

# **San Mateo County Animal Shelter Project**

## **Addendum to the Mitigated Negative Declaration**

(County File No. P23G6)  
(SCH No. 2015072036)

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**February 2018**

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## **INTRODUCTION**

This document is an Addendum to the San Mateo County Animal Shelter Project Mitigated Negative Declaration (MND), State Clearinghouse No. 2015072036, adopted in September 2015. Since the adoption of the MND, the County has modified project plans to expand the area of disturbance that was considered in the MND. This Addendum evaluates if new or significant impacts would result from changes to the project. Based on the results of the evaluation, no new or substantially worsened impacts would result from the proposed modifications to the project. This Addendum and the 2015 MND constitute the entirety of the administrative record required for project assessment and approval by the County of San Mateo decision-making entities.

## **PURPOSE OF THIS ADDENDUM**

Following the certification and adoption of a California Environmental Quality Act (CEQA) document, when a project is changed or there are changes in the environmental setting, a determination must be made by the lead agency as to whether an addendum or subsequent MND should be prepared. CEQA Guidelines Sections 15162 and 15164 set forth criteria to assess which environmental document is appropriate. An addendum is appropriate if the following criteria are met:

- No new significant impacts will result from the project or from new mitigation measures
- No substantial increase in the severity of environmental impact will occur
- No new feasible alternatives or mitigation measures that would reduce impacts previously found not to be feasible have, in fact, been found to be feasible

An addendum is not circulated for public review but can be included in or attached to the final adopted CEQA document. The decision-making body will consider the addendum with the final adopted MND prior to making a decision on the project. Based upon the information provided in the following section of this document, the changes to the approved project would not result in new significant impacts or substantially increase the severity of impacts. Therefore, an addendum is an appropriate means for addressing this project change, and this Addendum has been prepared to demonstrate that the proposed changes to the area of disturbance would have no effect on the environmental impact analyses presented in the MND.

## **CONCLUSIONS**

This Addendum provides additional environmental analysis for proposed changes to the project since adoption of the MND. The conclusions of the analysis in this Addendum remain consistent with those made in the MND. As demonstrated below, the proposed modifications to the approved project would not result in any new significant impacts or any substantial increase in the severity of impacts over what was previously disclosed in the MND, and no new mitigation measures would be required.

## **APPROVED PROJECT AND ENVIRONMENTAL ANALYSIS**

The project site is located at the Peninsula Humane Society and Society for the Prevention of Cruelty to Animals (SPCA) Intake at 12 Airport Boulevard, San Mateo, California. The site is currently occupied with a 51,338-square-foot animal control and shelter facility, consisting of one- and two-story structures in an irregularly shaped configuration organized into various functional zones connected by a series of indoor and outdoor corridors. The site also contains paved parking areas and landscaping. The existing impervious surface area on the site is approximately 98,000 square feet. The project site is bounded by the San Francisco Bay to the north, of which the first 100 feet inland is under the jurisdiction of the San Francisco Bay Conservation and Development Commission (BCDC). The Bay Trail runs along the eastern and northern edges of the project site. The project site is relatively flat terrain with elevations ranging

between approximately 3 to 8 feet above mean sea level. Wetlands and a culvert are also present on the site.

The County of San Mateo will redevelop the project site by constructing a new facility consisting of a main building (31,608 square feet), a maintenance shop (1,584 square feet), outdoor dog kennels (7,449 square feet), dog yards (7,687 square feet), a barn area (864 square feet), and a duck pond (240 square feet). The existing set of buildings would eventually be demolished once the new County animal control and shelter facility is fully operational. The new facility would offer similar services to the existing facility, and would generally include: public receiving, administration/support areas, domestic animal holding, animal support spaces, family support services, clinic (spay/neuter and shelter medicine), and outdoor programmatic spaces.

### **Modifications to the Approved Project**

Since the adoption of the MND, the County has expanded the area of disturbance to accommodate temporary facilities during construction of the new facility (see **Figure 1**). The expanded area would include temporary dog yards, storage, and a multi-purpose room in a temporary trailer. All facilities located within this expanded area would be temporary and would be relocated back into the new building when construction is complete.

In addition to the expanded area of disturbance, two paved parking lots to the north and east of the site (associated with the Coyote Point Recreation Area) would be used for temporary construction worker parking. Temporary trails for foot traffic crossing the Bay Trail would connect these parking areas to the project site.

Replacement of the animal shelter facility would ultimately result in a net increase of impervious surface area of approximately 19,000 square feet (19 percent), for a total impervious surface area of approximately 117,000 square feet. The project would include two detention basin areas to detain stormwater and would adhere to the required National Pollutant Discharge Elimination System (NPDES) General Construction Permit and the Municipal Regional Stormwater NPDES Permit/C.3 Requirement. As per the C.3 requirements no net increase in stormwater runoff would occur.

Construction would require the removal of approximately 40 trees on the project site. As described in the adopted MND, a permit through the County's Planning Department is required to trim or cut down a tree if the tree is classified as a live Significant Tree or a Heritage Tree. The County would comply with all requirements set forth in the tree removal permit if such trees are identified on the project site. The City has also adopted a Heritage Tree Ordinance. Although the County is exempt from the City's requirements, the County would voluntarily comply with City's requirements associated with the removal of any Heritage Tree.

Construction activities would be phased according to the following:

- Phase 1A would include the majority of the east portion of the site.
- Phase 1B would include a section at the south end of the site.
- Phase 2 would include the west portion of the site.

Construction is expected for the length of 22 months, from February 2018 to December 2019.

## **Environmental Analysis**

### ***Aesthetics***

The adopted MND determined that the project would have a less than significant impact on aesthetic resources and no mitigation would be required. While the project changes would expand the temporary area of disturbance, no changes to the permanent square footage of the new facility are proposed. Thus, the project changes would not affect the long-term visual character of the project site. Approximately 40 trees would be removed to accommodate the new facility, primarily located on the southeastern portion of the site. Some trees on the southeastern portion of the site would remain and be visible to off-site users. During construction, temporary facilities would be visible within the expanded area of disturbance, and would be removed when the new facility is operational. Construction activities would be the same as those described in the initial study (IS)/MND and would temporarily change the visual character of the site. Therefore, no new or substantially worsened aesthetic impacts would occur as a result of the project changes.

### ***Agricultural and Forest Resources***

The adopted MND determined that the project would have no impact on agricultural and forest resources. While the project changes would increase the temporary area of disturbance, the project would still occur at the same project site analyzed in the adopted MND. Like the project site, the newly added temporary construction worker parking areas are designated as Urban and Built-Up Land;<sup>1</sup> thus, use of these areas during the 22-month construction period would not affect farmland or forestland. Therefore, no new or substantially worsened impacts to agricultural and forest resources would occur as a result of the project changes.

