

EXHIBIT “A”

Response to IS/MND Comments

memorandum

date January 15, 2016

to San Mateo County Department of Public Works

from Environmental Science Associates

subject Response to Comments on the Draft Initial Study/Mitigated Negative Declaration for the Updated Alpine Road Trail Improvements Project

1. Introduction

This memorandum has been prepared to respond to comments received by San Mateo County (County) on the 2015 Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Alpine Road Trail Improvements Project (proposed project). An IS/MND is an informational document prepared by a Lead Agency, in this case, the County, that provides environmental analysis for public review and for the agency decision-makers to consider before taking discretionary actions related to any proposed project that could have a significant effect on the environment.

As described more fully in the 2015 Draft IS/MND, some of the work proposed for the Alpine Road Trail Improvements Project was analyzed in a draft IS/MND published by the County in August 2013. However, some elements of the project have since changed. Therefore, the County prepared the 2015 Draft IS/MND to evaluate the potential effects of the entire project, as described in the 2015 Draft IS/MND Project Description. The 2015 Draft IS/MND analyzed the impacts resulting from the proposed project and where applicable, identified mitigation measures to minimize the impacts to less-than-significant level. Therefore, the County Board of Supervisors is proceeding to adopt the 2015 IS/MND for the proposed project.

Prior to the approval of the proposed project, the County Board of Supervisors must certify that the Draft IS/MND adequately discloses the environmental effects of the proposed project, and that the IS/MND is the appropriate environmental document for the proposed project and has been completed in conformance with the California Environmental Quality Act (CEQA).

This memorandum for the Alpine Road Trail Improvements Project 2015 Draft IS/MND presents:

- The name of the person and organization commenting on the 2015 Draft IS/MND,
- Responses to the received comments, and
- Revisions to the text of the 2015 Draft IS/MND.

This memorandum, in combination with the 2015 Draft IS/MND, completes the Final IS/MND.

2. CEQA Process and Comments Received

In accordance with Section 15073 of the CEQA Guidelines, the County submitted the Draft IS/MND to the State Clearinghouse for a 30-day public review period starting on October 14, 2015. In addition, the County circulated a Notice of Intent to Adopt the Draft IS/MND to interested agencies and individuals. The County subsequently extended the public review period, which ended on November 27, 2015. During the public review period, the County received nine comment letters on the Draft IS/MND. **Table 1** lists the entities that submitted comments on the Draft IS/MND during the public review period. The comment letters with annotated comments are attached.

TABLE 1
PERSONS COMMENTING ON DRAFT IS/MND

Comment Letter Code	Commenter Name	Date Received
A	California Department of Transportation (Patricia Maurice)	11/3/2015
B	Committee for Green Foothills (Lennie Roberts)	11/13/2015
C	County of Santa Clara Department of Parks & Recreation (Hannah Cha)	11/13/2015
D	Stanford, Land Use and Environmental Planning (Catherine Palter)	11/13/2015
E	Janet Davis	10/17/2015
F	Joe Hedges	10/15/2015
G	John Langbein	10/4/2015
H	John Pencavel	10/20/2015
I	Diane Schiano and Rick Voreck	10/15/2015

In accordance with CEQA Guidelines Section 15074(b), the County Board of Supervisors considers the Draft IS/MND together with comments received during the public review process prior to adopting the Draft IS/MND and approving the project. The CEQA Guidelines do not require the preparation of a response to comments document. However, to assist the Board in considering the comments that were received on the project and identifying potential significant effects not already evaluated in the Draft IS/MND, the County has prepared this memorandum in response to comments received. Based on the review of the comments received, no new, potentially significant impacts beyond those identified in the Draft IS/MND would occur. All potential impacts identified in the Draft IS/MND were determined to be either less-than-significant or less-than-significant with mitigation.

3. Response to Comments

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711



Serious Drought.
Help save water!

November 3, 2015

SM280157
SM-280-R0.1

Mr. Gil Tourel
San Mateo County Public Works
555 County Center, 5th Floor
Redwood City, CA 94063-1665

Dear Mr. Tourel:

Alpine Road Trail Improvements Project – Revised Mitigated Negative Declaration

Thank you for continuing to include the California Department of Transportation (Caltrans) in the review of the above project. Our comments concerning encroachment permits and cultural resources were adequately addressed in your January 24, 2014 email.

A-1

Transportation Management Plan - The Revised Mitigated Negative Declaration, 2.16 Transportation/Traffic, page 2-77, discusses ingress and egress of truck traffic to the construction sites by intermittently closing the right-turn lane of the Interstate-280 (I-280) northbound off-ramp. Please submit a Transportation Management Plan (TMP) or construction traffic impact study (TIS) since traffic restrictions will be needed on or affecting the state highway system. The TMP or construction TIS must be approved by Caltrans prior to construction. TMPs must be prepared in accordance with *California Manual on Uniform Traffic Control Devices* (CA-MUTCD). Further information is available for download at the following web address:
<http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd2014/Part6.pdf>

A-2

Please ensure that such plans are also prepared in accordance with the transportation management plan requirements of the corresponding jurisdictions. For further TMP assistance, please contact the Office Traffic Management Plans/Operation Strategies at (510) 286-4579.

As soon as it is available, please send a copy of the project's Conditions of Approval. Please feel free to call or email Sandra Finegan at (510) 622-1644 or sandra.finegan@dot.ca.gov with any questions regarding this letter.

Sincerely,

for

PATRICIA MAURICE
District Branch Chief
Local Development – Intergovernmental Review

Response to Letter A. California Department of Transportation, Patricia Maurice

Response to Comment A-1

This comment acknowledging County responses to comments previously submitted by the California Department of Transportation (Caltrans) in 2014 is noted.

Response to Comment A-2

This comment has been noted. The County anticipates submitting a Transportation Management Plan (TMP) along with an application for an encroachment permit for this project. As described in the Draft IS/MND (page 2-78), Mitigation Measure TRA-1 would require the County's construction contractor(s) to prepare and implement a traffic control plan to reduce traffic impacts on the roadways at and near the work sites, as well as to reduce potential traffic safety hazards and ensure adequate access for emergency responders and construction vehicles, as appropriate. The measure would further require the County and construction contractor(s) to coordinate development and implementation of this plan with the Town of Portola Valley, City of Menlo Park, and Caltrans, as appropriate. Finally, the measure states the traffic control plan shall conform to the California Manual on Uniform Traffic Control Devices (MUTCD), Part 6 (Temporary Traffic Control) (Caltrans, 2014), to the extent applicable. Thus, project implementation would include development of a TMP that is consistent with the requests Caltrans indicates in this comment.



COMMITTEE FOR
GREEN FOOTHILLS

November 13, 2015

Gil Tourel, Principal Civil Engineer
Department of Public Works
555 County Center, 5th Floor
Redwood City, CA 94063

Re: Alpine Road Trail Improvement Project, Draft Mitigated Negative Declaration

Dear Mr. Tourel,

Thank you for the opportunity to comment on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the above-referenced project. On behalf of Committee for Green Foothills (CGF), I have the following comments:

Section 1.2: Project Background, page 1-2, The Introduction refers to the Lower Alpine Road Trail as a multi-use trail. Throughout most of the proposed project area, the existing trail can hardly be characterized as multi-use. The existing width is insufficient to be designated as “multi-use”; the proposed project will not be expanding the width beyond the current footprint. Alpine Road has Class 2 bike lanes adjacent to the travel lanes. In order to avoid confusion, references in the IS/MND to “multi-use” trail should be deleted.

Section 1.3: Project Objectives, page 1-2: As stated, the main project objectives are to rehabilitate the segment of existing Lower Alpine Trail within unincorporated San Mateo County, to stabilize the bank along the trail and Los Trancos Creek at three locations to prevent further erosion and trail narrowing, to protect adjacent critical utilities as well as Alpine Road, and to improve the trail surface for trail users. A major section of the trail is located next to Los Trancos Creek and its riparian corridor, and is adjacent to Alpine Road, a designated Scenic Road (SMC General Plan Table 4.6). Please correct the IS/MND to include this designation by the County. In recognition of Los Trancos Creek’s important biological and scenic resources, CGF requests that the Project include a new Objective: to minimize impacts upon the creek’s sensitive stream and riparian habitats and to maintain the scenic quality along Alpine Road.

Section 1.4.2 Proposed Improvements, pages 1-3 to 1-14: CGF appreciates the limiting of trail rehabilitation to within its existing footprint rather than expanding it. We note that expansion beyond the existing footprint could create significant impacts that would require substantial mitigations. We also appreciate the nuanced shifting of the trail 1-2 feet away from specific trees to protect their trunks and roots. In order to prevent damage to tree trunks and roots along the trail during construction/rehabilitation, tree protection measures such as exclusion fencing/netting/ trunk wrapping should be included either as a mitigation measure or as a condition of approval.

Section 1.4.3 Project Construction, pages 1-14 to 1-16: The potential location for staging equipment at the northwest quadrant of the I-280 interchange along the southbound side of Alpine Road is currently being used as a staging area for a Caltrans project, and would also be suitable for the Alpine Road Trail Project. However, in order to minimize impacts from site disturbance, the

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footprint of this staging area and access thereto should be kept to the minimum necessary, gravel or other suitable pervious surface should be used where construction vehicles and equipment will be operated, and the on-site storm drain inlet should be protected using appropriate silt fencing. Invasive species in this quadrant, which include milk thistle, stinkwort and yellow star thistle, should be controlled by mowing and/or mulching.

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B-6

Section 2-1 Aesthetics, pages 2-4 to 2-6: The IS/MND states that Alpine Road is a rural road that provides scenic views, and also notes that this segment is within Portola Valley's Alpine Scenic Corridor Plan, a Sub-Area of the Town of Portola Valley's General Plan. Alpine Road is also designated as a Scenic Road in the San Mateo County General Plan (see comment re: Section 1.2 Objectives above). The primary views that contribute to the scenic quality along this stretch of Alpine Road are of mature coast live oaks, valley oaks, and riparian vegetation along Los Trancos Creek, including native willows and buckeyes. Removal of 41 trees and Site 2 and 42 trees at Site 3 as well as riparian understory plants on both sides of the creek will significantly impact the scenic views. Please provide specific details as to the location and species of each of the trees proposed for removal and other vegetation that will be removed (see also comments on Section 2-4 Biological Resources).

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B-7

Section 2-4 Biological Resources, pages 2-29 to 2-30: The discussion under question e regarding conflicts with policies or ordinances such as a tree preservation policy or ordinance states that 41 trees ranging in diameter from 6 to 56 inches at Site 2 and 42 trees ranging in diameter from 6 to 20 inches at Site 3 would be removed during construction. The IS/MND should include specific details as to what species of native tree(s) are to be removed. Mitigation Measure BIO-2 should include replacement in kind of those particular species, in addition to the more general requirement for riparian vegetation replacement. Figure 5 shows a 72" diameter Eucalyptus immediately adjacent to the vegetated Crib Wall at Site 2. It is unclear whether this tree is to be preserved, but the project will likely cut some of its primary roots and compromise its stability; CGF recommends that it be removed. Mitigation Measure BIO-2 requires a Riparian Restoration Plan to be submitted to the Corps, USFWS, CDFW and RWQCB but does not require approval by these agencies; please correct this. The success criteria of "project site is not dominated by invasive vegetation" is vague and unenforceable, a more specific standard should be used.

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B-12

Thank you again for the opportunity to comment. CGF thanks the Board of Supervisors for providing funding and looks forward to this project's implementation. Please send notification for consideration of this item by the Board of Supervisors to my home/office address below, or by email.

