**	prickly lettuce	
Asteraceae	*Silybum marianum**	milk thistle	Limited
Brassicaceae	*Hirschfeldia incana**	short-podded mustard	Moderate
Brassicaceae	*Raphanus sativus**	wild radish	Limited
Cactaceae	*Opuntia ficus-indica**	mission prickly-pear	
Convolvulaceae	*Convolvulus arvensis**	field bindweed	
Euphorbiaceae	*Euphorbia lathyris**	caper spurge	Watch List
Fabaceae	*Acacia* sp.*	wattle	Moderate
Fabaceae	*Genista monspessulana**	French broom	High
Fabaceae	*Trifolium hirtum**	rose clover	Moderate
Fagaceae	*Quercus agrifolia*	coast live oak	
Fagaceae	*Quercus lobata*	valley oak	
Fagaceae	*Quercus suber**	cork oak	
Juglandaceae	*Juglans hindsii*	northern California black walnut	
Juglandaceae	*Juglans regia**	English walnut	
Lamiaceae	*Marrubium vulgare**	common horehound	Limited
Myrtaceae	*Eucalyptus globulus**	blue gum	Moderate
Myrtaceae	*Eucalyptus* sp.*	gum tree	
Oleaceae	*Ligustrum sp.*	privet	
Oleaceae	*Olea europaea**	European olive	Limited
Papaveraceae	*Eschscholzia californica*	California poppy	
Polygonaceae	*Rumex crispus**	curly dock	Limited
Solanaceae	*Nicotiana* sp.	ornamental tobacco	
Viburnaceae	*Sambucus mexicana*	blue elderberry	
Poaceae	*Avena* sp.*	wild oat	

Poaceae	*Briza maxima**	rattlesnake grass	Limited
Poaceae	*Bromus hordeaceus*	soft brome	
Poaceae	*Bromus diandrus*	ripgut brome	Moderate
Poaceae	*Festuca perennis**	rye grass	Moderate
Poaceae	*Hordeum murinum**	foxtail barley	Moderate
Poaceae	*Phalaris aquatica**	Harding grass	Moderate
Poaceae	*Stipa* sp.	needlegrass	

[1]Cal-IPC Ranks (Cal-IPC 2022):

- Watch List – These species are predicted to become invasive if no further actions are taken. Distribution may range from limited to widespread in specific regions.
- Limited – These species are invasive, but their ecological impacts are minor on a statewide level. They have low to moderate rates of colonization. Although their distribution is generally limited, these species may be locally persistent and problematic.
- Moderate – These species have substantial and apparent—but generally not severe—ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal. Distribution may range from limited to widespread.
- High – These species have severe ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal and establishment, and most are widely distributed.

Appendix B. Special-Status Plants Considered but Rejected for Occurrence

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
San Mateo thorn-mint	*Acanthomintha duttonii*		X		
Blasdale's bent grass	*Agrostis blasdalei*	X			X
Franciscan onion	*Allium peninsulare* var. *franciscanum*		X		
California androsace	*Androsace elongate* ssp. *acuta*				X
Coast rockcress	*Arabis blepharophylla*	X			X
Anderson's manzanita	*Arctostaphylos andersonii*	X			
Montara manzanita	*Arctostaphylos montarensis*	X			X
Kings Mountain manzanita	*Arctostaphylos regismontana*	X	X	X	
Ocean bluff milk-vetch	*Astragalus nuttallii* var. *nuttallii*	X		X	X
Coastal marsh milk-vetch	*Astragalus pycnostachyus* var. *pycnostachyus*	X		X	X
Brewer's calandrinia	*Calandrinia breweri*	X			
Oakland star-tulip	*Calochortus umbellatus*				X
Pink star-tulip	*Calochortus uniflorus*	X			
Johnny-nip	*Castilleja ambigua* var. *ambigua*	X			X
Congdon's tarplant	*Centromadia parryi* ssp. *congdonii*				X
Pappose tarplant	*Centromadia parryi* ssp. *parryi*	X	X		X
Point Reyes salty bird's-beak	*Chloropyron maritimum* ssp. *palustre*	X		X	X
San Francisco Bay spineflower	*Chorizanthe cuspidata* var. *cuspidata*	X			
Franciscan thistle	*Cirsium andrewsii*	X			
Fountain thistle	*Cirsium fontinale* var. *fontinale*	X	X		
Lost thistle	*Cirsium praeteriens*			X	X
Santa Clara red ribbons	*Clarkia concinna* ssp. *automixa*	X			
Round-headed Chinese-houses	*Collinsia corymbosa*	X		X	X

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
San Francisco collinsia	*Collinsia multicolor*	X			
Clustered lady's-slipper	*Cypripedium fasciculatum*	X	X		
Mountain lady's-slipper	*Cypripedium montanum*	X			
Western leatherwood	*Dirca occidentalis*	X			
California bottle-brush grass	*Elymus californicus*	X			
San Mateo woolly sunflower	*Eriophyllum latilobum*	X	X		
Hoover's button-celery	*Eryngium aristulatum* var. *hooveri*	X		X	X
Jepson's coyote-thistle	*Eryngium jepsonii*	X	X		
Minute pocket moss	*Fissidens pauperculus*	X			
Hillsborough chocolate lily	*Fritillaria biflora* var. *ineziana*				X
San Francisco gumplant	*Grindelia hirsutula* var. *maritima*				X
Short-leaved evax	*Hesperevax sparsiflora* var. *brevifolia*	X			
Marin western flax	*Hesperolinon congestum*		X		
Kellogg's horkelia	*Horkelia cuneata* var. *sericea*	X			
Point Reyes horkelia	*Horkelia marinensis*	X			
Island tube lichen	*Hypogymnia schizidiata*	X		X	
Coast iris	*Iris longipetala*	X			
Perennial goldfields	*Lasthenia californica* ssp. *macrantha*	X			X
Legenere	*Legenere limosa*	X			X
Serpentine leptosiphon	*Leptosiphon ambiguus*		X		
Coast yellow leptosiphon	*Leptosiphon croceus*	X			X
Broad-lobed leptosiphon	*Leptosiphon latisectus*	X			X
Rose leptosiphon	*Leptosiphon rosaceus*	X		X	X
Crystal Springs lessingia	*Lessingia arachnoidea*		X		
Spring lessingia	*Lessingia tenuis*	X			
Ornduff's meadowfoam	*Limnanthes douglasii* ssp. *ornduffii*	X		X	X
San Mateo tree lupine	*Lupinus arboreus* var. *eximius*	X			
White-flowered rein orchid	*Piperia candida*	X			
Michael's rein orchid	*Piperia michaelii*	X			

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
Choris' popcornflower	*Plagiobothrys chorisianus* var. *chorisianus*	X			
Hickman's popcornflower	*Plagiobothrys chorisianus* var. *hickmanii*	X			
Oregon polemonium	*Polemonium carneum*	X			
Hickman's cinquefoil	*Potentilla hickmanii*	X			
Lobb's aquatic buttercup	*Ranunculus lobbii*	X			
Sanford's arrowhead	*Sagittaria sanfordii*	X			
Hoffman's sanicle	*Sanicula hoffmannii*	X			
Chaparral ragwort	*Senecio aphanactis*	X			
San Francisco campion	*Silene verecunda* ssp. *verecunda*		X		
Northern slender pondweed	*Stuckenia filiformis* ssp. *alpina*	X			X
Two-fork clover	*Trifolium amoenum*				X
Santa Cruz clover	*Trifolium buckwestiorum*	X			
Saline clover	*Trifolium hydrophilum*				X
San Francisco owl's-clover	*Triphysaria floribunda*	X			
Coastal triquetrella	*Triquetrella californica*	X		X	
Methuselah's beard lichen	*Usnea longissima*				X

H. T. HARVEY & ASSOCIATES

Ecological Consultants

Runnymede Road Residential Project
Biological Resources Report

Project #4687-01

Prepared for:

Kevin Bryant
Town of Woodside
P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

Prepared by:

H. T. Harvey & Associates

December 16, 2022

983 University Avenue, Building D • Los Gatos, CA 95032 • Ph: 408.458.3200

List of Abbreviated Terms

BMPs	best management practices
Cal-IPC	California Invasive Plant Council
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DBH	diameter at breast height
FESA	Federal Endangered Species Act
HMMP	habitat mitigation and monitoring plan
LSAA	Lake and Streambed Alteration Agreement
MBTA	Migratory Bird Treaty Act
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
OHW	ordinary high water
Porter-Cologne	Porter-Cologne Water Quality Control Act
RWQCB	Regional Water Quality Control Board
SWRCB	State Water Resources Control Board
Town	Town of Woodside
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VegCAMP	Vegetation Classification and Mapping Program

Table of Contents

Section 1. Introduction 1
1.1 Project Location 1
1.2 Project Description 1

Section 2. Methods 4
2.1 Background Review 4
2.2 Site Visit 4

Section 3. Regulatory Setting 5
3.1 Federal Regulations 5
3.1.1 Clean Water Act 5
3.1.2 Rivers and Harbors Act 5
3.1.3 Federal Endangered Species Act 6
3.1.4 Federal Migratory Bird Treaty Act 7
3.2 State Regulations 7
3.2.1 Porter-Cologne Water Quality Control Act 7
3.2.2 California Endangered Species Act 8
3.2.3 California Environmental Quality Act 8
3.2.4 California Fish and Game Code 10
3.2.5 State Water Resources Control Board Stormwater Regulation 11
3.3 Local Regulations 12
3.3.1 Woodside Tree Protection Ordinance 12
3.3.2 Woodside Stream Corridor Protection Ordinance 13

Section 4. Environmental Setting 14
4.1 General Project Area Description 14
4.2 Biotic Habitats 14
4.2.1 Pasture 14
4.2.2 Coast Live Oak Woodland 16
4.2.3 Ornamental Woodland 17
4.2.4 Developed 18
4.3 Wildlife Movement 18

Section 5. Special-Status Species and Sensitive Habitats 20
5.1 Special-Status Plant Species 23
5.2 Special-Status Animal Species 27
5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats 37
5.3.1 Sensitive Natural Communities 37
5.3.2 Sensitive Vegetation Alliances 38
5.3.3 CDFW Riparian Habitat 38
5.3.4 Sensitive Habitats (Waters of the U.S./State) 38
5.3.5 Nonnative and Invasive Species 38

Section 6. Impacts and Mitigation Measures 39
6.1 Impacts on Special-Status Species 40
6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant) 40
6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation) 40
6.1.3 Impacts on the Monarch Butterfly (Less than Significant) 44
6.1.4 Impacts on the California Red-Legged Frog and San Francisco Garter Snake (Less than Significant with Mitigation) 44

6.1.5 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant) 46
6.1.6 Impacts on the White-Tailed Kite (Less than Significant) 47
6.1.7 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant with Mitigation) 47
6.1.8 Impacts on Common Species of Roosting Bats (Less than Significant) 48
6.1.9 Impacts due to Bird Collisions (Less than Significant) 49
6.1.10 Impacts due to Increased Lighting (Less than Significant with Mitigation) 50
6.2 Impacts on Sensitive Communities 52
6.3 Impacts on Wetlands 53
6.4 Impacts on Wildlife Movement 53
6.4.1 Impacts on Wildlife Movement (Less than Significant) 53
6.4.2 Impacts on Nesting Birds (Less than Significant) 53
6.5 Impacts due to Conflicts with Local Policies: 54
6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant) 54
6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan 54
6.7 Cumulative Impacts 55
Section 7. Compliance with Additional Laws and Regulations for Nesting Birds 56
Section 8. References 57

Figures

Figure 1. Vicinity Map 2
Figure 2. Project Site 3
Figure 3. Biotic Habitats 15
Figure 4. CNDDB-Mapped Records of Special-Status Plants 21
Figure 5. CNDDB-Mapped Records of Special-Status Animals 22

Tables

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site 24
Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site 29

Appendices

Appendix A. Plants Observed A-1
Appendix B. Special-Status Plants Considered but Rejected for Occurrence B-1

List of Preparers

Steve Rottenborn, Ph.D., Principal/Senior Wildlife Ecologist
Robin Carle, M.S., Project Manager/Senior Wildlife Ecologist
Katie Gallagher, M.S., Senior Plant and Wetlands Ecologist
Vanessa Morales, B.S., Plant and Wetlands Ecologist
Jane Lien, B.S., Wildlife Ecologist

Section 1. Introduction

This report describes the biological resources present in the area of the proposed Runnymede Road higher-density residential project, the potential impacts of the proposed project on biological resources, and measures necessary to reduce project impacts to less-than-significant levels under the California Environmental Quality Act (CEQA). This assessment is based on the project maps and description provided to H. T. Harvey & Associated by the Town of Woodside (Town) through October 2022.

1.1 Project Location

The 2.0-acre project site is located on Runnymede Road in Woodside, California (Figures 1 and 2). The site is generally bounded by undeveloped lands to the northwest, Runnymede Road to the northeast (with Interstate 280 present immediately northeast of Runnymede Road), Raymundo Drive to the southeast, and low-density residential housing to the southwest. Surrounding areas consist of undeveloped open space to the northwest, residential development to the northeast and southeast, and both residential development and undeveloped open space to the southwest. The project site is located on the *Woodside*, *California* 7.5-minute United States Geological Survey (USGS) quadrangle.

1.2 Project Description

The project proposes to construct residential housing on the project site at a density of approximately 10 units per acre.

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Figure 1. Vicinity Map
Runnymede Road Residential Project Biological Resources Report (4687-01)
December 2022

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Figure 2. Project Site
Runnymede Road Residential Project Biological Resources Report (4687-01)
December 2022

Section 2. Methods

2.1 Background Review

Prior to conducting field work, H. T. Harvey & Associates ecologists reviewed the project description and maps provided by the Town through October 2022; aerial images (Google Inc. 2022); a USGS topographic map; a National Wetlands Inventory map (2022); National Resources Conservation Service (NRCS) soil survey maps (2022); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (2022); and other relevant reports, scientific literature, and technical databases. For the purposes of this report, the *project vicinity* is defined as the area within a 5-mile radius surrounding the project site.

In addition, for plants, we reviewed all species on current California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3, and 4 lists (CNPS 2022a) occurring in the project region, which is defined as the *Woodside, California* USGS 7.5-minute quadrangle and surrounding eight quadrangles (*Montara Mountain*, *San Mateo*, *Redwood Point*, *Palo Alto*, *Mindego Hill*, *La Honda*, *San Gregario*, and *Half Moon Bay*). In addition, we queried the CNDDB (2022) for natural communities of special concern that occur on the project site, and we perused records of birds reported in nearby areas, such along the Crystal Springs Trail and at Edgewood Park, on eBird (Cornell Lab of Ornithology 2022) and on the Peninsula-Birding List Serve (2022).

2.2 Site Visit

H. T. Harvey & Associates senior plant and wetland ecologist Katie Gallagher, M.S., plant and wetland ecologist Vanessa Morales, B.S., and wildlife ecologist Jane Lien, B.S., conducted a reconnaissance-level survey of the project site on November 2, 2022. The purpose of the survey was to provide an impact assessment specific to the proposed construction of the project, as described above. Specifically, surveys were conducted to (1) assess existing biotic habitats and plant and animal communities on the project site, (2) assess the project site for its potential to support special-status species and their habitats, and (3) identify potential jurisdictional and sensitive habitats, such as waters of the U.S./state and riparian habitat. K. Gallagher and V. Morales conducted a presence/absence survey for California bottle-brush grass (*Elymus californicus*) and arcuate bush-mallow (*Malacothamnus arcuatus*) on the project site. J. Lien conducted a focused survey for roosting bats and signs of bat presence (e.g., guano and urine staining) in trees and buildings on the site, as well as a focused survey for nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*).

Section 3. Regulatory Setting

Biological resources on the project site are regulated by a number of federal, state, and local laws and ordinances, as described below.

3.1 Federal Regulations

3.1.1 Clean Water Act

The Clean Water Act (CWA) functions to maintain and restore the physical, chemical, and biological integrity of waters of the U.S., which include, but are not limited to, tributaries to traditionally navigable waters currently or historically used for interstate or foreign commerce, and adjacent wetlands. Historically, in non-tidal waters, U.S. Army Corps of Engineers (USACE) jurisdiction extends to the ordinary high water (OHW) mark, which is defined in Title 33, Code of Federal Regulations, Part 328.3. If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark to the outer edges of the wetlands. Wetlands that are not adjacent to waters of the U.S. are termed "isolated wetlands" and, depending on the circumstances, may be subject to USACE jurisdiction. In tidal waters, USACE jurisdiction extends to the landward extent of vegetation associated with salt or brackish water or the high tide line. The high tide line is defined in 33 Code of Federal Regulations Part 328.3 as "the line of intersection of the land with the water's surface at the maximum height reached by a rising tide." If there are wetlands adjacent to channelized features, the limits of USACE jurisdiction extend beyond the OHW mark or high tide line to the outer edges of the wetlands.

Construction activities within jurisdictional waters are regulated by the USACE. The placement of fill into such waters must comply with permit requirements of the USACE. No USACE permit will be effective in the absence of Section 401 Water Quality Certification. The State Water Resources Control Board (SWRCB) is the state agency (together with the Regional Water Quality Control Boards [RWQCBs]) charged with implementing water quality certification in California.

Project Applicability: The project site does not support wetland or aquatic habitats. As a result, a permit from the USACE would not be required for the project.

3.1.2 Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 prohibits the creation of any obstruction to the navigable capacity of waters of the U.S., including discharge of fill and the building of any wharfs, piers, jetties, and other structures without Congressional approval or authorization by the Chief of Engineers and Secretary of the Army (33 U.S.C. 403).

Navigable waters of the U.S., which are defined in 33 CFR, Part 329.4, include all waters subject to the ebb and flow of the tide, and/or those which are presently or have historically been used to transport commerce. The shoreward jurisdictional limit of tidal waters is further defined in 33 CFR, Part 329.12 as "the line on the shore reached by the plane of the mean (average) high water." It is important to understand that the USACE does not regulate wetlands under Section 10, only the aquatic or open waters component of bay habitat, and that there is overlap between Section 10 jurisdiction and Section 404 jurisdiction. According to 33 CFR, Part 329.9, a waterbody that was once navigable in its natural or improved state retains its character as "navigable in law" even though it is not presently used for commerce as a result of changed conditions and/or the presence of obstructions. Historical Section 10 waters may occur behind levees in areas that are not currently exposed to tidal or muted-tidal influence, and meet the following criteria: (1) the area is presently at or below the mean high water line; (2) the area was historically at or below mean high water in its "unobstructed, natural state"; and (3) there is no evidence that the area was ever above mean high water.

As mentioned above, Section 404 of the CWA authorizes the USACE to issue permits to regulate the discharge of dredged or fill material into waters of the U.S. If a project also proposes to discharge dredged or fill material and/or introduce other potential obstructions in navigable waters of the U.S., a Letter of Permission authorizing these impacts must be obtained from the USACE under Section 10 of the Rivers and Harbors Act.

Project Applicability: No current or historical Section 10 Waters are present on or close to the project site. Therefore, a Letter of Permission from the USACE is not required.

3.1.3 Federal Endangered Species Act

The Federal Endangered Species Act (FESA) protects federally listed wildlife species from harm or *take*, which is broadly defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." *Take* can also include habitat modification or degradation that directly results in death or injury of a listed wildlife species. An activity can be defined as *take* even if it is unintentional or accidental. Listed plant species are provided less protection than listed wildlife species. Listed plant species are legally protected from take under the FESA only if they occur on federal lands.

The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service have jurisdiction over federally listed, threatened, and endangered species under FESA. The USFWS also maintains lists of proposed and candidate species. Species on these lists are not legally protected under FESA, but may become listed in the near future and are often included in their review of a project.

Project Applicability: No suitable habitat for any federally listed plant species is present on the project site.

There is at least a very low potential for the federally threatened California red-legged frog (*Rana draytonii*) and the federally endangered San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) to occur on the project site as very scarce and infrequent dispersants or foragers, and project activities may impact these species if individuals are present. The monarch butterfly (*Danaus plexippus*), a candidate for listing under FESA, may also

occur on the project site, and there is similarly some potential for the project to result in impacts on this species if it is present. No additional federally listed or candidate animal species occur or potentially occur on the project site.

3.1.4 Federal Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. Section 703, prohibits killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. The MBTA protects whole birds, parts of birds, and bird eggs and nests, and it prohibits the possession of all nests of protected bird species whether they are active or inactive. An *active* nest is defined as having eggs or young, as described by the USFWS in its June 14, 2018 memorandum "Destruction and Relocation of Migratory Bird Nest Contents". Nest starts (nests that are under construction and do not yet contain eggs) and inactive nests are not protected from destruction.

Project Applicability: All native bird species that occur on the project site are protected under the MBTA.

3.2 State Regulations

3.2.1 Porter-Cologne Water Quality Control Act

The SWRCB works in coordination with the nine RWQCBs to preserve, protect, enhance, and restore water quality. Each RWQCB makes decisions related to water quality for its region, and may approve, with or without conditions, or deny projects that could affect waters of the state. Their authority comes from the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne). Porter-Cologne broadly defines waters of the state as "any surface water or groundwater, including saline waters, within the boundaries of the state." Because Porter-Cologne applies to any water, whereas the CWA applies only to certain waters, California's jurisdictional reach overlaps and may exceed the boundaries of waters of the U.S. For example, Water Quality Order No. 2004-0004-DWQ states that "shallow" waters of the state include headwaters, wetlands, and riparian areas. Moreover, the San Francisco Bay Region RWQCB's Assistant Executive Director has stated that, in practice, the RWQCBs claim jurisdiction over riparian areas. Where riparian habitat is not present, such as may be the case at headwaters, jurisdiction is taken to the top of bank.

On April 2, 2019, the SWRCB adopted the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. In these new guidelines, riparian habitats are not specifically described as waters of the state but instead as important buffer habitats to streams that do conform to the State Wetland Definition. The *Procedures* describe riparian habitat buffers as important resources that may both be included in required mitigation packages for permits for impacts to waters of the state, as well as areas requiring permit authorization from the RWQCBs to impact.