### ***Air Quality***

The adopted MND determined that the project would have a less-than-significant impact on air quality with the implementation of **Mitigation Measure AQ-1** to reduce construction-period fugitive dust emissions. While the project changes would increase the temporary area of disturbance, construction activities would be the same as those described in the IS/MND. Moreover, the project size would remain the same, below the Bay Area Air Quality Management District (BAAQMD) significance thresholds for both construction exhaust and operational emissions. Therefore, no new or substantially worsened impacts to air quality would occur as a result of the project changes and no additional mitigation measures would be required.

### ***Biological Resources***

The adopted MND determined that the project would have a less-than-significant impact on biological resources with the implementation of **Mitigation Measures BIO-1** through **BIO-4** to protect wetlands and nesting birds. In September 2017, H. T. Harvey & Associates conducted a reconnaissance-level field survey of the project site and prepared a Biological Resources Technical Memorandum to evaluate potential biological constraints associated with the enlarged disturbance footprint (see **Appendix A** of this Addendum). **Figure 2** shows the wetland, aquatic, and riparian habitats likely to fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or the California Department of Fish and Wildlife (CDFW) on the project site. In addition to the potential jurisdictional areas described in the adopted MND, the 2017 field survey identified one additional potential jurisdictional area located in the northeast corner of the project site, a 0.003-acre coastal

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<sup>1</sup> California Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program. *San Mateo County Important Farmland 2014*.

<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/smt14.pdf> (accessed September 8, 2017).

freshwater marsh, as shown on **Figure 2**. While the project changes would increase the temporary area of disturbance, none of the potential jurisdictional areas on the project site are located within the proposed expanded area of disturbance, including construction worker parking areas and foot trails adjacent to the project site. Operation of temporary facilities during construction of the new facility in the expanded area of disturbance, including dog yards, would result in dog barking and other activities in closer proximity to wetlands and vegetation that may serve as nesting substrate for birds. The project would also require the removal of approximately 40 trees, which could potentially impact nesting birds, if present. However, the project would still be required to adhere to the County's tree protection ordinances and implement the mitigation measures described in the adopted MND and Mitigation Monitoring and Reporting Program (MMRP) to minimize potentially significant impacts to wetlands and nesting birds. Therefore, no new or substantially worsened impacts to biological resources would occur as a result of the project changes and no additional mitigation measures would be required.

### ***Cultural Resources***

The adopted MND determined that the project would have a less than significant impact on cultural resources with the implementation of **Mitigation Measures CUL-1 through CUL-7** to protect unknown archaeological and paleontological resources should they be unearthed during construction. The project changes would increase the temporary area of disturbance on the project site but would entail the same construction activities described in the IS/MND. Use of the paved parking areas adjacent to the project site for temporary construction worker parking would not entail ground disturbance. Therefore, no new or substantially worsened impacts to cultural resources would occur as a result of the project changes and no additional mitigation measures would be required.

### ***Geology and Soils***

The adopted MND determined that the project would have less-than-significant impacts related to geology and soils with the implementation of **Mitigation Measures GEO-1 through GEO-3**. Hazards related to geology and soils are site-specific. While the project changes would increase the temporary area of disturbance on the project site, the project would occur at the same site and be subject to the same geologic and soils hazards and associated mitigation measures presented in the IS/MND. Use of the paved parking areas adjacent to the project site for temporary construction worker parking would not entail ground disturbance. Therefore, no new or substantially worsened geology and soils impacts would occur as a result of the project changes and no additional mitigation measures would be required.

### ***Climate Change***

The adopted MND determined that project-related greenhouse gas (GHG) emissions would be below BAAQMD significance thresholds and, therefore, less than significant. While the project changes would increase the temporary area of disturbance on the project site, GHG emissions associated with construction activities and project operation would be the same as described in the IS/MND. Therefore, no new or substantially worsened climate change impacts would occur as a result of the project changes.

### ***Hazards and Hazardous Materials***

The adopted MND determined that the project's impacts associated with hazards and hazardous materials would be less than significant with the implementation of **Mitigation Measures HAZ-1 through HAZ-7**. While the project changes would increase the temporary area of disturbance on the project site, the project would still occur on the same site with the same hazards identified in the IS/MND. Use of the paved parking areas adjacent to the project site for temporary construction worker parking would not entail ground disturbance. Therefore, no new

or substantially worsened impacts related to hazards and hazardous materials would occur as a result of the project changes and no additional mitigation measures would be required.

### ***Hydrology and Water Quality***

The adopted MND determined that the project would have a less-than-significant impact on hydrology and water quality with the implementation of **Mitigation Measure HYD-1** in the event that groundwater is encountered during construction. While the project changes would increase the temporary area of disturbance on the project site, the project would still entail the same construction activities described in the IS/MND. Moreover, adherence to the required NPDES General Construction Permit and the Municipal Regional Stormwater NPDES Permit/C.3 Requirement would mitigate any impacts to water quality resulting from operation of the temporary facilities. These requirements include the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that contains best management practices (BMPs). The purpose of the SWPPP is to identify potential sediment sources and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts would not occur during construction activities. Implementation of a SWPPP with BMPs would control erosion and protect water quality from potential contaminants in stormwater runoff emanating from the construction site. Once operational, the project would have an impervious area of approximately 117,000 square feet—an increase in impervious area from existing conditions of approximately 19,000 square feet (19 percent). However, the project would adhere to the NPDES permits and C.3 requirements. Therefore, no new or substantially worsened impacts to hydrology and water quality would occur as a result of the project changes and no additional mitigation measures would be required.

### ***Land Use and Planning***

The adopted MND determined that the project would have a less-than-significant impact on land use and planning. While the project changes would increase the temporary area of disturbance on the project site, the project would still occur at the same site and would continue the existing land use on site. The project would still adhere to BCDC permitting requirements as described in the IS/MND. Therefore, no new or substantially worsened impacts to land use and planning would occur as a result of the project changes.

### ***Mineral Resources***

The adopted MND determined that the project would have no impact on mineral resources as the City of San Mateo does not contain known mineral resources. Therefore, no new or substantially worsened impacts to mineral resources would occur as a result of the project changes.

### ***Noise***

The adopted MND determined that the project's noise and vibration impacts would be less than significant. The project changes would increase the temporary area of disturbance on site, but would entail the same construction and operational activities described in the 2015 IS/MND. Use of the paved parking areas adjacent to the project site would be for temporary construction worker parking and would not entail additional construction activities. During construction, temporary facilities would be located in closer proximity to the Bay Trail, and trail users may temporarily experience dog barking as a noise source from the temporary dog yards; however, this would be similar to existing conditions and would be relocated to the new facility upon completion of construction. Therefore, no new or substantially worsened noise and vibration impacts would occur as a result of the project changes.