↑
B-13

Sincerely,



Lennie Roberts, San Mateo County Legislative Advocate
339 La Cuesta Drive
Portola Valley, CA 94028

TABLE 4.6

DESIGNATED STATE AND COUNTY SCENIC ROADS

State Designated Routes

Cabrillo Highway - State Route No. 1 (from southern limits of the City of Half Moon Bay to Santa Cruz County)

Junipero Serra Freeway - Interstate Route No. 280 (from Millbrae to Santa Clara County)

Skyline Boulevard - State Route No. 35 (from State Route 92 to Santa Clara County)

County Designated Routes

Alameda de las Pulgas - (from Woodside Road to Crystal Springs Road)

Alpine Road - (from Alameda de las Pulgas to Portola Road and from Skyline Boulevard to Pescadero Road)

Cabrillo Highway - (from Junipero Serra Freeway to northern limits of the City of Half Moon Bay)

Canada Road

Canyon Road - (from Skyline Boulevard to Easton Drive)

Cloverdale Road

Crystal Springs Road

John Daly Boulevard

Junipero Serra Freeway - (from San Francisco to San Bruno)

Easton Drive - (from Canyon Road to El Camino Real)

Edgewood Road - (from Alameda de las Pulgas to Canada Road)

El Camino Real - (from Easton Drive to Crystal Springs Road)

Gazos Creek Road - (from Cabrillo Highway to Cloverdale Road)

Guadalupe Canyon Parkway

Response to Letter B. Committee of Green Foothills, Lennie Roberts

Response to Comment B-1

This comment regarding the opportunity provided for giving comments on the project is acknowledged.

Response to Comment B-2

The observation by the Committee for Green Foothills that use of the Lower Alpine Road Trail is primarily used by walkers and runners is noted. Regarding the commenter's request for deleting reference to "multi-use", please note that the County of San Mateo Parks Department website¹ indicates that the trail is open to both hikers and bicyclists. Thus, the Draft IS/MND's description of the trail as "multi-use" is appropriate, as the trail is available to pedestrians and bicyclists. The proposed project and project objectives do not seek to change the existing use types or increase the capacity of the trail.

Response to Comment B-3

The commenter correctly notes that the San Mateo County General Plan identifies Alpine Road as a Scenic Road. This General Plan designation is acknowledged in the Draft IS/MND, Section 2.1, Aesthetics (page 2-4). However, for the benefit of the commenter and the general public, the second sentence in response to question 2.1a) on page 2-4 is revised as follows:

The project site is, however, adjacent to Alpine Road, a rural road designated by the San Mateo County as a Scenic Route that provides scenic views (County of San Mateo, 1986).

The commenter also requests the addition of a new objective to the project description related to minimizing impacts upon the creek's sensitive stream and riparian habitats and to maintain the scenic quality along Alpine Road is acknowledged. In accordance with CEQA Guidelines, the statement of objectives should include the underlying purpose of the project. However, while the objectives need not include resource effect minimization; the CEQA impact analysis of the project would identify opportunities to reduce or minimize impacts on resources. In this case, the main objectives of the project are to rehabilitate a segment of the Alpine Road Trail, stabilize the bank along the trail and Los Trancos Creek at three identified locations, prevent further trail narrowing to protect adjacent critical utilities, and improve the trail surface for trail users (see Draft IS/MND page 1-2). Implementation of mitigation measures identified in Section 2.4, Biological Resources, of the Draft IS/MND (pages 2-17 to 2-31) would minimize impacts on stream and riparian habitats and scenic vegetative character to a less-than-significant level; therefore inclusion of a new objective pertaining to minimizing impacts on stream and riparian habitat and scenic quality is not necessary.

Response to Comment B-4

This comment expressing support for limiting trail rehabilitation to existing footprint and shifting the trail 1-2 feet from specific trees is acknowledged.

Response to Comment B-5

The commenter requests that tree protection measures such as exclusion fencing, netting, or trunk wrapping be included either as a mitigation measure or as a condition of project approval. Commenter's concern regarding for tree protection during project construction is noted. The accessways and work areas established for the proposed

¹ County of San Mateo, Department of Parks, Alpine Trail website: <http://parks.smcgov.org/alpine-trail>, accessed November 24, 2015.

project and analyzed in the Draft IS/MND are sufficiently large to allow for the passage and operation of equipment at safe distances from remaining trees. As such, additional tree protection measures would not be required to avoid a substantial adverse effect on biological resources. Nevertheless, as an additional precautionary measure, the County's contractor would install tree protection fencing as suggested by commenter to establish the limits of encroachment around existing trees that would be protected. In response to this comment, the following sentence is added at the end of the section entitled "Construction Access and Equipment" in the Draft IS/MND page 1-17:

Exclusion fencing would be established around trees that would be protected throughout the duration of the construction period.

Response to Comment B-6

The commenter requests that the footprint of the staging area be kept to the minimum necessary and that gravel or other suitable pervious surface should be used where construction vehicles and equipment would be operated. The commenter also requests that the on-site storm drain inlet at this staging area be protected and that invasive species present within the proposed staging area be controlled.

As explained in Draft IS/MND Section 2.9, Hydrology and Water Quality, Mitigation Measure HYD-1 (pages 2-57 through 2-58), the contractor would be required to prepare a comprehensive stormwater pollution and erosion control plan for the project. The plan would be required to comply with County's standard construction specifications, as well as State and Federal requirements. Implicit in these specifications is the County's expectation and contractor's incentive to keep the staging area to the minimum necessary; the contractor would be responsible for containing, maintaining, and restoring disturbed portions of the staging and adjacent areas.

As noted by commenter and described in Draft IS/MND Section 1.4.3, Project Construction (page 1-16), staging of equipment would occur in the northwest quadrant of the I-280 interchange along the southbound side of Alpine Road. This area presently consists of disturbed ruderal grassland and graveled areas, with some limited invasive species presence, used to stage equipment for prior road construction projects. The area within which proposed project staging would occur is pervious and no equipment staging on impervious surfaces is proposed.

Per the County's standard construction specifications, the contractor would be required to contain any polluted runoff that could potentially leave the staging area, including through storm drains, to within the staging area. To achieve this, the contractor would be required to implement best management practices (BMPs) for controlling erosion and runoff. BMPs may consist of straw logs, straw mulch, silt fencing, temporary berms, or any combination of these or other means acceptable to the Engineer to prevent polluted runoff and/or wind erosion. The specifications further require that the BMPs be regularly inspected, maintained, and removed and disposed of properly upon completion of construction.

The County's standard construction specifications also require that staging area surfaces be returned to their approximate pre-construction condition. Per the specifications, staging areas would be covered with six to twelve inches of three-inch un-compacted drain rock (unless other material is approved in advance in writing by the Engineer) and any adjacent areas disturbed by the contractor would be smoothed and mulched, which would control the potential transfer of invasive species. Any straw used for mulch would be required to be free of oat or weed seed to prevent the spread of invasive species.

Response to Comment B-7

The commenter notes that Alpine Road is a Scenic Road as designated by San Mateo County. Please see Response to Comment B-3 above.

Commenter asserts that the removal of 41 trees at Site 2 and 42 trees at Site 3 as well as riparian understory plants on both side of the creek would significantly impact the scenic views. The Draft IS/MND acknowledges that the project, including tree removal, would affect views in the vicinity of Sites 2 and 3. Section 2.1, Aesthetics, of the IS/MND (pages 2-6 through 2-7) includes a discussion of the effects of tree removal on scenic views. The document notes that the removal of these trees would thin the riparian canopy in the work areas and could open views to land uses beyond (east of) Site 2, potentially making visible greater portions of the Boething Treeland Farm and hills beyond. Such changes could be noticeable to motorists traveling on Alpine Road and trail users. However, as also noted in the analysis, these views would be brief, as motorists and trail users would be in motion and have only fleeting views of the project sites. The same would be the case for motorists traveling along I-280 at speeds of up to 65 miles per hour. Since the areas from which trees would be removed are densely vegetated, the removal of these trees would not substantially degrade the riparian corridor as a scenic resource.

As noted in Section 1, Project Description, of the Draft IS/MND (pages 1-10 and 1-13), in accordance with San Mateo County's Significant Tree Ordinance and Santa Clara County Tree Preservation and Removal Ordinance, trees measuring 12 inches in diameter at breast height (dbh) or greater would be replaced at a ratio of 3:1. Trees measuring less than 12 inches dbh would be replaced at a ratio of 1:1. While the replacement trees would take several years to reestablish, the scenic character of the Los Trancos creek riparian corridor would not be substantially degraded in the interim. Through conformance with the above-named ordinances and with replacement plantings, once established, the vegetative scenic character of the impacted area would be restored to its approximate pre-construction condition. For these reasons, the Draft IS/MND concludes the effect on scenic resources would be less than significant.

Commenter also requests specific details regarding the locations of trees to be removed. For commenter's reference, a plan showing tree location and types is added to the Draft IS/MND as Appendix D (see Attachment 1). The Table of Contents in the Draft IS/MND (page i) is revised as follows:

Appendices

A. Summary of Hydraulic Modeling Analysis	A-1
B. Geotechnical Engineering Investigation	B-1
C. Air Quality Emissions Estimates	C-1
D. <u>Tree Removal Plan</u>	<u>D-1</u>

Response to Comment B-8

The commenter requests specific details regarding the types of native trees to be removed and their respective locations. Please see response to Response to Comment B-7.

Response to Comment B-9

Commenter requests that Mitigation Measure BIO-2 be revised to include an in-kind replacement requirement for those particular species of trees that would be removed. Environmental Checklist question 2.4a) asks whether the project would have a significant adverse effect on candidate, sensitive, or special status species. The associated discussion in the Draft IS/MND explains that the project could have significant adverse effects certain species with potential to occur within the project area, including steelhead, California red-legged frog, and western pond

turtle. As discussed in the Section 2.4, Biological Resources, implementation of Mitigation Measure BIO-2, which includes elements such as the development of a restoration plan, revegetation with native plant species, and regular monitoring, among others, is designed to reduce potential effects on these specific species. In-kind replacement of common tree species, such as Eucalyptus, would not be required to address impacts to candidate, sensitive, or special status species.

However, the analysis in response to question 2.4e) does address overall tree removal as it relates to potential conflicts with tree preservation policies or ordinances. As explained in the Draft IS/MND (pages 2-29 and 2-30), the project would comply with the provisions of the San Mateo County Significant Tree Ordinance and the Santa Clara County Tree Preservation Ordinance, as applicable. The former specifies that replacement of trees removed shall be with plantings of trees acceptable to the Planning Director. In-kind replacement of non-native or exotic trees removed from the project site may not be acceptable to the Planning Director. The Ordinance does, however, recognize and in some cases require in-kind replacement for removal of indigenous trees. The Santa Clara County Tree Preservation Ordinance requires that replacement trees be of a like kind and species of tree removed, if native and feasible, or of a kind and species to be determined by the Planning Department.

Response to Comment B-10

Commenter recommends that the 72" diameter Eucalyptus tree shown on Draft IS/MND Figure 5 be removed. The plans shown in Draft IS/MND Figure 5 were based upon 35% complete design drawings. The design has progressed since publication of the Draft IS/MND and the County has determined that the Eucalyptus tree in question should be removed. Figure 5 is revised to show the tree as being removed (see Attachment 2).