Pursuant to the CWA, projects that are regulated by the USACE must also obtain a Section 401 Water Quality Certification permit from the RWQCB. This certification ensures that a proposed project will uphold state

water quality standards. Because California's jurisdiction to regulate its water resources is much broader than that of the federal government, proposed impacts on waters of the state require Water Quality Certification even if the area occurs outside of USACE jurisdiction. Moreover, the RWQCB may impose mitigation requirements even if the USACE does not. Under the Porter-Cologne, the SWRCB and the nine regional boards also have the responsibility of granting CWA National Pollutant Discharge Elimination System (NPDES) permits and Waste Discharge Requirements for certain point-source and non-point discharges to waters. These regulations limit impacts on aquatic and riparian habitats from a variety of urban sources.

Project Applicability: No waters of the state or riparian habitats regulated by the RWQCB are present on the project site. Therefore, a Section 401 permit or Waste Discharge Requirement from the RWQCB would not be required.

3.2.2 California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code, Chapter 1.5, Sections 2050-2116) prohibits the take of any plant or animal listed or proposed for listing as rare (plants only), threatened, or endangered. In accordance with CESA, the CDFW has jurisdiction over state-listed species (Fish and Game Code 2070). The CDFW regulates activities that may result in *take* of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not expressly included in the definition of *take* under the California Fish and Game Code. The CDFW, however, has interpreted *take* to include the "killing of a member of a species which is the proximate result of habitat modification."

Project Applicability: No suitable habitat is present on the project site for any state-listed plant species. There is at least a very low potential for the San Francisco garter snake, state listed as endangered, to occur on the project site as a very scarce and infrequent transient or dispersant, and this species could be affected by the project if it is present. The mountain lion (*Puma concolor*), a candidate for listing under CESA, and the state threatened tricolored blackbird (*Agelaius tricolor*) may occur on the site occasionally as nonbreeders, but no impacts to individuals of these species will result from the project.

3.2.3 California Environmental Quality Act

CEQA is a state law that requires state and local agencies to document and consider the environmental implications of their actions and to refrain from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects. CEQA requires the full disclosure of the environmental effects of agency actions, such as approval of a general plan update or the projects covered by that plan, on resources such as air quality, water quality, cultural resources, and biological resources. The State Resources Agency promulgated guidelines for implementing CEQA known as the State CEQA Guidelines.

Section 15380(b) of the State CEQA Guidelines provides that a species not listed on the federal or state lists of protected species may be considered rare if the species can be shown to meet certain specified criteria. These criteria have been modeled after the definitions in the FESA and the CESA and the section of the California Fish and Game Code dealing with rare or endangered plants and animals. This section was included in the guidelines primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW or species that are locally or regionally rare.

The CDFW has produced three lists (amphibians and reptiles, birds, and mammals) of "species of special concern" that serve as "watch lists". Species on these lists are of limited distribution or the extent of their habitats has been reduced substantially, such that threat to their populations may be imminent. Thus, their populations should be monitored. They may receive special attention during environmental review as potential rare species, but do not have specific statutory protection. All potentially rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the CEQA Section 15380(b). The CNPS, a non-governmental conservation organization, has developed CRPRs for plant species of concern in California in the CNPS Inventory of Rare and Endangered Plants (CNPS 2022a). The CRPRs include lichens, vascular, and non-vascular plants, and are defined as follows:

- CRPR 1A Plants considered extinct.
- CRPR 1B Plants rare, threatened, or endangered in California and elsewhere.
- CRPR 2A Plants considered extinct in California but more common elsewhere.
- CRPR 2B Plants rare, threatened, or endangered in California but more common elsewhere.
- CRPR 3 Plants about which more information is needed - review list.
- CRPR 4 Plants of limited distribution-watch list.

The CRPRs are further described by the following threat code extensions:

- .1—seriously endangered in California;
- .2—fairly endangered in California;
- .3—not very endangered in California.

Although the CNPS is not a regulatory agency and plants on these lists have no formal regulatory protection, plants appearing as CRPR 1B or 2 are, in general, considered to meet CEQA's Section 15380 criteria, and adverse effects to these species may be considered significant. Impacts on plants that are listed by the CNPS on CRPR 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those of CRPR 1B or 2, impacts on them are less frequently considered significant.

Compliance with CEQA Guidelines Section 15065(a) requires consideration of natural communities of special concern, in addition to plant and wildlife species. Vegetation types of "special concern" are tracked in Rarefind (CNDDB 2022). Further, the CDFW ranks sensitive vegetation alliances based on their global (G) and state (S) rankings analogous to those provided in the CNDDB. Global rankings (G1–G5) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas S rankings are a reflection of the condition of a habitat within California. If an alliance is marked as a G1–G3, all of the associations within it would also be of high priority. The CDFW provides the Vegetation Classification and Mapping Program's (VegCAMP's) currently accepted list of vegetation alliances and associations (CDFW 2022).

Project Applicability: All potential impacts on biological resources will be considered during CEQA review of the project in the context of this biological resources report. Project impacts are discussed in Section 6 below.

3.2.4 California Fish and Game Code

Ephemeral and intermittent streams, rivers, creeks, dry washes, sloughs, blue line streams on USGS maps, and watercourses with subsurface flows fall under CDFW jurisdiction. Canals, aqueducts, irrigation ditches, and other means of water conveyance may also be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. A *stream* is defined in Title 14, California Code of Regulations Section 1.72, as "a body of water that follows at least periodically or intermittently through a bed or channel having banks and that supports fish and other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." Using this definition, CDFW extends its jurisdiction to encompass riparian habitats that function as a part of a watercourse. California Fish and Game Code Section 2786 defines *riparian habitat* as "lands which contain habitat which grows close to and which depends upon soil moisture from a nearby freshwater source." The lateral extent of a stream and associated riparian habitat that would fall under the jurisdiction of CDFW can be measured in several ways, depending on the particular situation and the type of fish or wildlife at risk. At minimum, CDFW would claim jurisdiction over a stream's bed and bank. Where riparian habitat is present, the outer edge of riparian vegetation is generally used as the line of demarcation between riparian and upland habitats.

Pursuant to California Fish and Game Code Section 1603, CDFW regulates any project proposed by any person that will "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds." California Fish and Game Code Section 1602 requires an entity to notify CDFW of any proposed activity that may modify a river, stream, or lake. If CDFW determines that proposed activities may substantially adversely affect fish and wildlife resources, a Lake and Streambed Alteration Agreement (LSAA) must be prepared. The LSAA sets reasonable conditions necessary to protect fish and wildlife, and must comply with CEQA. The applicant may then proceed with the activity in accordance with the final LSAA.

Certain sections of the California Fish and Game Code describe regulations pertaining to protection of certain wildlife species. For example, Code Section 2000 prohibits take of any bird, mammal, fish, reptile, or amphibian except as provided by other sections of the code.

The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered *take* by the CDFW. Raptors (e.g., eagles, hawks, and owls) and their nests are specifically protected in California under Code Section 3503.5. Section 3503.5 states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the code or in accordance with regulations adopted by the commission. Activities resulting in mortality of non-game mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered *take* by the CDFW.

Project Applicability: No riparian habitat regulated by the CDFW occurs on the project site. Therefore, a CDFW LSAA would not be required for the project.

Most native bird, mammal, and other wildlife species that occur on the project site and in the immediate vicinity are protected under the California Fish and Game Code. Project impacts on these species are discussed in Section 6.

3.2.5 State Water Resources Control Board Stormwater Regulation

Construction Phase. Construction projects in California causing land disturbances that are equal to 1 acre or greater must comply with state requirements to control the discharge of stormwater pollutants under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009-DWQ, as amended and administratively extended). Prior to the start of construction/demolition, a Notice of Intent must be filed with the SWRCB describing the project. A Storm Water Pollution Prevention Plan must be developed and maintained during the project and it must include the use of best management practices (BMPs) to protect water quality until the site is stabilized.

Standard permit conditions under the Construction General Permit requires that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors. Additionally, the Construction General Permit does not extend coverage to

projects if stormwater discharge-related activities are likely to jeopardize the continued existence, or result in take of any federally listed endangered or threatened species.

Post-Construction Phase. In many Bay Area counties, including Santa Clara County, projects must also comply with the California RWQCB, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (Water Board Order No. R2-2015-0049, as amended). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design that prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors.

Project Applicability. The project will comply with the requirements of the NPDES Statewide Storm Water Permit and Statewide General Construction Permit. Therefore, construction-phase activities would not result in detrimental water quality effects on biological or regulated resources.

3.3 Local Regulations

3.3.1 Woodside Tree Protection Ordinance

According to the Town Municipal Code §153.434, no person is allowed to destroy any tree without a obtaining a permit. In addition, §153.437 states that significant trees are to be protected during site development and construction. Significant trees are defined (§153.005) by their circumference or diameter based on growth rates. Slow-growing trees are defined as alder (*Alnus rhombifolia*), big leaf maple (*Acer macrophyllum*), blue oak (*Quercus douglasii*), buckeye (*Aesculus californica*), Fremont cottonwood (*Populus fremontii*), madrone (*Arbutus menziesii*), and tan bark oak (*Lithocarpus densiflorus*). Slow-growing species are significant if the trunk is larger than 7.6 inches diameter at breast height (DBH), measured at 4 feet above grade. Fast-growing species are defined as black oak (*Quercus kelloggii*), California bay laurel (*Umbellularia californica*), coast live oak (*Quercus agrifolia*), coast redwood (*Sequoia sempervirens*), Douglas fir (*Pseudotsuga menziesii*), valley oak (*Quercus lobata*), and western sycamore (*Platanus racemosa*). Fast-growing species larger than 9.5 inches DBH are significant trees. All other species larger than 11.5 inches DBH are considered significant trees. Protection of significant trees includes both precautions during site development and construction and measures to limit adverse environmental effects. Protection during development and construction include at a minimum the installation of a fence around the drip line, restricted construction activity within the dripline as defined by the permit and supervised by a certified arborist, and the posting of appropriate signage on the fence. Measures to limit adverse environmental effects include erosion control and soil and water retention. The town Planning Director may also require additional protective measures based on site conditions.

Project Applicability: The project will comply with the Town's tree replacement guidelines and policies for any trees that need to be removed.

3.3.2 Woodside Stream Corridor Protection Ordinance

No alteration or work in a stream corridor may occur without Planning Commission approval. A stream corridor is defined in the Municipal Code (§153.005) as the greater of two measurements: (1) a horizontal distance of 50 feet measured from each side of the centerline of the stream, or (2) a horizontal distance of 25 feet measured from the top of the stream bank. Municipal Code §153.440 limits activities within stream corridors to trails and certain conditional uses (e.g., pastures, bridges, and agriculture), and limits uses within the stream corridor as follows:

A. No removal of riparian vegetation is permitted within the stream corridor, except that required for the permitted and conditional uses.

B. No filling of the natural stream corridors or dumping of slash, debris, residue from parking or recreation areas, fertilizers, pesticides, herbicides, or liquid or solid waste is permitted.

C. All agricultural wastes, including manure, must be kept out of the stream corridor and disposed of in a manner which will prevent drainage from such wastes into the stream corridor.

D. No channelization or damming of streams or creeks is permitted, unless required or allowed by the Planning Commission.

E. Any alteration of, or work in, the stream corridor is subject to the approval of the Planning Commission except the work set forth in item A above or the removal of material which obstructs the normal flow of water within the stream channel.

F. No structure, including a fence, is permitted within the stream corridor. Cross fencing of the stream corridor shall be permitted subject to the issuance of a permit from the Town Engineer.

Project Applicability: No stream features are present on the project site, or close enough to the project site such that a protected stream corridor would overlap the project site.

Section 4. Environmental Setting

4.1 General Project Area Description

The project site is located in the Town of Woodside in San Mateo County, California (Figure 1). The climate in the project vicinity is coastal Mediterranean, with most rain falling in the winter and spring. Mild cool temperatures are common in the winter, and hot to mild temperatures are common in the summer. Climate conditions in the vicinity include a 30-year average of 28.6 inches of annual precipitation with a monthly average temperature range from 41.7°F to 58.7°F (PRISM Climate Group 2022). Elevations on the project site range from 554–560 feet above mean sea level (Google Inc. 2022). The NRCS has mapped two soil units on the project site: Candlestick variant loam, 2–15% slopes, and Orthents cut and fill-Urban land complex, 5–75% slopes (NRCS 2022). Candlestick variant loam is a well-drained soil found on alluvium that is derived from several parent material sources upslope of the project site. Orthents cut and fill-Urban land complex is a well-drained soil derived from alluvium with variable soil profiles. Serpentine soils are mapped within 0.6 mile of the project site near Edgewood Park, but are not mapped on the site itself (Brabb et al 1998).

4.2 Biotic Habitats

The reconnaissance-level survey identified four biotic habitats on the project site: pasture, coast live oak woodland, ornamental woodland, and developed (Figure 3). These biotic habitats are described in detail below. Plant species observed during the reconnaissance-level survey are listed in Appendix A.

4.2.1 Pasture

Vegetation. Approximately 0.9 acre of the project site consists of an active horse pasture that is regularly grazed. No woody vegetation occurs within this area. Instead, this habitat contains mostly bare dirt with only a few scattered individuals of nonnative cheeseweed (*Malva parviflora*), short-podded mustard (*Hirschfeldia incana*), and purple star thistle (*Centaurea calcitrapa*).

Photo 1. Pasture habitat in the foreground and ornamental woodland habitat in the background, both on the project site.

Wildlife. Wildlife use of the pasture habitat on the project site is limited by the lack of vegetative cover. However, wildlife that are tolerant of disturbed conditions may occasionally forage or disperse across this habitat, and species associated with the surrounding woodland and grassland habitats may occasionally forage here. A number of resident and wintering bird species associated with surrounding developed and woodland areas will forage in the pasture, including the California towhee (*Melozone crissalis*), mourning dove (*Zenaida macroura*), lesser goldfinch (*Spinus psaltria*), dark-eyed junco (*Junco hyemalis*), white-crowned sparrow

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Figure 3. Biotic Habitats
Runnymede Road Residential Project Biological Resources Report (4687-01)
December 2022

(*Zonotrichia leucophrys*), and golden-crowned sparrow (*Zonotrichia atricapilla*). In addition, burrows of Botta's pocket gophers (*Thomomys bottae*) are present in small numbers in the pasture, and other common mammals such as the house mouse (*Mus musculus*) and deer mouse (*Peromyscus californicus*) are expected to forage here occasionally as well. Diurnal raptors such as red-tailed hawks (*Buteo jamaicensis*) forage for these small mammals over grasslands during the day, and at night nocturnal raptors, such as barn owls (*Tyto alba*), will forage for nocturnal rodents, such as the deer mouse.

Other mammals, including the native striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), and coyote (*Canis latrans*), as well as the nonnative Virginia opossum (*Didelphis virginiana*) and feral cat (*Felis catus*), will use the agricultural habitat on the project site for foraging and dispersal. Black-tailed deer (*Odocoileus hemionus*) may also graze occasionally in this habitat due to the site's location adjacent to extensive undeveloped open space areas to the west. Several reptile species that occur regularly in adjacent habitats, including the western fence lizard (*Sceloporus occidentalis*), gopher snake (*Pituophis catenifer*), and southern alligator lizard (*Elgaria multicarinata*) may also forage or take cover in small mammal burrows here. Common bats, such as California myotis (*Myotis californicus*), forage over or on the pasture as well.

4.2.2 Coast Live Oak Woodland

Vegetation. Approximately 0.6 acre of coast live oak woodland habitat is present in the northwestern half of the project site along Runnymede Road. This habitat is dominated by coast live oak (*Quercus agrifolia*) in the overstory and shrubs such as nonnative French broom (*Genista monspessulana*) and privet (*Ligustrum* sp.) and native coyote brush in the midstory (Photo 5). Growing in the understory are nonnative perennial Harding grass (*Phalaris aquatica*) and Italian thistle (*Carduus pycnocephalus*). Other common species found in this habitat in low numbers are native toyon (*Heteromeles arbutifolia*) and poison oak (*Toxicodendron diversilobum*) and nonnative firethorn (*Pyracantha* sp.) and cotoneaster (*Cotoneaster* sp.). The ground cover is mainly composed of leaf duff.

Photo 2. Coast live oak woodland habitat on the project site.

Wildlife. Woodlands dominated by oaks typically support diverse animal communities in California. Coast live oaks can provide cavities, bark crevices, and complex branching growth that create shelter for wildlife species, and these trees produce mast crops that are an important food source for many birds and mammals. The coast live oak woodland on the project site is limited in extent, but a number of wildlife species associated with oak woodlands are expected utilize this habitat for breeding and foraging due to the close proximity of more extensive oak woodland habitat off-site, primarily to the northwest.

Trees and shrubs provide habitat for breeding birds such as the Bewick's wren (*Thryomanes bewickii*), chestnut-backed chickadee (*Poecile rufescens*), Anna's hummingbird (*Calypte anna*), bushtit (*Psaltriparus minimus*), dark-eyed junco, California scrub-jay (*Aphelocoma californica*), Steller's jay (*Cyanocitta stelleri*), and oak titmouse (*Baeolophus inornatus*), as well as wintering birds including the ruby-crowned kinglet (*Regulus calendula*), yellow-rumped warbler (*Setophaga coronata*), and Townsend's warbler (*Setophaga townsendi*). Raptors such as the Cooper's hawk (*Accipiter cooperii*) may forage for prey in oak woodlands on the site in small numbers. It is possible that up to one pair of raptors could nest in the patches of oak woodland habitat on the site, but no active or inactive raptor nests were detected during the site visit, suggesting that raptors have not nested on the site in recent years.

Leaf litter and fallen logs provide cover and foraging habitat for amphibians such as California slender salamanders (*Batrachoseps attenuatus*), and reptiles such as the western fence lizard and northern alligator lizard are also expected to occur in this habitat. Mammals, including the native raccoon and nonnative fox squirrel (*Sciurus niger*) occur in the coast live oak woodland on the project site, and six nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), a California species of special concern, were observed in this habitat during the site visit. Mesopredators, such as the bobcat (*Lynx rufus*), coyote, and gray fox (*Urocyon cinereoargenteus)* will occasionally forage for these small mammals in this habitat in low numbers. Roosting bats may occur in oak woodlands, but no cavities or crevices that provide high-quality roosting habitat for bats were observed in oaks on the site.

4.2.3 Ornamental Woodland

Vegetation. A 0.4-acre portion of the project site along the northwestern and southwestern boundaries of the horse pasture consists of landscaped ornamental eucalyptus trees (*Eucalyptus globulus*), planted in straight lines (Photo 1). The understory of this habitat supports no vegetation and consists of bare dirt or bark duff from bark that has sloughed off the eucalyptus trees.

Photo 3. Ornamental woodland habitat in the background and pasture habitat in the foreground, both on the project site.

Wildlife. Wildlife use of the ornamental woodland habitat on the project site is limited by human disturbance, the limited extent of the habitat, and the low structural diversity of the vegetation. Many of the bird species that nest and forage in these woodlands are associated with adjacent developed and grassland areas, including the house finch (*Haehormous mexicanus*), lesser goldfinch, Anna's hummingbird, mourning dove, and northern mockingbird (*Mimus polyglottus*). In addition, due to the close proximity of woodland habitats located both on-site and off-site, a number of common bird species associated with oak woodlands, such as the oak titmouse and chestnut-backed chickadee, are expected utilize the ornamental woodland habitat on the site opportunistically for foraging. Raptors such as the Cooper's hawk may forage for prey in ornamental

woodlands on the site in small numbers. The larger trees within these woodlands can potentially support up to one nest of raptors, though no old raptor nests were observed during the November 2022 site visit, suggesting that raptors have not nested in these trees in recent years. However, trees in woodlands located off-site to the northwest, northeast, and southwest provide higher-quality nesting habitat for Cooper's hawks and other raptors compared to the ornamental trees on the site, which occur in smaller patches (as opposed to in a larger woodland area).

Common mammals such as native striped skunks and nonnative Virginia opossums will forage on fruit and seeds in ornamental woodland habitat on the site, and nonnative fox squirrels were observed nesting in these trees. The deer mouse also forages in this habitat, and reptiles found in adjacent grassland habitat, such as the western fence lizard and gopher snake, will forage in ornamental woodland habitat. No cavities or crevices were observed in the trees within this habitat that provide high-quality roosting habitat for bats.

4.2.4 Developed

Vegetation. A 0.1-acre developed area located along Runnymede Road on the project site supports a staging area for Town of Woodside services that contains old logs, vegetative debris, and piles of imported dirt (Photo 3). No woody vegetation occurs within this area. Instead, this habitat contains mostly bare dirt or imported gravel with only a few scattered individuals of nonnative cheeseweed and short-podded mustard.

Photo 3. Developed habitat on the project site.

Wildlife. The small developed area on the project site serves as wildlife habitat only in a very limited capacity, and the wildlife species that occur in this area are associated with nearby pasture, coast live oak woodland, ornamental woodland, and developed areas, and are also tolerant of frequent human disturbances. Common wildlife species that will use this area include the nonnative house mouse, and black rat (*Rattus rattus*), as well as the native western fence lizard, raccoon, and a variety of birds, including the house finch, mourning dove, and northern mockingbird. Due to the limited size of this developed area on the site and the lack of vegetation, these wildlife species are expected use this habitat only opportunistically for movement and foraging, rather than as their primary habitat.

4.3 Wildlife Movement

Wildlife movement within and in the vicinity of the project site takes many forms, and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and landscaped areas. Mammals of different species move within their home ranges, but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or

hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the project vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development immediately southwest, southeast, and northeast of the site, there are currently no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site. Wildlife species may move through the area using cover and refugia as they find them available. Open oak woodland, scrub, and grassland habitats to the northwest, which connect to Phleger Estate and San Francisco Public Utilities Commission lands surrounding Crystal Springs Reservoir, provide connectivity between regional natural areas for many common and special-status species of birds, fish, mammals, reptiles, and amphibians. Specifically, migratory passerines, rabbits, striped skunks, raccoons, Pacific treefrogs (*Hyliola regilla*), and alligator lizards, amongst other species, are expected to move through these habitats adjacent to the project site. Because the project site is located on the periphery of these areas, some of these wildlife species may occasionally occur on the site itself. However, the site does not provide connectivity between important habitats in the region, and thus does not represent key habitat supporting wildlife movement through the region.

