DRAFT ENVIRONMENTAL IMPACT REPORT

Redwood Cabin Removal Project

Prepared for

Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

April 14, 2022

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Prepared by

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LIST OF ABBREVIATIONS

BMP	Best Management Practices
Board	Midpen Board of Directors
CA-MUTCD	California Manual on Uniform Traffic Control Devices
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society Inventory of Rare and Endangered plants
Coroner	County Medical Examiner
CRHR	California Register of Historical Resources
CWA	Clean Water Act
DPR	Department of Parks and Recreation
Draft EIR	draft environmental impact report
EIR	environmental impact report
EPG	environmental protection guidelines
ESA	Endangered Species Act
FGC	Fish and Game Code
GHG	greenhouse gasses
IPMP	Integrated Pest Management Program
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
MBTA	Migratory Bird Treaty Act
Midpen	Midpeninsula Regional Open Space District
MLD	Most Likely Descendant
NABP	Native American Burial Plan
NAHC	Native American Heritage Commission

NHPA	National Historic Preservation Act
NOP	Notice of Preparation
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
PRC	Public Resources Code
Preserve	La Honda Creek Open Space Preserve
project	Redwood Cabin Removal Project
RWQCB	Regional Water Quality Control Board
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service

EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), "an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical." As required by the guidelines, this chapter includes (1) a summary description of the Redwood Cabin Removal Project (project), (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1), (3) identification of the alternatives evaluated and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the project.

ES.2 SUMMARY DESCRIPTION OF THE PROJECT

ES.2.1 Project Location

The Redwood Cabin is situated within the upper portion of the La Honda Creek Open Space Preserve (Preserve). The Preserve encompasses 6,142 acres in the Santa Cruz Mountains within unincorporated San Mateo County, approximately 5 miles east of the Pacific Ocean. The Preserve is bounded by Highway 35 (Skyline Boulevard) to the north, by Highway 84 (La Honda Road) to the east and south, and by Bogess Creek to the west. The Redwood Cabin occupies a portion of Assessor's Parcel Number 075-330-260 and is located west of the community of Skylonda, California.

ES.2.2 Project Background

The Redwood Cabin was constructed by W.B. Allen from 1927-1928 and served as a recreational retreat for Allen's family and guests, including the YMCA and Rotary Club (LSA Associates 2018; Midpen 2020). The Redwood Cabin was acquired by Midpen in 1988 and has since been uninhabited.

In 2020, Page & Turnbull, Inc. prepared a Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (CRHR). The Historic Resource Evaluation determined that the Redwood Cabin is an historic resource per CEQA because it appears to be eligible for listing in the CRHR. The Redwood Cabin appears to be one of few remaining examples of a permanent recreational cabin from the 1920s, in the general area, with a high degree of historic integrity—historic integrity refers to a building's original character and materials, not the physical condition of the building—and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3).

On April 8, 2020, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin and implementing habitat enhancements to reflect native ecological conditions.

ES.2.3 Project Objectives

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety;
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings;

- Reduce structure and wildland fire risk by removing a structure with a history of vandalism;
- Improve the natural visual character and scenic open space qualities at the site; and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

ES.2.4 Characteristics of the Project

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including the stone retaining walls and barbeque and fire pits. Prior to demolition activities, lead-based paint present within the structure would be properly removed and disposed of.

While it is expected that excavation of posts and bases associated with the structure would be approximately 2 feet below grade, it is possible that maximum depth of excavation could reach up to 5 feet. During demolition of the structure, it is estimated that approximately 60 tons of material would be removed from the project site (ZFA 2020). Tree removal will not be required to facilitate demolition activities, although some brush clearing along the access road may be necessary.

Following completion of demolition activities, disturbed areas would be recontoured and erosion control applied to the site to ensure adequate site drainage. All demolition and recontoured areas would be compacted to 75 percent relative compaction. Native grass seed mix would be spread in the disturbed areas and weed free or native grass straw would be placed in the disturbed areas, on top of the native grass seed mix, to assist with soil stabilization and erosion control. Any wood chips or mulch generated from unsalvageable building materials may also be used to stabilize disturbed areas but will not be more than 3 inches in depth. Midpen may also conduct the following activities on the project site after demolition and recontouring:

- soil decompaction activities outside of critical rootzones,
- soil testing and, if needed, spot application of amendments such as fertilizers, lime, or organic materials, and
- revegetation or plantings.

Midpen also conducts early detection rapid response surveys for up to 3 years at revegetation sites and treats any invasive plant species on the early detection rapid response list. Other priority integrated pest management target species, including slender false brome may be treated prior to and after demolition. Slender false brome is an invasive weed of high concern at the project site; due to Midpen's mandatory quarantine of this weed, all slender false brome in the area will be treated prior to any work being completed.

Current activity at the project site consists of occasional visits from Midpen staff for inspections. Once removal of the structure and site recontouring/erosion control activities are complete, no additional maintenance or operational activities would be required at the project site except for invasive plant species treatment, if needed. The site would remain closed to the public.

ES.3 ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

ES.3.1 Project-Specific Impacts

This EIR has been prepared pursuant to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 1500, et seq.) to evaluate the physical environmental effects of the project. Midpen is the lead agency for the project and has the principal responsibility for approving and carrying out the project and for ensuring that the requirements of CEQA have been met. After the Final EIR is prepared and the EIR public-review process is complete, the Midpen Board of Directors (Board) is the party responsible for certifying that the EIR adequately evaluates the impacts of the project.

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts for the project. The table provides the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

ES.3.2 Significant-and-Unavoidable Impacts and Cumulative Impacts

The Redwood Cabin Project would result in significant and unavoidable impacts related to historical resources.

Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Implementation of the project would involve demolition of the Redwood Cabin and removal of associated site features, including the stone retaining wall, barbeque, and fire pits. The demolition of the Redwood Cabin would result in a substantial adverse change in the significance of this historical resource because the building would no longer exist. Because associated site features were determined not to possess individual historic significance and do not comprise a historic landscape, removal of these features, in tandem with the Redwood Cabin would not result in an adverse change to the significance of a historic resource. Because the Redwood Cabin structure was recommended eligible for listing in the CRHR under criterion 1 and 3, and project activities would result in an adverse change in the significance of a CEQA historic resource, impacts would be significant.

Mitigation Measure 3.2-1a requires completion of Historic American Building Survey documentation of the Redwood Cabin before commencement of any demolition work. Mitigation Measure 3.2-1b requires creation of an interpretive resource outlining the Redwood Cabin's historic status, historic context, and significance, which would be available in a digital and/or physical format for public engagement and may be shared with a relevant local organization such as the San Mateo County Historical Association. Mitigation Measure 3.2-1c requires salvage and reuse of acceptable demolished structure materials in compliance with Midpen's waste diversion requirements outlined in Midpen's Board of Directors Policy 4.08 – Construction and Demolition Waste Diversion. Implementation of Mitigation Measures 3.2-1a, 3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin, however, these measures would not reduce the project's impact associated with an adverse change to the significance of a historical resource. Because the historically eligible structure would no longer exist, impacts to the Redwood Cabin would remain significant and unavoidable after application of all feasible mitigation measures.