Response to Comment B-11

The commenter requests that Mitigation Measure BIO-2 be amended to require that the Riparian Restoration Plan is approved by the Corps, USFWS, CDFW, and the RWQCB. Please see Response to Comment B-9 regarding the purpose of Mitigation Measure BIO-2. As noted in Draft IS/MND Section 1.6, Other Approvals, several resource agencies have jurisdiction over special status species and habitats that could be affected by the proposed project. The restoration plan identified in BIO-2 would be a requirement of the application package for multiple agencies. During the application review and agency consultation processes, agencies with jurisdiction will have the opportunity to review and comment on the draft restoration plan. Accordingly, agencies with approval authority could request modifications to the plan or condition project approval on such revisions. Therefore, project authorization would serve as a de facto approval of the final restoration plan. For these reasons, modification of Mitigation Measure BIO-2 would not be required in order to reduce potential effects on special status species to a less-than-significant level.

Response to Comment B-12

The commenter request that Mitigation Measure BIO-2 be amended to require a specific restoration success criterion related to invasive species cover. Mitigation Measure BIO-2 is amended as follows:

At a minimum, the site shall meet the following success criteria:

- Temporarily impacted areas are returned to pre-project conditions or greater
- No significant undercutting, scour or erosion is present within, upstream, or downstream of the work area.
- Replacement trees have a minimum 70% survival rate

- The project site is not dominated by invasive vegetation (defined as less than 20% cover of invasive species by Year 3).

Response to Comment B-13

This comment regarding a request for a notification for consideration of above comments (B-1 through B-12) is acknowledged.

County of Santa Clara

Parks and Recreation Department

298 Garden Hill Drive
Los Gatos, California 95032-7669
(408) 355-2200 FAX 355-2290
Reservations (408) 355-2201
www.parkhere.org



November 13, 2015

Attn: Gil Tourel, Principal Civil Engineer
County of San Mateo
Public Works Department
555 County Center, 5th Floor
Redwood City, CA 94063-1665

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the Alpine Road Trail Improvements Project

Dear Mr. Tourel:

The County of Santa Clara Parks and Recreation Department (County Parks Department) has received the Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Alpine Road Trail Improvements Project, which includes three bank stabilizations sites and rehabilitating 1.84 miles of the existing trail.

C-1

The County Parks Department's comments are primarily focused on potential impacts related to the *Santa Clara County Countywide Trails Master Plan Update* relative to countywide trail routes, public access, and regional parks. Please include the following description in the document.

Relationship to the Santa Clara County Countywide Trails Master Plan Update

The *Countywide Trails Master Plan Update* indicates the following trail route in the project site.

C-2

- ***San Francisquito - Los Trancos Creeks Connector Trail (Route C1)*** – Per the Countywide Trails Master Plan Update, this trail route is designated as an off-street trail for hiking and off-road cycling.

Chapter 2.15 - Recreation

The MND includes a discussion of impacts to recreation to the existing San Francisquito - Los Trancos Creeks Connector Trail. The MND states that impacts to recreation are less than significant and no mitigation is therefore required. The County Parks Department recommends that the "significant unless mitigated" box be checked and that mitigation be required to address the short-term impacts to trail users during construction. We suggest that mitigation be included which requires the posting of signs notifying park users of alternative trail routes during construction.

C-3

Thank you for the opportunity to comment on the MND for the Alpine Road Trail Improvements Project. If you have any questions regarding these comments, please feel free to contact me at (408) 355-2228 or via email at Hannah.Cha@prk.sccgov.org.

C-4

Sincerely,

Hannah Cha
Provisional Park Planner II

cc: Kimberly Brosseau, Acting Principal Planner

Response to Letter C. County of Santa Clara Department of Parks and Recreation, Hannah Cha

Response to Comment C-1

This comment regarding the County of Santa Clara Parks and Recreation Department's receipt of the Notice of intent to adopt a MND for the Alpine Road Trail Improvement Project is acknowledged.

Response to Comment C-2

The commenter requests that the Draft IS/MND be revised to acknowledge that the *Santa Clara Countywide Trails Master Plan Update* designates the portion of Alpine Road Trail in the project area as the San Francisquito – Los Trancos Creeks Connector Trail (C-1) and requests such designation be acknowledged in the Draft IS/MND. A review of the most current draft of the *Santa Clara Countywide Trails Master Plan Update* map available on the Santa Clara County Parks Website (dated August 18, 2015) identifies the portion of Alpine Road Trail in the project area as “proposed”. Accordingly, the following footnote is added to Draft IS/MND Section 2.15, Recreation (page 2-74):

The project would entail rehabilitation of the existing Alpine Road Trail, which is used for recreation, and bank stabilization of the Los Trancos Creek at three locations.⁵ During portions of the construction phase, affected segments of the Alpine Road Trail would require closure to the public.

⁵ The portions of the trail to be improved are identified in the *Santa Clara Countywide Trails Master Plan Update* as occurring within a proposed segment of the San Francisquito – Los Trancos Creeks Connector Trail (Route C-1), a designation afforded to off-street trails allowing for hiking and off-road cycling.

Response to Comment C-3

Commenter recommends the Draft IS/MND's Section 2.15, Recreation, conclusion be revised to indicate that short-term impacts to trail users during construction would be significant unless mitigated. The County appreciates and shares commenter's concern for trail access; indeed, improved trail access is the purpose of the proposed project.

As presented in the Draft IS/MND and in Appendix G of the CEQA Guidelines, the question of recreational effects is one of physical change, rather than user experience. The Draft IS/MND's analysis of recreation impacts (page 2-74) appropriately focuses upon whether the project would result in: (1) increased use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated; and (2) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. In both cases, the emphasis is on physical effects on the environment. As discussed in response to the first question, the Draft IS/MND acknowledges that users of the trail may be temporarily displaced or rerouted during the construction period. However, this displacement would not be expected to result in substantial physical deterioration of alternative recreational amenities or alternate routes – the threshold, or standard, for determining significance. For this reason, the Draft IS/MND's conclusion that recreation-related effects would be less-than-significant is appropriate.

While the CEQA effect on recreation resources is less than significant, the effects of project construction related to potential conflicts and safety hazards are also addressed in Draft IS/MND Section 2.16, Traffic and Transportation (page 2-79 through 2-81). The analysis concludes such conflicts could be significant and relies

upon implementation of Mitigation Measure TRA-1 to reduce these potential effects to a less-than-significant level. With respect to commenter's request for the posting of signs to notify park users of alternative routes during construction, Mitigation Measure TRA-1 provides for the posting of advanced warning signs (e.g., "Bicyclists Allowed Full Use of Lane) in the vicinity of construction activities that may encroach on bicycle routes or multi-use paths.

It is noted that the duration of such impacts on recreational trail users would be brief. As noted in the Draft IS/MND (page 2-68), trail resurfacing would be expected to proceed at a rate of approximately 100 feet per day and be completed within one month. And trail resurfacing would proceed in segments, so no one section would be closed for more than a few days.

Response to Comment C-4

This comment regarding the opportunity for providing comments for the proposed project is acknowledged.



STANFORD UNIVERSITY
LAND USE AND ENVIRONMENTAL PLANNING

November 13, 2015

San Mateo County Public Works
555 County Center, 5th Floor
Redwood City, CA 94063-1665
Attn: Gil Tourel, Principal Civil Engineer

Subject: Alpine Road Trail Improvements Project Draft IS/MND

Dear Mr. Tourel:

Thank you for the opportunity to comment on the October 2015 Draft Initial Study/Mitigated Negative Declaration for the Alpine Road Trail Improvements. Stanford University is pleased with the efforts of San Mateo County Public Works staff to propose biotechnical methods of bank stabilization solutions, as described in this Initial Study/Mitigated Negative Declaration. Following are Stanford's comments on the environmental analysis.

- The document states that 41 trees would be removed at Site 2 and 42 trees would be removed at Site 3, without identification of species. In addition, the species of the replacement trees is not yet identified. For this reason, Stanford requests to review the restoration plan described on page 2-22 that will be submitted to Corps, NMFS, USFWS, RWQCB, and CDFW, with respect to the tree removal and restoration on Stanford land.

D-1
- Zoning for the Stanford land is A1, which is correctly stated on page 2-9 and incorrectly stated on page 2-2.

D-2
- Mitigation Measure HYD-1 on page 2-57 mentions compliance with County of San Mateo Department of Public Work's Contract Requirements for Erosion and Sediment Control and Contract Requirements for Water Pollution Control for Construction in Sensitive Areas, and should also include compliance with Santa Clara County storm water permit and SWPPP requirements for the work in Santa Clara County.

D-3
- The correct land use designation in Santa Clara County's Stanford Community Plan is Special Conservation (page 2-63).

D-4
- On page 2-64, the document states that *"the northern portion of the project site occurs on lands owned by Stanford University, which is covered by the Stanford University Habitat Conservation Plan (HCP). However, as concluded for question 2.4f, the project would*

D-5

not conflict with the provisions of the HCP as the proposed project activities in and around Los Trancos Creek are outside the plan area.” The first sentence is incorrect, but the second sentence and the analysis in question 2.4f are correct.

↑
D-6

- The recreational analysis on pages 2-72 through 2-74 identify the Stanford Golf Course and Stanford Dish Trail as parks and recreational facilities. These are private facilities and should not be included in the CEQA analysis.

↑
D-7

Sincerely,

Catherine Palter

Catherine Palter
Associate Vice President
Land Use and Environmental Planning

Response to Letter D. Stanford University, Catherine Palter

Response to Comment D-1

This comment expressing support for the proposed project is acknowledged.

Response to Comment D-2

Commenter notes that the specific types and locations of trees proposed for removal are not presented in the Draft IS/MND. Commenter requests the opportunity to review the restoration plan described on Draft IS/MND page 2-22 as it pertains to Stanford lands. Regarding commenter's first point concerning types and locations of trees to be removed, please see Response to Comment B-7. With respect to commenter's request to review the restoration plan, the County will continue to coordinate with Stanford University through the agreement process identified in the Draft IS/MND Section 1.6. Other approvals will include discussions of project design and implementation details on Stanford land.

Response to Comment D-3

Commenter asserts that the zoning for Stanford land is correctly stated on page 2-9 as A1, but incorrectly stated on page 2-2. The discussion on Draft IS/MND page 2-9 is specific to agricultural resources, and so only the A1 designation is referenced in that section. However, the discussion on Page 2-2 of the Draft IS/MND presents the zoning designations of all lands within the project area, as presented on the Santa Clara County's Interactive Property Profile website (Santa Clara County, 2015). According to Santa Clara County's website, the project site includes lands zoned for agriculture (A1-20s-sr), but also zoned for Open Space and Field Research (OS/F). Specifically, the latter zoning designation is shown for lands east of the Los Trancos riparian corridor. According to the County's zoning ordinance, the purpose of the OS/F district is to implement the December 2000 Stanford University Community Plan (General Plan) policies for the Open Space and Field Research land use designation. For these reasons, the Draft IS/MND has not been revised.

Response to Comment D-4

Commenter notes that Mitigation Measure HYD-1 would require contractor's compliance with San Mateo County standard construction specifications and requests the measure be modified to also require contractor's compliance with the Santa Clara County stormwater permit and Stormwater Pollution Prevention Plan (SWPPP) requirements for the work in Santa Clara County. By way of background, the San Mateo County standard construction specifications require compliance with all applicable State regulations, which are common to both San Mateo and Santa Clara counties, along with additional measures to address potential water quality impacts. For example, the standard specifications require conformance to the California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater National Pollution Discharge Elimination System (NPDES) Permit Order No. R2-2009-0074, which serves as the stormwater permit referenced by the commenter for both San Mateo and Santa Clara counties. The San Mateo County standard construction specifications also require, where applicable, compliance with the State Water Resources Control Board NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2010-0014-DWQ (Construction General Permit). The standard specifications require that a SWPPP be prepared by a Qualified SWPPP Developer (QSD) and implemented by a Qualified SWPPP Practitioner (QSP) in accordance with the requirements of the Construction General Permit. For these reasons, implementation of Mitigation Measure HYD-1 as written would be sufficient to protect against potential project-related violations of water quality standards or waste discharge requirements and avoid a significant impact related to water quality.