Section 5. Special-Status Species and Sensitive Habitats

CEQA requires assessment of the effects of a project on species that are protected by state, federal, or local governments as "threatened, rare, or endangered"; such species are typically described as "special-status species". For the purpose of the environmental review of the project, special-status species have been defined as described below. Impacts on these species are regulated by some of the federal, state, and local laws and ordinances described in Section 3 above.

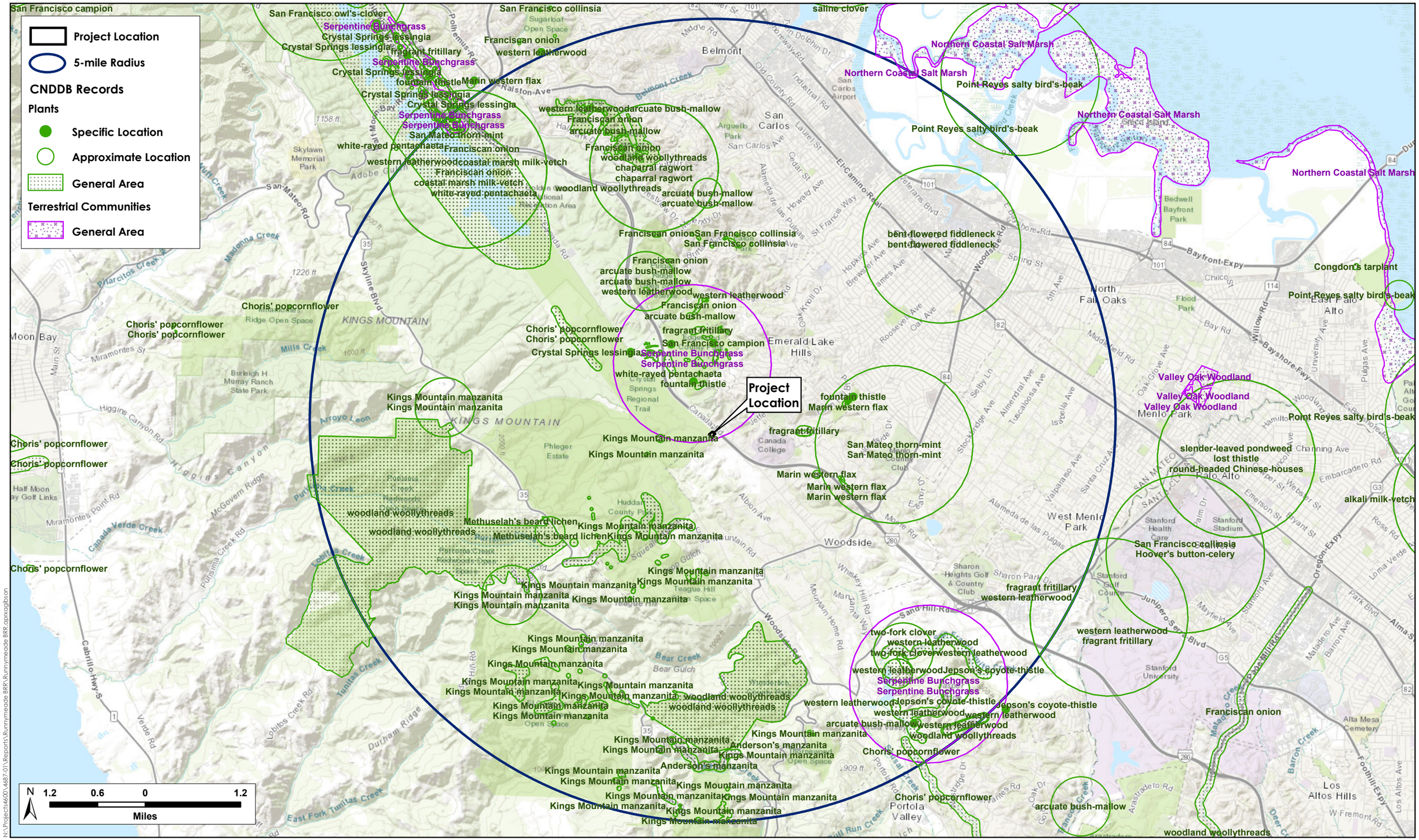
For purposes of this analysis, "special-status" plants are considered plant species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as CRPR 1A, 1B, 2, 3, or 4.

For purposes of this analysis, "special-status" animals are considered animal species that meet one or more of the following criteria:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Information concerning threatened, endangered, and other special-status species that potentially occur on the project site was collected from several sources and reviewed by H. T. Harvey & Associates biologists as described in Section 2.1 above. Figure 4 depicts CNDDB records of special-status plant species in the general vicinity of the project site and Figure 5 depicts CNDDB records of special-status animal species. These generalized maps show areas where special-status species are known to occur or have occurred historically.


Project Location
5-mile Radius
CNDDB Records
Plants
Specific Location
Approximate Location
General Area
Terrestrial Communities
General Area
Project Location
San Francisco campion
San Francisco owl's-clover
Serpentine Bunchgrass
Crystal Springs lessingia
Crystal Springs lessingia
fragrant fritillary
Serpentine Bunchgrass
Crystal Springs lessingia
fountain thistle
Marin western flax
Crystal Springs lessingia
Crystal Springs lessingia
Serpentine Bunchgrass
Serpentine Bunchgrass
San Mateo thorn-mint
white-rayed pentachaeta
Franciscan onion
western leatherwood
coastal marsh milk-vetch
Franciscan onion
coastal marsh milk-vetch
white-rayed pentachaeta
San Francisco collinsia
Franciscan onion
western leatherwood
Franciscan onion
western leatherwood
arcuate bush-mallow
Franciscan onion
woodland woollythreads
chaparral ragwort
chaparral ragwort
arcuate bush-mallow
woodland woollythreads
arcuate bush-mallow
Franciscan onion
San Francisco collinsia
San Francisco collinsia
Franciscan onion
arcuate bush-mallow
arcuate bush-mallow
western leatherwood
western leatherwood
Franciscan onion
arcuate bush-mallow
Choris' popcornflower
Choris' popcornflower
fragrant fritillary
San Francisco campion
Crystal Springs lessingia
Serpentine Bunchgrass
Serpentine Bunchgrass
white-rayed pentachaeta
fountain thistle
Choris' popcornflower
Choris' popcornflower
Choris' popcornflower
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain manzanita
Kings Mountain manzanita
fountain thistle
Marin western flax
fragrant fritillary
San Mateo thorn-mint
San Mateo thorn-mint
Marin western flax
Marin western flax
Marin western flax
Choris' popcornflower
Choris' popcornflower
Choris' popcornflower
woodland woollythreads
woodland woollythreads
Methuselah's beard lichen
Kings Mountain manzanita
Methuselah's beard lichen
Kings Mountain manzanita
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Kings Mountain manzanita

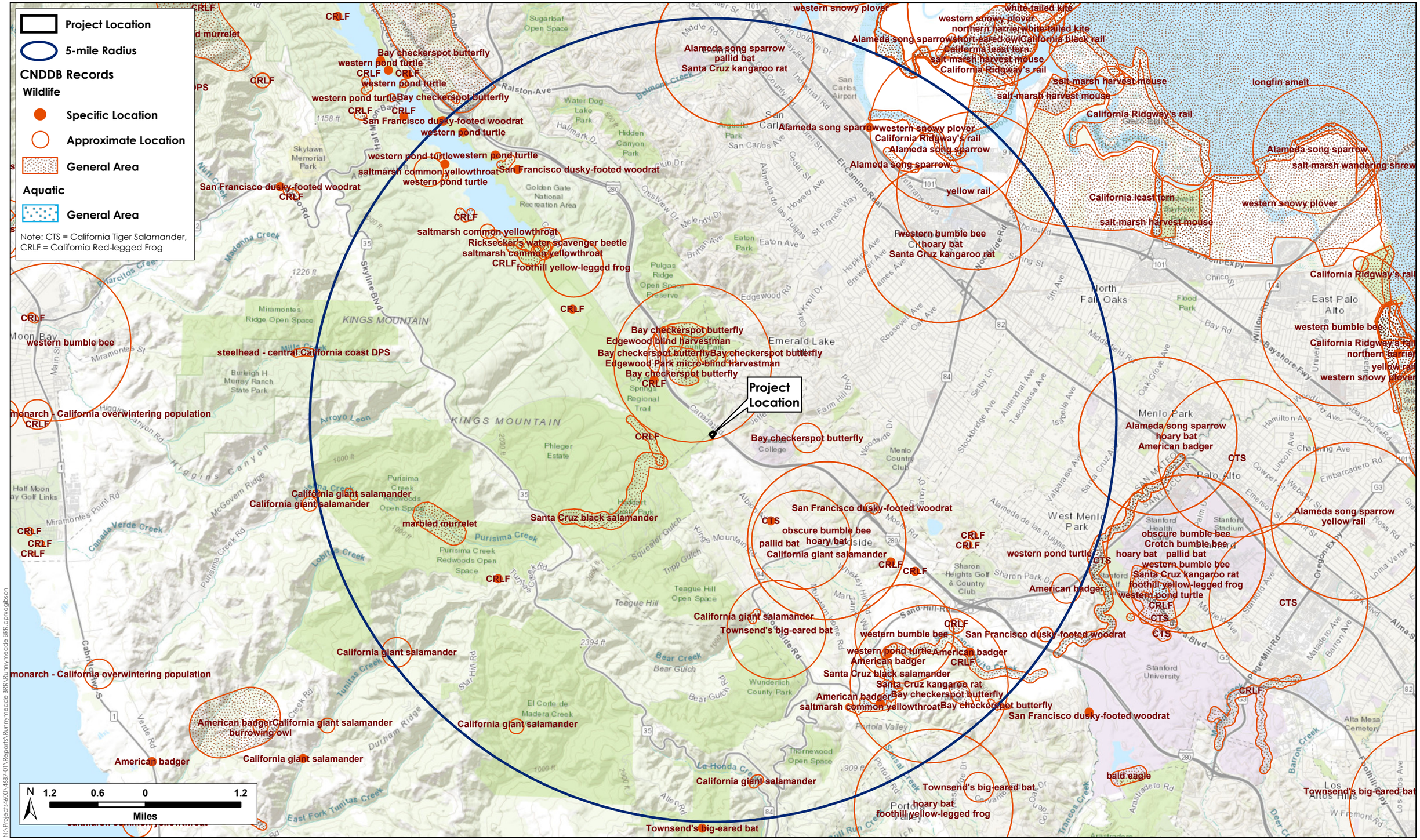

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Figure 5. CNDDB-Mapped Records of Special-Status Animals
Runnymede Road Residential Project Biological Resources Report (4687-01)
December 2022

5.1 Special-Status Plant Species

The CNPS (2022) and CNDDB (2022) identify 82 special-status plant species as potentially occurring in at least one of the nine USGS 7.5-minute quadrangles containing or surrounding the project site (for CNPS) or within the project vicinity (for CNDDB) (Appendix B). Of the 82 potentially occurring special-status plant species, 70 were determined to be absent from the project site for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or edaphic requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby extant records (Appendix B).

Suitable habitat, edaphic requirements, and elevation range are present on the project site for 12 special-status plant species; these species are addressed in greater detail in Table 1 below. Of the 12 special-status plant species for which suitable habitat is present on the site, only two – California bottle-brush grass and arcuate bush-mallow – would be detectable during a November survey, and the presence/absence survey conducted in November 2022 determined that these species are absent from the project site. The other 10 potentially occurring special-status plants are not detectable in November, and we were therefore unable to survey for them. Those additional special-status plant species that can potentially occur on the project site and for which presence/absence surveys could not be conducted in November 2022 are Franciscan thistle (*Cirsium andrewsii*), mountain lady's-slipper (*Cypripedium montanum*), western leatherwood (*Dirca occidentalis*), harlequin lotus (*Hosackia gracilis*), woolly-headed lessingia (*Lessingia hololeuca*), woodland woollythreads (*Monolopia gracilens*), Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*), white-flowered rein orchid (*Piperia candida*), Hoffmann's sanicle (*Sanicula hoffmannii*), and Santa Cruz clover (*Trifolium buckwestiorum*).

Table 1. Special-Status Plant Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
CNPS-Listed Plant Species			
Franciscan thistle (*Cirsium andrewsii*)	CRPR 1B.2	Broadleaved upland forest, coastal bluff scrub, coastal prairie, coastal scrub (blooming period March to July)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Franciscan thistle is known to occur in near Point San Pedro at the foot of Montara Mountain approximately 16 miles to the northwest (CNDDB 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Mountain lady's-slipper (*Cypripedium montanum*)	CRPR 4.2	Broadleaved upland forest, cismontane woodland, lower montane coniferous forest, North Coast coniferous forest (blooming period March to August)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Mountain lady's-slipper is known to occur in the USGS 7.5-minute *La Honda* quadrangle and in the Peninsula Watershed (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Western leatherwood (*Dirca occidentalis*)	CRPR 1B.2	Broadleaved upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, North Coast coniferous forest, riparian forest, riparian woodland (blooming period January to March, sometimes April)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Western leatherwood is known to occur at Edgewood Park approximately 0.5 mile to the north of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
California bottle-brush grass (*Elymus californicus*)	CRPR 4.3	Broadleaved upland forest, cismontane woodland, North Coast coniferous forest, riparian woodland (detectable year-round)	**Absent.** Suitable broadleaved upland forest habitat to support this species is present on the project site. California bottle-brush grass has been documented along the length of the San Francisco Peninsula, mostly in public open space managed by Midpeninsula Regional Open Space District, although the exact location of these occurrences is not available publicly. No individuals were observed during a survey conducted during the November 2022 site visit, which was conducted at an appropriate time for the species to be detectable if present. Determined to be absent.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Harlequin lotus (*Hosackia gracilis*)	CRPR 4.2	Broadleaved upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, North Coast coniferous forest, valley and foothill grassland, often on roadsides (blooming period March to July)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Harlequin lotus is known to occur in the Peninsula Watershed approximately 8 miles to the north of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Woolly-headed lessingia (*Lessingia hololeuca*)	CRPR 3	Broadleaved upland forest, coastal scrub, lower montane coniferous forest, and valley and foothill grassland on clay or serpentine soils (blooming period June to October)	**Could Potentially Occur.** Suitable grassland habitat to support this species is present on the project site. Woolly-headed lessingia is known to occur at Edgewood Park approximately 1.0 mile to the north of the project site (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Arcuate bush-mallow (*Malacothamnus arcuatus*)	CRPR 1B.2	Chaparral and cismontane woodland, sometimes on gravelly alluvial soils, or in any shrub or tree woodland that has recently burned (detectable year-round)	**Absent.** Arcuate bush-mallow has been documented in a wide variety of woody habitats, including oak woodland, and is most prevalent after wildland fires (Morse 2022). Arcuate bush-mallow is known to occur adjacent to Edgewood Park approximately 0.4 mile north of the project site (CNDDB 2022). However, no individuals were observed during a survey conducted during the November 2022 site visit, which was conducted at an appropriate time for the species to be detectable if present. Determined to be absent.
Woodland woollythreads (*Monolopia gracilens*)	CRPR 1B.2	Grassy openings in broadleaved upland forest and chaparral, cismontane woodland, and valley and foothill grassland, in sandy to rocky soils, often in serpentine soils after burns (blooming period March to July)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. This species is known to occur at Edgewood Park approximately 1.0 mile to the north (CNDDB 2022). A focused survey for this species was not performed in 2022 as the site visit did not occur during the species' blooming period.

Name	*Status	Habitat and Blooming Period	Potential for Occurrence on the Project Site
Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*)	CRPR 4.2	Broadleaved upland forest, chaparral, coastal prairie, valley and foothill grassland, and vernal pools in vernally mesic habitats (blooming period June to October)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Gairdner's yampah is known to occur in the Peninsula Watershed approximately 8 miles to the north (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
White-flowered rein orchid (*Piperia candida*)	CRPR 1B.2	Broadleaved upland forest, lower montane coniferous forest, North Coast coniferous forest (blooming period sometimes March, May to September)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. White-flowered rein orchid is known to occur in the Los Trancos Open Space Preserve approximately 9 miles to the southeast (Calflora 2022) although it was last documented in 1992. The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Hoffmann's sanicle (*Sanicula hoffmannii*)	CRPR 4.3	Broadleaved upland forest, chaparral, cismontane woodland, coastal bluff scrub, coastal scrub, lower montane coniferous forest (blooming period March to May)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Hoffman's sanicle is known to occur in the Portola Redwoods State Park approximately 14 miles to the southeast (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.
Santa Cruz clover (*Trifolium buckwestiorum*)	CRPR 1B.1	Broadleaved upland forest, cismontane woodland, coastal prairie (blooming period April to October)	**Could Potentially Occur.** Suitable broadleaved upland forest habitat to support this species is present on the project site. Santa Cruz clover was documented from Coal Mine Ridge approximately 7.5 miles to the southeast (Calflora 2022). The survey performed in November 2022 was too late in the year to detect this species. Thus, the possibility that the species may be present on the site cannot be ruled out.

*Key to Status Abbreviations: California Rare Plant Rank (CRPR).

CRPR 1B = Rare, Threatened, or Endangered in California and elsewhere

CRPR 3 = Plants about which more information is needed (a review list)

CRPR 4 = Plants of limited distribution - Watch list

.1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 = Moderately threatened in California (20-80% of occurrences threatened)

.3 = Not very threatened in California (less than 20% of occurrences threatened)

5.2 Special-Status Animal Species

The legal status and likelihood of occurrence on the project site of special-status animal species known to occur, or potentially occurring, in the surrounding region are presented in Table 2. Most of the special-status species listed in Table 2 are not expected to occur on the project site because it lacks suitable habitat, is outside the known range of the species, and/or is isolated from the nearest known extant populations by development or otherwise unsuitable habitat.

The following special-status species that are present in specialized habitats on the San Francisco Peninsula, or that occurred on or near the Peninsula historically but are no longer present, are absent from the project site due to a lack of suitable habitat and/or isolation of the site from populations by urbanization: the western bumble bee (*Bombus occidentalis*), Crotch bumble bee (*Bombus crotchii*), California tiger salamander (*Ambystoma californiense*), western pond turtle (*Actinemys marmorata*), burrowing owl (*Athene cunicularia*), and loggerhead shrike (*Lanius ludovicianus*). The Bay checkerspot butterfly (*Euphydryas editha bayensis*) was reintroduced to Edgewood Park in 2011, but the number of individuals present has dwindled to the point that there is no reasonable expectation that any individuals would disperse to the project site, and the project site does not provide suitable serpentine grassland for the species. While bald eagles (*Haliaeetus leucocephalus*) may fly over the project site at times, none are expected to nest or forage on or close to the project site.

No aquatic habitats to support special-status fish species are present on the project site or in adjacent areas, such as along the ephemeral drainage to the northwest. Thus, these species are absent from the project site and adjacent areas.

Special-status bird species that may occasionally occur on the project site as nonbreeding foragers, but that do not nest on the site, are the northern harrier (*Circus hudsonius*), golden eagle (*Aquila chrysaetos*) peregrine falcon (*Falco peregrinus anatum*), tricolored blackbird, and Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*). The mountain lion, a candidate for listing under CESA, as well as the pallid bat, Townsend's big-eared bat (*Corynorhinus townsendii*), western red bat (*Lasiurus blossevillii*), and American badger (*Taxidea taxus*), which are California species of special concern, may also forage on the project site. These species are not expected to den, roost, or breed on or immediately adjacent to the project site due to a lack of suitable habitat, and they will be affected very little, if at all, by the proposed project. In addition, the Vaux's swift (*Chaetura vauxi*), olive-sided flycatcher (*Contopus cooperi*), yellow warbler (*Setophaga petechia*), and grasshopper sparrow (*Ammodramus savannarum*) are bird species that are considered a California species of special concern only when nesting; they may occur occasionally in grasslands on the project site as nonbreeding transients, foragers, or migrants, but no suitable nesting habitat for these species occurs on or adjacent to the project site.

The monarch butterfly, California red-legged frog, San Francisco garter snake, white-tailed kite (*Elanus leucurus*), and San Francisco dusky-footed woodrat are addressed in greater detail in this report, because these species

can potentially breed or occur on or immediately adjacent to the project site and/or may be significantly impacted by the proposed project (see Section 6 *Impacts and Mitigation Measures* below).

Table 2. Special-Status Animal Species, Their Status, and Potential for Occurrence on the Project Site

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Federal or State Endangered, Threatened, or Candidate Species			
Bay checkerspot butterfly (*Euphydryas editha bayensis*)	FT	Native grasslands on serpentine soils. Larval host plants are *Plantago erecta* and/or *Castilleja* sp. The flight season extends from late February to early May.	**Absent.** This species was historically abundant in Edgewood Park approximately 0.5 mile northwest of the project site. However, this local population was extirpated in the early 2000s. Reintroduction efforts commenced in 2011, and, while initially successful, with a high of 800 adults in 2014, only 47 adults were detected in the park during annual surveys in 2016 (Creekside Science 2016). Recent counts of adults detected during spring flight surveys were six in 2020, five in 2021, and eight in 2022, indicating that the population has dwindled further (C. Niederer, pers. comm.). Suitable habitat to support the Bay checkerspot butterfly (i.e. serpentine grassland habitat with larval host plants) is absent from the project site. Given how low the population at Edgewood Park is, and the lack of suitable larval or nectaring habitat (i.e., serpentine grassland) on the project site,, there is no reasonable expectation that individuals would disperse to the project site.
Monarch butterfly (*Danaus plexippus*)	FC	Requires milkweeds (*Asclepias* spp.) for egg-laying and larval development, but adults obtain nectar from a wide variety of flowering plants in many habitats. Individuals congregate in winter roosts, primarily in Mexico and in widely scattered locations on the central and southern California coast.	**May be Present as Breeder.** The monarch butterfly occurs throughout the region primarily as a migrant. No larval host plants were observed on the project site during the November 2022 survey; however, the site is regularly grazed and milkweeds, if present, would not have been detectable. If milkweeds are present, monarch butterflies may breed on the project site from March through October. However, due to the limited size of the site and disturbance from grazing by horses, only small numbers of monarch butterflies are expected to breed there, if any. Small numbers of individuals may forage throughout the project site, especially during spring and fall migration. However, the site does not provide high-quality foraging habitat for this species. While ostensibly suitable overwintering habitat for monarchs (i.e., eucalyptus trees) is present on the site, no current or historical overwintering sites are known as far inland as the project site; the nearest known overwintering location is 9.9 miles to the north Coyote Point Park in San Mateo (Xerces Society 2022).