Impact 3.2-3: Potential to Contribute to a Significant Cumulative Impact to Cultural Resources

Implementation of EPG CUL-1 would avoid potential adverse effects to archaeological resources by ensuring proper identification, evaluation, and treatment of previously unidentified archaeological material, such that impacts would be less than significant. Therefore, implementation of the project would not contribute to a cumulative loss of archaeological resources. Similarly, other projects under Midpen's jurisdiction would be required to implement EPG CUL-1 to avoid/reduce impacts to archaeological resources.

As described in Impact 3.2-1, the Redwood Cabin is an eligible historic architectural resource. As such, implementation of the project would result in removal of a historical resource under CEQA as well as one of the few remaining structures representative of recreational development in the region. Implementation of Mitigation Measures 3.2-1a,3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin, however, these measures would not reduce the project's impact associated with an adverse change to the significance of a historical resource. This permanent loss in the resource would result in a cumulative contribution to a historic impact.

Therefore, although cumulative impacts to archaeological resources would be less than significant, cumulative impacts to cultural resources as a whole would be significant and unavoidable.

ES.4 ALTERNATIVES TO THE PROPOSED PROJECT

The following provides brief descriptions of the alternatives evaluated in this Draft EIR. Table ES-2 presents a comparison of the environmental impacts between the alternatives and the proposed project.

- Alternative 1: No Project Alternative assumes no demolition of the existing structure. The project site would remain in its current condition.
- Alternative 2: Stabilize Alternative assumes no demolition of the existing structure but includes stabilizing the building and site.
- Alternative 3: Repair and Rehabilitate Alternative assumes the repair and rehabilitation of the building for eventual reuse as a retreat space, meeting space, or hikers hut (or similar use).

ES.4.1 Environmentally-Superior Alternative

Alternative 2, Stabilize Alternative, would be the environmentally superior alternative. The Redwood Cabin would not be removed, which would result in the loss of opportunity to improve biological resources through invasive plant treatment, soil decompaction and amendments, or revegetation at the site. This would result in slightly greater impacts to biological resources but the alternative would avoid the proposed project's significant and unavoidable cultural resource impact. This significant and unavoidable impact would not be avoided under the No Project Alternative, and impacts to biological resources would be slightly greater under the No Project Alternative, for the same reason as under the Stabilize Alternative, than under the proposed project because it would not provide the long-term opportunity to improve biological resources by removing a built structure to help restore the natural biological values of a mixed evergreen forest. However, the Stabilize Alternative meets only one of the objectives: removing physical hazards to ensure public safety. The remaining four objectives would not be met by this alternative. Therefore, while the Stabilize Alternative would be the environmentally superior action alternative, it would not meet several of the project objectives.

ES.5 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

A notice of preparation (NOP) was distributed for the Redwood Cabin Project on June 9, 2021, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. A public scoping meeting was held on Wednesday, June 23, 2021 at 7:00 pm. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for was being prepared for the project and to solicit input on the scope and content of the environmental document. The NOP and responses to the NOP are included in Appendix A of this Draft EIR. Key concerns and issues that were expressed during the scoping process included the following:

- Historic value and significance of the Redwood Cabin;
- AB 52 consultation; and
- Construction traffic control plan

These issues are each addressed in this Draft EIR and accompanying Initial Study. With the exception of historical resource impacts, any impacts related to these issues are either identified as less than significant, or less than significant after mitigation.

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
Biological Resources			
Impact 3.1-1: Loss or Degradation of Habitat for Special-Status Botanical Species Suitable habitat for special-status botanical species is present within the project site; however, no special-status botanical species were identified during surveys of the site in 2020, and no loss of individual special-status plants is anticipated. With the removal of the cabin, the recontouring of the project site, and implementation of EPG BIO-10, the project would result in an increase in suitable habitat for special-status botanical species. In addition, the implementation of IPMP BMPs would avoid habitat degradation that may result from the introduction and spread of invasive plants. Therefore, the project would have a less-than-significant impact on special-status botanical species.	LTS	No mitigation is required for this impact.	LTS
Impact 3.1-2: Injury or Mortality of Special-Status Amphibians Special-status amphibians may be found within the project site. The recontouring of the site and implementation of EPG BIO-10 would ensure that there is no loss of habitat for these species. Project activities including the demolition of the Redwood Cabin and associated structures, recontouring, and staging of materials could result in the injury or mortality of special-status amphibians, and any injury or mortality of individual special-status amphibians would be a significant impact.	S	**Mitigation 3.1-2a: Protection Measures for California Red-Legged Frog** To avoid loss of individual California red-legged frog, Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures. ▶ Activities including the use of mechanical equipment, excavating, and bulldozing will require pre-activity visual surveys as well as monitoring during the activities. All maintenance activity proposals involving mechanized equipment and associated monitoring proposals will be approved by CDFW and USFWS prior to implementation of the project. ▶ Biological monitors will check for any listed species under vehicles and equipment parked for more than 30 minutes. ▶ Refueling of equipment will be conducted using heavy-gauge tarps made of chemically resistant polypropylene or other impervious material with vertical sides for spill containment. These containment tarps will be set up under the equipment prior to servicing or refueling. Once the work is completed, the tarp and its contents must be immediately removed from the property and all contaminants properly disposed of off-site. Standard operating procedures will be implemented immediately in case of fuel spillage. ▶ All vehicles must stay on designated roads, paved and unpaved, and if it is necessary for a vehicle to travel off the designated road (paved or 2 track	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		unpaved), a monitor will precede the vehicle to clear wildlife from the pathway of the vehicle. ▶ Prior to the start of work, an educational program regarding the sensitivity of the California red-legged frog and its habitat will be conducted for all personnel. ▶ Prior to the start of work, areas will be identified by the biological monitor and approved by the USFWS and CDFW as acceptable locations for the relocation of California red-legged frog if the species is encountered within the project site. Relocation areas will be a minimum of 500-feet from the boundary of the project site and will not include staging areas or roads. No California red-legged frog will be removed from Midpen property or maintained in captivity overnight without prior notification and written approval from the USFWS and CDFW unless the animal is in need of emergency medical assistance. Medical assistance will be provided by a USFWS-approved, certified wildlife veterinarian familiar with amphibian care. ▶ If a California red-legged frog enters the project site, all work shall stop until the animal leaves on its own. If the frog does not leave on its own, a biological monitor specifically authorized by the USFWS and CDFW will be allowed to handle and relocate the California red-legged frog to the pre-approved relocation area. **Mitigation 3.1-2b: Biological Monitoring for California Giant Salamander and Santa Cruz Black Salamander** To avoid loss of individual California giant salamander and Santa Cruz black salamander, Midpen will implement the following measures. ▶ Prior to the start of demolition each day, the access road and portions of the project site where activities will occur will be surveyed by a qualified biologist for the presence of California giant salamander and Santa Cruz black salamander. The survey will include the inspection of any debris from demolition or materials staged overnight for the presence of these species. ▶ If individual California giant salamanders or Santa Cruz black salamanders are discovered during daily inspections, work shall stop until the individual salamander moves on its own to a point where it is no longer at risk of incidental injury or death from project activities, or until the individual salamander is moved outside of the project site by a qualified biologist.	