Nevertheless, for the benefit of the commenter and in the interest of inter-County collaboration, Mitigation Measure HYD-1 is modified as follows (page 2-57):

Erosion and water quality control measures identified in the plan must comply with the County of San Mateo Department of Public Work's Contract Requirements for Erosion and Sediment Control and Contract Requirements for Water Pollution Control for Construction in Sensitive Areas. The plan shall be developed in coordination with the Santa Clara Valley Urban Runoff Pollution Prevention Program staff, as applicable. and At a minimum, the plan shall include, but not be limited to, the following measures (County of San Mateo 2013a; County of San Mateo, 2013b):

Response to Comment D-5

Commenter notes that the Stanford Community Plan identifies a portion of the project area within Santa Clara County as Special Conservation. The Draft IS/MND has been revised on pages 2-63 and 2-64 as follows:

The Stanford Community Plan designates portions of the project area east of Los Trancos Creek (primarily portions of Sites 2 and 3) as Special Conservation, a designation afforded to lands generally deemed unsuitable for development, other than that related to conservation and habitat management, due to natural resource constraints. Beyond the Special Conservation area lie lands designated Open Space and Field Research, a designation allowing for field study, agricultural uses, recreation, and utility infrastructure uses in keeping with the predominantly natural appearance of the setting (Stanford University, 2000).... Because the purpose of the project is to rehabilitate a segment of the Alpine Road Trail and stabilize the banks of the Los Trancos Creek at three locations, the proposed project would not conflict with the residential, educational, or open space uses of the area. The proposed project would also be expected to improve habitat conditions by preventing further erosion of the creek bank and associated water quality impacts in the creek, consistent with ongoing and future conservation and resource management efforts in the area.

Response to Comment D-6

The commenter states that the Draft IS/MND incorrectly identifies a portion of the project as occurring on lands subject to the Stanford University Habitat Conservation Plan (HCP). The Draft IS/MND is revised as follows (page 2-64)

~~As stated above, the northern portion of the project site occurs on lands owned by Stanford University, but does not occur within which is covered by the Stanford University Habitat Conservation Plan (HCP) area. However, a~~ As concluded for question 2.4f, the project would not conflict with the provisions of the HCP as the proposed project activities in and around Los Trancos Creek are outside the plan area

Response to Comment D-7

Commenter notes that the Stanford Golf Course and Dish Trail are private facilities and requests their reference be removed from the Draft IS/MND discussion in Section 2.14, Public Facilities. The Draft IS/MND is revised as follows (page 2-72).

Other than the Alpine Road Trail, the nearest public parks or recreational areas to the project site includes ~~the Stanford University Golf Course located at the northern end of the project site, as well as Pearson-Arastradero Preserve and Stanford Dish Trail and Foothills Park.~~ Temporary project construction could cause a decrease in use of the trail itself.

From: [Janet Davis](#)
 To: [AlpinetrailISMND](#)
 Cc: [Don Horsley](#); [Dave Pine](#); [Warren Slocum](#); [Alan E. Launer](#); [Jean McCown](#); [Lennie Roberts](#); [Len Materman](#)
 Subject: Response to ESA Report on Trail "Improvements"
 Date: Saturday, October 17, 2015 3:07:13 PM

COMMENTS ON DRAFT INITIAL STUDY FOR ALPINE "TRAIL"
Prepared by ESA Oct. 15 2015
(<http://parks.smcgov.org/park-planning>)

INTRODUCTION:

This firm has prepared other studies for the Stanford Weekend Acres vicinity. This was more comprehensive than prior reports. However, it has some sections that need significantly more information. It is patently obvious that the authors have no knowledge of the area and the issues involved. A mere Negative Declarations seems insufficient to deal with the issues.

E-1

One particularly annoying detail is that these reports by ESA continually refer to the "multiuse trail" that supposedly runs from Junipero Serra to Portola Valley. That is **NOT correct**. There **is** a highly hazardous "trail" that runs from Junipero Serra Blvd. to the limit of Menlo Park's jurisdiction. From that point, through Stanford Weekend Acres subdivision to La Cuesta in Ladera, there is a **neighborhood footpath** that has never been a trail, let alone a multi-use trail.

E-2

As an absolute MINIMUM requirement there should be a neighborhood meeting to air residents' concerns since there has been virtually no outreach with respect to the project right from the start.

E-3

Since the rationale for this entire exercise is to safeguard the PGE 6" pipeline, why is it that PG&E (a public, for-profit-company that is being fined millions of dollars for negligence) is not fronting at least some of the cost instead of the county taxpayers, especially since they elected to place the line where it currently exists?

E-4

Points in Need of Elaboration with Respect to Trail:

Guard Rail By Bishop Lane: (Figure 2 page 12) This is a place where there have been numerous accidents with vehicles impaling themselves on the guard rail, vehicles going over the embankment in the vicinity of the guard rail, and there are problems with illegal parking south of the guard rail. In addition to all of that there is a very steep embankment, below which are several houses that are currently shielded by extensive landscaping. The report anticipates recompacting the area by the guard rail and replacing with blocks and geogrid.

E-5

Please explain what impact this will have on the landscaping, the width of the path, and additional protection of pedestrians from the constant vehicular accidents.

E-6

By Stowe Lane:

The only adjustment to this area of the path that was actually needed was the ADA compliant slopes put in after the tragic accident involving major injuries to an elderly man.

E-7

Located in the area immediately north of Stowe is a School bus stop. It is also the site of numerous accidents where vehicles have veered onto the pedestrian path. Under this path is the 6" PGE line. A mere slurry seal job is useless.

E-8

Has this been considered, and if so what precautions will be taken to safeguard pedestrians.

To the south of Stowe there is a short section of curbed pathway with a very steep slope under which the 6" PG&E gas line runs. Modifications have been made near this area to direct storm waters onto my property and that of SFWD. The 6" PG&E pipe runs behind the encroaching fence. A mere slurry seal job will just

E-9

exacerbate the existing problems.

What, if anything, will be done to address this drainage problem?

↑
E-9

To the south of this area there is no curb and vehicles continually use the bike and pedestrian path between Bishop and Stowe as an additional auto lane. There have been numerous accidents because of this. A mere slurry seal job will just make the existing path more attractive as a vehicular lane.

What, if anything will be done to address this problem?

E-10
↓

By Wildwood and Bishop berms and Between Happy Hollow & Piers Lane:

It is good that no action is contemplated in the first two of these locations, and it would be beneficial if the areas by Stowe were also left alone since any work there will merely create more problems than currently exist. This also seems to conflict with the plans for work around the guard rail at Bishop.

Please explain.

E-11
↓

Area By Piers Lane:

More details are needed here. Currently the area is a total nightmare. Vehicles are parked all over the pedestrian sidewalk and the bike lane, as well as across the road by Ansel Lane. There are constant accidents or near misses, the privacy of the nearby residents is severely impacted, and the lack of law enforcement with respect to parking violations attracts criminals who vandalize cars. Frequently cars are parked (illegally) all the way up to the Bishop guardrail. In addition, in the winter the area turns into a quagmire. It is also the site of the PGE 6" gas line.

Since this is probably the major problem along the entire pathway, and no action is planned here, what is the point of supposedly addressing trail "improvements?"

E-12
↓
E-13
↓

AESTHETICS & TREES:

It is ludicrous to hypothesize that there will be a less than significant impact associated with **removing 83 trees** from about a half mile segment of Alpine Road merely because drivers on Alpine and 280 travel at, respectively, 45 and 65 mph and will therefore, not have the ability to see the devastation! It is also ridiculous to suggest that this will not degrade the riparian canopy. Where trees have been removed in other areas near the creek it invites increased predation, and allows the water temperature to elevate. This cannot be sufficiently modified by shrubbery or undergrowth.

E-14
↓
E-15
↓

Another factor not addressed involves noise. When significant trees are removed the noise level from I-280 increases markedly.

This is not addressed. What is required is a complete list of trees to be removed, together with a plot showing location and description of the tree. Also required is an explanation of why heritage/significant tree specimen such as oaks, alders etc. cannot be saved and relocated once the project is completed. This has been done in other situations. Stanford's Tree Farm is nearby and they presumably have appropriate equipment and facilities to do this, hopefully financed by PG&E.

E-16
↓

SWALES:

At various places it is stated that concrete swales will be installed to direct flood waters to existing storm drains. This demonstrates absolute ignorance of the environmental conditions that exist during winter in this area. It is highly likely that the existing erosion was caused by the very storm drains cited, since the location of the eroded sites correlates with the location of the storm drains. In wet winters the amount of water flowing into these storm drains from the hills to the west is astounding, and the force of that water when entering the creek has not apparently been measured. Since that force will be directed to the toe, it will undoubtedly have an erosive impact on the opposite banks of the creek.

This has not been addressed.

E-17
↓

ROAD CLOSURES:

Stanford Weekend Acres residents endured this for almost a year when the intersections at Sand Hill and Alpine were widened. We know the problems and the lack of County supervision.

There is insufficient information as to impact on SWA residents, Recology and Postal services,

E-18
↓

Stanford commuters, access to the hospital, Emergency vehicle access, redirecting truck traffic etc.

↑ E-18

TRAFFIC:

At p.102 it is noted that there will be an increase in traffic noticeable to SWA residents.

It is not clear if this refers just to construction equipment, since the road itself will be closed off to normal vehicular traffic during construction. Please expand.

E-19

BIOLOGICAL RESOURCES:

Totally insufficient information here. Prof. Alan Launer of Stanford should be involved in this respect since he knows more about this specific area than any SF consulting firm could possibly know.

E-20

APPENDIX A: HYDROLOGY REPORT:

This comprises *a mere 4 pages of text with only 4 citations* to references going back to 1959 and *relies on computer models*. Nowhere is there any reference to the multitudinous studies of this particular section of the creek undertaken by Balance Hydraulics; the team involved in downstream study of the Fish Ladder; or the studies of the creek in connection with the Searsville dam. The three authors of the report by the San Francisco firm: Jason White, Scott Stoller P.E., and Andrew Collison Ph.D. all have credentials in geomorphology, but they do not apparently have the on-site experience of the firms that have done *years of on-site study* of this particular section of the creek. They are unlikely to have knowledge of the accretion, erosion and movement west of the creek since the storm of 1955. They have no demonstrated knowledge of what happened in 1998: the extent of bank collapse and of wholesale movement of giant boulders by the force of the water in that (mere 50 year) flood event.

E-21

Moving Creek 15 ft./Shortening Creek:

Part of this report states that the construction process will involve shortening two parts of the creek which will (according to the authors) each involve an increase in velocity of 12%.

Nowhere that I found does this adequately explain the impact on the other side of the creek or on downstream properties. Nor does it detail the cumulative effect of (a) two such shortenings – does this amount to a 24% increase? Or (b) the cumulative effect of this shortening plus the excess outfall to the storm drains.