### ***Population and Housing***

The adopted MND determined that the project would have no impact on population and housing. The project would still occur at the same project site analyzed in the IS/MND. Therefore, no new or substantially worsened impacts to population and housing would occur as a result of the project changes.

### ***Public Services***

The adopted MND determined that the project would have no impact on public services. While project changes would increase the temporary area of disturbance on the site, no changes to the operational project size are proposed. Therefore, no new or substantially worsened impacts to public services would occur as a result of the project changes.

### ***Recreation***

The adopted MND determined that the project would have no impact on recreation. Project changes would include the temporary use of two paved parking areas associated with Coyote Point Recreation Area to north and east of the project site for construction worker parking and would require temporary paths crossing the Bay Trail for foot traffic only to allow construction workers to access the project site. However, the project would not increase the recreational use of Coyote Point Recreation Area, nor would it require the construction of new recreational facilities. Therefore, no new or substantially worsened impacts to recreational facilities would occur as a result of the project changes.

### ***Transportation and Traffic***

The adopted MND determined that the project would have less-than-significant impacts on transportation and traffic. While project changes would increase the temporary area of disturbance on the project site and would include the use of two parking lots adjacent to the site for temporary construction worker parking, the project would entail the same construction and operational activities described in the 2015 IS/MND. Construction workers crossing the Bay Trail on foot when traveling between the temporary parking areas and project site would yield to pedestrians and bicyclists on the Bay Trail, and access to the Bay Trail would remain throughout project construction. Therefore, no new or substantially worsened impacts to transportation and traffic would occur as a result of the project changes.

### ***Tribal Cultural Resources***

In 2017, the CEQA Appendix G checklist was updated to include analysis of tribal cultural resources (TCRs). Defined in Section 21074(a) of the Public Resources Code, a TCR is a site feature, place, cultural landscape, sacred place, or object, which is of cultural value to a California Native American tribe *and* is either listed in or eligible for listing in the California Register of Historical Resources or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a TCR. As described in the 2015 IS/MND, searches of the California Historical Resources Information System and Native American Heritage Commission Sacred Lands File were conducted for the project site. No TCRs were identified on the project site. Therefore, neither the project nor project changes would impact TCRs.

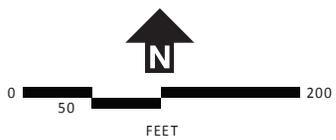
### ***Utilities and Service Systems***

The adopted MND determined that the project would have less-than-significant impacts on utilities and service systems. While the project changes would increase the temporary area of disturbance on the site, the project would still consist of continuation of existing land uses on site within a smaller footprint. Therefore, no new or substantially worsened impacts to utilities and service systems would occur as a result of the project changes.

***Mandatory Findings of Significance***

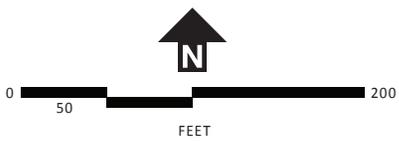
The adopted MND determined that all potential project impacts would be reduced to a less-than-significant level through mitigation and the project would not contribute to cumulatively considerable impacts. As demonstrated above, the project would not result in any new or worsened individual impacts to any of the topics analyzed, and the mitigation measures identified in the MND would still apply. Therefore, no new or substantially worsened impacts to mandatory findings of significance would occur as a result of the project changes.

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Revised Area of Potential Disturbance Map

Figure



Existing Conditions

Figure

## **Appendix A**

### **Biological Resources Technical Memorandum**

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## Memorandum

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Project# # 3603-02

September 25, 2017

**To:** Catherine Wade, Project Manager, Circlepoint

**From:** Kelly Hardwicke, Principal-in-Charge, H. T. Harvey & Associates

**Project:** San Mateo Animal Care Facility, San Mateo County

**Subject:** Biological Resources Technical Memorandum

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This memorandum was prepared by H. T. Harvey & Associates for the purpose of evaluating the potential biological constraints to the redevelopment of the San Mateo County Animal Care Shelter (Project) in San Mateo, California. Biological constraints to proposed development typically take the form of sensitive and/or regulated habitats such as wetlands; special-status plant, fish, and wildlife species (e.g., federally or state threatened or endangered species); ordinance-sized trees; or particularly large, important, or exemplary occurrences of native plant or animal species or vegetation communities. We conducted an initial evaluation of potential significant biological issues that might impose major constraints on the proposed Project. This evaluation consisted of reviews of databases on the locations of records of special-status species, a reconnaissance survey of the Project site, local knowledge of wildlife and plants in the area, and literature searches. In addition, we present an overview of some of the general issues that might impose lesser constraints on the Project for informational purposes.

### Project Description

The Project site is located at the Peninsula Humane Society and Society for the Prevention of Cruelty to Animals (SPCA) Intake at 12 Airport Boulevard, San Mateo, California. The site is situated between Highway 101 and the San Francisco Bay, and is surrounded by recreational land. The Bay Trail runs along its northern border, and Coyote Point Recreation Area is to the east. Industrial properties are located to the west of the site across Airport Boulevard. Proposed Project activities consist of the demolition of all existing structures and construction of the new Humane Society and SPCA buildings, which would include equine facilities.

## Methods

To identify potential biological constraints that may need to be addressed during Project planning, California Environmental Quality Act (CEQA) review, permitting, and implementation, H. T. Harvey & Associates ecologists conducted an extensive review of background information concerning biological resources on the Project site, including aerial photos (Google Inc. 2017), U.S. Geological Survey (USGS) topographic maps, and U.S. Fish and Wildlife Service National Wetland Inventory maps (NWI 2014). In addition, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB 2017) were queried for special-status plants, fish, and wildlife species.

To assess potentially occurring special-status plants, we performed a search of the California Native Plant Society's (CNPS) Online Inventory of Rare Plants (2017) and the California Natural Diversity Database (CNDDDB) (2017) for California Rare Plant Rank (CRPR) 1A, 1B, 2A, and 2B plants in the Project region, defined as the *San Mateo* USGS 7.5 minute quadrangle and the eight quadrangles surrounding the Project site (*San Francisco South, Hunters Point, San Leandro, Half Moon Bay, Redwood Point, Palo Alto, Woodside, and Montara Mountain*). Quadrangle-level results are not maintained for CRPR 3 and 4 species, so we also conducted a search of the CNPS Inventory (2017) for these species occurring in San Mateo County. In addition, we queried the CNDDDB (2017) for natural communities of special concern that occur within the Project region. All of these sources were combined to create the final target species list and determine the probability of occurrence for all special-status plant species within the Project site.