<table>
<tr><th>Impacts</th><th>Significance before Mitigation</th><th>Mitigation Measures</th><th>Significance after Mitigation</th></tr>
<tr><td>Impact 3.1-3: Disturbance of Nesting Marbled Murrelet
The nearest mapped nesting habitat for marbled murrelet (Brachyramphus marmoratus) is located approximately one-half mile west of the project site. However, unmapped nesting habitat could occur within a quarter mile of the project site, and implementation of the project could result in loss of eggs and young from nest disturbance during the breeding season (March 24 – September 15) . If nesting marbled murrelets are within a quarter mile of the project site, the project would have a significant impact on this species.</td><td>S</td><td>Mitigation 3.1-3: Preconstruction surveys and nest buffers marbled murrelet
To avoid disturbance and loss of the nests of marbled murrelet Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.
Pre-demolition nest tree survey within a quarter mile of the project site for trees that meet the Pacific Seabird Group definition of potential murrelet nesting trees.
▶ If a potential nesting tree is detected within 300 feet of the project site or if a murrelet nest is detected, Midpen will notify the USFWS before work begins.
▶ If a potential nesting tree is detected greater than 300 feet and less than a quarter mile from the project site, the following will apply:
◤ If possible, work within the project site shall be confined to September 15 to November 1.
◤ If work is scheduled to be performed during the breeding season (March 24 to September 15), disturbance minimization buffers determined by the sound level anticipated from the project will be implemented based on sound level monitoring studied, submitted to USFWS and the table below.
<table>
<tr><th colspan="5">Anticipated Project-Generated Sound Level (dB)[2]</th></tr>
<tr><th>Ambient Pre-Project Sound Level (dB)[1]</th><th>Moderate (71-80)</th><th>High (81-90)</th><th>Very High (91-100)</th><th>Extreme (101-110)</th></tr>
<tr><td>Natural Ambient (≤50)[3]</td><td>50 (165)[4,5]</td><td>150 (500)</td><td>400 (1,320)</td><td>400 (1,320)</td></tr>
<tr><td>Very Low (51-60)</td><td>0</td><td>100 (300)</td><td>250 (825)</td><td>400 (1,320)</td></tr>
<tr><td>Low (61-70)</td><td>0</td><td>50 (165)</td><td>250 (825)</td><td>400 (1,320)</td></tr>
<tr><td>Moderate (71-80)</td><td>0</td><td>50 (165)</td><td>100 (330)</td><td>400 (1,320)</td></tr>
<tr><td>High (81-90)</td><td>0</td><td>50 (165)</td><td>50 (165)</td><td>150 (500)</td></tr>
</table>
[1] Ambient sound level includes all natural and human-induced sounds occurring at the project stie prior to the project, and not related to the project.
[2] Project-generated sound levels measured at 50 feet from the source
[3] "Natural Ambient" refers to sound levels generally experienced in habitats not substantially influenced by human activities
[4] All distances are given in meters, with rounded equivalent feet in parentheses.
[5] For murrelets, activities conducted during the dawn and dusk periods have special considerations for ambient sound level.
Source: USFWS 2016; USFWS 2020</td><td>LTS</td></tr>
</table>