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Crotch bumble bee (*Bombus crotchii*)	SC	Open grassland and scrub habitats.	**Absent.** Although this species was historically found throughout the southern two-thirds of California, population declines and range contractions (25% relative to its historical range) have made this species very scarce in the region (CDFW 2019). There are no recent (i.e. after 1909) records on the San Francisco peninsula (Bumble Bee Watch 2022, CNDDB 2022, iNaturalist 2022), and CNDDB (2022) does not include even historical records from San Mateo County. Therefore, this species is not expected to occur on the project site.
Western bumble bee (*Bombus occidentalis*)	SC	Occurs in a variety of grassland, scrub, and open woodland habitats.	**Absent.** Although the species was historically found throughout much of central and northern California, including the project vicinity, it has been extirpated from much of its former range, and there are no recent records from San Mateo County or nearby areas (CDFW 2019, Bumble Bee Watch 2022, iNaturalist 2022). Therefore, this species is absent from the project site.
California tiger salamander (*Ambystoma californiense*)	FT, ST	Vernal or temporary pools in annual grasslands or open woodlands. Adults live terrestrially in small mammal burrows.	**Absent.** The California tiger salamander's range on the San Francisco Peninsula historically occurred barely as far northwest as Woodside, where there is a 1962 record from a location approximately 1.6 miles southeast of (and across Interstate 280 from) the project site (CNDDB 2022). That occurrence is considered "possibly extirpated" by CNDDB. The closest extant population is located in the vicinity of Lagunita on the Stanford University Campus, approximately 6 miles to the southeast (CNDDB 2022). That population is located far beyond the known dispersal distance of the species, and is separated from the project site by extensive urbanization. Therefore, this species is determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
California red-legged frog (*Rana draytonii*)	FT, CSSC	Streams, freshwater pools, and ponds with emergent or overhanging vegetation.	**May be Present as Nonbreeder.** No suitable aquatic breeding habitat for California red-legged frogs is present on the project site, and the species is not known to occur on or adjacent to the site. A number of records of California red-legged frogs are present within the species' known dispersal distance (2 miles) from the project site west of Interstate 280, including a known breeding pond approximately 0.9 mile to the northwest and a record along West Union Creek approximately 0.7 mile to the southwest (CNDDB 2022). However, the project site is surrounded on three sides by development, and thus does not lie in between aquatic breeding habitats for this species such that red-legged frogs are expected to travel past the site regularly when dispersing between aquatic habitats in the vicinity. Although occasional dispersing individuals can travel onto the site from open areas to the northwest, the project site does not provide high-quality dispersal or refugial habitat for this species due to a lack of aquatic habitats, as well as regular disturbance from grazing by horses. Nevertheless, due to the close proximity of known occurrences of this species to the project site, the possibility that occasional dispersing individuals could traverse or briefly take refuge on the site cannot be ruled out. These individuals would not be expected to remain for any substantial length of time, as the project site does not provide high-quality habitat (i.e., wetlands).

Name	*Status	Habitat	Potential for Occurrence on the Project Site
San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)	FE, SE, SP	Occurs in a variety of habitats, including riparian areas; requires burrows for hibernation and frogs as a prey base.	**May be Present as Nonbreeder**. The San Francisco garter snake occurs on the San Francisco Peninsula from just north of the San Francisco–San Mateo County line south to approximately the San Mateo–Santa Cruz County line. An intergrade zone composed of hybrids between the San Francisco garter snake and red-sided garter snake (*Thamnophis sirtalis sirtalis*) occurs from Palo Alto north to the Pulgas region near Upper Crystal Springs Reservoir (Barry 1994). No suitable aquatic breeding or foraging habitat occurs on the project site, and San Francisco garter snakes are not known to occur on or adjacent to the project site. An established population of San Francisco garter snakes is present at Crystal Springs Reservoir approximately 4 miles to the northwest. Additional records of potential intergrades have been detected in aquatic habitats west of Cañada Road approximately 0.9 mile and 1.4 miles northwest of the project site (CNDDB 2022). Although the project site is surrounded on three sides by development and is not located in between known populations of the species such that garter snakes would be expected to travel past the site regularly, it is possible that occasional individuals from nearby populations could traverse or briefly take refuge on the project site. These individuals would not be expected to remain for any substantial length of time, as the project site does not provide high-quality habitat (i.e. aquatic habitats with frogs as a prey base are absent from the project site and immediate vicinity).
Bald eagle (*Haliaeetus leucocephalus*)	SE, SP	Occurs mainly along seacoasts, rivers, and lakes; nests in tall trees or in cliffs, occasionally on electrical towers. Feeds mostly on fish.	**Absent.** Bald eagles are known to nest in the project vicinity at inland reservoirs and along the coast, including at Crystal Springs Reservoir approximately 4 miles north of the project site. However, no suitable nesting or foraging habitat for bald eagles is present on the project site. Determined to be absent.
Tricolored blackbird (*Agelaius tricolor*)	ST	Nests near fresh water in dense emergent vegetation.	**May be Present as Nonbreeder.** In San Mateo County, the tricolored blackbird has bred in only a few scattered locations, and is absent from, or occurs only as a nonbreeder in, most of the County (Sequoia Audubon Society 2001). This species typically nests in extensive stands of tall emergent herbaceous vegetation in non-tidal freshwater marshes and ponds. No suitable nesting habitat is present on the project site or its immediate vicinity. Thus, this species is expected to occur on the site only occasionally and in low numbers as a nonbreeding forager, if at all.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Mountain lion (Southern California/Central Coast ESU) (*Puma concolor*)	SC	Has a large home range size and occurs in a variety of habitats. Natal dens are typically located in remote, rugged terrain far from human activity. May occasionally occur in areas near human development, especially during dispersal.	**May be Present as Nonbreeder.** In the project region, there are verified sightings reported on BAPP.org (2022) and numerous unpublished reports. This species occurs widely, though at low densities, throughout the Santa Cruz Mountains, and may disperse into lowland/valley floor areas. Mountain lions are not expected to regularly use the project site or establish a den on the site due to high levels of human activity and a lack of suitable denning habitat, but individuals may occur on the site as rare dispersants due to the site's location on the periphery of extensive natural areas that connect with San Francisco Public Utilities Commission lands surrounding Crystal Springs Reservoir to the northwest.
California Species of Special Concern			
Western pond turtle (*Actinemys marmorata*)	CSSC	Permanent or nearly permanent water in a variety of habitats.	**Absent.** This species is known to occur in the project vicinity approximately 1.4 miles northwest of the project site, west of Interstate 280 (iNaturalist 2022). No suitable aquatic habitat to support this species occurs on the project site or in nearby areas. Due to the lack of suitable aquatic habitat on and near the project site, as well as the 1.4-mile intervening distance between the site and the nearest known population, pond turtles are not expected to disperse to the project site from known populations in the region, even in small numbers. Determined to be absent.
Northern harrier (*Circus cyaneus*)	CSSC (nesting)	Nests in marshes and moist fields, forages over open areas.	**May be Present as Nonbreeder.** No suitable nesting habitat is present on the project site or in the surrounding vicinity. This species is a common winter resident in open grassland and scrub habitats the project vicinity, such as at Edgewood Park (Cornell Lab of Ornithology 2022), and individuals may forage on the project site during migration and winter.
Burrowing owl (*Athene cunicularia*)	CSSC	Nests and roosts in open grasslands and ruderal habitats with suitable burrows, usually those made by California ground squirrels (*Otospermophilus beecheyi*).	**Absent.** Burrowing owls are not known to occur in the project vicinity (Cornell Lab of Ornithology 2022), and suitable habitat (i.e. California ground squirrel burrows) is absent from the project site. Determined to be absent.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Vaux's swift (*Chaetura vauxi*)	CSSC (nesting)	Nest both in small colonies and as single pairs, occupying cavities in large snags, primarily in old-growth forests. They also occasionally use artificial cavities such as chimneys. Forage aerially.	**May be Present as Nonbreeder.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). However, no large trees with suitable cavities or residential chimneys are present on or near the project site, and this species is not expected to nest on, or in close enough proximity to the project site to be impacted by project activities. May forage aerially over the project site, especially during migration.
Olive-sided flycatcher (*Contopus cooperi*)	CSSC (nesting)	Breeds in mature, primarily coniferous, forests with open canopies, along forest edges in more densely vegetated areas, in recently burned forest habitats, and in selectively harvested landscapes.	**May be Present as Nonbreeder.** Known to nest throughout much of San Mateo County, including in the project vicinity (Sequoia Audubon 2001). However, no suitable coniferous forest nesting habitat is present on or adjacent to the project site. Occasional non-breeding individuals may forage on the site, especially during migration.
Loggerhead shrike (*Lanius ludovicianus*)	CSSC (nesting)	Nests in tall shrubs and dense trees; forages in grasslands, marshes, and ruderal habitats.	**Absent.** Known to nest in eastern San Mateo County (Sequoia Audubon Society 2001). Shrubs and trees on and adjacent to the project site provide ostensibly suitable nesting habitat for loggerhead shrikes, and grasslands on the site provide ostensibly suitable foraging habitat. However, the regional loggerhead shrike population has declined substantially in recent years, and this species is not expected to occur on the project site due to the limited extent of the available habitat. Rather, loggerhead shrikes that occur in the vicinity are expected to occur in higher-quality habitat to the north, such as at Edgewood Park, nearby. Determined to be absent.
Yellow warbler (*Setophaga petechia*)	CSSC (nesting)	Nests in riparian woodlands.	**May be Present as Nonbreeder.** No suitable nesting habitat for yellow warblers is present on or adjacent to the project site. The species is an abundant migrant throughout the project region during the spring and fall, when nonbreeding individuals may forage in woodland habitats on the site.
Grasshopper sparrow (*Ammodramus savannarum*)	CSSC (nesting)	Nests and forages in grasslands, meadows, fallow fields, and pastures.	**May be Present as Nonbreeder.** Known to nest and occur in the project region primarily in grasslands and less frequently disturbed agricultural habitats, such as at Edgewood Park to the north (Cornell Lab of Ornithology 2022). No suitable nesting habitat for this species is present on the project site due to the limited extent of the grassland habitat and the presence of trees, which prefers to nest in more extensive grasslands without trees, is present on the project site. Small numbers of individuals may forage in grasslands on the project site during migration.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*)	CSSC	Nests in pickleweed dominant salt marsh and adjacent ruderal habitat.	**May be Present as Nonbreeder.** In the South San Francisco Bay, nests primarily in short pickleweed-dominated portions of diked/muted tidal salt marsh habitat and in adjacent ruderal habitats (Rottenborn 2007). No suitable nesting habitat occurs on the project site. Individuals of several savannah sparrow subspecies, including *alaudinus*, may forage on the project site during migration and winter.
Pallid bat (*Antrozous pallidus*)	CSSC	Forages over many habitats; roosts in caves, rock outcrops, buildings, and hollow trees.	**May be Present as Nonbreeder.** Historically, pallid bats were likely present in a number of locations throughout the project region, but their populations have declined in recent decades. Pallid bats are not expected to roost in the buildings near the site because of existing, active human use, no trees that provide particularly large or high-quality cavities to support a roosting colony of this species are present on or close enough to the project site to be disturbed by work activities, and no known recent (after 1960) records of maternity colonies of this species are present on or adjacent to the project site (CNDDB 2022, iNaturalist 2022). Nevertheless, individuals from colonies in the region (especially in the Santa Cruz Mountains to the west) could occasionally forage on the project site.
Townsend's big-eared bat (*Corynorhinus townsendii*)	CSSC	Roosts in caves and mine tunnels, and occasionally in deep crevices in trees such as redwoods or in abandoned buildings, in a variety of habitats.	**May be Present as Nonbreeder.** Townsend's big-eared bats are known to occur in the Santa Cruz Mountains to the southwest (iNaturalist 2022). Suitable cavernous roosting habitat is not present in the project site to support a roosting colony of this species, and individuals are not expected to roost in buildings near the site because of existing, active human use. Individuals from colonies in the region may occasionally forage over the open habitats on the project site.
Western red bat (*Lasiurus blossevillii*)	CSSC	Roosts in foliage in forest or woodlands, especially in or near riparian habitat.	**Low Potential for Occurrence.** Western red bats occur in the project vicinity in low numbers as migrants and winter residents, but this species does not breed in the region. Individual western red bats may roost in the foliage of trees virtually anywhere on the project site, but are expected to roost primarily in riparian areas elsewhere in the region. Occasional individuals may forage over the project site year-round.

Name	*Status	Habitat	Potential for Occurrence on the Project Site
San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*)	CSSC	Nests in a variety of habitats including riparian areas, oak woodlands, and scrub.	**Present.** Suitable habitat is present in the small oak woodland in the northwestern corner of the project site, and a six individual woodrat nests were detected on the ground in coast live oak woodland habitat on the site during the focused survey in November 2022.
American badger (*Taxidea taxus*)	CSSC	Burrows in grasslands and occasionally in infrequently disked agricultural areas.	**May be Present as Nonbreeder.** Known to occur in the project region primarily in extensive grasslands and scrub habitats north and west of the project site. Badgers are not expected to regularly use the project site or establish a den on the site due to high levels of human activity, but, individuals may occur on the site as rare dispersants or foragers due to the site's location on the periphery of open habitats in the region.
State Fully Protected Species			
American peregrine falcon (*Falco peregrinus anatum*)	SP	Forages in many habitats; nests on cliffs and tall bridges and buildings.	**May be Present as Nonbreeder.** Peregrine falcons are not known or expected to nest on or near the project site due to a lack of suitable cliff-like habitat for nesting. However, this species may occasionally forage in open areas such as the project site during the nonbreeding season, though always at low densities.
Golden eagle (*Aquila chrysaetos*)	SP	Breeds on cliffs or in large trees (rarely on electrical towers); forages in open areas.	**May be Present as Nonbreeder.** No suitable nesting habitat for golden eagles is present on the project site. This species occurs in the project vicinity as an occasional forager, primarily during migration and winter (Cornell Lab of Ornithology 2022). The project site provides only very limited foraging habitat for this species due to its small size, and golden eagles are expected to forage on the site rarely, if at all.
White-tailed kite (*Elanus leucurus*)	SP	Nests in tall shrubs and trees; forages in grasslands, marshes, and ruderal habitats.	**May be Present as Breeder.** White-tailed kites are common residents in open areas in the project vicinity. Trees in the mixed oak woodland habitat on and adjacent to the project site provide suitable nesting habitat for this species. No white-tailed kites or nests of this species were observed on or adjacent to the site during the November 2022 site visit; however, up to one pair of white-tailed kites may nest in trees on or adjacent to the project site. Individuals may forage in open habitats on and adjacent to the site year-round.

*Key to Abbreviations: Status: Federally Endangered (FE); Federally Threatened (FT); Federal Candidate for Listing (FC); State Endangered (SE); State Threatened (ST); State Candidate for Listing (SC); State Fully Protected (SP); California Species of Special Concern (CSSC).

5.3 Sensitive Natural Communities, Vegetation Alliances, and Habitats

Natural communities have been considered part of the Natural Heritage Conservation triad, along with plants and animals of conservation significance, since the state inception of the Natural Heritage Program in 1979. The CDFW determines the level of rarity and imperilment of vegetation types, and tracks sensitive communities in its Rarefind database (CNDDB 2022). Global rankings (G) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas state (S) rankings are a reflection of the condition of a habitat within California. Natural communities are defined using NatureServe's standard heritage program methodology as follows (Faber-Langendoen et al. 2012):

G1/S1: Critically imperiled

G2/S2: Imperiled

G3/S3: Vulnerable.

G4/S4: Apparently secure

G5/S4: Secure

In addition to tracking sensitive natural communities, the CDFW also ranks vegetation alliances, defined by repeating patterns of plants across a landscape that reflect climate, soil, water, disturbance, and other environmental factors (Sawyer et al. 2009). If an alliance is marked G1-G3, all of the vegetation associations within it will also be of high priority (CDFW 2022). The CDFW provides VegCAMP's currently accepted list of vegetation alliances and associations (CDFW 2022).

Impacts on CDFW sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, must be considered and evaluated under CEQA (Title 14, Division 6, Chapter 3, Appendix G of the California Code of Regulations). Furthermore, aquatic, wetland and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS.

5.3.1 Sensitive Natural Communities

A query of sensitive natural communities in the CNDDB (2022) identified five sensitive natural communities as occurring within the nine 7.5-minute USGS quadrangles containing or surrounding the project site: northern coastal salt marsh (Rank G3/S3.2), northern maritime chaparral (Rank G1/S1.2), serpentine bunchgrass (Rank G2/S2.2), valley needlegrass grassland (G3/S3.1), and valley oak woodland (G3/S2.1). No sensitive natural communities are present on the project site.

5.3.2 Sensitive Vegetation Alliances

None of the habitat types on the site represent or include sensitive vegetation alliances.

5.3.3 CDFW Riparian Habitat

No riparian habitat is present on or adjacent to the project site.

5.3.4 Sensitive Habitats (Waters of the U.S./State)

No wetlands or other waters of the U.S./state occur on or adjacent to the project site.

5.3.5 Nonnative and Invasive Species

Several nonnative, invasive plant species occur on the project site. Of these, several have a "limited" rating by the Cal-IPC, indicating they are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic. These "limited" species include bristly ox-tongue and rattlesnake grass (*Briza maxima*). Species with a "moderate" rating by the Cal-IPC have substantial and apparent–but generally not severe–ecological impacts on physical processes, plant and animal communities, and vegetation structure, and that their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal, though establishment would be generally dependent on ecological disturbance: Italian thistle, purple-star thistle, short-podded mustard, wall barley (*Hordeum murinum*), and Harding grass. Species with a "high" invasive rating by the Cal-IPC have the potential to cause severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate-to-high rates of dispersal and establishment, and most are widely distributed ecologically (Cal-IPC 2022). On the project site, species with a "high" rating include French broom (*Genista monspeliensis*). Due to these species' ubiquity in the region, project activities are not expected to result in the spread of nonnative and invasive plant species.

Section 6. Impacts and Mitigation Measures

CEQA and the State CEQA Guidelines provide guidance in evaluating impacts of projects on biological resources and determining which impacts will be significant. The Act defines "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project."

Appendix G of State CEQA Guidelines provides a checklist of other potential impacts to consider when analyzing the significance of project effects. The impacts listed in Appendix G (Chapter IV) may or may not be significant, depending on the level of the impact. For biological resources, these impacts include whether the project would:

A. "have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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 state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means"

D. "interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites"

E. "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance"

F. "conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan"

Potential impacts on biological resources as a result of the proposed residential project were systematically evaluated at the project level based on the project description provided to us by the Town through October 2022. Based on this information, it is our understanding that all project impacts including grading, construction, staging, and access will occur within the limits of boundaries provided, and that all project impacts within this boundary will be permanent. For the purpose of this assessment, we have assumed that the proposed project would impact up to all 2.0 acres of the project site.

Potential impacts on existing biological resources were evaluated by comparing the quantity and quality of habitats present on the project site under baseline conditions to the anticipated conditions after implementation of the proposed project. Direct and indirect impacts on special-status species and sensitive natural communities were assessed based on the potential for the species, their habitat, or the natural community in question to be disturbed or enhanced following implementation of the proposed project.

6.1 Impacts on Special-Status Species: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Less than Significant with Mitigation)

6.1.1 Impacts on Regionally Common Habitats and Associated Common Plant and Wildlife Species (Less than Significant)

Proposed project activities would result in the permanent removal of up to 0.9 acre of pasture, 0.6 acre of coast live oak woodland, 0.4 acre of ornamental woodland, and 0.1 acre of developed areas on the project site. These impacts would reduce the extent of vegetation within the impact area and result in a reduction in the abundance of some of the common plant and wildlife species that occur there. However, the pasture, coast live oak woodland, ornamental woodland, and developed habitats on the project site occur in a location in Woodside that has been subject to disturbance in the past, is regularly disturbed (e.g., due to grazing by horses and human activities), and is on the periphery of a developed residential area such that these habitats do not provide regionally rare or especially high-value habitat for native vegetation, wildlife, or special-status species. In addition, these habitats are abundant and widespread regionally, are not particularly sensitive, and are not especially valuable (from the perspective of providing important plant or wildlife habitat) or exemplary occurrences of these habitat types. Therefore, impacts on these habitats are considered less than significant under CEQA. Further, because the number of individuals of any common plant or animal species within these habitats, and the proportion of these species' regional populations that could be disturbed, is very small, the project's impacts would not substantially reduce regional populations of these species. Thus, these impacts do not meet the CEQA standard of having a *substantial* adverse effect and would not be considered significant under CEQA.

6.1.2 Impacts on Special-Status Plants (Less than Significant with Mitigation)

Ten special-status plant species were determined to have some potential to occur on the project site. These species are Santa Cruz clover, a CRPR 1B.1 species; Franciscan thistle, western leatherwood, woodland woollythreads, and white-flowered rein orchid, CRPR 1B.2 species; woolly-headed lessingia, a CRPR 3 species; mountain lady's-slipper, harlequin lotus, and Gairdner's yampah, CRPR 4.2 species; and Hoffmann's sanicle, a CRPR 4.3 species. These species could potentially occur in broadleaved upland forest habitats on the project site, but presence/absence surveys for these species during the appropriate blooming period have not yet been performed to determine presence/absence. If any special-status plant species occur on the project site, the project could impact these plants due to disturbance or destruction of individuals and suitable habitat. Direct

impacts could include grading or filling areas supporting the species, trampling or crushing of plants, and soil compaction. Indirect impacts could include increased mobilization of dust onto plants, which can affect their photosynthesis and respiration, or changes to hydrology supporting these plants due to grading or construction in nearby habitats.