A reconnaissance-level field survey of biological resources and constraints present within the Project site and was conducted by H. T. Harvey & Associates wildlife ecologist Matthew Timmer, M.S., and plant biologist Maya Goklany, M.S. on December 9, 2014. Specifically, the survey was conducted to assess the existing biotic habitats at the Project site, to (1) determine the potential for special-status plant, fish, or wildlife species to occur on-site; (2) identify and map wetland, aquatic, riparian habitats that are likely to fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or the CDFW; and to (3) determine if the existing conditions of the Project site could pose any additional constraints on the Project, such as the presence of large trees or areas within close proximity to the San Francisco Bay that fall under the jurisdiction of the Bay Conservation and Development Commission (BCDC). Additional areas were added to the Project site at a later time, and a reconnaissance-level field survey of these areas was conducted by Ms. Goklany on September 1, 2017. During this site visit, Ms. Goklany identified biological resources and constraints present in the newly added areas, and rechecked the original site/survey area to determine if any substantial changes to biotic habitats and/or jurisdictional areas had occurred since the initial survey in 2014.

Although a formal wetland delineation was not conducted, the reconnaissance survey examined the vegetation, soils, and hydrology using the "Routine Determination Method" outlined in the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987). This method utilizes a three-parameter approach to identifying wetlands is based upon the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. The wetland indicator status of each species was obtained from the Arid West 2016 Regional Wetland Plant List

(Lichvar et al. 2016). Exploratory pits were dug in the transitional zones between wetland and upland habitats to examine the soil profile for hydric soil indicators, diagnostic features that provide evidence of the development of soil under sufficiently wet conditions (NRCS 2010). Wetland hydrology indicators include visual observation of surface water, high water table, or a saturated soil profile.

## Results

Table 1 summarizes the potential biological constraints to the Project related to sensitive or regulated habitats and ordinance-size trees. For each existing habitat on the Project site, associated sensitive or regulated habitats are listed in Table 1, along with the potential impacts to these resources from the proposed scope of work. Additionally, Table 1 outlines the agencies that regulate each resource and the permitting requirements of the Project.

### Existing Habitats

The Project site supports seven habitat types: 1) potential wetlands (coastal brackish and freshwater marshes), 2) aquatic (perennial perennial stream), 3) stormwater ditch, 4) willow forest, 5) ruderal grassland, 6) ornamental woodland/lawn, and 7) urban-suburban. Sensitive/regulated habitats include 0.740 ac of potential wetlands and 0.043 ac of aquatic habitat, and are discussed in greater detail in the following section. The remainder of the site may be classified as non-jurisdictional uplands.

### Potential Wetlands

**Coastal Brackish Marsh.** The westernmost feature, W1, is a 0.567 ac coastal brackish marsh (Figure 1; Photo 1, Appendix A) that has been mapped by the NWI as a palustrine, emergent, persistent, dike/impounded wetland that is seasonally flooded (NWI 2014). The lowest-lying portion of this feature (approximately 60 percent of the entire W1 area shown in Figure 1) was inundated during the December 2014 survey and was dominated by pickleweed (*Salicornia* sp.), a strongly hydrophytic (wetland loving) plant species (Lichvar et al. 2016). The outer edges and slightly elevated portions of W1 were dominated by mildly hydrophytic plant species such willow dock (*Rumex* sp.) and saltgrass (*Distichlis spicata*) (Lichvar et al. 2016); and an unknown grass that lacked the floral parts necessary for its identification to genus or species at the time of the survey.

The wetland feature, W3, is a 0.018 ac coastal brackish marsh (Figure 1; Photo 2, Appendix A), and has not been mapped by the NWI (2014). This feature is located at the western end of a narrow stormwater ditch; it is co-dominated by pickleweed and tall flatsedge (*Cyperus eragrostis*), the latter of which had senesced despite its perennial growth habit. At the time of the December 2014 survey, surface water was present in W3 as a result of the heavy rains at the Project site just prior to the visit and prevented digging exploratory soil pits in this area. Despite these wet conditions, the San Francisco Bay region had experienced drought conditions from 2011 through 2014 (USACE 2014) which likely caused dieback of much of the perennial hydrophyte community at W3. During a brief visit to this feature in 2017, numerous green and flowering tall flatsedge were observed.

Both W1 and W3 are blocked from tidal influence by a levee that runs along the shoreline of the San Francisco Bay, but due to the presence of pickleweed and saltgrass which are halophytic (salt loving), we have classified these areas as “brackish”. While it is our current assumption W3 would be considered a regulated wetland, a formal wetland delineation would be necessary to confirm that this section of the stormwater ditch is saturated for a sufficient duration of time to be considered a wetland and would also allow for the determination of a hydrologic connection (e.g. interception with groundwater) between W3 and nearby wetland or aquatic features. However, our current assumption is this would be considered a regulated wetland after formal delineation.

**Coastal Freshwater Marsh.** A perennial stream that conveys stormwater flows through the Project site, a portion of which has been mapped by the NWI as a palustrine, emergent, persistent, dike/impounded wetland that is seasonally flooded (NWI 2014). The majority of the channel bed and banks support a 0.152 ac coastal freshwater marsh that is dominated by giant reed (*Arundo donax*) (W2, Figure 1; Photo 3, Appendix A). Giant reed is a strongly hydrophytic plant species (Lichvar et al. 2016) that is listed by the California Invasive Plant Council (Cal-IPC) as having a high ecological impact; a negative effect on physical processes, native plant and animal communities, and the overall structure of vegetative communities (2017). Sections of the channel banks were lined with concrete and cobble-sized rip-rap, and at the time of the reconnaissance survey, surface water at a depth of at least one foot covered the channel bed.

Wetland feature, W4, is a 0.003 ac coastal freshwater marsh (Figure 1; Photo 4, Appendix A) and is dominated by strongly to mildly hydrophytic plants, such as tall flatsedge, curly dock (*Rumex crispus*), Italian ryegrass (*Festuca perennis*), and seaside barley (*Hordeum marinum*) (Lichvar et al. 2016). Surface water was not present in W4 at the time of the August 2017 survey, but vegetation was matted in one direction indicating that this section of the ditch conveyed flows during the 2016/2017 wet season. While it is our current assumption W4 would be considered a regulated wetland, a formal wetland delineation would be necessary to confirm that this section of the stormwater ditch is saturated for a sufficient duration of time to be considered a wetland and would also allow for the determination of a hydrologic connection (e.g. interception with groundwater) between W4 and other nearby wetland or aquatic features.