E-22

Roughened Channel/Boulders:

It is hypothesized that adding boulders to the area downstream from the “shortened” parts will mitigate the increased velocity. Since entire concrete dams and massive boulders have been dislodged and relocated within the channel by storms, this would seem to be a futile endeavor that could perhaps exacerbate the already significant problem of boulders being carried downstream, filling up pools that the salmon and other species rely on. In addition, these boulders and rocks have increased the likelihood of downstream flooding and bank erosion.

A better explanation is in order.

E-23

CONCLUSION:

The above merely addresses the highlights of what I found to be lacking in the ESA Report. There are Geologists and Engineers living in SWA who can address Geotechnical and other aspects. However, there is insufficient information given to fully document the likely impacts of the proposed work, a good many of which (affecting both the trail and creek,) have the potential to cause more harm than good. At the very least there needs to be widely publicized community meetings; more input from the various disciplines at Stanford who have had extensive experience involving the creek and environment; outreach to Environmental groups; and involvement with the Creek JPA. It also seems imperative that PG&E who are partially responsible for the problem in the first place, contribute to any costs. As to the trail “improvements” the only area that really needs addressing (by Piers Lane) is not to be touched. Therefore, it seems to me to be preferable to leave the path through SWA alone.

Oct. 17, 2015.

E-24

Response to Letter E. Janet Davis

Response to Comment E-1

This general introductory comment expressing disagreement with the Negative Declaration's status of the project is noted. Responses to specific comments regarding the adequacy and accuracy of the Draft MND are addressed below.

Response to Comment E-2

Commenter questions the Draft IS/MND's reference to the Alpine Road Trail as a "multi-use trail". In response to this comment, please refer to Response to Comment B-2.

Response to Comment E-3

The commenter expresses concern regarding the adequacy of the public's involvement in the project. The commenter's concerns are appreciated. However, the scope of this memorandum is limited to the adequacy of the environmental document. CEQA Guidelines Section 15073 requires that a lead agency provide a public review period of not less than 20 days and when an MND is submitted to the State Clearing house for review by state agencies, the public review period shall not be less than 30 days. CEQA Guidelines Section 15072 requires that a lead agency mail a notice of intent (NOI) to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the project is located.

Consistent with CEQA Guidelines Section 15073, the public review period ran for more than 30 days, extending from October 14, 2015 to November 27, 2015. During this time, document copies or notices of availability were distributed to the State Clearinghouse, affected public agencies, several community groups, and the Portola Valley Public Library. At the time of publication, this document was and currently is available for review on the County Parks website at the following link: <http://www.co.sanmateo.ca.us/portal/site/parks/>. Consistent CEQA Guidelines Section 15072, notification of the Draft IS/MND was provided through legal notices in the San Francisco Examiner (publication date October 12, 2015 and October 20, 2015). Notice was also provided to the San Mateo County and Santa Clara County clerks' offices for posting.

While additional outreach, such as a public meeting, is not required under CEQA for a MND and the CEQA requirements have been met for public outreach, it is noted that San Mateo County has been in the planning and design phase of this project since 2012. As noted in the introduction to this memorandum and in the Draft IS/MND (page 1-2), a previous iteration of the proposed project was evaluated in a draft IS/MND which was circulated for public review and comment in 2013. In addition, public meetings and/or County Board of Supervisor meetings were held on, January 28, 2014, March 11, 2014, November 18, 2014, January 27, 2015, and March 17, 2015, each of which provided an opportunity for public comment. As noted above, the Draft IS/MND that is the subject of this memorandum was circulated for public comment for 45 days, more than the 30 day minimum required by the CEQA Guidelines. Moreover, the project has been listed on the County's website since October 12, 2015. Thus, the County has provided numerous opportunities for public involvement in project development and evaluation.

Response to Comment E-4

Commenter's concern regarding the cost of the project is noted. Consideration of project costs is beyond the scope of CEQA review. In accordance with CEQA, the Draft IS/MND appropriately evaluates the project's potential direct and indirect physical changes on the environment.

Questions and comments regarding project funding and cost may be submitted to the Department of Public Works and addressed beyond this document.

Response to Comment E-5

Commenter asserts that the project would occur in an area where there have been numerous motor vehicle accidents and where parking is problematic. The commenter's concern for the safety of the roadway alignment and adequacy of parking is appreciated. One of the main objectives of the proposed project is to rehabilitate the existing Alpine Road Trail within unincorporated San Mateo County and to stabilize the bank along the trail and Los Trancos Creek at three identified locations. The proposed project does not include roadway improvements, such as changes to guardrails or parking restrictions/enforcement at the mentioned locations. This comment letter has been forwarded to the Road Operations department within the County's Road Service Division. As this comment does not address the content or adequacy of the Draft IS/MND, no further response is provided.

Response to Comment E-6

The commenter requests additional information regarding the effects of installing geogrid reinforcement and Keystone blocks under the trail along Bishop Lane on landscaping, trail width, and protection of pedestrians from vehicle accidents. For clarification, the Keystone blocks would be installed subgrade of the rehabilitated Alpine Road Trail for support. Such activities would not be expected to require removal of adjacent residences' landscaping unless said landscaping encroaches into the County's right-of-way at locations of Keystone block installation. The County's right-of-way extends 40 to 50 feet from the centerline of the trail. In the event that adjacent residences' landscaping could be affected by project construction, the County would properly notify appropriate residents adjacent to the proposed trail rehabilitation work prior to construction.

As described in Section 1.4.2 of the Draft IS/MND, the width of the rehabilitated portion of the trail would be the same as the existing trail, which varies 4 to 6 feet wide.

Commenter's concern regarding safety is noted. As stated on Draft IS/MND page 1-2, the main objectives of the proposed project include rehabilitation of the Alpine Road Trail. Implementation of the project would prevent further trail narrowing and improving the trail surface. These improvements would enhance user safety by minimizing potential user conflicts, reducing tripping and other hazards caused by uneven travel surfaces, and by providing a safe alternative to walking or biking along the road's shoulder.

Response to Comment E-7

Commenter's note regarding improvements at Stowe Lane is noted.

Response to Comment E-8

Commenter's concern regarding pedestrian safety north of Stowe Lane is noted. As discussed in Response to Comment E-5, the project does not propose to modify the roadway such that pedestrian safety would be affected. Please also refer to Response to Comment C-3 for a discussion of pedestrian safety during project construction.

Finally, as described in Response to Comment E-6, the project objectives includes maintaining trail widths and improving travel surfaces, which would improve user safety.

Response to Comment E-9

Commenter asserts that the proposed application of slurry seal on a trail segment near commenter's property would exacerbate stormwater drainage problems caused by a previous drainage modification project. As explained in Draft IS/MND Section 1.4.2, the project would involve improvements to segments of the trail that have been previously paved; there would be no paving of trail segments that are not currently paved. As discussed in Draft IS/MND Section 2.9, Hydrology and Water Quality (page 2-61), the project would not result in a substantial increase in impervious surfaces such that runoff rates or volumes would substantially change. With respect to other drainage problems in the area, please refer to Response to Comment E-5 regarding the scope of the project improvements.

Response to Comment E-10

Commenter asserts that motorists use the segment of the Alpine Road Trail between Bishop and Stowe Lanes as an additional auto lane. Commenter asserts that adding slurry seal to this segment would make the segment more attractive as a vehicular travel way. The majority of the trail segment identified by commenter (between Bishop and Stowe Lanes) is not proposed for repaving, and therefore is not part of the proposed project. As shown in Draft IS/MND Figure 1, Project Location Map (page 1-4), only a small segment of trail between Bishop and Stowe lanes is proposed for improvement. And the segment within this area that is proposed for improvement, located immediately south of Stowe Lane, is presently raised and separated from the travel lane by a curb. Please also see Response to Comment E-5 regarding the scope of project improvements and Response to Comment E-8 for additional discussion of trail user safety.

Response to Comment E-11

Commenter expresses approval that no work is proposed by Wildwood Lane and Bishop Lane berms and between Happy Hollow and Piers Lane, and notes that commenter's preference would be to also have no work undertaken by Stowe Lane. This comment is noted.

Commenter also expresses concern regarding potential conflicts between the proposed project and plans for work around the guard rail at Bishop Lane. The County has no reasonably foreseeable plan for work on the guard rail at Bishop Lane (County of San Mateo, 2015). As a result, no conflicts between the proposed project and future improvements to the Bishop Lane guardrail would result from project implementation.

Response to Comment E-12

Commenter expresses concern regarding existing parking and traffic conditions near Piers Lane. This comment is noted. Please see the Response to Comment E-5, regarding the scope of the project.

Response to Comment E-13

Commenter asserts that the area near Piers Lane "turns into a quagmire" during the winter and expresses concern that no action is planned to address drainage or traffic and parking concerns in the area. Please see the Response to Comment E-5, regarding the scope of the project.

Response to Comment E-14

Commenter questions the Draft IS/MND's conclusion that the project's removal of trees from Sites 2 and 3 would have a less-than-significant effect related to aesthetics. Commenter is referred to Response to Comments B-7 and E-15.

Response to Comment E-15

Commenter questions the Draft IS/MND's conclusion that removal of 83 trees from the creek would not degrade the creek's riparian canopy and asserts the impacts cannot be addressed by the addition of shrubbery or undergrowth.

The project's proposed site restoration would involve more than replacement with shrubbery or undergrowth. The Draft IS/MND's project description states on pages 1-10 and 1-13 that "trees measuring 12 inches in diameter at breast height (dbh) or greater would be replaced at a ratio of 3:1. Trees measuring less than 12 inches dbh would be replaced at a ratio of 1:1." Therefore, all trees that are removed during construction would be replaced. The Biological Resources section acknowledges, on page 2-26, that temporary construction impacts within the riparian corridor, including tree removal, would have a potentially significant impact on riparian habitat at the three bank stabilization sites. However, with the tree replacement measure described in the project description, and implementation of Mitigation Measure BIO-2 (which requires restoration of riparian zones that are temporarily impacted, preparation of a Riparian Restoration Plan, post-restoration monitoring, and ensuring that the restoration area meets final success criteria such as a minimum 70% survival rate for replacement trees, by year 3), the project would not substantially degrade the riparian corridor and impacts would be reduced to less-than-significant levels. Furthermore, given the distribution of trees to be removed (Attachment 1), the small areas of site disturbance relative to the riparian corridor, and the dense riparian vegetation at the project sites, sufficient cover would remain at these locations to prevent substantial changes in predation and water temperature due to lack of tree cover during the restoration period. Please also see Response to Comment B-7.

Response to Comment E-16

Commenter asserts tree removal would increase noise levels from I-280 and notes that such a discussion is absent from the Draft IS/MND. Commenter further requests a list and map showing trees to be removed. Commenter further requests that heritage/significant trees to be removed be salvaged.

Regarding commenter's request for a list and map of trees to be removed, please refer to Response to Comment B7. With respect to commenter's concerns regarding noise, Draft IS/MND Section 2.12, Noise, examines the project's potential to cause significant impacts related to project noise. The effects of noise impacts are evaluated at the location of the sensitive receptor. The Draft IS/MND (page 2-68) notes that sensitive receptors in the project area are limited to residences, as there are no schools or hospitals that would be affected. According to the Federal Transit Administration Noise and Vibration Impact Assessment (FTA, 2006), a dense tree zone 100 feet thick that completely blocks line-of-sight between the noise source and receiver can attenuate noise levels by approximately 5 dB. The trees in question are located approximately 1,200 feet south of the nearest sensitive receptor to the north (Alpine Road at Piers Lane) and approximately 350 feet north of the nearest sensitive receptor to the south (Aliso Way cul-de-sac). The trees proposed for removal at Sites 2 and 3 do not completely block line-of-site between I-280 and the nearest sensitive receptors. Due to their distance from the sensitive receptors and I-280, their sparse distribution at the project sites (see Attachment 1), and given the sensitive receptors' exposure to I-280 noise from other directions, it is unlikely that the trees to be removed would have a noticeable (i.e., greater than 3dB) attenuation effect on I-280 traffic noise at the locations of these sensitive receptors. As a result, the

noise effects associated with tree removal would not be perceptible by the human ear and thus would have no effect on sensitive receptors. For these reasons, the issue was not addressed in the Draft IS/MND.