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Project activities shall not be conducted within a visual line-of-site distance of 132 feet from a suitable nest tree as designated by a qualified biologist. ▶ If a sound study is not conducted, no project activities shall occur within a quarter mile of potential nest trees during the marbled murrelet breeding season (March 24 to September 15). ▶ If project activity takes place during the breeding season (March 24 to September 15) regardless of the distance to potential nest trees, activity will be restricted to 2 hours after sunrise and 2 hours before sunset to minimize disturbance to murrelets that may be flying over the project site to forage at the coast. ▶ If marbled murrelet protocol level surveys are conducted and do not indicate that the habitat is occupied by marbled murrelet, the seasonal and distance work restrictions may be lifted with written approval from the USFWS.	
Impact 3.1-4: Disturbance of Common Raptor and Other Common Bird Nests The project site provides suitable nesting habitat for common raptors and other common nesting birds, and project activities could result in the disturbance of active nests if demolition occurs during the nesting season. The disturbance of active nests could result in the abandonment of nests and the mortality of eggs and young, which would be a potentially significant impact.	PS	**Mitigation 3.1-4: Preconstruction surveys and nest buffers for common raptors and other nesting birds** To avoid disturbance and loss of the nests of common raptors and other nesting birds Midpen will implement the following measures. ▶ If work is scheduled to be performed during the nesting season (the specific start and end dates of the season will be determined by a qualified biologist but are typically February 15 to August 30), a pre-demolition survey will be performed within 1,000 feet of the project site, no more than 14 days prior to the start of demolition related activities. If no active nests are detected during surveys, no further mitigation is required. ▶ If active nests are found during the pre-demolition survey, a buffer will be established around each nest. No project activity will occur within a buffer of 1,000-feet around large raptor nests (e.g., buteos) 500-feet around small common raptor nests (e.g., accipiters) and 250-feet around the nests of other common bird species. The size of the buffer around any individual nest maybe reduced by a qualified biologist in consultation with CDFW, depending on screening of the nest from project activities and other site-specific conditions. These buffers will be maintained until a qualified biologist determines that any young have fledged, and the nest is no longer active.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact 3.1-5: Loss of San Francisco Dusky-Footed Wood Rat Nests The Redwood Cabin contains multiple San Francisco dusky-footed wood rat (*Neotoma fuscipes annectens*) nests. The demolition of the cabin would destroy these nests and could result in the injury or mortality of young woodrats if demolition occurs during the rearing season (approximately April 1 to July 15). The destruction of these nests and the injury or mortality of young woodrats would be a significant impact	S	**Mitigation 3.1-5: Minimize impacts from loss of San Francisco dusky-footed wood rat nests** ▶ To avoid loss of San Francisco dusky-footed wood rat during demolition, work will be conducted outside of the rearing season (before April 1 or after July 15). ▶ Prior to demolition, debris piles will be constructed outside of and adjacent to the project footprint to provide shelter for wood rats that are displaced by demolition. These debris piles will be constructed under the guidance of a qualified biologist and will consist of dead branches of various sizes (0.5 to 6 inches in diameter) collected from the surrounding area. Each pile will be approximately 3 to 5 feet high by 8 to 10 feet in diameter. The number of debris piles will be determined by a qualified biologist based on the number of nests in the Redwood Cabin prior to demolition. ▶ To avoid death of wood rats, wood rat nest materials will be removed by hand from the Redwood Cabin prior to demolition of the structure. ▶ If wood rats are observed during demolition, work will stop until the animal leaves the area on its own, or until a qualified biologist determines that work can continue without harm to the animal.	LTS
Impact 3.1-6: Loss of Bat Roosts and Mortality of Individuals The Redwood Cabin provides potential roosts for common and special-status bats. The demolition of the Redwood Cabin could result in disturbance of active bat roosts, which could result in the loss of adult and young bats. The loss of individual special-status bats, or the loss of a maternity roost of any bat species would be a potentially significant impact	PS	**Mitigation 3.1-6: Pre-demolition surveys and measures to reduce impacts to bat roosts and special-status bats** ▶ A pre-demolition bat roost survey shall be conducted at the project site by a qualified biologist no more than two days prior to the start of demolition. ▶ In addition, if demolition is anticipated to occur during the bat wintering period (from November 16 through February 15), a pre-demolition winter roost survey shall be conducted by a qualified biologist. ▶ If individual nonbreeding and non-special-status bats are roosting within the structure, a qualified biologist may remove the bats and work may proceed during any time of the year. If special-status bats or a maternity roost of any bat species is detected, demolition will not be allowed to occur during the April through August maternity season; outside of the maternity season, bats shall be excluded and provided alternate roost sites before demolition. ▶ Midpen will develop a project specific bat roost deterrent plan if special-status bats or a maternity roost of any bat species is detected in the Redwood Cabin. The deterrent plan will be submitted to CDFW for approval and will include measures such as acoustic deterrents and one-way bat doors installed outside of the maternity season (April through August), and other similar methods.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Demolition will occur when forecast nighttime lows are not below 50 degrees Fahrenheit. ▶ The materials around crevices that may provide roosting sites within the structure will be first demolished with hand tools to minimize the potential risk of injuring bats. ▶ Initial demolition will be performed in the early evening after sunset, or if evening work is not feasible, the work shall be initiated in the afternoon to ensure that any bats present are not in torpor and unable to escape. Once demolition has been started, further work may be performed at any point in the day. A qualified bat biologist will be present at the initiation of demolition to capture and temporarily hold any bats present for release the evening of the same day.	
Impact 3.1-7: Disturbance or Loss of Special-Status Mammal Den Sites (American Badger and Ringtail) The project site and adjacent redwood forest provide potential denning sites for special-status mammals. The demolition of the Redwood Cabin could result in disturbance of active dens and the injury or mortality of pups if the demolition occurs during the breeding season. The loss of active dens and injury of mortality of special-status mammal pups would be a potentially significant impact	PS	**Mitigation 3.1-7: Pre-demolition surveys and den buffers for American badger and ringtail** ▶ If the project occurs during the period when pups are potentially in the den February 15 through July 1, a qualified biologist shall conduct pre-demolition surveys within 100 feet of the project site for potential American badger and ringtail dens. The survey will occur no more than 7-days prior to implementation of demolition activities. ▶ If any potentially occupied American badger dens are located during surveys, no work shall be performed within a 100-foot buffer around dens during the period when pups are potentially in the den (February 15 through July 1). ▶ If any potentially occupied ringtail dens (e.g., brush piles, appropriately sized burrows, hollow logs, hollow trees) are located during surveys, the same buffers as described for American badger will be applied during breeding season for ringtail (May 1 through June 30).	LTS
Impact 3.1-8: Disturbance or Loss of Riparian Habitat or Other Sensitive Natural Communities The project does not contain riparian woodland; however, herbaceous riparian habitat is present along the adjacent La Honda Creek. The project would not directly affect this habitat and the implementation of EPG WQ-2 would avoid and minimize impacts from the runoff of sediment from the project. The site also contains a CDFW-designated sensitive natural community, Redwood Forest; however, this community would not be adversely affected by the project because the project would not remove any trees, would treat on-site invasive species, and	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
would restore the area disturbed by the project through the implementation of EPG BIO-10. Therefore, the impact of the project on riparian habitat and other sensitive natural communities would be less than significant.			
Impact 3.1-9: Degradation or loss of protected wetlands and other waters The access road to the project site crosses La Honda Creek and an un-named tributary. A temporary bridge may be required to move equipment across the tributary; however, no dredge or fill of the creek or tributary will occur as a result of the project. In addition, EPG WQ-2 will be implemented to avoid and minimize impacts to La Honda Creek and its tributary due to runoff from the project site. Therefore, the impact to protected wetlands and other waters would be less than significant.	LTS	No mitigation is required for this impact.	LTS
Impact 3.1-10: Potential to Interfere with Wildlife Movement and Nursery Sites The demolition of the Redwood Cabin would not result in any changes in habitat or new structures that would interfere with wildlife movement. The noise and human activity associated with the project could result in temporary impacts to wildlife movement that would not be substantial, due to the short duration and limited footprint of the project in relation to other habitat in the vicinity. Therefore, the projects impact would be less than significant.	LTS	No mitigation is required for this impact.	LTS
Impact 3.1-11: Potential to Contribute to a Significant Cumulative Impact to Biological Resources Implementation of the proposed project in the context of historical effects on the landscape and in combination with other cumulative projects in the area could result in impacts to biological resources. However, through the implementation of EPGs, BMPs, and mitigation measures, the contribution of the project would be less than cumulatively considerable. Therefore, this impact would be less than significant.	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cultural Resources			
Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource Implementation of the project would result in a substantial adverse change in the significance of a recommended-eligible historical resource. This would result in a significant impact as described in State CEQA Guideline 15064.5(b)(1).	S	**Mitigation 3.2-1a: Document historic buildings prior to removal.** Midpen shall complete Historic American Building Survey documentation of the Redwood Cabin before any demolition work is conducted. Documentation shall consist of written history of the property, plans and drawings of the historic resources, and photographs, as described below: ▶ **Written History.** The report shall be reproduced on archival bond paper. ▶ **Plans and Drawings.** An architectural historian (or historical architect, as appropriate) shall conduct research into the availability of plans and drawings of the Redwood Cabin as the building currently exists. If such plans/drawings exist, their usefulness as documentation for the building shall be evaluated by the architectural historian. If deemed adequate, the plans/drawings shall be reproduced on archival mylar. If no plans/drawings are available, or if the existing plans/drawings are not found to be useful in documenting the historic resource, a historical architect shall prepare dimensioned plans and exterior elevations of the building. A combination of existing and new drawings is acceptable. All drawings shall be reproduced on archival mylar. ◤ The architectural historian shall conduct research into the existence of the original architectural plans and drawings of the building. If found, the plans shall be reproduced on archival mylar. Alternatively, the architectural plans can be scanned and saved as TIFF files. The scanning resolution shall be not less than 300 dpi. ◤ All digital files, including drawing files, shall be saved on media and labeled following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Specifications. ▶ **Photographs.** Digital photographs shall be taken of the Redwood Cabin following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Standards. The documentation shall be prepared by an architectural historian, or historical architect as appropriate, meeting the Secretary's Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards. The documentation shall be submitted to the San Mateo County Library, the San Mateo County Historical Association, the Northwest Information Center, and the Midpen office in Los Altos.	SU