Conservation of special-status plant species is important because their populations contribute to preserving genetic resources and help ensure persistence of these rare species in the county and state. Due to the regional rarity of these species, impacts to more than 10% of a population (by individuals or occupied area) of CRPR List 1B species or more than 20% of a population of CRPR List 3 or 4 species could result in the loss of that population, thereby contributing to a reduction in the species' abundance and genetic resources. Such an impact would therefore be considered significant under CEQA. Impacts to 10% or less of a CRPR 1B population, or 20% or less of a CRPR 3 or 4 population, would not be expected to cause the extirpation of such a population as long as the remaining plants are avoided and protected.

Implementation of the Mitigation Measures BIO-1, BIO-2, and BIO-3 below will reduce these impacts to a less-than-significant level.

Mitigation Measure BIO-1. Pre-Activity Surveys for Special-Status Plants. Prior to initial ground disturbance for project-related activities, appropriately timed, presence/absence surveys for special-status plant species will be conducted by a qualified plant ecologist on the project site and within a 50-foot surrounding buffer to assess the presence or absence of these species. This buffer may be increased by the qualified plant ecologist depending on site-specific conditions and activities planned in the area, but will be at least 50 feet in width; if access to adjacent areas cannot be obtained, the plant ecologist will stand on the project site or other accessible areas and use binoculars or other means to look for special-status plants in the 50-foot surrounding buffer. Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust, such as grading; potential for project activities to alter hydrology supporting habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away. Based on the flowering periods of the potentially occurring species, surveys will need to occur at least three different times of year to ensure that they occur during appropriate periods for detecting these species: late winter from January to February (to detect western leatherwood), late spring from April to May (to detect Franciscan thistle, mountain lady's-slipper, harlequin lotus, woodland woollythreads, Hoffmann's sanicle, Santa Cruz clover), and summer from June to October (to detect woolly-headed lessingia, Gairdner's yampah, white-flowered rein orchid). The surveys will be conducted in a year with sufficient precipitation to detect these species; alternatively, if these species are determined to be detectable in appropriate reference populations (regardless of precipitation), surveys for these species on the project site can be determined to be valid even if precipitation is well below average. Mowing must be avoided prior to the surveys so that these species can be detectable if present. If any special-status plants are detected, the plant ecologist will use any available means to determine the abundance and extent of the population, even if the population continues off-site.

If pre-activity surveys detect no special-status plants, then no further mitigation related to these species is necessary. If special-status plants are detected, then Mitigation Measures BIO-2, and BIO-3 if necessary, will be implemented.

Mitigation Measure BIO-2. Avoidance Buffers. To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent will design and construct the proposed project to completely avoid impacts on at least 90% of individuals in the populations of CRPR 1B plant species and/or at least 80% of individuals in the populations of CRPR 3 and 4 plant species on the project site or close enough to the site to be affected by the project. Avoided special-status plant populations will be protected by establishing and observing the identified buffer between plant populations and the impact area. All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, will be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around special-status plants to be avoided will be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site in question). This marking will be maintained intact and in good condition throughout project-related construction activities.

If complete avoidance is not feasible and more than 10% of a population (by occupied area or individuals) of CRPR 1B plant species, or more than 20% of a population of CRPR 3 or 4 plant species, will be impacted by the project as determined by a qualified plant ecologist, Mitigation Measure BIO-3 will be implemented.

Mitigation Measure BIO-3. Preserve and Manage Mitigation Populations. If avoidance of special-status plant species is not feasible and more than 10% of a population (by occupied area or individuals) of CRPR 1B plant species, or more than 20% of a population of CRPR 3 or 4 plant species would be impacted, compensatory mitigation will be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To compensate for impacts on these plants, off-site habitat occupied by the affected species will be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant affected, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10% significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to these species beyond the 10% significance threshold) or establish an entirely new population in suitable habitat.

Areas proposed to be preserved as compensatory mitigation for impacts to special-status plant species must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas will be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat will be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant

species composition, and will contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands will be ensured through an appropriate mechanism, such as a conservation easement or fee title purchase. A habitat mitigation and monitoring plan (HMMP) will be developed by qualified plant or restoration ecologists and implemented for the mitigation lands. That plan will include, at a minimum, the following information:

- a summary of impacts to the special-status plant species in question, including impacts to its habitat, and the proposed mitigation;
- a description of the location and boundaries of the mitigation site and description of existing site conditions;
- a description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the species;
- a description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist);
- proposed management activities to maintain high-quality habitat conditions for the species;
- a description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria will include demonstration that any plant population fluctuations over the monitoring period of a minimum of 5 years for preserved populations and a minimum of 10 years for enhanced or established populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management);
- if a new population is established, the new population must contain at least 200 individuals or the same number of impacted individuals, whichever is greater, by year 5. This is to ensure the created population will be large enough to expect to persist and gain sufficient dedicated pollination services. If year 5 is a poor weather year for summer and fall-blooming annual plants and reference populations show a decline, this criteria can be measured in the next year occurring with average or better rainfall; and
- contingency measures for mitigation elements that do not meet performance criteria. For example, if by year 5 (or the next suitable rainfall year after year 5) of monitoring, the project is unable to establish a self-sustaining population of the required number of individuals as described above, the applicant shall preserve and manage an extant population of that same species under a revised HMMP.

Approval of the HMMP by the Town will be required before project impacts to special-status plant species occur.

6.1.3 Impacts on the Monarch Butterfly (Less than Significant)

Project activities will permanently impact 0.9 acre of pasture, 0.6 acre of coast live oak woodland, and 0.4 acre of ornamental woodland that may be occupied by monarch butterflies. Given the small size of the project site and the lack of any evidence that it supports high densities of the larval host plant (milkweed), nectar plants, or an overwintering site, few, if any, monarch butterflies are expected to be present on the project site when work occurs. Nevertheless, project activities could result in the loss of larval host plants and adult nectar sources for monarch butterflies, and potentially also the loss of eggs, larvae, or pupae due to crushing by construction personnel or equipment, vegetation removal, excavations, and placement of soil stockpiles.

The proposed project would impact only a very small proportion of this species' regionally available habitat and this species' populations, and the number of individuals likely to be displaced by habitat disturbance and loss would be quite small with respect to the amount of suitable habitat available in the area. Thus, due to the abundance of suitable habitat in the project region, project activities are not expected to result in a substantial impact on breeding and foraging habitat for monarch butterflies. Therefore, the potential loss of small numbers of individual monarch butterflies as a result of the project, as well as the permanent loss of potential breeding and foraging habitat, would not rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on this species or its habitats under CEQA.

6.1.4 Impacts on the California Red-Legged Frog and San Francisco Garter Snake (Less than Significant with Mitigation)

There is a very low potential for California red-legged frogs and San Francisco garter snakes to be present on the project site when construction occurs, and thus, the project is unlikely to impact these species. However, the potential for occurrence of occasional dispersants cannot be eliminated. If individuals are present on the site, construction activities associated with the proposed project could result in direct impacts on individual California red-legged frogs and San Francisco garter snakes due to injury or mortality from vehicle traffic, equipment use, and worker foot traffic. In addition, individuals may be crushed in their refugia by the passage of heavy equipment or trapped and suffocated. An increase in native and nonnative predators attracted to the project site due to trash left on the work site might temporarily result in increased mortality of individuals of these species. Such impacts would be temporary in nature, occurring only during construction activities. Nevertheless, because of the regional rarity of these species, increased mortality of California red-legged frogs and San Francisco garter snakes would be significant under CEQA. Implementation of Mitigation Measures BIO-4 through BIO-8 will reduce such impacts on California red-legged frogs and San Francisco garter snakes to a less-than-significant level.

In addition, 1.9 acre of pasture, coast live oak woodland, and ornamental woodland habitats that provide suitable dispersal and refugial habitat for California red-legged frogs and San Francisco garter snakes would be permanently lost due to project construction. However, this habitat is of very low quality due to the lack of aquatic habitat features on and near the site; high levels of disturbance from human uses and horses; and the very low probability that California red-legged frogs and San Francisco garter snakes use these habitats on the

project site. Also, all of these habitats are widespread and regionally abundant. Therefore, the loss of 1.9 acres of low-quality dispersal and refugial habitat would not reduce regional populations of these species or impede their ability to move across the landscape. Thus, no compensatory mitigation for the loss of this habitat is warranted.

Mitigation Measure BIO-4. Worker Environmental Awareness Program. Before any construction activities begin, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the California red-legged frog and San Francisco garter snake, their habitat, the importance of these species, the general measures that are being implemented to conserve them as they relate to the project, and the boundaries within which the project may be accomplished.

Mitigation Measure BIO-5. Pre-construction Survey. A qualified biologist shall survey the project site within 48 hours of the initiation of project activities, including ground disturbance and vegetation removal, looking for individual California red-legged frogs and San Francisco garter snakes. If any individuals are detected during this survey, Mitigation Measure BIO-7 will be implemented.

Mitigation Measure BIO-6. Wildlife Exclusion Fence. Prior to any ground disturbance activities, a temporary wildlife exclusion barrier will be installed along the limits of disturbance. The barrier will be designed to allow the California red-legged frog and San Francisco garter snake to leave the project site and prevent them from entering the impact area, and will remain in-place until all project activities have been completed. The location and design of the fence shall be approved by a qualified biologist, and the qualified biologist will also be present on site to monitor installation until the exclusion fence is complete.

At a minimum, the exclusion fencing shall be at least 3 feet high and the lower 6 inches of the fence shall be buried in the ground to prevent animals from crawling under. The remaining 2.5 feet shall be left above ground to serve as a barrier for animals moving on the ground surface. The fence shall be pulled taut at each support to prevent folds or snags, and supports shall be placed on the inside (project side) of the fencing. Fencing shall be installed and maintained in good condition during all construction activities. Such fencing shall be inspected and maintained daily until the completion of project construction. If equipment needs to pass through this fencing for work activities, a gate shall be installed to allow access and the fence shall be sealed at the end of each working day.

Mitigation Measure BIO-7. Protocol if a California Red-legged Frog or San Francisco Garter Snake is Encountered. If a California red-legged frog, San Francisco garter snake, or any animal that construction personnel believes may be either of these species, is encountered during the course of project activities, the following procedures will be followed:

- All work that could result in the injury, disturbance, or harassment of the individual animal shall immediately cease.
- The foreman and qualified biologist will be immediately notified.

- The qualified biologist will determine if the animal is a California red-legged frog or San Francisco garter snake and, if so, the USFWS (and CDFW, if the animal is a San Francisco garter snake) will be contacted for further guidance before any construction activities resume.

Mitigation Measure BIO-8. Trash Removal. All food-related trash within the work area will be placed in containers with secure lids before the end of work each day in order to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish that may be left on-site. If containers meeting these criteria are not available, all rubbish will be removed from the project site at the end of each work day.

6.1.5 Impacts on Nonbreeding Special-Status Birds and Mammals (Less than Significant)

Several special-status bird and mammal species may occur on the project site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These are the northern harrier, Vaux's swift, olive-sided flycatcher, yellow warbler, tricolored blackbird, Bryant's savannah sparrow, grasshopper sparrow, American peregrine falcon, golden eagle, mountain lion, American badger, pallid bat, Townsend's big-eared bat, and western red bat.

The northern harrier, Vaux's swift, olive-sided flycatcher, and yellow warbler (California species of special concern) as well as the tricolored blackbird (a state threatened species) are not expected to occur on or close to the project site as breeders due to the absence of suitable habitat, but individuals may occur occasionally as foragers during the nonbreeding season. The Bryant's savannah sparrow (a California species of special concern) breeds in marshes along the San Francisco Bay to the north, and individuals may forage in California annual grassland on the project site during the nonbreeding season. Similarly, the grasshopper sparrow (a California species of special concern) breeds in expansive grassland habitats to the north, and individuals may occasionally forage in grasslands in the project site during migration. The American peregrine falcon and golden eagle (state fully protected species) are not expected to nest on the project site due to a lack of suitable habitat, though individuals may occasionally forage on the project site in small numbers. Due to the site's location on the periphery of open space areas of the Santa Cruz Mountains, the mountain lion (a state candidate species) and American badger (a California species of special concern) may briefly traverse the site as non-breeding dispersants or foragers, but they are not expected to linger for any length of time due to high levels of human activity. The pallid bat, Townsend's big-eared bat, and western red bat (California species of special concern) may occur on the project site as occasional foragers, but are not expected to breed or roost on the project site due to a lack of suitable habitat and existing human activity on the site, and there are no known maternity colonies on or adjacent to the project site. Nevertheless, individuals from more remote colonies could potentially forage over open grasslands in the project site on rare occasions.

Activities under the proposed project would have some potential to impact foraging habitats and/or disturb individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. Further, the project

site does not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, impacts of the project will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant under CEQA.

6.1.6 Impacts on the White-Tailed Kite (Less than Significant)

The white-tailed kite (a state fully protected species) may nest in oak woodland habitat or ornamental trees on and adjacent to the project site. Based on site observations, the areal extent of suitable habitats within and adjacent to the project site, and known nesting densities of this species, it is likely that no more than one pair of white-tailed kites could potentially nest on or immediately adjacent to the project site. The project would result in the permanent loss of suitable nesting and foraging habitat for the white-tailed kite. In addition, activities that occur during the nesting season and cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests (i.e., nests with eggs or young). Heavy ground disturbance, noise, and vibrations caused by project activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs that could be disturbed is very small (i.e., one pair), the impacts of project activities would represent a very small fraction of the regional population of this species. Therefore, neither the potential loss of individual white-tailed kites, nor the disturbance of nesting and foraging habitat, would rise to the CEQA standard of having a *substantial* adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat under CEQA. However, as discussed in Section 3 above, all native migratory birds, including raptors, are protected under the MBTA and California Fish and Game Code. Recommended measures to comply with these laws are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.1.7 Impacts on the San Francisco Dusky-Footed Woodrat (Less than Significant with Mitigation)

Six nests of San Francisco dusky-footed woodrats are present in coast live oak woodland habitat on the project site. Woodrats from this community will also forage in oak woodland habitats on the project site. Construction of the project could result in the injury or mortality of individual woodrats and disturbance or destruction of nests and young, leading to increased predation risk on woodrats flushed from nests, as a result of vegetation clearing and operation of equipment.

Although woodrats are abundant in the project region, especially in natural areas in the Santa Cruz Mountains, woodrats are very important ecologically in that they provide an important prey source for raptors (particularly owls) and for predatory mammals, and their nests also provide habitat for a wide variety of small mammals, reptiles, and amphibians. Thus, in our opinion, impacts of the project on six woodrat nests would be considered significant under CEQA. Implementation of Mitigation Measures BIO-9 through BIO-11 below would reduce this impact to a less-than-significant level under CEQA.

Mitigation Measure BIO-9. Pre-Activity Survey. A qualified biologist will conduct a preconstruction survey for San Francisco dusky-footed woodrat nests within 30 days of the start of work activities. If active woodrat nests are determined to be present in, or within 10 feet of, the impact areas, Measures BIO-10 and BIO-11 below will be implemented, as appropriate.

Mitigation Measure BIO-10. Avoidance Buffers. Active woodrat nests that are detected within the work areas will be avoided to the extent feasible. Ideally, a minimum 10-foot buffer will be maintained between project activities and woodrat nests to avoid disturbance. In some situations, a smaller buffer may be allowed if, in the opinion of a qualified biologist, nest relocation (Measure BIO-11 below) would represent a greater disturbance to the woodrats than the adjacent work activities.

Mitigation Measure BIO-11. Nest Relocation. If avoidance of active woodrat nests within and immediately adjacent to (within 10 feet of) the work areas is not feasible, then nest materials will be relocated to suitable habitat as close to the project area as possible (ideally, within or immediately adjacent to the project site).

- Prior to the start of construction activities, a qualified biologist will disturb the woodrat nest to the degree that all woodrats leave the nest and seek refuge outside of the construction area. Relocation efforts will avoid the peak nesting season (February–July) to the maximum extent feasible. Disturbance of the woodrat nest will be initiated no earlier than one hour before dusk to prevent the exposure of woodrats to diurnal predators. Subsequently, the biologist will dismantle and relocate the nest material by hand. During the deconstruction process, the biologist will attempt to assess if there are juveniles in the nest. If immobile juveniles are observed, the deconstruction process will be discontinued until a time when the biologist believes the juveniles will be capable of independent survival (typically after 2 to 3 weeks). A no-disturbance buffer will be established around the nest until the juveniles are mobile. The nest may be dismantled once the biologist has determined that adverse impacts on the juveniles would not occur.

Implementation of these measures would minimize impacts of the project on the San Francisco dusky-footed woodrat, and no compensatory mitigation (beyond the relocation of nest materials described above) would be necessary.

6.1.8 Impacts on Common Species of Roosting Bats (Less than Significant)

Common bat species, such as the California myotis, can potentially roost in small numbers in trees on the project site. No evidence of a colony of roosting bats was detected in trees on the site during the November 2022 focused survey, but the presence of small numbers of a common species of roosting bats could not be ruled out. The removal of trees on the site has the potential to result in the loss of a small colony of common species of roosting bats. When trees containing roosting colonies or individual bats are removed or modified, individual bats can be physically injured or killed, can be subjected to physiological stress from disturbance during torpor, or can face increased predation because of exposure during daylight. In addition, nursing young may be subjected to disturbance-related abandonment by their mothers. However, the trees present on the site only provide marginal habitat for roosting bats, and initial surveys concluded that if common species of roosting

bats were to roost in these structures, they would occur only in small numbers. Therefore, the loss of the marginal habitat or a small number of individuals of common bat species would not have a *substantial* adverse effect on local and regional populations of these species, and thus would not constitute a significant impact under CEQA.

6.1.9 Impacts due to Bird Collisions (Less than Significant)

Under existing conditions, the project site consists of a mix of undeveloped areas dominated by pasture, oak and ornamental woodlands, and a construction staging area. Terrestrial land uses and habitat conditions in areas immediately surrounding the project site consist of low-density residential buildings with associated pedestrian walkways, roads, and landscape vegetation to the northeast, southeast, and southwest, and extensive undeveloped open space to the northwest. Native vegetation in these open space areas includes native scrub and grassland vegetation as well as mature native trees, especially native oaks. This vegetation supports relatively high densities and diversity of native bird species, and some of these birds will use the vegetation on the project site opportunistically due to the site's close proximity to these open space areas. In contrast, the residential areas to the northeast, southeast, and southwest support many nonnative landscape trees and shrubs, which supports fewer of the resources required by native birds compared native vegetation, and the structural simplicity of the vegetation (without well-developed ground cover, understory, and canopy layers) in these developed areas further limits resources available to birds (Anderson et al. 1977, Mills et al. 1989).

Because the natural habitats on the site are limited in extent and of relatively lower quality compared to habitats in surrounding natural open space areas, and the site is regularly disturbed by human activities and grazing by horses, the number of individual landbirds that inhabit and regularly use vegetation on the project site at any given time is low under existing conditions despite the periodic use of the site by birds that inhabit nearby open space areas. Particularly rare species or species of conservation concern are not expected to occur in the project site.

The extent and species of future landscape vegetation to be installed under the project is unknown. For the purpose of this assessment, we assume that while a number of the existing mature trees on the site may be removed, they would be replaced in accordance with the Town's tree protection requirements. Any trees and landscaped areas that will be planted on the site in the future are expected to provide similar habitat structure and foraging opportunities for landbirds compared to existing conditions, although the extent of grasslands on the site will likely be reduced following construction. Landbirds that will occur on the site and in the vicinity will be attracted to any trees and landscaped areas that are planted, and some will make use of new developed structures. These birds will move between the site and habitats in the surrounding vicinity (e.g., the open space areas to the north). As a result, no substantive changes in the number of songbirds inhabiting the project site are expected to result from the proposed project.

It is well documented that glass windows and building façades can result in injury or mortality of birds due to birds' collisions with these surfaces (Klem et al. 2009, Sheppard and Phillips 2015). Because birds do not perceive glass as an obstruction the way humans do, they may collide with glass when the sky or vegetation is

reflected in glass (e.g., they see the glass as sky or vegetated areas); when transparent windows allow birds to perceive an unobstructed flight route through the glass (such as at corners); and when the combination of transparent glass and interior vegetation (such as in planted atria) results in attempts by birds to fly through glass to reach that vegetation. The greatest risk of avian collisions with buildings occurs in the area within 40–60 feet of the ground, because this is the area in which most bird activity occurs (San Francisco Planning Department 2011, Sheppard and Phillips 2015). Very tall buildings (e.g., buildings 500 feet or more high) may also pose a threat to birds that are migrating through the area, particularly to nocturnal migrants that may not see the buildings or that may be attracted to lights on the buildings (San Francisco Planning Department 2011).

Birds are likely to collide with glazing on building façades on the project site for the following reasons:

- It is possible that the project may incorporate trees and other landscaping immediately adjacent to glazing on a building's façades. Such vegetation is expected to attract birds. Once birds are using that vegetation, they may not perceive the glass as a solid structure. The vegetation would reflect in the glass of the building's façades, potentially causing birds to attempt to fly in to the reflected "vegetation" and strike the glass. As a result, some birds that are attracted to the trees and other landscaping that is adjacent to the glass façades are expected to collide with the glass.
- Night lighting associated with new buildings has some potential to disorient birds, especially during inclement weather when night migrating birds descend to lower altitudes. As a result, some birds moving through the project site at night may be disoriented by night lighting and potentially collide with buildings.

The extent to which the proposed new buildings and other structures will incorporate glazing on their façades is unknown, as these structures have not yet been designed. However, it is our understanding that while these buildings will incorporate some glazing on their facades, they will not be designed to incorporate extensive glazing. Because the buildings are expected to incorporate predominantly opaque facades with no extensive areas of glazing, birds will be better able to perceive the building facades as solid obstructions to flight than if the glassy surface appeared more uniform. Thus, the number and frequency of avian collisions with glass façades on the proposed buildings is expected to be low, and the project would not result in the loss of a substantial proportion of any species' Bay-area populations or any Bay-area bird community. Thus, according to CEQA standards, we would consider such impacts to be less than significant.