Concerning commenter's request for salvaging of trees to be removed, given the size of the trees in question, the duration of construction, and the low success rate of mature tree transplantation, the County has determined that a more feasible approach would be to replace the removed trees at the ratios described in the Draft IS/MND's Project Description and noted in Response to Comment E-15.

Response to Comment E-17

Commenter expresses concern regarding the effectiveness of the proposed concrete swales and states the force of the water emerging from the stormdrain outlets would have an erosive impact on the opposite banks of the creek. As noted on Draft IS/MND pages 1-5 and 1-10, the project design includes the addition of concrete swales at Sites 2 and 3. The purpose of the swales is to reduce the amount of stormwater flowing down the face of the creek bank at the bank stabilization sites. Under current conditions at these locations, stormwater flows down the face of the banks, contributing to the eroded conditions necessitating the proposed bank stabilization work. The proposed swales would be constructed upslope (roadside) of the proposed retaining walls and would be designed to capture and redirect a small amount of stormwater runoff generated within the area between the trail and the proposed retaining wall. The redirected stormwater runoff would be routed into existing storm drains which are adequately sized to accommodate this small increase in volume. As noted in Draft IS/MND Section 2.9, Hydrology and Water Quality (page 2-61), stormwater runoff collected by the existing stormdrain conveyance would be similar in nature to the existing site runoff quality and quantity. Moreover, the existing storm drain outlets through which this redirected stormwater would flow would be improved and integrated into the planted rock within the crib wall structures to dissipate energy from those sources. Furthermore, the contribution from the swales and storm drain would occur when a significantly larger flow is present in the creek, which would provide an additional buffer against the force of storm water input. Thus, the purpose of the proposed swales and the reconfiguration of existing storm drain outlets would be to reduce rather than exacerbate erosion at the project sites.

Response to Comment E-18

Commenter expresses concern regarding the effect of road closures and requests additional information regarding impacts on Stanford Weekend Acres residents and other roadway users. As discussed in Draft IS/MND Section 2.16, Traffic and Transportation, the project would require temporary road closures at Golf Lane and the channelized right-turn lane on the I-280 northbound off-ramp connecting to northbound Alpine Road. In addition, portions of the Alpine Road northbound travel lane would also be closed to allow for bank stabilization and trail work. The latter closures would require use of the Alpine Road southbound travel lane for alternate one-way northbound/southbound traffic flow. As noted on Draft IS/MND page 2-78, these closures would disrupt traffic and increase delays for both motorists and bicyclists in the project vicinity during the project's construction phase. To reduce disruption and delays, the Draft IS/MND calls for implementation of Mitigation Measure TRA-1 which calls for the preparation and implementation of a traffic control plan containing specific elements designed to minimize disruption to local roadways.

Response to Comment E-19

Commenter requests clarification regarding traffic increases during project construction. To clarify, Alpine Road would not be closed to normal vehicle traffic during project construction. As explained in Response to Comment E-18, portions of Alpine Road's northbound travel lane would be closed. At these locations, the southbound travel lanes would be used for north- and southbound travel. As discussed in Draft IS/MND Section 2.16, increased

traffic volume on Alpine Road during the construction phase would be noticeable to local residents who use that street. As explained on Draft IS/MND pages 2-76 through 2-78, the increase in volume would be due to the additional traffic associated with construction workers, materials and equipment deliveries, and haul trucks, which would include approximately 35 to 40 round-trips per day during peak construction periods.

Response to Comment E-20

Commenter questions whether Alan Launer of Stanford University has been involved in the project. With respect to public participation in the CEQA document's preparation, please see Response to Comment E-3. All members of the public and Stanford University were invited to participate in the review period. The County has consulted with representatives of Stanford University, including Alan Launer, in the development of the proposed project.

Response to Comment E-21

Commenter expresses concern regarding the adequacy of the Draft IS/MND's Appendix A, Hydrology Report, and the qualifications of the report's authors and their familiarity with prior studies of the site and site history.

The hydrology memorandum prepared by ESA and presented in the Draft IS/MND was written specifically to address stipulations from the RWQCB that the proposed project should not cause increased erosion potential outside the project boundary by shortening the creek on the bends adjacent to the proposed crib wall structures; it is not intended to serve as a more general discussion of geomorphic conditions in the creek, although those conditions (including events larger than the 1998 event) were analyzed and taken into account in the proposed project's design. The use of computer models to assess the effects of proposed changes in creek cross section and alignment on erosion and flood risk is standard practice within the fields of engineering, geomorphology and hydraulics, and is supplemented with the team's field experience in the watershed and more widely across the region. The Chow (1959) publication referenced in the memorandum is a seminal study in hydraulics that is still highly relevant to the circumstances (using data from a one dimensional hydraulic model to assess flow around a meander bend) for this level of design. Note, however, that while the one-dimensional model is sufficient for purposes of CEQA analysis, in later design stages the team will be using a two dimensional hydraulic model to refine the erosion assessment and design. The modeling assessed three flow conditions, including a 100-year event that is larger than the 1998 event.

ESA's staff has conducted numerous hydrologic, hydraulic and geomorphic studies for the San Francisquito Creek JPA, Town of Portola, SLAC National Accelerator Laboratory and others. The memorandum's authors are familiar with many of Balance Hydrologics' (Balance) reports on San Francisquito Creek, notably the design reports for the crib wall constructed in a similar outside bend setting upstream of the two sites in this proposed project, as well as the flow and sediment transport monitoring studies that Balance have been conducting. The crib walls proposed are structurally and visually very similar to the one currently in place that was designed by Balance. However, based on the design team's observations of this installation since it was constructed, the propose project would include several elements to improve performance (in particular to prevent sediment within the crib wall from washing out thereby providing a better planting medium for live riparian plantings).

Response to Comment E-22

Commenter requests additional information regarding the effects of creek shortening on segments of the creek beyond the project site and on downstream properties. Please see the general explanation of creek shortening above. The analysis described in the Draft IS/MND's hydrology memorandum looked at the potential for increased erosion on the bed and banks upstream and downstream of the two project sites and assessed twelve scenarios (four

locations [upstream and downstream at the two project sites] under three different flow events). In eleven of the twelve scenarios, erosive energy was the same or less under project conditions compared with existing conditions; in one of twelve scenarios there was a 12% increase in erosive energy. The one exception was a length of channel that is approximately 20 feet long located immediately downstream of Site 2 on the outside bend. Erosive energy at this location was unchanged during the 2.33- and 10-year flood events, but increased by 12% during the 100-year flood event. As described in the memorandum, the location where erosive energy increased under the 100-year flood event is occupied by two mature alder trees that currently provide a dense root mat over the creek bed and banks, between the creek and Alpine Road. These trees provide a high degree of resistance to erosion and rather than try to engineer a solution the design leaves these trees intact and relies on their natural resistance (and habitat value) against what would be a small increase in erosion under very infrequent conditions. In subsequent design refinements, the County will also seek to ‘smooth’ the transition from the constructed crib wall to the undisturbed banks in an attempt to eliminate or reduce this one instance of locally-increased erosion potential.

In response to commenter’s question regarding cumulative effects, there would be no cumulative effect of the two shortenings; only Site 2 shows an increase in erosive energy under any scenario. The hydraulic analysis shows that further away from the proposed crib walls the velocity and erosive energy return to existing conditions. New concrete swales and storm drain inlets connecting to existing storm drains would reduce bank erosion by routing storm water runoff through, rather than down the face of, the reconstructed creek banks. The existing storm drain outlets would be improved and integrated into the planted rock within the crib wall structures to dissipate energy from those sources. See also Response to Comment E-17.

Response to Comment E-23

Commenter questions the effectiveness of using boulders downstream of the project sites to mitigate increased creek velocity resulting from shortened creek segments. The proposed design includes a series of boulder steps and boulder elements within the channel, primarily upstream and throughout the “shortened” creek segments, to prevent bed and bank erosion and to increase roughness and to absorb the increase in energy from the slight increase in gradient caused by relocating the channel 15 feet away from the road. The purpose of placing the boulders upstream of the creek bends is to reduce the velocity of the water entering the bend, thereby reducing erosive forces at the project site and downstream. During final design, hydraulic calculations will be performed to estimate the size of boulders that will be immobile during the required design event (likely to be the 100-year flood). These boulders would be sized so as not to move downstream in events smaller than the design flood. Moreover, as described in Draft IS/MND Section 1.4.4, Project Operation, the County would regularly monitor the success of the project for a period of 5 years following construction, and periodically after that. Potential effects of the project, including those associated with continued erosion, on fish habitat within the creek are discussed in Draft IS/MND Section 2.4, Biological Resources. As noted on Draft IS/MND page 2-21, if the bank stabilization measures are not successful (i.e., there is excessive undercutting, scour, or erosion), the quality of steelhead habitat within or adjacent to the project area could be adversely affected. To minimize such potential effects, the Draft IS/MND recommends implementation of Mitigation Measure BIO-2, which sets forth performance criteria for successful site restoration and would require additional monitoring beyond that described in the project description. And so in the unlikely event that one of the boulders was to move, mechanisms would be in place to detect and remedy the situation, as necessary.

Response to Comment E-24

This comment summarizes commenter’s concerns as expressed in prior comments. Refer to Responses to Comments E-1 through E-23 above.

From: [Joe](#)
To: alpinetrailismnd@smcgov.org
Subject: Thank you
Date: Thursday, October 15, 2015 5:16:13 PM

Any plan to improve the Alpine Trail is a good plan.

I F-1

Joe Hedges
President - VSI
210 High Street
Palo Alto, CA 94301
(650) 315-3736
joe@vsi-oil.com

Response to Letter F. Joe Hedges

Response to Comment F-1

This comment expressing support for the proposed project is acknowledged.

Tessa Verhoef

From: Krzysztof Lisaj <klisaj@smcgov.org>
Sent: Thursday, November 05, 2015 2:42 PM
To: Elijah Davidian
Cc: Gilles Tourel; Carter Choi
Subject: FW: two comments on IS/MND

Eli,

Additional comments for the IS/MND.

-KL

From: John Langbein [mailto:john_langbein@yahoo.com]
Sent: Wednesday, November 04, 2015 5:15 PM
To: Krzysztof Lisaj <klisaj@smcgov.org>; alpinetrailismnd@smcgov.org alpinetrailISMND
 <alpinetrailISMND@smcgov.org>
Subject: two comments on IS/MND

Here are my two comments on the revised report:

- 1) The northbound "bike lane" just north of the intersection with Stowe Lane needs to be widened by moving the sidewalk to the east. Prior to Stowe Lane, there is a sign stating that the bike lane ends. This sign could be eliminated by actually widening by moving the sidewalk (Alpine Trail) a foot or so to the east which would allow for the continuation of a regulation bike lane
- 2) Traffic control during construction phase. There will be segments along Alpine RD where trail-users will be directed to use the NB bike lane and cyclists will need to merge with motor vehicle traffic. The revised report calls for either "share the road" signs or "Bikes may use full lane", R4-11. "Share the road" is ambiguous to all users. Since the motor vehicle lane width is too narrow for sharing, a more direct statement is provided by R4-11. Please strike all references to "share the road" signs.