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Mitigation 3.2-1b: Redwood Cabin interpretation. Midpen will create an interpretive resource outlining the Redwood Cabin's historic status, historic context, and significance. This resource will be available in a digital and/or physical format for public engagement and may be shared with a relevant local organization such as the San Mateo County Historical Association. **Mitigation Measure 3.2-1c: Salvage of useable materials.** Should any of the demolished structure materials (i.e., redwood logs) be in acceptable condition, Midpen shall reserve materials for potential future uses and/or salvage in compliance with Midpen's waste diversion requirements outlined in Midpen's Board of Directors Policy 4.08 - Construction and Demolition Waste Diversion. If these materials are free of pests, Midpen will coordinate with a local historic salvage organization, such as Garden City Recycle and Salvage in Santa Cruz, Whole House Building Supply & Salvage in San Mateo, or Heritage Salvage in Petaluma for their reuse.	
Impact 3.2-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources Project-related ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. However, because project excavation activities would occur in previously disturbed areas, the potential for encountering archaeological material is low. Additionally, because EPG CUL-1 would be implemented in the event of a discovery, this would be a less-than-significant impact.	LTS	No mitigation is required for this impact.	LTS
Impact 3.2-3: Potential for the project, in combination with other development, to contribute to a significant cumulative impact to cultural resources. The project, in combination with other cumulative development in the area, could result in impacts to cultural resources in the area. Through the implementation of environmental protection measures, the contribution of the project would not be cumulatively considerable with respect to archaeological resources. However, because the project would result in permanent removal of a historic architectural resource, impacts to historical resources would be significant. Therefore, cumulative impacts to cultural resources would be significant.	S	Mitigation Measures, 3.2-1a, 3.2-1b, and 3.2-1c, described above.	SU

Table ES-2 Summary Environmental Impacts of the Alternatives Relative to the Redwood Cabin Project

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Stabilize Alternative	Alternative 3: Repair and Rehabilitate Alternative
Biological Resources	LTSM	Slightly Greater	Slightly Greater	Greater
Cultural Resources	SU	Slightly Less	Less	Less

Source: Compiled by Ascent in 2021

Notes: LTSM = Less Than Significant with Mitigation SU = Significant and Unavoidable

1 INTRODUCTION

This draft environmental impact report (Draft EIR) evaluates the environmental impacts of the proposed Redwood Cabin Removal Project (project) and has been prepared under the direction of Midpeninsula Regional Open Space District (Midpen) in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000-21177) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000-15387) ("CEQA Guidelines").

This chapter of the Draft EIR provides information on the following:

- project requiring environmental analysis (synopsis);
- type, purpose, and intended uses of the Draft EIR;
- scope of the Draft EIR;
- agency roles and responsibilities; and
- standard terminology.

1.1 PROJECT REQUIRING ENVIRONMENTAL ANALYSIS

The following is a synopsis of the project characteristics. For further information on the proposed project, see Chapter 2, "Project Description."

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including retaining walls and barbeque pits. After demolition, the site would be left to return to its natural condition. Disturbed portions of the site would be recontoured and erosion control applied to the site to ensure adequate site drainage. The site would be revegetated with native grass seed mix. Excavations that extend below finish grade would be backfilled, compacted, and would entail minor grading as necessary for drainage and erosion control. No public access facilities would be constructed as part of this project.

1.2 PURPOSE AND INTENDED USES OF THIS DRAFT EIR

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the Midpen Board of Directors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002, CCR Section 15093).

According to CCR Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

Because it will carry out the project, Midpen is the lead agency, as defined by CEQA, for this EIR. Other public agencies with jurisdiction over the project are listed below in Section 1.5, "Agency Roles and Responsibilities."

1.3 SCOPE OF THIS DRAFT EIR

This Draft EIR includes an evaluation of the following two environmental issue areas as well as other CEQA-mandated issues (e.g., cumulative impacts, growth-inducing impacts, significant unavoidable impacts, alternatives):

- Biological Resources, and
- Cultural Resources.

Under the CEQA statutes and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the Redwood Cabin Removal Project; review of applicable planning documents and CEQA documentation; field work; comments received during a public scoping meeting held on June 23, 2021; and comments received on the Notice of Preparation (NOP) (see Appendix A of this Draft EIR). Applicable documentation includes the La Honda Creek Open Space Preserve Master Plan (2012); La Honda Creek Open Space Preserve Master Plan IS/MND (2012); and the White Barn Stabilization Project Addendum (2021). These documents are available on Midpen's website, respectively:

https://www.openspace.org/sites/default/files/La%20Honda%20Creek%20Preserve%20Master%20Plan.pdf
https://www.openspace.org/sites/default/files/20160629_LHC_IS_MND.pdf
https://www.openspace.org/sites/default/files/Addendum%20to%20the%20Master%20Plan%20IS-MND.pdf

The NOP was distributed on June 9, 2021, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for the project was being prepared and to solicit input on the scope and content of the environmental document. As a result of the review of existing information and the scoping process, it was determined that each of the issue areas listed above should be evaluated fully in this Draft EIR. Further information on the NOP and scoping process is provided below in Section 1.4, "Public Review Process."

1.4 PUBLIC REVIEW PROCESS

As identified above in Section 1.3, "Scope of this Draft EIR," in accordance with CEQA regulations, an NOP was distributed on June 9, 2021, to responsible agencies, interested parties and organizations, and private organizations and individuals that could have interest in the project. The NOP was available on Midpen's website and was distributed to responsible agencies, nearby jurisdictions, adjacent landowners, and local resource protection organizations.

Midpen hosted a virtual public scoping meeting to inform stakeholders about the project and solicit input regarding environmental topics and alternatives to be evaluated in the EIR. The scoping meeting was held during the Midpen Board of Directors meeting on June 23, 2021.

The purpose of the NOP was to provide notification that an EIR for the project was being prepared and to solicit input on the scope and content of the document. The NOP and responses to the NOP are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, comments from the general public as well as organizations and agencies on environmental issues may be submitted to the lead agency.

A virtual public meeting will be held on the Draft EIR on April 27, 2022, at 7 p.m. Upon completion of the public review and comment period, a Final EIR (Final EIR) and Mitigation Monitoring and Reporting Plan (MMRP) will be prepared that will include both written and oral comments on the Draft EIR received during the public-review period, responses to those comments, and any revisions to the Draft EIR made in response to public comments. The Draft EIR and Final EIR will comprise the EIR for the project.

Before approving the Redwood Cabin Removal Project, the lead agency, is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

1.5 AGENCY ROLES AND RESPONSIBILITIES

This Draft EIR will be used by Midpen and CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state and local agencies, which may have an interest in resources that could be affected by the project, or that have jurisdiction over portions of the project.

As the lead agency pursuant to CEQA, Midpen is responsible for considering the adequacy of the EIR and determining if the project should be approved.

Under CEQA, a responsible agency is a public agency, other than the lead agency, that has responsibility to carry out or approve a project (PRC Section 21069). A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California (PRC Section 21070).