**Table 1. Existing Habitats, Sensitive/Regulated Biological Resources, Potential Impacts, and Regulatory Agencies/Permitting Needs**

Existing Habitat	Sensitive/Regulated Biological Resources	Potential Impacts	Regulatory Agencies/Permitting Needs
Wetland	Coastal brackish and freshwater marshes(W1-W4, Figure 1)	Grade/fill for new facilities	USACE/404 Nationwide Permit for W1-W4
		Dewatering	
		Conversion to horse pasture	RWQCB/401 Water Quality Certification for W1-W4  CDFW/Lake and Streambed Alteration Agreement (LSAA) for W2  BCDC/Permit for development of areas within the 100 foot (ft) shoreline band
Aquatic (Other Waters)	Stream (OW1, Figure 1)	Grade/fill for new facilities	USACE/404 Nationwide Permit for OW1 and C1
	Culvert (C1, Figure 1)	Dewatering	
		Conversion to horse pasture	RWQCB/401 Water Quality Certification for OW1 and C1  CDFW/LSAA for OW1 and C1  BCDC/Permit for areas within the 100 ft shoreline band
Stormwater Ditch	None	Grade/fill for new facilities	BCDC/Permit for areas within the 100 ft shoreline band
Willow Forest	Ordinance-sized trees	Conversion to horse pasture	
		Grade/fill for new facilities	City of San Mateo-Parks and Recreation
		Conversion to horse pasture	Department/Tree Removal or Pruning Permit  BCDC/Permit for areas within the 100 ft shoreline band

Existing Habitat	Sensitive/Regulated Biological Resources	Potential Impacts	Regulatory Agencies/Permitting Needs
Ruderal Grassland	None	Grade/fill for new facilities  Conversion to horse pasture	BCDC/Permit for areas within the 100 ft shoreline band
Ornamental woodland/lawn	None	Grade/fill for new facilities  Conversion to horse pasture	BCDC/Permit for areas within the 100 ft shoreline band
Urban-Suburban	None	Demolish existing structures  Grade/fill for new facilities  Conversion to horse pasture	BCDC/Permit for areas within the 100 ft shoreline band

N:\Projects\36003\3603-01\03\Reports\Fig 1 Potential Jurisdictional Areas\_edit.mxd



**H. T. HARVEY & ASSOCIATES**

Ecological Consultants

**Figure 1: Potential Jurisdictional Areas on the Project Site**

San Mateo Animal Care Facility  
Biological Resources Technical Memorandum (3603-03)  
September 2017

## Aquatic

Aquatic habitat includes a 0.011 ac concrete-lined section of an unnamed stream that is devoid of vegetation (OW1, Figure 1; Photo 5). The NWI has mapped a portion of the stream as a riverine, intermittent, excavated streambed that is temporarily flooded (NWI 2014). Since several feet of surface water were present along the entire length of the channel at the time of the September 2014 and August 2017 surveys, and historic aerial images from the dry season months show that the aquatic habitat remains inundated year-round (Google Inc. 2013), the aquatic habitat in OW1 was classified as perennial.

A culvert at the southern end of the perennial is also considered aquatic habitat, and covers approximately 0.032 ac (C1, Figure 1). Just outside the southern Project site boundary, stormwater emanates from C1 which runs beneath Airport Boulevard. Water then directly enters the San Francisco Bay via a pump station with three outflow pipes that spill onto a concrete apron above the mean high water and high tide line (C1, Figure 1; Photo 6).

## Stormwater Ditch

An excavated stormwater ditch runs along the northern border of the Project site adjacent to the Bay Trail; at sections of the ditch support the potential wetlands (W3 and W4, Figure 1), and the ditch runs through small patches of willow riparian forest. For the majority of its length, the ditch supports mesic plant species that are mildly hydrophytic, and upland plants such as buckhorn plantain (*Plantago coronopus*), Italian ryegrass, cut leaf geranium (*Geranium dissectum*), filaree (*Erodium* sp.) (Lichvar et al. 2016). A stormwater drain is present at the eastern end of the ditch, and the sections of the narrow channel (approximately 1 to 5.5 feet wide) were inundated with several inches of water during the December 2014 survey from the heavy rains that occurred just prior to the site visit (Photo 7, Appendix A). Because this ditch is well maintained and constructed in uplands, only the portion currently supporting wetland vegetation (W3) is likely to be considered a jurisdictional waters feature.

## Willow Forest

Small patches of willow forest are present along the northern border of the Project site adjacent to the Bay Trail. This habitat is comprised mature willow trees and shrubs (*Salix* sp.) (Photo 8, Appendix A). Much of the understory lacks vegetation and is cluttered with woody debris, although English ivy (*Hedera helix*) is common in some areas, another species considered to be highly invasive by the Cal-IPC (2017). No herbaceous wetland vegetation was observed in the willow forest area, and the willows did not occur in an area that was observed to be inundated or saturated at either site visit. These phreatophytic trees are likely tapping into, and rely on, groundwater well below the soil surface. No indicators of hydric soils were observed in the willow forest, and as the stormwater ditch they occur along lacks a defined bed and banks, was excavated in uplands, and does not replace a native drainage, in our opinion this habitat type does not represent riparian habitat that would be claimed by CDFW.

## Ruderal Grassland

The majority of the ruderal grassland on the Project site surrounds the wetland features. This habitat is highly degraded, and comprised of UPL species. Common forbs within this habitat include fennel (*Foeniculum vulgare*), wild radish (*Raphanus sativus*), black mustard (*Brassica nigra*), bull mallow (*Malva nicaeensis*), and sourgrass (*Oxalis pes-caprae*); and non-native annual grasses such as wildoats (*Avena* sp.), and various bromes, including (*Bromus diandrus*) and (*Bromus madritensis*). Several berms are scattered across the ruderal grassland and are likely comprised of soil that was removed and placed in piles during previous excavation activities on the Project site.

## Ornamental Woodland/Lawn

Much of the project site is comprised of ornamental woodland/lawn; landscaped areas that are routinely mowed and are sometimes irrigated. Common trees throughout this habitat include upland species such as Canary Island date palm (*Phoenix canariensis*), Canary Island pine (*Pinus canariensis*), cypress (*Hesperocyparis* sp.), eucalyptus (*Eucalyptus* sp.), and acacia (*Acacia* sp.). Lawns were dominated by unknown grasses that lacked the floral parts necessary for its identification to genus or species at the time of the survey, and sourgrass and English ivy were prevalent throughout these areas.

## Urban-Suburban

Urban-suburban habitat on the Project site lacked vegetation and includes Humane Society and SPCA buildings and facilities, parking lots, and walking paths or trails.

## Regulated Habitats

Wetland and aquatic habitat on the Project site may be regulated by the USACE, San Francisco RWQCB, and the CDFW. Four potential wetland features (W1-W4, Figure 1) and two potential aquatic features (OW1 and C1, Figure 1) exist on the Project site. Project impacts including, but not limited to grading, placement of fill, dewatering of channels or ponded water, or conversion of existing habitat to horse pasture in jurisdictional areas would require obtaining the various permits listed in Table 1.