John Langbein

G-1

G-2

Response to Letter G. John Langbein

Response to Comment G-1

Commenter suggests widening northbound bike lane north of intersection with Stowe Lane by moving sidewalk eastward. As noted in Response to Comment E-5, the primary objective of the project is to rehabilitate segments of existing Alpine Road Trail. The proposed project does not include widening of bicycle lanes or other roadway improvements. This comment letter has been forwarded to the Road Operations department within the County's Road Service Division. As this comment does not address the content or adequacy of the Draft IS/MND, no further response is provided.

Response to Comment G-2

The commenter suggests that "Bicyclists Allowed Use of Full Lane", instead of "Share the Road" should be used to indicate areas where bicyclists would share the road with vehicles.

The comment is noted, and on Page 2-78, bullet seven is revised as follows to ensure that the sign message would be consistent with the 2012 California Manual on Uniform Traffic Control Devices:

- Construction activities that may encroach on bicycle routes or multi-use paths, advance warning signs (e.g., "Bicycles May Use Full Lane", Sign R4-11 of the 2012 California Manual on Uniform Traffic Control Devices ~~"Bicyclists Allowed Use of Full Lane" and/or "Share the Road"~~) shall be posted that indicate the presence of such users.

From: [John H Pencavel](#)
To: alpinetrailismnd@smcgov.org
Subject: "Alpine Road Trail Improvements Project"
Date: Tuesday, October 20, 2015 6:41:45 PM

To Whom It May Concern,

My name is John Pencavel. I live on Sneckner Court. Each morning at about 6.30 a.m., I walk from my house on the path next to Alpine Road to Piers Lane and up the dish. Later I return by the same path.

I welcome the forthcoming repair of this footpath. However, the statement that the current width is 4-6 feet is not correct. For a relatively short distance where there is no metal barrier, the path between bushes and poison oak on one side and the white line denoting the road on the other side is frighteningly narrow. Cars (often travelling at 40 m.p.h.) routinely cross over the white line and come close to the pedestrian. On one occasion, the side mirror on a vehicle came very close to me.

I ask that, at least for this portion of the footpath (between Bishop Lane and Piers Lane), the path be widened to reduce the intimidation of pedestrians and to forestall a tragic accident.

Thank you.

John Pencavel

H-1

H-2

Response to Letter H. John Pencavel

Response to Comment H-1

Commenter expresses support for project, but notes that the Draft IS/MND's characterization of the trail as being 4-6 feet in width is incorrect, as there is a short segment of the trail that is narrower than 4 feet. The specific location of the segment in question is not provided. Commenter's expression of support and trail width observation is noted. The characterization of trail width in Draft IS/MND Section 1.4.2, Proposed Improvements, is intended to be general. On page 1.3, the Draft IS/MND notes that the existing trail width "varies between approximately 4 and 6 feet within the project area". This characterization acknowledges that some segments of the trail may be narrower than 4 feet, while others may be wider than 6 feet. But on average, the trail widths range between approximately 4 and 6 feet in width. Commenter's observations regarding vegetative encroachment into the trail area have been noted. Please also refer to Response to Comment E-5; comments regarding design and maintenance issues have been forwarded on to the appropriate County department for review. As this comment does not address the content or adequacy of the Draft IS/MND, no further response is provided.

Response to Comment H-2

Commenter recommends widening the segment of Alpine Road Trail between Bishop Lane and Piers Lane. As noted in Response to Comment E-5, the primary objective of the project is to rehabilitate segments of existing Alpine Road Trail. The rehabilitated trail would be the same width as the existing trail. Please also refer to Response to Comment E-5; comments regarding design and maintenance issues have been forwarded on to the appropriate County department for review. As this comment does not address the content or adequacy of the Draft IS/MND, no further response is provided.

From: [Diane Schiano](#)
To: alpinetrailSMND@smcgov.org
Subject: PLEASE INCLUDE THIS EMAIL ADDRESS ON ALL MESSAGES RE ALPINE TRAIL
Date: Thursday, October 15, 2015 8:28:21 PM

WE ARE INTERESTED PARTIES!!!

I-1

Thank you,
Diane Schiano & Rick Voreck
2673 Alpine Rd
Portola Valley CA 94028
dianejschiano@gmail.com
voreck.rick@gmail.com
650-854-1948

--

Diane J. Schiano
dianejschiano@gmail.com

Response to Letter I. Diane Schiano & Rick Voreck

Response to Comment I-1

Commenter requests being notified by e-mail of future Alpine Road Trail Project developments. Comment is acknowledged.

4. Text Revisions

The text revisions are in the order they appear in the Draft IS/MND and include text corrections and clarifications to the Draft IS/MND. Newly added text is shown in underline format, and deleted text is shown in strikethrough format.

The Table of Contents, page i, is revised in response to Comment B-7:

Appendices

A. Summary of Hydraulic Modeling Analysis	A-1
B. Geotechnical Engineering Investigation	B-1
C. Air Quality Emissions Estimates	C-1
D. <u>Tree Removal Plan</u>	<u>D-1</u>

Section 1.4.3, page 1-17, the following sentence is added in Response to Comment B-5 at the end of the section entitled “Construction Access and Equipment”:

Exclusion fencing would be established around trees that would be protected throughout the duration of the construction period.

Section 2.1, page 2-4, the following sentence is revised in response to Comment B-3:

The project site is, however, adjacent to Alpine Road, a rural road designated by the San Mateo County as a Scenic Route that provides scenic views (County of San Mateo, 1986).

Section 2.4, page 2-23, Mitigation Measure BIO-2 is revised in Response to Comment B-12:

At a minimum, the site shall meet the following success criteria:

- Temporarily impacted areas are returned to pre-project conditions or greater
- No significant undercutting, scour or erosion is present within, upstream, or downstream of the work area.
- Replacement trees have a minimum 70% survival rate
- The project site is not dominated by invasive vegetation (defined as less than 20% cover of invasive species by Year 3).

Section 2.15, page 2-74, is revised to include the following footnote in response to Comment C-2:

The project would entail rehabilitation of the existing Alpine Road Trail, which is used for recreation, and bank stabilization of the Los Trancos Creek at three locations.⁵ During portions of the construction phase, affected segments of the Alpine Road Trail would require closure to the public.

⁵ The portions of the trail to be improved are identified in the *Santa Clara Countywide Trails Master Plan Update* as occurring within a proposed segment of the San Francisquito – Los Trancos Creeks Connector Trail (Route C-1), a designation afforded to off-street trails allowing for hiking and off-road cycling.

Section 2.9, page 2-57, is revised in response to Comment D-4:

Erosion and water quality control measures identified in the plan must comply with the County of San Mateo Department of Public Work's Contract Requirements for Erosion and Sediment Control and Contract Requirements for Water Pollution Control for Construction in Sensitive Areas. The plan shall be developed in coordination with the Santa Clara Valley Urban Runoff Pollution Prevention Program staff, as applicable. and At a minimum, the plan shall include, but not be limited to, the following measures (County of San Mateo 2013a; County of San Mateo, 2013b):

Section 2.10, pages 2-63 and 2-64, the following paragraph is revised in response to Comment D-5:

The Stanford Community Plan designates portions of the project area east of Los Trancos Creek (primarily portions of Sites 2 and 3) as Special Conservation, a designation afforded to lands generally deemed unsuitable for development, other than that related to conservation and habitat management, due to natural resource constraints. Beyond the Special Conservation area lie lands designated Open Space and Field Research, a designation allowing for field study, agricultural uses, recreation, and utility infrastructure uses in keeping with the predominantly natural appearance of the setting (Stanford University, 2000).... Because the purpose of the project is to rehabilitate a segment of the Alpine Road Trail and stabilize the banks of the Los Trancos Creek at three locations, the proposed project would not conflict with the residential, educational, or open space uses of the area. The proposed project would also be expected to improve habitat conditions by preventing further erosion of the creek bank and associated water quality impacts in the creek, consistent with ongoing and future conservation and resource management efforts in the area.

Section 2.10, page 2-64, the following text is revised in response to Comment D-6:

~~As stated above, the northern portion of the project site occurs on lands owned by Stanford University, but does not occur within which is covered by the Stanford University Habitat Conservation Plan (HCP) area. However, a~~As concluded for question 2.4f, the project would not conflict with the provisions of the HCP as the proposed project activities in and around Los Trancos Creek are outside the plan area

Section 2.14, page 2-72, the last paragraph is revised in response to Comment D-7:

Other than the Alpine Road Trail, the nearest public parks or recreational areas to the project site includes ~~the Stanford University Golf Course located at the northern end of the project site, as well as Pearson-Arastradero Preserve and Stanford Dish Trail and Foothills Park.~~ Temporary project construction could cause a decrease in use of the trail itself.

Section 2.16, page 2-78, Mitigation Measure TRA-1 bullet seven is revised in Response to Comment G-2:

- Construction activities that may encroach on bicycle routes or multi-use paths, advance warning signs (e.g., "Bicycles May Use Full Lane", Sign R4-11 of the 2012 California Manual on Uniform Traffic Control Devices ~~"Bicyclists Allowed Use of Full Lane" and/or "Share the Road"~~) shall be posted that indicate the presence of such users.

Section 2.18, Mandatory Findings of Significance, is revised to include consideration for an pending PG&E pipeline safety assessment in the vicinity of Sites 2 and 3, which may result in removal of trees at those locations. County staff was made aware of the PG&E pipeline safety assessment on December 1, 2015, after publication of the Public Review Draft IS/MND and close of the public comment period. Nevertheless, the pipeline safety

assessment and potential effects are added to the IS/MND for the benefit of the public. The discussion beginning at page 2-86 of the Draft IS/MND is revised as follows:

In the project vicinity, the closest projects proposed includes the Town of Portola Valley's Alpine Road Undergrounding Project (approximately 2 miles south of the proposed project site) and PG&E's community pipeline safety assessment. This particular former project includes undergrounding the overhead utility lines located along sections of Alpine Road from the intersection of Nathhorst Avenue to approximately 150 feet north of Hillbrook Drive. The latter initiative involves reviewing areas around transmission pipelines to ensure emergency access for first responders and to prevent damage to the pipeline. Other than the Alpine Road Undergrounding Project and PG&E community pipeline safety assessment, there are no ongoing projects in the immediate project vicinity and none are anticipated in the foreseeable future (County of San Mateo, 2015).

The projects would not have impacts to agriculture or forestry resources, mineral resources, or population and housing that would combine with other projects. The proposed activities Undergrounding Project could have potential impacts with respect to aesthetics, biological and cultural resources, geology, and hazards and hazardous materials, hydrology and water quality, land use and planning, recreation, public services, transportation and traffic, and utilities and service systems. However, such impacts would be limited to the project site and, where necessary, mitigated such that they would not substantially combine with other off-site impacts.

The Undergrounding Project's potential impacts with respect to air quality and greenhouse gas emissions, however, could extend beyond the site to combine with impacts from other projects. As described in Sections 2.3 and 2.7, Air Quality and Climate Change, respectively, the BAAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable in developing its CEQA significance thresholds. The BAAQMD considers projects that result in emissions that exceed its CEQA significance thresholds to result in individual impacts that are cumulatively considerable and significant. As discussed in the above sections, the proposed project's emissions would be limited to the construction period and would be below the BAAQMD cumulatively considerable threshold.