The following agencies may serve as responsible agencies for the project:

State

- State Water Resources Control Board / San Francisco Bay Regional Water Quality Control Board

Local

- County of San Mateo
- Bay Area Air Quality Management District

1.6 DRAFT EIR ORGANIZATION

This Draft EIR is organized into chapters, as identified and briefly described below. Chapters are further divided into sections (e.g., Chapter 3, "Environmental Impacts and Mitigation Measures" and Section 3.2, "Cultural Resources"):

The "Executive Summary": This chapter introduces the project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant impacts and mitigation measures to reduce or avoid significant impacts.

Chapter 1, "Introduction": This chapter provides a description of the lead and responsible agencies, the legal authority and purpose for the document, and the public review process.

Chapter 2, "Project Description": This chapter describes the location, background, and goals and objectives for the Redwood Cabin Removal Project and describes the project elements in detail.

Chapter 3, "Environmental Impacts and Mitigation Measures": The sections within this chapter evaluate the expected environmental impacts generated by the project and are arranged by subject area. Within each subsection of Chapter 3, the regulatory background, existing conditions, analysis methodology, and thresholds of significance are described. The anticipated changes to the existing conditions after development of the project are then evaluated for each subject area. For any significant or potentially significant impact that would result from project implementation, mitigation measures are presented and the resulting level of impact significance after implementation of mitigation is identified. Environmental impacts are numbered sequentially within each section (e.g., Impact 3.2-1, Impact 3.2-2, etc.). Any required mitigation measures are numbered to correspond to the impact numbering; therefore, the mitigation measure for Impact 3.2-2 would be Mitigation Measure 3.2-2.

Chapter 4, "Alternatives": This chapter evaluates alternatives to the project, including alternatives considered but eliminated from further consideration, the No Project Alternative, and two alternative development options. The environmentally superior alternative is identified.

Chapter 5, "Other CEQA Sections": This chapter evaluates growth-inducing impacts and irreversible and irretrievable commitment of resources and discloses any significant and unavoidable adverse impacts.

Chapter 6, "Report Preparers": This chapter identifies the preparers of the document.

Chapter 7, "References": This chapter identifies the organizations and persons consulted during preparation of this Draft EIR and the documents and individuals used as sources for the analysis.

2 PROJECT DESCRIPTION

2.1 INTRODUCTION

The Midpeninsula Regional Open Space District (Midpen) is an independent special district in the San Francisco Bay Area that has preserved nearly 65,000 acres of public land and manages 26 open space preserves. Midpen's mission is to acquire and preserve a regional greenbelt of open space land; protect and restore the natural environment; and provide opportunities for ecologically sensitive public use and education. On the San Mateo County coast, Midpen's mission is expanded to include the preservation of agricultural lands and protection and restoration of the natural environment.

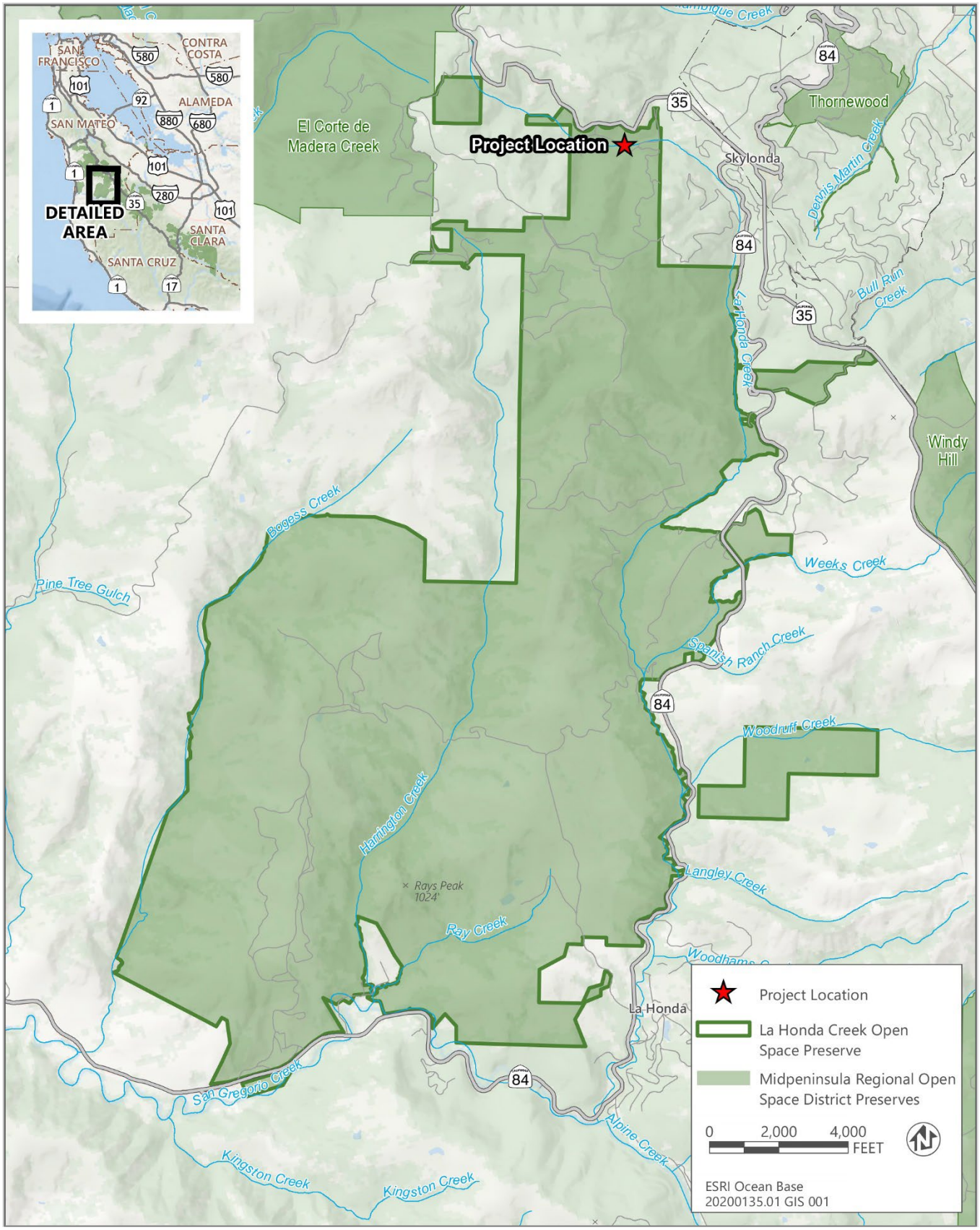
The Redwood Cabin Removal Project (project) site is located within the upper La Honda Creek Open Space Preserve (Preserve) in San Mateo County, California. The approximately 100-year-old building is currently vacant and in disrepair. The project would remove the existing Redwood Cabin and other human-made features (i.e., retaining walls, fire/barbeque pits) within the project site to remove physical hazards and improve site safety, address ongoing trespassing and vandalism issues, and restore natural resource and open space/scenic values of the surrounding mixed evergreen forest. After demolition and removal activities, site recontouring and erosion control measures would ensure soil stabilization within disturbed portions of the site. No public access facilities would be constructed as part of this project.