6.1.10 Impacts due to Increased Lighting (Less than Significant with Mitigation)

The project will result in the construction of buildings and other features (e.g., driveways, roads, and sidewalks) that will increase the amount of lighting on and around the project site. Lighting from the project would be the result of light fixtures illuminating buildings, building architectural lighting, driveway/road lighting, and pedestrian lighting. Depending on the location, direction, and intensity of exterior lighting, this lighting can potentially spill into adjacent natural areas, thereby resulting in an increase in lighting compared to existing conditions. Areas to the northeast, southeast, and southwest are primarily developed residential areas that do not support sensitive species that might be significantly impacted by illuminance from the project. However,

the open space areas located to the northwest provide suitable habitat for a variety of wildlife species, and are close enough to the project site to be affected by an increase in lighting.

Many animals are sensitive to light cues, which influence their physiology and shape their behaviors, particularly during the breeding season (Ringer 1972, de Molenaar et al. 2006). Artificial light has been used as a means of manipulating breeding behavior and productivity in captive birds for decades (de Molenaar et al. 2006), and has been shown to influence the territorial singing behavior of wild birds (Longcore and Rich 2004, Miller 2006, de Molenaar et al. 2006). While it is difficult to extrapolate results of experiments on captive birds to wild populations, it is known that photoperiod (the relative amount of light and dark in a 24-hour period) is an essential cue triggering physiological processes as diverse as growth, metabolism, development, breeding behavior, and molting (de Molenaar et al. 2006). This holds true for birds, mammals (Beier 2006), and other taxa as well, suggesting that increases in ambient light may interfere with these processes across a wide range of species, resulting in impacts on wildlife populations.

Artificial lighting may indirectly impact mammals and birds by increasing the nocturnal activity of predators like owls, hawks, and mammalian predators (Negro et al 2000, Longcore and Rich 2004, DeCandido and Allen 2006, Beier 2006). The presence of artificial light may also influence habitat use by rodents (Beier 2006) and by breeding birds (Rogers et al. 2006, de Molenaar et al. 2006), by causing avoidance of well-lit areas, resulting in a net loss of habitat availability and quality.

Wildlife species inhabiting the sensitive habitats to the northwest are already habituated to the existing artificial illuminance from a variety of urban and natural light sources that are found nearby. However, due to the ecological importance of these habitats and the wildlife communities they support, substantial increases in illuminance of these natural areas could result in a potentially significant impact under CEQA by disrupting the natural behaviors of the species using these habitats. Although there is agreement throughout the literature that increases in illuminance can affect wildlife behavior, as described above, there is no quantitative level of illuminance increase (above ambient light) that is agreed upon as a threshold for significant impacts to animals. In our professional opinion, implementation of Mitigation Measure BIO-12 below would reduce this impact to a less-than-significant level under CEQA.

Mitigation Measure BIO-12. Minimize Project Lighting. Due to the potential for lighting on the project site to affect wildlife species that occur on the site and in adjacent natural areas, the project will implement the following measures to minimize lighting on the site.

- All exterior lighting shall be fully shielded to block illumination from shining outward towards open space areas located to the northwest.
- To the maximum extent feasible, up-lighting (i.e., lighting that projects upward above the fixture) shall be avoided in the project design. All lighting shall be fully shielded to block illumination from shining upward above the fixture.

- If up-lighting cannot be avoided in the project design, up-lights shall be shielded and/or directed such that no luminance projects above/beyond objects at which they are directed (e.g., trees and buildings) and such that the light would not shine directly into the eyes of a bird flying above the object. If the objects themselves can be used to shield the lights from the sky beyond, no substantial adverse effects on migrating birds are anticipated.
- Fixtures shall comply with lighting zone LZ-1, *Low Ambient*, as recommended by the International Dark-Sky Association (2011) for rural and low-density residential areas. The allowed total initial luminaire lumens for the project site is 1.25 lumens per square foot of hardscape, and the BUG rating for individual fixtures shall not exceed B2 or G1, as follows:
    - B2: 1,000 lumens high (60–80 degrees), 2,500 lumens mid (30–60 degrees), 1,000 lumens low (0–30 degrees)
    - G1 (asymmetrical fixtures): 100 lumens forward very high (80–90 degrees), 100 lumens backlight very high (80–90 degrees), 1,800 lumens forward high (60–80 degrees), and 500 lumens backlight high (60–80 degrees) for asymmetrical fixtures or 1,800 lumens backlight high for quadrilateral symmetrical fixtures.
- In addition, the maximum allowed luminaire lumens (initial lamp lumens for a lamp, multiplied by the number of lamps in the luminaire) for unshielded luminaires at one entry per building is 420 lumens, and for additional unshielded luminaires on the project site is 315 lumens. The maximum allowed luminaire lumens for fully shielded luminaires is 1,260 lumens. Landscape lighting and shielded directional flood lighting are not allowed.
- Exterior lighting shall be minimized (i.e., total outdoor lighting lumens shall be reduced by at least 30% or extinguished, consistent with recommendations from the International Dark-Sky Association [2011]) from 10:00 p.m. until sunrise, except as needed for safety and City code compliance.

6.2 Impacts on Sensitive Communities: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (No Impact)

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (Faber-Langendoen2012), as described above in Section 5.3. Aquatic, wetland, and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS (see Section 6.3 below). Project impacts on sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, were considered and evaluated.

No riparian habitat or other sensitive natural communities are located on or adjacent to the project site, and thus, there will be no impacts to riparian habitat or other sensitive natural communities as a result of the project.

6.3 Impacts on Wetlands: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (No Impact)

No wetlands or other waters of the U.S./state are present on the project site, and the project avoids all direct and indirect impacts on state or federally protected wetlands and aquatic habitats. Thus, no wetland habitat will be impacted directly or indirectly by the project.

6.4 Impacts on Wildlife Movement: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Less than Significant)

6.4.1 Impacts on Wildlife Movement (Less than Significant)

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

The project site is situated on the edge of urban residential development in Woodside. As a result, the proposed development of the project site would not result in the fragmentation of natural habitats. While some wildlife species that occur in nearby natural areas may move through the site when traveling through the area, they will continue to be able to move between open space habitats in the Santa Cruz Mountains to the northwest following construction of the new residences on the property. Thus, any wildlife species that currently move through surrounding open space areas would continue to be able to do so following project construction, and the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact is determined to be less than significant.

6.4.2 Impacts on Nesting Birds (Less than Significant)

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the project site or in immediately adjacent areas. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on and adjacent to the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on

their regional populations). Thus, in our opinion, no mitigation measures are warranted to avoid and minimize project impacts on nesting birds under CEQA.

Nevertheless, several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. The removal of vegetation supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. Recommended measures to ensure project compliance with the MBTA and California Fish and Game Code are provided under Section 7 *Compliance with Additional Laws and Regulations*, below.

6.5 Impacts due to Conflicts with Local Policies: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Less than Significant with Mitigation)

6.5.1 Impacts Due to the Removal of Ordinance-Sized Trees (Less than Significant)

The project may remove existing trees on the site, including significant trees as defined by the Town (see Section 3.3.1 above), and the applicant will submit a permit application for tree removal. In accordance with the Woodside Municipal Code, the provisions listed below would be required by the project, at a minimum, for trees to be protected on the site:

- Tree protection fencing and appropriate signage around the drip lines of trees to be protected
- Measures to effect erosion control, soil and water retention, and to limit adverse environmental effects
- Significant trees that will be impacted by the project will be replaced in accordance with all applicable laws, policies or guidelines, including Section 153.430 of the Woodside Municipal Code. Per Section 453.438 of the Municipal Code, any significant trees shall be replaced with a California native tree species, be planted as near as possible to the original location, and will be of at least a 36-inch box or other minimum size as specified by the Planning Director. Replacement trees shall be planted within one year of removal or, in the case of removal to accommodate construction, prior to final inspection.

With the incorporation of the above measures to insure compliance with the Woodside Municipal Code, any potential impacts related to conflict with local policies or ordinances protecting trees would be less than significant.

6.6 Impacts due to Conflicts with an Adopted Habitat Conservation Plan: Conflict with the provisions of an adopted habitat conservation plan,

natural community conservation plan, or other approved local, regional, or state habitat conservation plan (No Impact)

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans.

6.7 Cumulative Impacts (Less than Significant)

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in Woodside will result in impacts on the same habitat types and species that will be affected by the proposed project. The proposed project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the project in combination with other projects in the larger region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project; and compensatory mitigation and proactive conservation measures associated with each project. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

However, many projects in the region that impact resources similar to those impacted by the project will be subject to CEQA requirements. It is expected that such projects will mitigate their impacts on sensitive habitats and special-status species through the incorporation of mitigation measures and compliance with permit conditions.

Regardless of the magnitude and significance of cumulative impacts that result from other projects, the Runnymede Road Residential Project is not expected to have a substantial effect on biological resources, and would implement the mitigation measure described above to reduce impacts under CEQA to less than significant levels. Thus, provided that this project successfully incorporates the mitigation measure described in this biological resources report, the project will not have a cumulatively considerable contribution to cumulative effects on biological resources.

Section 7. Compliance with Additional Laws and Regulations for Nesting Birds

Several species of common native birds protected by the MBTA and California Fish and Game Code may nest in trees and shrubs on the site or immediately adjacent to the site. It is also possible that protected native birds could nest on the buildings on the site. The removal of vegetation or demolition of buildings supporting active nests may cause the direct loss of eggs or young, while construction-related activities located near an active nest may cause adults to abandon their eggs or young. This type of impact would not be significant under CEQA, in our opinion, because of the local and regional abundances of the species that could potentially nest on the site and the very low magnitude of the potential impact of development on these species (i.e., the project is expected to impact only a few pairs of these species, which is not a substantial impact on their regional populations). However, the following measures should be implemented to ensure that project activities do not violate the MBTA and California Fish and Game Code:

Measure 1. Avoidance of the Nesting Season. To the extent feasible, the initiation of commencement of demolition and construction activities should be scheduled to avoid the nesting season. If demolition and construction activities are initiated outside the nesting season, all potential demolition/construction impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.

Measure 2. Pre-Activity/Pre-Disturbance Surveys. If it is not possible to schedule the initiation of demolition and construction activities between September 1 and January 31, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. We recommend that these surveys be conducted no more than seven days prior to the initiation of demolition or construction activities. During this survey, the ornithologist will inspect all trees and other potential nesting habitats (e.g., trees, shrubs, and buildings) in and immediately adjacent to the impact areas for nests.

Measure 3. Non-Disturbance Buffers. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist will determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.

Measure 4. Inhibition of Nesting. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1). This will preclude the initiation of nests in this vegetation, and minimize the potential delay of the project due to the presence of active nests in these substrates.

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Appendix A. Plants Observed

Family	Scientific Name	Common Name	Cal-IPC Rank[1]
Anacardiaceae	*Toxicodendron diversilobum*	poison oak	
Asteraceae	*Baccharis pilularis* ssp. *consanguinea*	coyote brush	
	Carduus pycnocephalus ssp. *pycnocephalus**	Italian thistle	Moderate
	*Centaurea calcitrapa**	purple star-thistle	Moderate
	*Helminthotheca echioides**	bristly ox-tongue	Limited
Brassicaceae	*Hirschfeldia incana**	short-podded mustard	Moderate
Fabaceae	*Genista monspessulana**	French broom	High
Fagaceae	*Quercus agrifolia*	coast live oak	
	Quercus lobata	valley oak	
Malvaceae	*Malva parviflora**	cheeseweed	
Myrtaceae	*Eucalyptus* sp.*	gum tree	
Oleaceae	*Ligustrum* sp.	privet	
Rosaceae	*Cotoneaster* sp.*	cotoneaster	
	Heteromeles arbutifolia	toyon	
	Pyracantha sp.*	firethorn	
Poaceae	*Avena* sp.*	wild oat	
	*Briza maxima**	rattlesnake grass	Limited
	*Hordeum murinum**	foxtail barley	Moderate
	*Phalaris aquatica**	Harding grass	Moderate

[1]Cal-IPC Ranks (Cal-IPC 2022):

- Watch List – These species are predicted to become invasive if no further actions are taken. Distribution may range from limited to widespread in specific regions.
- Limited – These species are invasive, but their ecological impacts are minor on a statewide level. They have low to moderate rates of colonization. Although their distribution is generally limited, these species may be locally persistent and problematic.
- Moderate – These species have substantial and apparent—but generally not severe—ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal. Distribution may range from limited to widespread.
- High – These species have severe ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal and establishment, and most are widely distributed.

*Nonnative or invasive species

Appendix B. Special-Status Plants Considered but Rejected for Occurrence

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
San Mateo thorn-mint	*Acanthomintha duttonii*		X		
Blasdale's bent grass	*Agrostis blasdalei*	X			X
Franciscan onion	*Allium peninsulare* var. *franciscanum*	X	X		
bent-flowered fiddleneck	*Amsinckia lunaris*	X			
California androsace	*Androsace elongate* ssp. *acuta*				X
coast rockcress	*Arabis blepharophylla*	X			X
Anderson's manzanita	*Arctostaphylos andersonii*	X			
Montara manzanita	*Arctostaphylos montarensis*	X			X
Kings Mountain manzanita	*Arctostaphylos regismontana*	X	X	X	
ocean bluff milk-vetch	*Astragalus nuttallii* var. *nuttallii*	X		X	X
coastal marsh milk-vetch	*Astragalus pycnostachyus* var. *pycnostachyus*	X		X	X
Brewer's calandrinia	*Calandrinia breweri*	X			
Oakland star-tulip	*Calochortus umbellatus*				X
pink star-tulip	*Calochortus uniflorus*	X			
Johnny-nip	*Castilleja ambigua* var. *ambigua*	X			X
Congdon's tarplant	*Centromadia parryi* ssp. *congdonii*	X			X
pappose tarplant	*Centromadia parryi* ssp. *parryi*	X	X		X
Point Reyes salty bird's-beak	*Chloropyron maritimum* ssp. *palustre*	X		X	X
San Francisco Bay spineflower	*Chorizanthe cuspidata* var. *cuspidata*	X			
fountain thistle	*Cirsium fontinale* var. *fontinale*	X	X		
lost thistle	*Cirsium praeteriens*			X	X
Santa Clara red ribbons	*Clarkia concinna* ssp. *automixa*	X			
round-headed Chinese-houses	*Collinsia corymbosa*	X		X	X

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
San Francisco collinsia	*Collinsia multicolor*	X			
clustered lady's-slipper	*Cypripedium fasciculatum*	X			
San Mateo woolly sunflower	*Eriophyllum latilobum*	X	X		
Hoover's button-celery	*Eryngium aristulatum* var. *hooveri*	X		X	X
Jepson's coyote-thistle	*Eryngium jepsonii*	X	X		
San Francisco wallflower	*Erysimum franciscanum*	X			
minute pocket moss	*Fissidens pauperculus*	X			
Hillsborough chocolate lily	*Fritillaria biflora* var. *ineziana*	X			X
fragrant fritillary	*Fritillaria liliacea*	X			
San Francisco gumplant	*Grindelia hirsutula* var. *maritima*	X			X
short-leaved evax	*Hesperevax sparsiflora* var. *brevifolia*	X			
Marin western flax	*Hesperolinon congestum*	X	X		
Kellogg's horkelia	*Horkelia cuneata* var. *sericea*	X			
Point Reyes horkelia	*Horkelia marinensis*	X			
island tube lichen	*Hypogymnia schizidiata*	X		X	
coast iris	*Iris longipetala*	X			
perennial goldfields	*Lasthenia californica* ssp. *macrantha*	X			X
Legenere	*Legenere limosa*	X			X
serpentine leptosiphon	*Leptosiphon ambiguus*	X	X		
bristly leptosiphon	*Leptosiphon aureus*	X			
coast yellow leptosiphon	*Leptosiphon croceus*	X			X
large-flowered leptosiphon	*Leptosiphon grandiflorus*	X			
broad-lobed leptosiphon	*Leptosiphon latisectus*				X
rose leptosiphon	*Leptosiphon rosaceus*	X		X	X
Crystal Springs lessingia	*Lessingia arachnoidea*	X	X		
spring lessingia	*Lessingia tenuis*	X			
Ornduff's meadowfoam	*Limnanthes douglasii* ssp. *ornduffii*	X		X	X
San Mateo tree lupine	*Lupinus arboreus* var. *eXimius*	X			

Common Name	Scientific Name	No Suitable Habitat	Edaphic Conditions Absent	Outside the Elevation Range	Outside of Known Geographic Range/No Nearby Extant Records
marsh microseris	*Microseris paludosa*	X			
Dudley's lousewort	*Pedicularis dudleyi*	X			
white-rayed pentachaeta	*Pentachaeta bellidiflora*	X			
Michael's rein orchid	*Piperia michaelii*	X			
Choris' popcornflower	*Plagiobothrys chorisianus* var. *chorisianus*	X			
Hickman's popcornflower	*Plagiobothrys chorisianus* var. *hickmanii*	X			
Oregon polemonium	*Polemonium carneum*	X			
Hickman's cinquefoil	*Potentilla hickmanii*	X			
Lobb's aquatic buttercup	*Ranunculus lobbii*	X			
Sanford's arrowhead	*Sagittaria sanfordii*	X			
chaparral ragwort	*Senecio aphanactis*	X			
Scouler's catchfly	*Silene scouleri* ssp. *scouleri*	X			
San Francisco campion	*Silene verecunda* ssp. *verecunda*		X		
northern slender pondweed	*Stuckenia filiformis* ssp. *alpina*	X			X
two-fork clover	*Trifolium amoenum*	X			X
saline clover	*Trifolium hydrophilum*	X			X
San Francisco owl's-clover	*Triphysaria floribunda*	X			
coastal triquetrella	*Triquetrella californica*	X		X	
Methuselah's beard lichen	*Usnea longissima*				X

Appendix F

NOISE STUDY

Table of Contents

Preliminary Noise Study F-1
Traffic Increase Noise Analysis F-11

1 May 2024

Kevin Bryant, Town Manager
Town of Woodside
2955 Woodside Road
Woodside, CA 94062
kbryant@woodsidetown.org

Subject: Town of Woodside Housing Element
Housing Element Noise Study
Salter Project 22-0584

Dear Kevin:

This report summarizes the results of our noise study based on measurements at the seven sites identified in the Town of Woodside Housing Element and within Cañada College:

- 773 Cañada Road
- Runnymede Road
- High Road
- Cañada College – Sites 1 to 4

The purpose of the study is to establish a base line of environmental noise for future development. Preliminary mitigation measures (e.g., façade sound ratings) to comply with State and Municipal environmental noise requirements are also provided. Our findings are summarized below.

ACOUSTICAL CRITERIA

Future development in the Housing Element and Cañada College sites will be subject to the following municipal criteria for environmental noise intrusion for residences:

California Building Code (Title 24, Part 2)

Section 1207 of the 2022 California Building Code requires that the indoor noise level in residential units of multi-family dwellings not exceed DNL[1] 45 dB.

Town of Woodside Noise Element

Table N3 in the Noise Element within the Town of Woodside General Plan 2012 specifies that the interior noise levels in residential buildings are to be reduced to DNL 40 dB. This is more stringent than the California Building Code. Additionally, it requires ambient noise levels in exterior residential spaces (patios, swimming pools, tennis courts, etc.) not exceed DNL 55 dB.

NOISE MEASUREMENTS

To quantify the noise environment at the seven sites that were studies (shown in Figure 1), we conducted long-term noise measurements as summarized in Table 1 below (see Figures 1A to 1C for the measurement locations).

[1] DNL (Day-Night Average Sound Level) – A descriptor for a 24-hour A-weighted average noise level. DNL accounts for the increased acoustical sensitivity of people to noise during the nighttime hours. DNL penalizes sound levels by 10 dB during the hours from 10 PM to 7 AM. DNL is sometimes written as Ldn.

Table 1: Summary of Measurement Locations

Tag	Measurement Site	Measured Level (DNL)	Description
C-LT1	773 Cañada Rd	77 dB	On a pole appx. 160 feet from the I-280 median
C-LT2		70 dB	On a pole appx. 300 feet from the I-280 median
C-ST1		65 dB	Handheld appx. 500 feet from the I-280 median
R-LT1	Runnymede Rd	77 dB	On a pole appx. 135 feet from the I-280 median
R-LT2		83 dB	On a tree appx. 100 feet from the I-280 median
R-LT3		65 dB	On a tree appx 25 feet from Runnymede Dr centerline, and appx. 450 feet from I-280 median
R-ST4		63 dB	Handheld appx. 300 feet from the I-280 median
H-LT1	High Rd	75 dB	On a tree appx. 45 feet from the Hwy. 84 median
H-LT2		66 dB	On a pole appx 25 feet from High Rd. centerline, and appx. 155 feet from Hwy 84 median
H-LT3		58 dB	On a tree appx. 10 feet from Todo El Mundo centerline, and appx. 190 feet rom Hwy. 84 median
CC1-LT1	Cañada College Site 1	64 dB	On a pole appx. 370 feet from the I-280 median. Partial line of sight to Fwy compared to CC1-ST1
CC1-LT2		68 dB	On a pole appx. 25 feet from The Loop Rd., and appx. 280 feet from Farm Hill Blvd. centerline but partially shielded
CC1-ST1		73 dB	Handheld appx. 310 feet from the I-280 median
CC2-LT1	Cañada College Site 2	66 dB	On a tree appx. 510 feet from the I-280 median, appx. 330 feet from Canada Rd. centerline, and appx. 10 feet from West Entry Dr. centerline
CC2-LT2		62 dB	On a pole appx. 10 feet from West Entry Dr. centerline, and appx. 920 feet from the I-280 median
CC2-LT3		61 dB	On a tree appx. 25 feet from Campus Cir. centerline, and appx. 900 feet from the I-280 median
CC3-LT1	Cañada College Site 3	57 dB	On a tree appx. 55 feet from Campus Cir. centerline
CC3-LT2		56 dB	On a pole appx. 70 feet from Campus Cir. centerline
CC4-LT1	Cañada College Site 4	57 dB	On a pole appx. 20 feet from Campus Cir. centerline

LT = Long Term (deployed on site to measure continuously for approximately 48-hours, 12 ft above grade)
ST = Short Term (attended 15-minute msmt., DNL determined using calculated offset, 5 ft above grade).
Approximate distances are measured laterally from satellite imagery

INTERIOR NOISE LEVELS

To meet the State and Town interior noise standards, sound-rated windows, doors, and walls will be required. Since there are no specific site designs for each site, we have assumed the following characteristics based on our experience with typical residential construction. Preliminary window and exterior door STC[2] ratings needed to meet the Town of Woodside criterion of DNL 40 dB in residences are shown below in Table 2.