The PG&E pipeline safety assessment could result in the removal of trees that present emergency access impediments or safety concerns, typically within 5 to 10 feet of the pipeline (PG&E, 2015a). As part of the assessment, PG&E undertakes a tree-by-tree review, which considers distance from the pipeline, pipeline depth, tree species, and potential for corrosion from tree roots, among other factors (PG&E, 2015b). The review indicates whether a tree presents a manageable risk or an incompatible risk. There is no assumption that all trees within the review area would be removed.

PG&E has not completed the assessment in the areas of Sites 2 and 3, and so no tree removal plan is available. However, any tree removed as a result of the pipeline safety assessment in the vicinity of the project sites would be replaced at a ratio of 2:1 (San Mateo County, 2015b) by PG&E. To the extent practical, given safety concerns and the desires of the landowner, the replacement trees would be planted at or near the site of the removed tree.

As described in Section 2.1, Aesthetics, and Section 2.4, Biological Resources, the proposed project would remove trees from the Los Trancos Creek riparian corridor, which could have adverse effects on visual and biological resources. As also noted in these sections, the County would replace these trees in accordance with San Mateo and Santa Clara County tree ordinances and mitigation measures have been identified to reduce potentially significant effects on sensitive species and their habitats to a less-than-significant level. However, with the replacement plantings and mitigation in place, the proposed project would still have some temporary adverse residual effects on visual and biological resources until the replacement trees become established and mature.

The PG&E project could also result in tree removal at Sites 2 and 3. Given the close proximity of the Sites 2 and 3 work areas to the PG&E pipeline, it is possible that some of the trees PG&E identifies as safety concerns would

be the same trees proposed for removal by the County (see Attachment 1), thereby reducing the total number of trees that would be removed by the proposed project. As such, the PG&E pipeline safety assessment may result in impacts similar to those anticipated for the proposed project at Sites 2 and 3, including impacts on visual and biological resources. At the same time, these effects would be expected to be less substantial than those identified for the proposed project, given the narrow width of the pipeline assessment area and that not all trees would be removed from that zone. PG&E's replacement of removed trees would reduce the potential for permanent adverse visual or biological resources impacts, however, a residual temporal effect would remain.

The combined effects of the proposed project and the PG&E pipeline safety assessment could mean more trees are removed from Sites 2 and 3. Depending upon their number and location, they may contribute to the temporary and mitigated loss of trees related to the proposed project. Given that the above described effects would be temporary, local, and occur in a riparian zone that ranges in width from approximately 150 to 350 feet, the residual adverse effects of the proposed project after mitigation, when combined with those of the PG&E pipeline safety assessment, would not be cumulatively considerable.

For the reasons presented above, the proposed project would not be expected to result in adverse impacts to human beings, either directly or indirectly. All impacts identified in this document would be less than significant, or reduced to less than significant levels with implementation of mitigation measures, and the project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Therefore, the project's impact would be considered **less than significant**.

Section 3, Summary of Mitigation Measures, page 3-4, Mitigation Measure BIO-2 is revised as follows:

Mitigation No.	Mitigation Measure	Implementation Procedure	Monitoring and Reporting Actions	Monitoring Responsibility	Monitoring Schedule
Biological Resources					
BIO-2	<p>Mitigation Measure BIO-2: Riparian zones impacted during construction shall be restored following construction. Temporarily and permanently impacted riparian areas shall be replaced at a ratio of 1:1 or as otherwise determined in coordination with the appropriate agencies (Corps, NMFS, USFWS, RWQCB, and CDFW). After construction is completed, riparian zones shall be replanted with an assemblage of native plants appropriate to the local watershed and for the growing conditions within Los Trancos Creek. Sites must receive supplemental irrigation if necessary and monitored annually for a period of at least three years.</p> <p>Mitigation and monitoring specifications will be detailed in a Riparian Restoration Plan submitted to the Corps, NMFS, USFWS, RWQCB, and CDFW prior to project completion. At a minimum, the plan shall establish photo points to document pre-project riparian stream conditions in the work area and restoration success over time, specify the native plants to be used for restoration and the replacement ratio, establish success criteria and a monitoring schedule, and develop a contingency plan if restoration goals are not met within three years.</p> <p>At a minimum, the site shall meet the following success criteria:</p> <ul style="list-style-type: none"> Temporarily impacted areas are returned to pre-project conditions or greater No significant undercutting, scour or erosion is present within, upstream, or downstream of the work area. Replacement trees have a minimum 70% survival rate The project site is not dominated by invasive vegetation (<u>defined as less than 20% cover of invasive species by Year 3</u>). 	<ol style="list-style-type: none"> County shall review construction specifications to ensure that replanting requirements are incorporated. County shall replant affected riparian zones at a 1:1 ratio and shall submit Riparian Restoration Plan to CDFW for review. County shall implement Riparian Restoration Plan. 	<ol style="list-style-type: none"> County review construction specifications. County prepare Riparian Restoration Plan and replant riparian zones. County shall ensure that Riparian Restoration Plan is implemented. 	<ol style="list-style-type: none"> County County, CDFW County 	<ol style="list-style-type: none"> Prior to construction Following construction After construction

Section 3, Summary of Mitigation Measures, page 3-12, Mitigation Measure HYD-1 is revised as follows:

Hydrology and Water Quality					
HYD-1	<p>Mitigation Measure HYD-1: Erosion and water quality control measures identified in the plan must comply with the County of San Mateo Department of Public Work's Contract Requirements for Erosion and Sediment Control and Contract Requirements for Water Pollution Control for Construction in Sensitive Areas, and <u>The plan shall be developed in coordination with the Santa Clara Valley Urban Runoff Pollution Prevention Program staff</u>, as applicable, and at <u>At a minimum, the plan shall</u> include, but not be limited to, the following measures (County of San Mateo 2013a; County of San Mateo, 2013b:</p> <ul style="list-style-type: none"> • Temporary erosion control measures (such as silt fences, staked straw bales, and temporary revegetation) shall be employed for disturbed areas. No disturbed surfaces will be left without erosion control measures in place. • Sediment shall be retained on-site by a system of sediment basins, traps, or other appropriate measures. • A spill prevention and countermeasure plan shall be developed that will identify proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on-site. The plan will also require the proper storage, handling, use, and disposal of petroleum products. • Construction activities shall be scheduled to minimize land disturbance during peak runoff periods and to the immediate area required for construction. Existing vegetation will be retained where possible. To the extent feasible, grading activities shall be limited to the immediate area required for construction. • Surface waters, including ponded waters, must be diverted away from areas undergoing grading, construction, excavation, vegetation removal, and/or any other activity which may result in a discharge to the receiving water. Diversion activities must not result in the degradation of beneficial uses or exceedance of water quality objectives of the receiving waters. Any temporary dam or other artificial obstruction constructed must only be built from materials such as clean gravel which will cause little or no siltation. Normal flows must be restored to the affected stream immediately upon completion of work at that location. • Sediment shall be contained when conditions are too extreme for treatment by surface protection. Temporary sediment traps, filter fabric fences, inlet protectors, vegetative filters and buffers, or settling basins shall be used to detain runoff water long enough for sediment particles to settle out. Store, cover, and isolate construction materials, including topsoil and chemicals, to prevent runoff losses and contamination of groundwater. • Topsoil removed during construction shall be carefully stored and treated as an important resource. Berms shall be placed around topsoil stockpiles to prevent runoff during storm events. All removed topsoil shall be reused during construction to the extent feasible. Unused topsoil, if any, shall be broadly redistributed to the surrounding ruderal/developed areas in such a manner that topography and vegetation cover would not be adversely impacted. • Establish fuel and vehicle maintenance areas away from all drainage courses and design these areas to control runoff. • Disturbed areas will be re-vegetated after completion of construction activities. • All necessary permits and approvals shall be obtained. • Provide sanitary facilities for construction workers. 	<ol style="list-style-type: none"> 1. County shall require construction specifications include requirements regarding preparation and implementation of a comprehensive stormwater pollution and erosion control plan. 2. Contractor implements BMPs. 	<ol style="list-style-type: none"> 1. County reviews construction specifications and ensure consistency with Measure BIO-1. 2. County documents that BMPs are being implemented. 	<ol style="list-style-type: none"> 1. County 2. County 	<ol style="list-style-type: none"> 1. Prior to construction. 2. During construction.

Section 3, Summary of Mitigation Measures, page 3-15, Mitigation Measure TRA-1 is revised as follows:

Transportation/Traffic					
TRA-1	<p>Mitigation Measure TRA-1: The County shall require the construction contractor(s) to prepare and implement a traffic control plan to reduce traffic impacts on the roadways at and near the work sites, as well as to reduce potential traffic safety hazards and ensure adequate access for emergency responders and construction vehicles, as appropriate. The County and construction contractor(s) shall coordinate development and implementation of this plan with the Town of Portola Valley, City of Menlo Park, and Caltrans, as appropriate. To the extent applicable, the traffic control plan shall conform to the California Manual on Uniform Traffic Control Devices (MUTCD), Part 6 (Temporary Traffic Control) (Caltrans, 2012b). The traffic control plan shall include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> Identifying truck routes designated by the County. Haul routes that minimize truck traffic on local roadways shall be utilized to the extent possible. Sufficient staging areas for trucks accessing construction zones to minimize disruption of access to adjacent public right-of-ways. Controlling and monitoring construction vehicle movement through the enforcement of standard construction specifications by on-site inspectors. Scheduling truck trips outside the peak morning and evening commute hours to the extent possible. Limiting the duration of road and lane closures to the extent possible. Construction activities that may encroach on bicycle routes or multi-use paths, advance warning signs (e.g., <u>"Bicycles May Use Full Lane"</u>, <u>Sign R4-11 of the 2012 California Manual on Uniform Traffic Control Devices</u> <u>"Bicyclists Allowed Use of Full Lane"</u> and/or <u>"Share the Road"</u>) shall be posted that indicate the presence of such users. Implementing roadside safety protocols. Advance "Road Work Ahead" warning and speed control signs (including those informing drivers of State legislated double fines for speed infractions in a construction zone) shall be posted to reduce speeds and provide safe traffic flow through the work zone. Coordinating construction administrators of police and fire stations (including all fire protection agencies), and recreational facility managers. Operators shall be notified in advance of the timing, location, and duration of construction activities and the locations of detours and lane closures, where applicable. Repairing and restoring affected roadway rights-of way to their original condition after construction is completed. 	<ol style="list-style-type: none"> County shall require construction specifications include traffic control plan. Contractor implements measures. 	<ol style="list-style-type: none"> County reviews construction specifications. County documents that traffic control plan measures are being implemented. 	<ol style="list-style-type: none"> County County 	<ol style="list-style-type: none"> Prior to construction During construction

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5. References

- California Department of Transportation (Caltrans), 2014. California Manual on Uniform Traffic Control Devices (MUTCD), Part 6 (Temporary Traffic Control), 2014.
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ATTACHMENT 1

Appendix D. Tree Removal Plan

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SOURCE:BKF (survey and drafting)



D120603.01 - Alpine Road Trail Improvements

FIGURE D-1
TREE REMOVAL PLAN
SITE 2



SOURCE:BKF (survey and drafting)

— D120603.01 - Alpine Road Trail Improvements

FIGURE D-2
TREE REMOVAL PLAN
SITE 3

ATTACHMENT 2

Figure 5. Plan View of Proposed Creek Stabilization Work at Site 2

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