2.2 PROJECT LOCATION AND SETTING

The Redwood Cabin is situated within the upper portion of the Preserve. The Preserve encompasses 6,142 acres in the Santa Cruz Mountains within unincorporated San Mateo County, approximately 5 miles east of the Pacific Ocean (see Figure 2-1). The Preserve is bounded by Highway 35 (Skyline Boulevard) to the north, by Highway 84 (La Honda Road) to the east and south, and by Bogess Creek to the west.

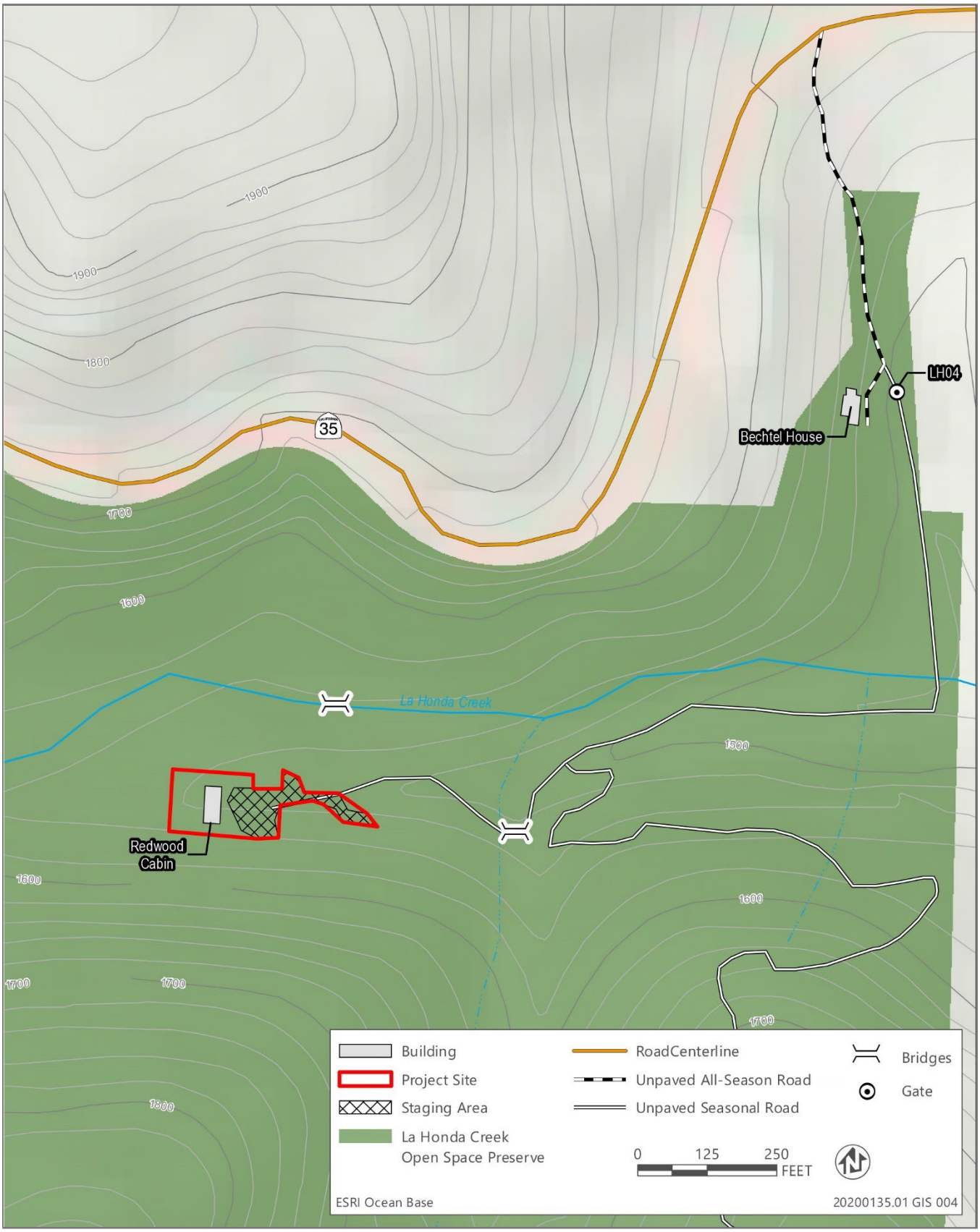
The Redwood Cabin occupies a portion of Assessor's Parcel Number 075-330-260 and is located west of the community of Skylonda, California. The project site is designated for Forest/Timber Production land uses under the San Mateo County General Plan and is zoned as Timber Land Preserve District under the San Mateo County Zoning Ordinance. Access to the Redwood Cabin is provided via an unpaved road accessible from Skyline Boulevard, which travels through two locked gates. The final segment of this unpaved road requires a four-wheel drive vehicle or access by foot (see Figure 2-2).

The project site is located in a wooded area within a portion of the Preserve that is currently not open to the public. The building is situated atop sloped terrain overlooking a circular dirt driveway that surrounds a small grove of redwood trees.



Source: Data received from Midpeninsula Regional Open Space District in 2020

Figure 2-1 Project Vicinity and Location



Source: Data received from Midpeninsula Regional Open Space District in 2021

Figure 2-2 Project Site

2.3 DESCRIPTION OF THE PROJECT SITE

2.3.1 Background

The Redwood Cabin is a large, side-gabled log cabin with a rectangular plan. The Redwood Cabin was constructed by W.B. Allen from 1927–1928 and served as a recreational retreat for Allen's family and guests, including the YMCA and Rotary Club (LSA Associates 2018; Midpen 2020). The Redwood Cabin was acquired by Midpen in 1988 and has since remained uninhabited. Today, the Redwood Cabin stands in a deteriorated state, posing a significant site safety hazard and has been the site of numerous trespassing and vandalism incidents (including fire ignitions) that raise concerns regarding overall public safety and fire risk within a very high fire severity zone.

In 2020, Page & Turnbull, Inc. prepared a Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (CRHR). The Historic Resource Evaluation determined that the Redwood Cabin is an historic resource per CEQA because it appears to be eligible for listing in the CRHR. The Redwood Cabin appears to be one of few remaining examples of a permanent recreational cabin in the Santa Cruz Mountains from the 1920s with a high degree of historic integrity—historic integrity refers to a building's original character and materials, not the physical condition of the building—and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3).

On April 8, 2020, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin and implementing habitat enhancements to reflect native ecological conditions.

STRUCTURE CONDITION

The Redwood Cabin has an approximately 2,000-square-foot footprint and is constructed of barked redwood logs with saddle notches. The cabin is supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The main entry is centered on the eastern façade and features a thick redwood burl door. Double casement windows of various sizes are present throughout all façades of the structure. The roof consists of a side-gable design with five skylights present on the east-facing roof gable. Representative photographs are shown in Figures 2-3 and 2-4. A wood plank floored deck supported by pressure treated timber previously wrapped around all four façades of the Redwood Cabin.