- All spaces will have hard-surfaced flooring
- Bedrooms will be 10-feet wide by 12-feet deep, living rooms will be 12-feet wide by 15-feet deep

- Ceilings in residences will be 9 feet above the finished floor
- Windows will comprise approximately 30-percent of the facade in each room
- The exterior wall will achieve approximately STC 45 (three coat stucco exterior and one layer of gypsum board on interior side with batt insulation)

To meet the interior noise criteria, we calculate the STC ratings will need to be as given in Table 2.

Table 2: Calculated STC Range for Exterior Windows and Doors for Future Development

Site	Building Description	Room Condition	Calculated STC Range
773 Cañada Rd	140-feet from Fwy	Facing Fwy	43 to 45
		Perpendicular to Fwy	36 to 38
		Facing away from Fwy	28 to 30
	320-feet from Fwy	Facing Fwy	36 to 38
		Perpendicular to Fwy	30 to 33
		Facing away from Fwy	28 or less
Runnymede Rd	110-feet from Fwy	Facing Fwy	43 to 45
		Perpendicular to Fwy	37 to 39
		Facing away from Fwy	28 to 30
	220-feet from Fwy	Facing Fwy	38 to 40
		Perpendicular to Fwy	33 to 35
		Facing away from Fwy	28 to 30
High Rd	45-feet from Woodside Rd	Facing Woodside Rd	37 to 39
		Perpendicular to Woodside Rd	34 to 36
		Facing away from Woodside Rd	30 to 32
Cañada College Site 1	390-feet from Fwy	Facing Fwy	37 to 39
		Perpendicular to Fwy (East)	35 to 37
		Perpendicular to Fwy (West)	33 to 35
		Facing away from Fwy	30 to 32
Cañada College Site 2	270-feet from Fwy	Facing Fwy	31 to 33
		Perpendicular to Fwy (Facing West Entry Dr)	28 to 30
		Perpendicular to Fwy (East)	28 or less
		Facing away from Fwy	28 or less
	480-feet from Fwy	Facing Fwy	28 to 30
		Perpendicular to Fwy (Facing West Entry Dr)	28 to 30
		Perpendicular to Fwy (East)	28 or less
		Facing away from Fwy	28 or less

[2] STC (Sound Transmission Class) – A single-number rating defined in ASTM E90 that quantifies the airborne sound insulating performance of a partition under laboratory conditions. Increasing STC ratings correspond to improved airborne sound insulation.

Cañada College Site 3	70-feet from Campus Cir	Facing Fwy	31 to 33
		Facing Campus Cir	28 to 30
		Other	28 to 30
Cañada College Site 4	30-feet from Campus Cir	Facing Campus Cir	28 to 30
		Other	28 or less

If room conditions exist with windows facing multiple noise sources simultaneously (e.g., corners), required STC ratings might be higher than those values listed in Table 2. For sites located near the highways (773 Cañada Rd, Runnymede Rd, High Rd, and Cañada College Site 1), the corner conditions might also need upgraded walls to meet the indoor noise criterion.

For reference, typical one-inch glazing assemblies (two 1/4-inch-thick panes with 1/2-inch airspace) achieve STC 32. Where STC ratings above 32 are needed, typically at least on pane may need to be laminated, depending the window manufacturer and window type. The recommended STC ratings are for full window assemblies (glass and frame) rather than just the glazing itself.

Once specific site plans and the architectural design is developed for each site, an acoustical engineer is to review the design and provide updated project specific STC ratings to meet AHJ requirements (as indicated by Policy N1.3.b).

EXTERIOR NOISE LEVELS

The results of Table 1 show that at every measurement location, noise levels exceeded the maximum ambient of DNL 55 dB for residential exterior spaces. Therefore, future developments will need to incorporate noise reducing elements to shield residential outdoor use spaces from noise. As noted by the Noise Element, these strategies could include shielding from the building mass (i.e., locating them interior to the project) and/or grading. Strategies such as sound-reducing noise barriers might be needed to meet the criterion in some cases, especially for sites near I-280 and Highway 84.

* * *

This concludes our noise study for the Town of Woodside Housing Element sites. Please contact us with any questions.

Best,

SALTER

Michael Hoeft
Senior Consultant

Alex Salter
Vice President

Enclosures as Noted

Cc: Sage Schaan (sschaan@woodsidetown.org)
Andrew Hill (andrew@dyettandbhatia.com)

Salter

San Francisco

San Jose

Los Angeles

Honolulu

Seattle

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WOODSIDE HE SITE STUDIES
PROJECT SITE LOCATIONS

FIGURE 1

Salter #	MRH/AKS
22-0584	04.30.24

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San Jose

Los Angeles

Honolulu

Seattle

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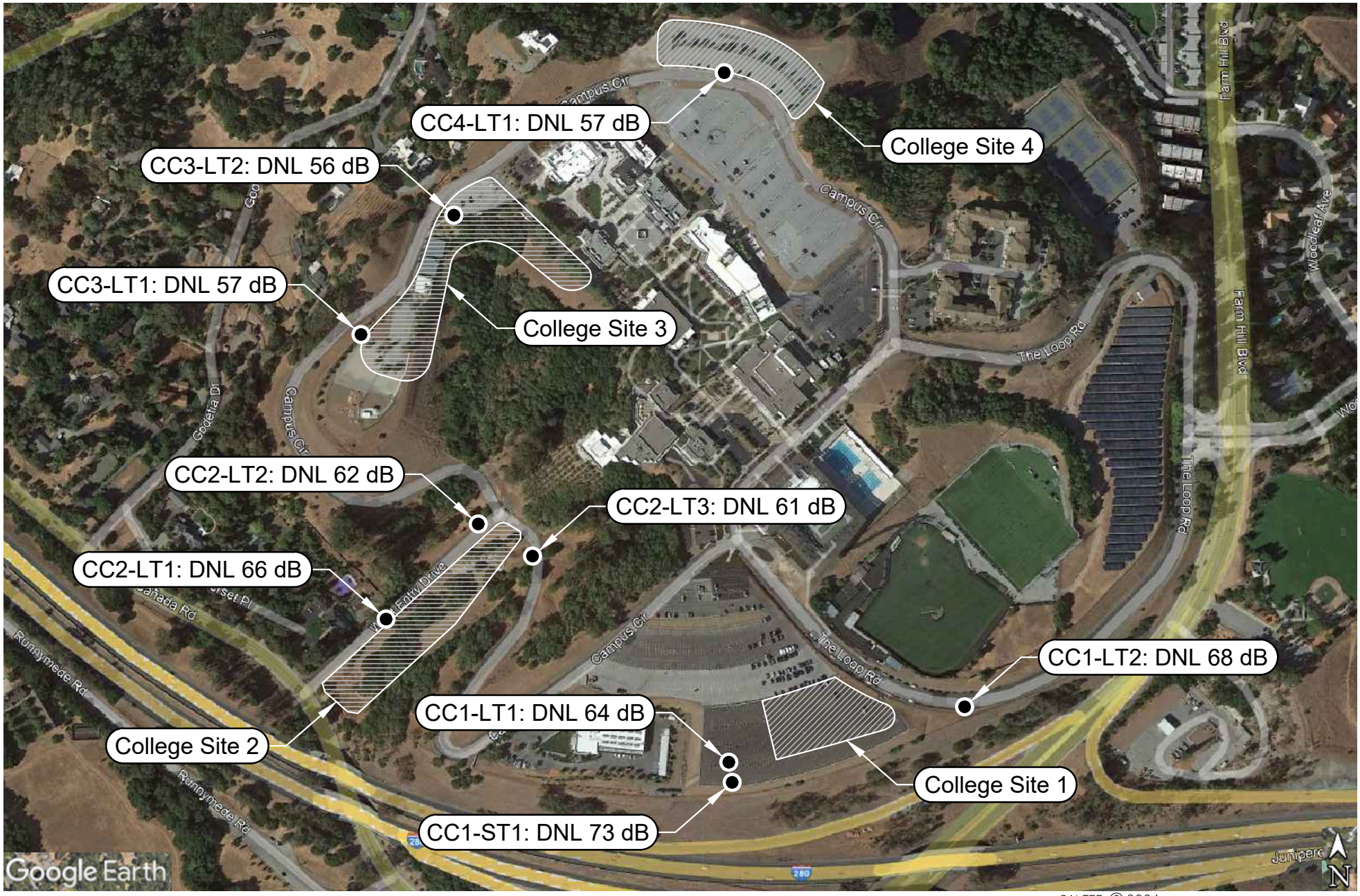

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WOODSIDE HE SITE STUDIES MEASUREMENT LOCATIONS AND MEASURED NOISE LEVELS

FIGURE 1A

Salter #	MRH/AKS
22-0584	04.30.24

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San Francisco

San Jose

Los Angeles

Honolulu

Seattle

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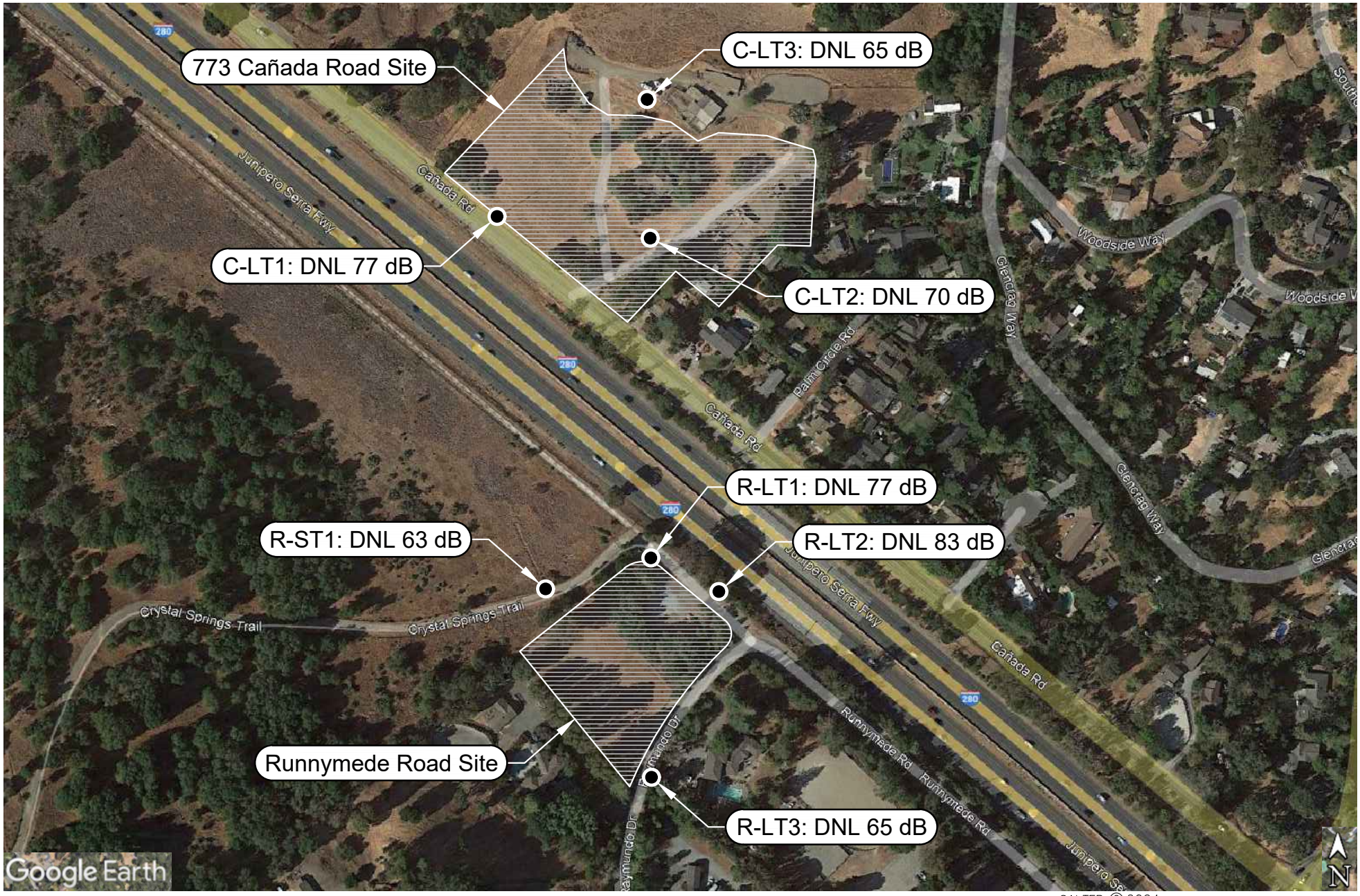

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WOODSIDE HE SITE STUDIES MEASUREMENT LOCATIONS AND MEASURED NOISE LEVELS

FIGURE 1B

Salter #	MRH/AKS
22-0584	04.30.24

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WOODSIDE HE SITE STUDIES MEASUREMENT LOCATIONS AND MEASURED NOISE LEVELS

FIGURE 1C

Salter #	MRH/AKS
22-0584	04.30.24

30 April 2023

Kevin Bryant, Town Manager
Town of Woodside
2955 Woodside Road
Woodside, CA 94062
kbryant@woodsidetown.org

Subject: Town of Woodside Housing Element Update
Traffic Increase Noise Analysis
Salter Project 22-0584

Dear Kevin:

This report summarizes potential noise impacts from traffic increases as a result of the Housing Element Update. This is based on traffic data received from Parametrix on 22 August 2023. Our findings are summarized below.

FUTURE NOISE INCREASE ANALYSIS

Table 1 below summarizes the potential increase in noise based on the traffic data.

Table 1: Traffic and Noise Increase Summary

Street	From	To	% Traffic Increase	DNL Increase (dBA)
Runnymede Road	Raymundo Drive	Cañada Road	36.70%	1
Cañada Road	Town Limit (North)	Runnymede Road	16.20%	<1
Cañada Road	Runnymede Road	Woodside Road	11.90%	<1
Portola Road	Family Farm Road	City Limit (South)	11.00%	<1
Portola Road	Woodside Road	Mountain Home Road	10.90%	<1
Mountain Home Road	Woodside Road	Portola Road	10.80%	<1
Kings Mountain Road	Town Limit (North)	Woodside Road	10.70%	<1
Tripp Road	Kings Mountain Road	Woodside Road	10.60%	<1
Elanor Drive	Southgate Drive	Stockbridge Ave	9.90%	<1
Whiskey Hill Road	Woodside Road	Sand Hill Road	9.70%	<1
Manzanita Way	Mountain Home Road	Sand Hill Road	9.70%	<1
Woodside Road	Portola Road	Cañada Road	9.50%	<1
La Honda Road	Skyline Boulevard	Portola Road	9.40%	<1
Sand Hill Road	Portola Road	Whiskey Hill Road	8.10%	<1
Woodside Road	I-280	Alameda de las Pulgas	7.60%	<1
Woodside Drive	High Road	Fernside St	7.50%	<1
Woodside Road	Cañada Road	I-280 Interchange	7.40%	<1
Farm Hill Boulevard	Woodhill Drive	I-280 Interchange	4.50%	<1

DISCUSSION

As shown in Table 1, the maximum anticipated DNL increase due to traffic is 1 dBA along Runnymede Road, and less than 1 dBA for other road segments. The Runnymede Road segment runs adjacent to I-280, and we expect that increases in noise level to this road will not be noticeable compared to noise from traffic along I-280. Other roads are anticipated to increase less than 1 dB, which would not be perceptible.

* * *

This concludes our traffic increase noise analysis for the Town of Woodside Housing Element Update. Please contact us with any questions.

Best,

SALTER

Michael Hoeft
Senior Consultant

Alex Salter
Vice President

Enclosures as Noted

Cc: Sage Schaan (sschaan@woodsidetown.org)
Andrew Hill (andrew@dyettandbhatia.com)

Appendix G

TRAFFIC STUDY

Memo

To: Andrew Hill, Dyett & Bhatia

CC: Sage Schaan and Kevin Bryant, Town of Woodside

From: Jimmy Jessup, Parisi Transportation Consulting

Date: April 21, 2023

Subject: Woodside Housing Element 2023-2031 Draft #2 VMT Impact and CEQA Analysis

This memo summarizes a vehicle miles traveled (VMT) impact analysis that was conducted for housing development associated with the Town of Woodside ("Town") Housing Element 2023-2031 Draft #2 ("Project")[1] The analysis was performed in accordance with guidance from the California Office of Planning and Research (OPR). VMT generated by potential housing units was determined by using the City/County Association of Governments (C/CAG) VMT Estimation Tool, and the analysis accounts for anticipated household and travel characteristics associated with the projected housing units.

The analysis determined that the home-based VMT per resident associated with implementation of the Project is above the threshold of significance and would result in a potentially significant transportation impact. Application of VMT reducing measures for specific projects would reduce Project generated VMT, but not to a level below the threshold of significance.

This memo also includes an assessment of potential Project impacts against the three additional CEQA checklist items for transportation impacts (conformance with applicable plans and policies, potential to increase hazards, and adequacy of emergency access). The Project is determined to result in a less than significant impact against these three additional checklist items.

BACKGROUND

In December 2018, OPR published *Technical Advisory on Evaluating Transportation Impacts in CEQA* ("*Technical Advisory*").[2] These guidelines direct lead agencies on how to evaluate project transportation impacts on the basis of Vehicle Miles Traveled (VMT), as required by Senate Bill

[1] Town of Woodside, *Town of Woodside Housing Element 2023-2031, HCD Transmittal Draft #2*. March 15, 2023. https://www.woodsidetown.org/planning/draft-2-housing-element-hcd-review-public-comment-period-through-march-13. Accessed April 11, 2023.

[2] California Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Issued December 2018. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed Nov 14, 2022.

743. CEQA Guidelines Section 15064.3, subdivision (b),[3] gives lead agencies the ability to set and apply the most appropriate significance thresholds and methodologies for evaluating VMT impacts. VMT screening thresholds and thresholds of significance specific to the Town of Woodside for assessment of land use projects have been recommended in a separate draft memo issued on December 6, 2022.[4] These thresholds have been applied to this analysis.

The Town of Woodside Housing Element 2023-2031 Draft #2 includes a list of housing unit types, affordability levels, and potential sites to accommodate the required Regional Housing Needs Allocation (RHNA) of housing units. This draft RHNA Plan includes a proposed 423 units of housing, consisting of accessory dwelling units (ADUs), single-family dwelling units (SFDs), and multi-family housing developments. The analysis determines the potential transportation-related impacts associated with development of the Project.

WOODSIDE TRANSPORTATION CONTEXT

The Town of Woodside is located on the San Francisco Bay Area Midpeninsula along the foothills and exhibits natural beauty due to wooded hillsides, narrow country roads, natural stream corridors, and scenic vistas, and attracts those seeking to reside in a rural environment.[5] The Town is accessible to major activity centers in the Bay Area along primary highway linkages. This section describes attributes that provide and influence transportation patterns within the Town and between the Town and other vicinities.

Interstate 280 (I-280) is an eight-lane freeway extending from San Francisco to San Jose that provides regional access to the Town. California State Route 84 (Woodside Road) is the primary east-west road in Woodside, running from US 101 in Redwood City to Highway 1 in San Gregorio. The road transitions from four lanes east of I-280 to two lanes west of I-280. Due to the topography, many Woodside roads are steep, narrow, and winding.

The Town has limited bicycle facilities on some roadways consisting of Class II and Class III bikeways (on-street bike lanes and travel lanes shared with motor vehicles, respectively). Designated paved, gravel and dirt pedestrian pathways exist on linkages between neighborhoods. Along many neighborhood roadways, the right of way is shared between pedestrians, cyclists, and automobiles. Woodside also has a system of roadside and off-road equestrian trails throughout Town.

Transit opportunities are limited in Woodside. SamTrans provides bus service on route 278 starting from Cañada College, past Woodside High School, and terminating at the Redwood City Transit Center, connecting to CalTrain service and other SamTrans routes. Route 278 runs between 6 AM

[3] CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, *Guidelines for Implementation of the California Environmental Quality Act*, Article 5, §15064.3(b). December 28, 2018.
[4] Parisi Transportation Consulting, *Recommended VMT Significance Thresholds for Land Use Projects in the Town of Woodside.* Draft memo, December 6, 2022.
[5] Town of Woodside, *General Plan 2012*. January 10, 2012.

and 9 PM, with service frequencies of every 30 minutes during weekday peak morning and afternoon periods, and hourly service frequencies during the remainder of weekdays and on weekends.

In terms of land use patterns, Woodside housing stock is comprised of mostly detached single family dwellings. Two locations are zoned for community commercial land use; Town Center is located at the intersection of Woodside Road and Cañada Road / Whiskey Hill Road, and the Skylonda Center is on the southern edge of Town at the intersection of La Honda Road and Skyline Boulevard.

Due to topography, land use patterns, rural Town character, and lack of public transit access, most residents utilize private vehicles for daily transportation needs.

VMT IMPACT ANALYSIS

ANALYSIS METHODS

To determine VMT impacts of the Project, an "Existing Scenario" and a "Cumulative Scenario" were analyzed. The Existing Scenario reflects existing baseline conditions by determining average home-based VMT per resident generated by households in Woodside. The Cumulative Scenario accounts for the potential of Housing Element 2023-2031 Draft #2 housing units to influence travel patterns in conjunction with effects of other past, current, and likely future land use projects in the Town and region and determines VMT generated by the Project in the year 2031 after forecasted Project completion.