Wetland feature W1 meets the definitions of Waters of the U.S. and state, and would fall under the jurisdiction of the USACE and San Francisco RWQCB. The CDFW is not likely to claim jurisdiction over W1 because the feature lacks a defined bed and banks (see Title 14, California Code of Regulations, Section 1.72). The perennial stream supports both wetlands (W2, Figure 1) and other waters (OW1 and C1, Figure 1) that would also fall under the jurisdiction of the USACE and San Francisco RWQCB. In addition, the CDFW would likely claim all three features within the perennial stream.

The potential wetlands within the stormwater ditch (W3 and W4, Figure 1) may fall under the jurisdiction of the USACE and RWQCB. However, features that are hydrologically isolated are not considered Waters of the U.S.,

and since there was no apparent connection between W3 and adjacent bodies of water (e.g. the perennial stream or San Francisco Bay) via culvert or surface flows (Photos 7 and 9, Appendix A), the USACE would claim jurisdiction over W3 and W4 only if these areas are connected to groundwater such that it rises to within 20 inches of the soil surface. A formal delineation must be submitted to the USACE to gain concurrence on excluding this area as Waters of the U.S., which would investigate soils in to determine whether the areas have a connection to groundwater near the surface.

The RWQCB's authority to regulate Projects that impact Waters of the State comes from both the Clean Water Act Section 401 and the Porter Cologne Water Quality Control Act, the latter of which has a much broader definition of Waters of the State than the USACE uses for Waters of the U.S., and the RWQCB would likely claim jurisdiction over W3 and W4 regardless of connection to groundwater. The CDFW would not likely claim jurisdiction over this feature because it lacks a defined bed and banks (see Title 14, California Code of Regulations, Section 1.72).

Due to the close proximity of the Project site to the San Francisco Bay, the BCDC would also claim jurisdiction over all habitats that fall within 100 feet of the shore or the mean tide line. The shoreline band is shown on Figure 1 and overlaps with 1.468 ac of the Project site.

Natural communities of “special concern” are tracked by the CNDDDB (2017) and the CDFW ranks sensitive vegetation alliances based on their global (G) and state (S) rankings analogous to those provided in the CNDDDB and using NatureServe's (2014) standard heritage program methodology. Global rankings (G1–G5) of natural communities reflect the overall condition (rarity and endangerment) of a habitat throughout its range, whereas S rankings are a reflection of the condition of a habitat within California. If an alliance is marked as a G1–G3, all of the associations within it would also be of high priority. The CDFW provides the Vegetation Classification and Mapping Program's currently accepted list of vegetation alliances and associations (CDFW 2010).

Three natural communities of special concern occur in the Project vicinity (defined as a 5-mile radius surrounding the site): northern coastal salt marsh, valley needlegrass grassland, and serpentine bunchgrass (Figure 2). Ruderal grassland in the Project site is heavily degraded and supports weedy nonnative species and common grasses and forbs that are not indicators of valley needlegrass grassland and/or serpentine bunchgrass habitats (Holland 1986). Since needlegrass (i.e. plants within the *Stipa* and *Nasella* genera) do not occur in the site, this natural community of special concern was considered absent. Moreover, the site is not underlain by serpentine soil or rock, and this natural community of special concern was also considered absent. All wetland features in the site (W1-W4, Figure 1) are restricted from tidal influence as a result of the levee along the shoreline of the San Francisco Bay, and thus, they were not characterized as northern coastal salt marsh. Sensitive vegetation alliances do not occur in the Project site. It should be noted that pickleweed mats and the vegetation alliance with “glasswort” (*Salicornia pacifica*) and saltgrass are ranked by CDFW (2010) as G4S3, but do not meet the criteria for a high conservation priority.

## Ordinance-size Trees

Heritage trees are defined in the City of San Mateo Municipal Code (Chapter 13.52) and in the San Mateo Ordinance Code Section 11,050. The City of San Mateo defines heritage trees as any bay (*Umbellularia* sp.), buckeye (*Aesculus* sp.), oak (*Quercus* sp.), cedar (*Cedrus* sp.), or redwood (*Sequoia* sp.) with a diameter-at-breast height (DBH) of 10 in or more (measured at 48 inches above natural grade), or any tree with a DBH of 16 in or more. Several large willow trees are present within the small patches of willow riparian forest on the Project site which likely have a DBH greater than 16 inches. In addition, several small buckeye and oak trees occur in the southeastern corner of the site. A comprehensive tree survey would be needed to determine if heritage trees would be impacted by the Project. Impacts to heritage trees as part of the Project may require a tree removal or pruning permit issued by the City of San Mateo Parks and Landscape Maintenance Manager. San Mateo County adheres to a different definition of heritage trees, which does not apply to any of those that are present on the Project site.

## Special-Status Plant Species

Based on CNDDDB (2017) records (Figure 2) and the CNPS Rare Plant Inventory tool (CNPS 2017), 106 special-status plant species were identified that are known to occur within one of the 9 USGS 7.5-minute quadrangles including or surrounding the site for CRPR 1 and 2 species, and in San Mateo County for CRPR 3 and 4 species. Special-status plants were defined as state or federally rare, threatened, or endangered species, species with CNPS Rare Plant Ranks 1-4. Species were determined to be absent from the site based upon (1) the lack of suitable habitat types; (2) the lack of specific edaphic requirements such as serpentine soils; (3) other edaphic requirements were not met by the habitats on-site; (4) the elevation range of the species is outside the range of the study area; or (5) the species is considered extirpated from the immediate vicinity of the Project based upon CNDDDB records (2017). This list of potentially occurring species was reduced to four plant species that could occur within wetland habitat on the Project site: Point Reyes bird's beak (*Chloropyron maritimum* ssp. *palustre*), saline clover (*Trifolium hydrophilum*), Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*), and harlequin lotus (*Hosackia gracilis*). The CNPS (2017) has ranked Point Reyes bird's beak and saline clover as 1B.2, and Gairdner's yampah and harlequin lotus as 4.2. The definitions of the CRPR lists are defined as follows:

- 1A =Plants presumed to be extirpated in California and either rare or extinct elsewhere
- 1B = Plants that are rare, threatened, or endangered in California and elsewhere
- 2A = Plants rare, threatened, or endangered in California but more common elsewhere
- 2B = Plants presumed extirpated in California, but more common elsewhere
- 3 = Plants about which information is needed-a review list
- 4 = A watch list of plants of limited distribution,
  - 0.1: Seriously endangered in California
  - 0.2: Fairly endangered in California
  - 0.3: Not very endangered in California



Impacts to the CNPS ranked 1B special-status plant species such as saline clover and Point Reyes bird's beak could be considered significant under CEQA, and thus, we recommend implementing pre-construction surveys to ensure compliance with these regulations if wetland habitat on the Project site cannot be avoided during construction activities. Due to the small project size and widespread distribution of Gairdner's yampah and harlequin lotus, it is unlikely that impacts to these species from the project, if they are present, would constitute a significant impact under CEQA.

The September 2017 site visit was conducted by a qualified botanist with experience identifying special-status plant species during Point Reyes bird's beak's blooming period (which occurs from June to October). No bird's beak was observed, and therefore this species is determined to be absent from the site. A site visit during the blooming period for saline clover (April – June) would be required to determine that potentially significant project-related impacts to special-status plants would not occur. Although potential project-related impacts to Gairdner's yampah and harlequin lotus would not be significant under CEQA, these species can likely be surveyed for at the same site visit required to determine whether saline clover is present, due to the overlap in published bloom periods for these three species.

### Special-Status Wildlife Species

The CNDDB was queried for special-status species that could occur in and near to the Project site (Figure 3). Because the Project site is located within a dense urban matrix and thus isolated from other undeveloped lands, the potential for Project-related impacts on special-status species is very limited. Many of the special-status animal species present in the region (i.e., San Francisco Peninsula) do not occur on the Project site because the site lacks suitable habitat and/or is outside the range of the species. Such species include the bay checkerspot butterfly (*Euphydryas editha bayensis*), mission blue butterfly (*Icaricia icarioides missionensis*), and the California least tern (*Sterna antillarum browni*). Several other special-status wildlife species may occur on the Project site only as uncommon or rare visitors, migrants, or transients, and are not expected to reside or breed on the site and would not be likely to be affected by construction or development of the site. These include species such as the brown pelican (*Pelecanus occidentalis californicus*), western snowy plover (*Charadrius alexandrinus nivosus*), short-eared owl (*Asio flammeus*), tricolored blackbird (*Agelaius tricolor*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*) and the San Francisco common yellowthroat (*Geothlypis trichas sinuosa*). Four federally-listed animal species occur in San Francisco Bay area habitats similar to that on the Project site, but are considered absent from the site. The rationale for considering these species absent from the Project site is described below.

1. The federally-endangered San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) occurs at very few locations in San Mateo County. The only known population on the east side of the peninsula occurs near the San Francisco International Airport, 3 miles to the northwest. While ostensibly suitable habitat is present on the site, the species is not expected to be present because of the numerous barriers (e.g., Highway 101) to dispersal from known locations.
2. The federally-endangered Ridgeway's rail (*Rallus obsoletus obsoletus*) occurs in tidal salt and brackish marsh. Rails have been recorded within several miles of the Project site, but the non-tidal marsh habitat in the Project area is too fragmented and unsuitable for Ridgeway's rails.



3. The federally-endangered salt marsh harvest mouse (*Reithrodontomys raviventris*) occurs in salt marsh habitat. The range of this species on the peninsula is now restricted to marshes south of the San Mateo Bridge. The marsh habitat on the Project site is too limited in size and isolated from other occupied marshes for this species to be present.
4. The federally-threatened California red-legged frog (*Rana draytonii*) is known to occur near the San Francisco International Airport, 3 miles to the northwest. However, while marginally suitable habitat is present at the Project site, it is too isolated to sustain a population of red-legged frogs. The Project site does not fall within critical habitat for this species.

Development of the site may potentially impact non-special-status nesting birds, which may nest in shrubs, trees, or on man-made structures. Although impacts to these common species would not be considered significant under the CEQA, nesting birds are protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Thus, we recommend implementing the avoidance and minimization measures described below to ensure compliance with these regulations.

## **Avoidance and Minimization Measures**

Measures to avoid and minimize impacts to water quality, heritage trees, and nesting birds may be considered during the initial design process, incorporated into the Project description, or may be set forth as requirements by regulatory agencies during the permitting process. Initially, the Project site may be designed to avoid temporary and permanent impacts to sensitive and/or regulated biological resources to the extent possible; and additional measures to avoid and minimize these impacts may be considered during the development of the Project.

### **Suggested Measures to Protect Water Quality**

1. The amount of wetland and aquatic habitats that are impacted by the Project should be limited to the smallest area required to safely and efficiently complete the work.
2. Work should proceed during days when rain is not occurring and is not predicted to occur (i.e., less than 30 percent chance) during the work period.
3. Heavy equipment will not be operated in wetland or aquatic habitats to the extent feasible, and during wet weather, they should remain on paved areas. Vehicle and equipment washing and fueling should take place off-site, or within a designated area near the entrance of the Project site in uplands at least 50 feet away from wetlands. Fueling areas should be designed to contain spills, and ample spill cleanup supplies will be kept on-site.
4. Standard erosion control and slope stabilization measures, such as fiber rolls, erosion control blankets, silt fences, and others may be required for work performed in any area where erosion could lead to sedimentation of a wetland or body of water. All erosion prevention and sediment control measures should be maintained and repaired throughout the duration of the Project.
5. The area and length of time during which bare soil, dirt/mud, gravel, rubbish, refuse and green waste is exposed should be minimized to the maximum extent practicable. When appropriate, tarps, plastic sheeting, or similar materials should be used to cover stockpiled materials on the Project site.

6. Material removed from the existing facilities should be hauled off-site to an appropriate facility for reuse or disposal which should be determined before construction activities begin.
7. Water conservation methods will ensure that water used on the Project site does not create surface flows capable of carrying pollutants to the nearby wetland and aquatic habitats. All personnel, including sub-contractors, should be instructed on the practical methods of preventing leaks or over-watering.
8. A portion of the excavated soil will be stockpiled on-site could serve as clean fill material to the extent possible. If not re-used on site, soils should be hauled off the site for reuse or disposal.
9. Groundwater or stormwater that accumulates within excavated areas should be pumped out and disposed of in uplands only. Likewise, water used for dust control, wash water, and other construction water will require containment, handling, and disposal.
10. If the Project will require temporary dewatering of wetland or aquatic habitat, a dewatering plan should be developed before construction activities begin.
11. Horse manure should be stored in production buildings or storage facilities, or otherwise covered to prevent manure from coming into contact with rainwater and entering surface waters through runoff.
12. Compost manure where appropriate, and reuse as fertilizer and/or soil amendment if possible.
13. Clean water should be diverted from contact with feedlots and holding pens, animals, and manure storage facilities through the use of berms, dikes, diversions, roofs, or enclosures.