Project generated VMT was determined by using the C/CAG VMT Estimation Tool, which is underpinned by the C/CAG-VTA travel forecasting model. The base model structure was developed by the Metropolitan Transportation Commission (MTC) and was further refined to represent a more detailed reflection of the circulation network and land use patterns in San Mateo County. This model utilizes socioeconomic inputs aggregated into geographic areas called transportation analysis zones (TAZ) to derive VMT estimates. The model can output VMT according to the metric applied by the jurisdiction for impact analysis. For residential land uses in Woodside, VMT is expressed as home-based VMT per resident.

INPUTS AND ASSUMPTIONS

While some RHNA unit allocations are associated with specific parcels, accessory dwelling unit (ADU) housing unit growth is forecasted throughout the Town without specific locations identified. This analysis applies the adequate sites inventory for vacant and non-vacant single-family dwelling (SFD) sites, pipeline projects, and multifamily sites (Appendix G of the Housing Element 2023-2031 Draft #2 Report), while ADUs included in the RHNA Plan were assumed to be developed throughout the Town proportional to existing population distribution. Table 1 displays the housing unit types and locations that were utilized in the Project VMT impact analysis.

Table 1: Housing Element Summary for VMT Impact Analysis Input

Site	Housing Type	Housing Units
Vacant Single-Family Sites	SFD	105
Non-Vacant Single-Family Sites	SFD	44
Pipeline Projects	SFD^	30
Cañada College	Multifamily	75
ADUs @ 15 units annually*	ADUs*	120
773 Cañada Road	SFD	16
High Road	SFD	16
Runnymede Road / Raymundo Drive	Multifamily	17
	Total	**423**

Source: Town of Woodside Housing Element 2023-2031 Draft #2 Report, March 2023. SFD = Single Family Dwelling. ADU = Accessory Dwelling Unit.
^Note: Some Pipeline projects include associated ADUs
*Note: For this analysis, ADUs are distributed throughout the Town in proportion to existing population distribution.

To perform the VMT analysis, housing units were assigned to the TAZ associated with each unit's parcel, except for ADUs, which were distributed to TAZs within Town as described above. Vehicle trip generation and household size adjustments to the model were made to reflect Project implementation characteristics and assumptions. Vehicle trip generation rates were estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th edition* for SFDs (single-family detached housing, ITE Land Use Code 210), Cañada College student housing (low-rise off-campus student apartments, ITE Land Use Code 225) and for multi-family units and ADUs (low-rise multifamily housing, ITE Land Use Code 220).[6] Average unit occupancy of two beds per room for Cañada College housing was based on preliminary concept plans. Average household size of SFDs and multifamily units was assumed to be consistent with that of San Mateo County, and average household size of ADUs was assumed to be 1.5, based on an ADU inventory split of one-person households and two-person households.[7]

VMT THRESHOLDS OF SIGNIFICANCE

As the Project is a programmatic update of the Woodside General Plan and includes multiple opportunity sites, it does not meet any VMT screening thresholds and is therefore subject to a detailed VMT analysis, with the following threshold of significance:

[6] Institute of Transportation Engineers, *Trip Generation Manual, 11th edition*, 2021.
[7] Southern California Association of Governments, *Regional Accessory Dwelling Unit Affordability Analysis*. https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527. Accessed Nov 14, 2022.

- Residential projects: a proposed project that exceeds a project generated level of 15 percent below existing Town average home-based VMT per resident may indicate a significant transportation impact.

Town average VMT was calculated based on VMT estimates from the C/CAG-VTA travel demand model. Overall baseline Woodside residential VMT was calculated as 26.0 daily home-based VMT per resident in 2020. Figure 1 shows average daily home-based VMT per resident for each TAZ based in 2020. The TAZ corresponding to portions of Woodside west of Cañada Road / Whiskey Hill Road currently exhibits VMT above the Town average (32.2 compared to 26.0 home-based VMT per resident), while the portions of Woodside east of Cañada Road / Whiskey Hill Road all generate less VMT than the Town average.

The threshold of significance for determining VMT impacts is 15 percent below baseline Town average, or 22.1 home-based VMT per resident.

VMT RESULTS

As displayed in Table 2, in the Cumulative Scenario the Project would generate daily home-based VMT per resident of 24.8, which represents a reduction of 4.6% from the baseline Town average of 26.0. This reduction would be primarily due to the fact that planned multifamily housing developments are generally located in TAZs that exhibit VMT per resident at rates lower than the Town average, and due to the specific circumstances of Cañada College student housing, whose residents would be located in close proximity to college facilities and would generate less and shorter vehicle trips than the average Town resident.

However, Project generated home-based VMT per resident of 24.8 would be higher than the threshold of significance (22.1), and hence indicate that the Project would result in a potentially significant transportation impact requiring mitigation. If mitigation measures would reduce Project generated daily home-based VMT per resident by an additional 10.4% from Town average, or 2.7 daily VMT per resident, the resulting VMT figure would be under the threshold of significance. These results indicate that the Project would result in a potentially significant transportation impact requiring mitigation.

Table 2: Project Generated VMT, Unmitigated

Scenario	Description	Threshold of Significance	Change from Town Average	Below Threshold of Significance?
Existing (2020)	Town Average Baseline VMT	26.0	-	-
Threshold of Significance	15% below Town Average VMT	22.1	-15.0%	-
Cumulative (2031)	Project Generated VMT	24.8	-4.6%	No

Source: C/CAG-VTA Travel Model, Parisi Transportation Consulting, 2023. Note: All VMT figures reflect home-based VMT per resident. Adopted threshold of Significance is equivalent to 15% below Town average.

VMT MITIGATION MEASURES

The C/CAG *SB 743 Implementation Decisions* whitepaper describes various VMT mitigation options and associated levels of demonstrated effectiveness within the context of regional VMT impacts and complexity of underlying factors influencing VMT generation in San Mateo County.[8] General Plan aspects such as the Woodside Housing Element Update have two primary avenues for reducing VMT, either through: 1) aspects related to the built environment such as land use mix, density, and transportation infrastructure, or 2) through programs that reduce VMT of individual projects, such as a transportation demand management (TDM) program. The California Air Pollution Control Officer Association (CAPCOA) has recently updated typical VMT reduction effectiveness of commonly applied TDM measures.[9]

Considering the Project characteristics, the first approach for reducing VMT addresses overall programmatic built environment aspects that would reduce the VMT impact of Housing Element Update housing units. In Woodside, which hosts a limited public transit network and relatively dispersed residences, VMT reduction can be achieved principally through increasing the number of housing units developed in existing low-VMT areas of Town. The areas west of Cañada Road / Whiskey Hill Road generate high VMT per resident, whereas the easternmost parts of Town generate lower VMT per resident (Figure 1).

With this understanding, facilitating development of single-family dwellings and ADUs in the eastern portion of Woodside would serve to reduce Town average VMT per person as well as Project-generated VMT. However, application of mitigation measures that seek to incentivize VMT reduction through land use development is challenging and resulting quantifiable attribution of policies are not supported by documented research.

The second approach for reducing VMT is through individual development TDM programs. Individual multifamily housing developments that do not meet VMT screening thresholds will undertake a detailed VMT impact analysis against the Town guidelines and will be subject to TDM measures to demonstrate necessary VMT reduction as per the C/CAG CMP and TDM requirements.[10] VMT reduction effectiveness estimates will vary according to individual project location, proximity to alternative modes of transportation, and other characteristics. TDM measures and VMT reduction shall be based on documented sources such as the CAPCOA *Handbook*, C/CAG 743 *Implementation Decisions* whitepaper, and the C/CAG *TDM Policy Update Approach* report.[11]

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[8] C/CAG of San Mateo County, *SB 743 Implementation Decisions*. September 29, 2021. https://ccag.ca.gov/sb-743-los-to-vmt/. Accessed November 21, 2022.
[9] California Air Pollution Control Officers Association, *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. Issued Dec 2021.
[10] C/CAG of San Mateo County, *Congestion Management Program.* Issued Dec 2021. All land use projects that generate more than 100 average daily trips require implementation of a TDM Plan and vehicle trip reduction targets.
[11] C/CAG of San Mateo County, *Transportation Demand Management Policy Update Approach.* Issued March 2021.

MITIGATION MEASURE TRANS-1: IMPLEMENT VMT REDUCTION MEASURES FOR CAÑADA COLLEGE HOUSING DEVELOPMENT

The student housing planned for Cañada College shall develop a transportation demand management plan outlining VMT reducing measures. These measures may include, but are not limited to, the measures listed below:

- Unbundle parking costs (i.e., separate parking costs from property costs)
- Subsidize resident transit passes for use on SamTrans route 278
- Provide transit improvements, such as providing bus shelter or contributing land on the project site for bus stop along SamTrans route 278 (depending on project location within the campus)
- Provide on-site car share or vehicle fleet, bike share, or scooter share programs
- Provide secure bike storage facilities and/or a bike repair station on-site
- Incorporate bicycle and pedestrian access to college facilities in site design, including connectivity to the existing free Cañada College shuttle stop
- Assign or hire a TDM Coordinator to provide education and marketing resources for residents and visitors

MITIGATION MEASURE TRANS-2: IMPLEMENT VMT REDUCTION MEASURES FOR INDIVIDUAL PROJECTS

Individual projects of more than five housing units shall develop a transportation demand management plan outlining VMT reducing measures. These measures may include, but are not limited to, the measures listed below:

- Provide off-street private parking less than zoning code required minimum (4 parking spaces for each main dwelling unit)[12]
- Provide on-site car share or bike share programs
- Provide secure bike storage facilities
- Incorporate bicycle and pedestrian access in site design
- Offer family-supportive amenities to assist with challenges faced by families making trips without private vehicle, such as on-site secure storage of personal car seats, strollers, cargo bicycles, and shopping carts

[12] Town of Woodside Municipal Code, Title XV, Sec. 153.223. https://library.municode.com/ca/woodside/codes/municipal_code?nodeId=CD_ORD_TITXVLAUS_CH153ZO_153.220OADPALORE_S153.223MINUREAUPASP. Accessed November 30, 2022.

- Offer a guaranteed ride home program for residents who opt not to own and park a car

It is widely recognized that reducing VMT through TDM programs in a largely suburban or rural setting without ample transportation alternatives presents challenges. Because TDM measures are more effective in areas where varied land uses are closely located and alternative means of transportation to personal vehicles are readily available, the application of TDM programs in Woodside may not be as effective as those in more dense and urban settings. The CAPCOA *Handbook* notes that TDM measures in suburban settings such as Woodside are generally expected to result in net VMT reduction of 10 percent or less, and accordingly, the C/CAG-VTA travel demand model estimates a maximum VMT reduction of approximately 10 percent for developments in the Woodside TAZs if the above TDM measures are implemented.

Table 3: Project Generated VMT, with Mitigations

Scenario	Description	Threshold of Significance	Change from Town Average	Below Threshold of Significance?
Existing (2020)	Town Average Baseline VMT	26.0	-	-
Threshold of Significance	15% below Town Average VMT	22.1	-15.0%	-
Cumulative (2031)	Project Generated VMT (Unmitigated)	24.8	-4.6%	No
	Project Generated VMT (With Mitigations)	24.1	-7.3%	No

Source: C/CAG-VTA Travel Model, Parisi Transportation Consulting, 2023. Note: All VMT figures reflect home-based VMT per resident. Adopted threshold of Significance is equivalent to 15% below Town average.

For Project VMT reduction analysis, TDM measures are applied to the 108 multifamily housing units included in the Housing Element 2023-2031 Draft #2 Plan. As displayed in Table 3, applying estimated TDM measures and associated VMT reductions to these units would reduce Project-generated home-based VMT per resident from 24.8 to 24.1, which remains above the threshold of significance (22.1).

Due to the inability to determine that overall Project home-based residential VMT per capita can be reduced below the threshold of significance despite implementation of VMT reduction measures, the Project transportation-related impact is considered significant and unavoidable with mitigation.

CEQA ANALYSIS RESULTS

The California Code of Regulations Guidelines for Implementation of CEQA includes a sample environmental significance criteria checklist form that may be used to foster agency review.[13] Table 4 is a summary of the Woodside Housing Element Update CEQA determination for each of the criteria that could constitute potential transportation-related environmental impacts. A discussion of each finding follows.

Table 4: CEQA Checklist Impact Determination

Question	CEQA Determination
Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less Than Significant Impact
Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Potentially Significant Impact
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant Impact
Would the project result in inadequate emergency access?	Less Than Significant Impact

Source: Parisi Transportation Consulting, 2023

WOULD THE PROJECT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES?

Transportation aspects of land use projects are shaped by adopted plans and policies at various levels of government and agencies. These plans and policies are consulted as part of the Housing Element Update to evaluate against applied principles and efforts to mitigate environmental effects. Discussion of this Project with respect to the framework established by federal, state, regional, and local plans and policies for purpose of mitigating significant environmental effects is presented in this section. This section includes rationale behind the conclusion that the proposed Project does not conflict with any described plans and policies and presents no CEQA impact. Policies and plans addressing the transportation aspects of this Project include:

- State: Senate Bill 743: Senate Bill 743, signed into law in 2013, mandated a change in CEQA guidelines to utilize VMT as opposed to vehicle flow or traffic congestion as a more appropriate metric for assessing impacts associated with projects, in line with goals of helping to achieve climate commitments, improving health and safety, and prioritizing

[13] CEQA Guidelines, California Code of Regulations, Title 14, Division 6, Chapter 3, *Guidelines for Implementation of the California Environmental Quality Act*, Appendix G. December 28, 2018

co-located land uses. This Project ensures compliance with this technical advisory by following the OPR *Technical Advisory* guidelines in its VMT analysis.

- Regional: Plan Bay Area 2050 (2021): In 2021, the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050 as the official regional long-range transportation and land use plan for the Bay Area.[14] Strategies in this plan include encouraging land use patterns that foster shared transportation modes, lessen the share of single-occupancy work commutes, and reduce greenhouse gas emissions. The Project's focus on multifamily housing sites with transit access and overall housing unit share in existing low-VMT areas is in line with the emission reduction objectives of Plan Bay Area 2050.

- Regional: C/CAG Congestion Management Program (2021): The C/CAG is the congestion management agency for San Mateo County and develops and updates its mandated short-range Congestion Management Program (CMP) every two years to describe strategies to assess and monitor the performance of the county's transportation system, address congestion and improve performance of a multimodal system among local jurisdictions.[15] The policy for land use projects applies to developments that generate more than 100 daily vehicle trips on the CMP roadway network to develop TDM measures to reduce vehicle trips. Future projects within the Housing Element Update that generate more than 100 daily trips would be obliged to comply with C/CAG CMP requirements.

- Local: Woodside General Plan (2012): The Woodside General Plan is a comprehensive long-range guide for future development of the Town. [16] The General Plan includes various goals and policies that address the Town roadway network, traffic, and other transportation facilities. The Circulation Element includes goals for development of a circulation system that balances system user needs, maintains safe roadways, expands the bikeway network and pedestrian pathways, and encourages and supports vehicle trip reduction. Development of Housing Element Update housing units would result in increased use of the circulation system, and integration of driveway entrances, curb cuts, and upgrades to facilities would be subject to applicable design standards and guidelines related to roadways, bikeways, sidewalks, and equestrian trails. Required TDM plans associated with multifamily housing developments and facilitation of ADU development in areas of existing low VMT is consistent with policies in the General Plan.

[14] Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050, A Vision for the Future*. Adopted October 2021.
[15] City/County Association of Governments of San Mateo County, *Congestion Management Program.* December 2021.
[16] Town of Woodside, *General Plan*. Adopted January 2012.

Impact Conclusion

The Project would not conflict with any programs, plans, ordinances, or policies related to the transportation network. The impact of the Project is therefore determined to be less than significant.

Mitigation Measure

No mitigation is required.

WOULD THE PROJECT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B)?

See the VMT Results section for full discussion of the VMT impact analysis performed for the Project.

Impact Conclusion

The Project would result in a potentially significant impact after mitigation measures are applied.

Mitigation Measures

See section VMT Mitigation Measures for description of Mitigation Measures TRANS-1 and TRANS-2, which are required to reduce Project generated VMT.

WOULD THE PROJECT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G. FARM EQUIPMENT)?

The Project does not include specific transportation network design considerations that may potentially increase sharp curves or other geometric hazards. Off-site transportation network alterations as a result of specific housing development projects would be considered as part of the project planning process. Other improvements to the circulation network undertaken by the Town would be implemented over time and in accordance with adopted design standards and guidelines.

All housing units proposed as part of the Housing Element Update are intended for residences within single-family or multifamily dwellings and are near existing residential land uses. Vehicle trips generated by these units would be primarily personal vehicle trips and do not introduce or present an incompatible transportation mode use.

Impact Conclusion

As the Project is not incompatible with surrounding land uses, there are no off-site road geometric design alterations, and potential hazards associated with circulation patterns will be addressed by individual projects, the Project would result in a less-than-significant impact.

Mitigation Measure

No mitigation is required.

WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?

Interstate 280, Woodside Road, and arterial roads of Woodside are designated as evacuation routes for use in the event of an emergency and shall be maintained in usable conditions at all times. Individual developments associated with the Project would be required to be assessed for impact to emergency vehicle access and designed in accordance with all applicable design standards for emergency access within and around the site.[17] Requirements include considerations for very high severity fire hazard zone developments, minimum lane width of the internal on-site drive aisles to allow for passing of emergency vehicles within multifamily developments, and fire safety plan review and approval. Potential impacts to roadway emergency access during construction would be addressed through the construction traffic control plan and reviewed and approved by appropriate City departments.

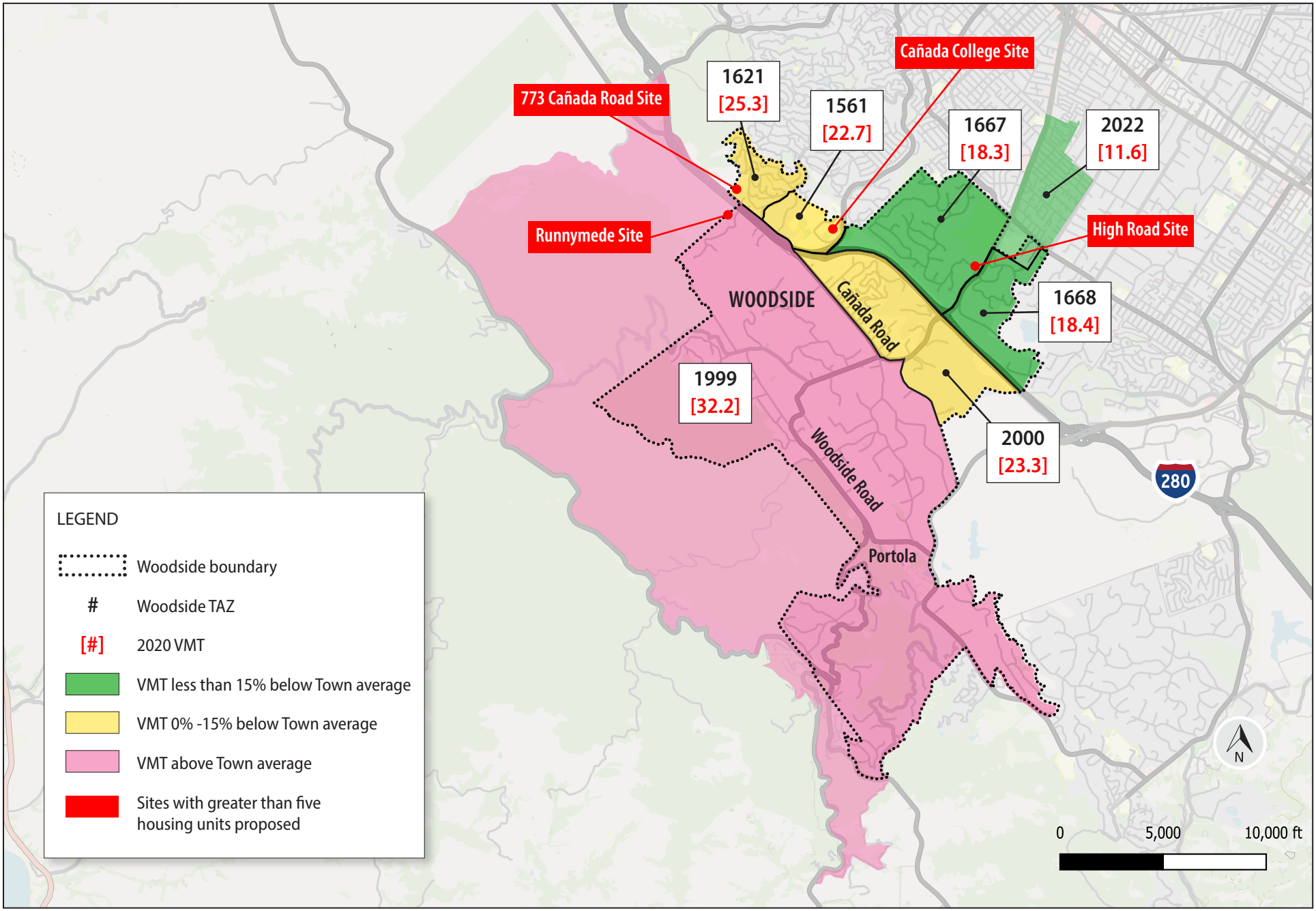
Impact Conclusion

As adequate emergency access is included as part of the Town requirements for individual projects, which will be reviewed by local officials as part of design review, the Project has a less-than-significant impact with respect to emergency access.

Mitigation Measure

No mitigation is required.

[17] Woodside Municipal Code, Article III, Sec. 34.51. https://library.municode.com/ca/woodside/codes/municipal_code?nodeId=CD_ORD_TITIIIAD_CH34FI_ARTIIIROPR_S34.51PUFILI, Accessed Nov. 28, 2022.



Source: C/CAG VMTE Estimation Tool. Map data from OpenStreetMap

Figure 1: Woodside Existing 2020 Home-based VMT Per Resident by TAZ

DYETT & BHATIA
Urban and Regional Planners