### **Suggested Measures to Protect Biological Resources**

1. Pre-construction surveys for special-status rare plant species that have the potential to occur on the Project site and be significantly impacted (saline clover) will be conducted during its bloom period.
2. Invasive vegetation trimmed from within the Project will be collected and taken to a landfill or composting facility capable of neutralizing invasive plant material through high-heat composting or similar methods.
3. The excavated area will be backfilled with clean, native soil, and will be engineered to match the characteristics (e.g. density and compaction) of the existing substrate on the Project site.
4. Trees that are not scheduled for removal will be preserved by providing sufficient setback to protect the roots, and setbacks will be clearly marked for avoidance.
5. Tree roots of trees to be retained on site will not be left exposed to the air during grading activities, and will be protected with wet burlap or peat moss until the excavated area is ready for backfill. During backfill, careful tamping and punching 12-inch holes in the compacted ground using an iron bar can help achieve the desired amount of soil aeration to allow root recovery.
6. The ends of damaged tree roots will be cleanly removed with a smooth cut. Damaged bark will be removed with a cut that is tapered at the top to provide drainage at the base of the wood.
7. Fell material from trimming, such as woody debris and vegetation, will be contained immediately and hauled off-site.

## Suggested Measures to Protect Nesting Birds

1. **Avoidance.** To the extent feasible, Project activities should be scheduled to avoid the nesting season. If such activities are scheduled to take place outside the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code should be avoided. The nesting season in San Mateo County extends from 1 Jan through 31 August for most raptors and 1 February through 31 August for most non-raptors.
2. **Vegetation Removal during the Non-Nesting Season.** If Project activities will not be initiated until after the start of the nesting season, potential nesting substrate (e.g., bushes, trees, grasses, and other vegetation) that is scheduled to be removed by the Project may be removed prior to the start of the nesting season (e.g., prior to 1 January) to reduce the potential for initiation of nests. If it is not feasible to schedule vegetation removal during the nonbreeding season, or where vegetation cannot be removed (e.g., in areas immediately adjacent to the property), then pre-construction surveys for nesting birds can be conducted as described below.
3. **Pre-construction/Pre-disturbance Surveys.** If it is not possible to schedule Project activities between 1 September and 31 December, then pre-construction surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests will be disturbed during Project implementation. An initial pre-construction survey to determine the likelihood of constraints due to the presence of an active nest should be conducted 14 days prior to the onset of construction activities with a final pre-construction survey conducted no more than 48 hours prior to the initiation of Project activities. During this survey, a qualified ornithologist shall inspect all potential nesting habitats (e.g., trees, shrubs, grasslands, and buildings) within 300 feet of impact areas for raptor nests and within 100 feet of impact areas for nests of non-raptors. If an active nest (i.e., a nest with eggs or young, or any completed raptor nest attended by adults) is found sufficiently close to work areas to be disturbed by these activities, the ornithologist, in consultation with the CDFW, will determine the extent of a disturbance-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species) to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during Project implementation.

## Summary

In summary, the Project has the potential to impact wetlands and aquatic habitats, special-status plants and wildlife, heritage trees, and nesting birds. Any grading activities or placement of fill in wetlands, streams, or culverts may require a USACE - Section 404 Nationwide Permit, RWQCB- 401 Water Quality Certification, and/or a CDFW Lake and Streambed Alteration Agreement (LSAA). Additional permits the Project applicant would need to obtain include an Administrative or Major Permit from the BCDC for any work that would occur within the 100-foot shoreline band, where BCDC staff will determine which type of permit is needed. The greater the level of work required within the shoreline band, the greater chance a Major Permit will be required. Finally, a Tree Removal/Pruning Permit from the City of San Mateo Parks and Recreation Department may be required for Project impacts to heritage trees. Since special-status plants have the potential to occur on the Project site, pre-construction surveys for these species would be necessary to determine if the Project would result in

significant impacts under CEQA. Incorporation of the Avoidance and Mitigation Measures described above would minimize impacts to sensitive/regulated habitats and other significant biological resources on the Project site.

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## Appendix A. Photo-documentation

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Photo 1. Coastal brackish marsh wetland (W1). This photo was taken in December 2014.



Photo 2. Coastal freshwater marsh (W2). This photo was taken in December 2014.



Photo 3. Coastal brackish marsh (W3). This photo was taken in December 2014.



Photo 4. Coastal freshwater marsh (W4). This photo was taken in September 2017.



Photo 5. Perennial stream habitat (OW1). This photo was taken in December 2014.

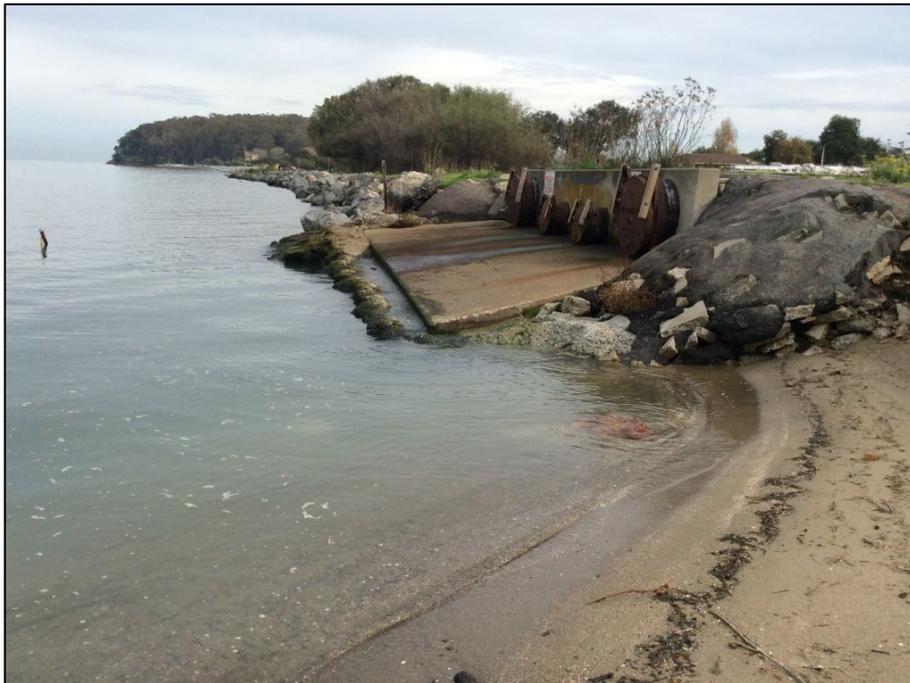


Photo 6. Culvert outlets (C1) to the San Francisco Bay. This photo was taken in December 2014.



**Photo 7. Stormwater drain at the eastern terminus of the ditch. This photo was taken in December 2014.**



**Photo 8. Willow forest habitat on the Project site supports heritage trees. This photo was taken in December 2014.**



Photo 9. Western terminus of the stormwater ditch. This photo was taken in December 2014.