There is a central interior stone chimney that connects to an expansive interior fireplace. The interior of the Redwood Cabin contains a large stone fireplace in its living room, two small bedrooms, a bathroom, and a kitchen. On either side of the wall separating the two bedrooms are middens of San Francisco dusky-footed woodrat built around corner lavatories. A midden was also observed inside the kitchen cabinetry in the southwest corner of the Redwood Cabin.

In 2020, ZFA Structural Engineers prepared a Structure Stabilization Basis of Design report (Basis of Design Report). The Basis of Design Report indicates that the Redwood Cabin is in generally poor-to-fair structural condition with obvious structural damage and apparent deterioration. Findings within the Basis of Design Report also revealed the presence of lead-based paint as well as several potential seismic deficiencies (ZFA 2020).

Source: Midpen in 2021

Photo 1: Redwood Cabin, eastern façade.

Source: Ascent Environmental in 2021

Photo 2: Fire pit at front, barbeque at rear.

Figure 2-3 Representative Photographs

Source: Midpen in 2021

Photo 3: Redwood Cabin, northern façade.

Source: Ascent Environmental in 2021

Photo 4: Redwood Cabin, western façade.

Figure 2-4 Representative Photographs

VANDALISM

The Redwood Cabin has a history of periodic trespass including recent vandalism events in 2021. Given the deteriorating condition of the structure, trespassing incidents raise concerns regarding public safety. On February 16, 2021, Midpen staff visited the Redwood Cabin and observed signs of recent vandalism: broken locks, smashed windows, and deliberate dismantlement of the deck and railing. In some cases, a remote location can protect an unoccupied structure from trespass and vandalism, but with the Redwood Cabin, it is clear that numerous people are aware of its location. Evidence of fires have been found in the past in the nonfunctional fireplaces in the Redwood Cabin, which raise concerns regarding potential fire risk given the site's located within a very high fire severity zone. The difficult access to this location makes regular patrol challenging, and any illegal activity unlikely to be observed and reported by the public.

To prevent future unauthorized entry, Midpen installed plywood boards over window and door openings that could provide ingress into the Redwood Cabin. Midpen also posted new signage around the Redwood Cabin to convey its status as a "hazardous closed area," which elevates the trespass penalty to a misdemeanor (code MROSD 802.2[b]). After trespass and vandalism were observed in April 2021, Midpen removed portions of the building's wraparound deck that were in a highly dilapidated and collapsible condition to address exterior public safety concerns

OTHER SITE FEATURES

Much of the area surrounding the Redwood Cabin is wooded. The driveway is partially delineated by stone walls and a staircase that previously connected to the Redwood Cabin deck. Various remnants of the prior use of the Redwood Cabin are scattered throughout the property, including horseshoe pits, as well as a stone barbeque pit and a brick planter (also referred to as fire pit) located east of the Redwood Cabin. Additionally, several stone retaining walls are present to the east and west of the structure.

2.3.2 Project Objectives

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety,
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings,
- Reduce structure and wildland fire risk by removing a structure with a history of vandalism,
- Improve natural visual character and scenic open space qualities at the site, and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

2.4 DESCRIPTION OF THE PROJECT

2.4.1 Redwood Cabin Removal

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including the stone retaining walls and barbeque and fire pits. Prior to demolition activities, lead-based paint present within the structure would be properly removed and disposed.

While it is expected that excavation of posts and bases associated with the structure would be approximately 2 feet below grade, it is possible that maximum depth of excavation could reach up to 5 feet. During demolition of the structure, it is estimated that approximately 60 tons of material would be removed from the project site (ZFA 2020). Tree removal will not be required to facilitate demolition activities, although some brush clearing along the access road may be necessary.

2.4.2 Site Recontouring and Revegetation

Following completion of demolition activities, disturbed areas would be recontoured and erosion control applied to the site to ensure adequate site drainage. All demolition and recontoured areas would be compacted to 75 percent relative compaction. Native grass seed mix would be spread in the disturbed areas and weed free or native grass straw would be placed in the disturbed areas, on top of the native grass seed mix, to assist with soil stabilization and erosion control. Any wood chips or mulch generated from unsalvageable building materials may also be used to stabilize disturbed areas but will not be more than 3 inches in depth. Midpen may also conduct the following activities on the project site after demolition and recontouring:

- soil decompaction activities outside of critical rootzones,
- soil testing and, if needed, spot application of amendments such as fertilizers, lime, or organic materials, and
- revegetation or plantings.

Midpen also conducts early detection rapid response surveys for up to 3 years at revegetation sites and treats any invasive plant species on the early detection rapid response list. Other priority integrated pest management target species, including slender false brome may be treated prior to and after construction. Slender false brome is an invasive weed of high concern at the project site; due to Midpen's mandatory quarantine of this weed, all slender false brome in the area will be treated prior to any work being completed.

Current activity at the project site consists of occasional visits from Midpen staff for inspections. Once removal of the structure and site recontouring/erosion control activities are complete, no additional maintenance or operational activities would be required at the project site except for invasive plant species treatment, if needed. The site would remain closed to the public.

2.5 CONSTRUCTION ACCESS, EQUIPMENT, STAGING, AND LOGISTICS

Project construction activities are estimated to begin in Fall 2023 over a duration of 10 weeks. The project would be implemented by crews consisting of approximately eight personnel. Construction activities (i.e., demolition and revegetation work) would typically occur between 7:00 a.m. and 3:30 p.m. Monday through Friday, and no work would occur on Sundays or holidays. Consistent with Section 4.88.360 of the San Mateo County Noise Ordinance for construction, any work occurring on Saturday would begin no earlier than 9:00 a.m.

Equipment and vehicles would access the project area from Highway 35 (via Highways 92 or 84), then to the unpaved driveway extended from Highway 35 to the project site. Project construction activities would not require any road closures. However, because it is uncertain if southbound Highway 35 provides adequate sight distance/stopping distance in the vicinity of where heavy vehicles would need turning access to the project site, Midpen will prepare a temporary traffic control plan to ensure the safety of Highway 35 road users and construction workers.

The California Manual on Uniform Traffic Control Devices (CA-MUTCD), Part 6: Temporary Traffic Control provides principles and guidance for the implementation of temporary traffic control to ensure the provision of reasonably safe and effective movement of roadway users through or around temporary traffic control zones while reasonably protecting road users, workers, responders to traffic incidents, and equipment. Thus, the anticipated elements of the temporary traffic control plan listed below shall be developed and implemented consistent with guidance provided in CA-MUTCD, Part 6: Temporary Traffic Control and all applicable industry standards.

At a minimum, the temporary traffic control plan will include the following elements:

- Emergency services access to local land uses shall be maintained at all times for the duration of construction activities.
- Signage along Highway 35 to notify local traffic of a construction access point.
- Roadside safety protocols shall be complied with to reduce the risk of accident.
- Use flaggers to direct traffic as necessary to ensure adequate stopping distance.

Construction equipment, materials, and vehicle staging would occur within the driveway area of the project site. The construction staging area is identified in Figure 2-2. The following pieces of equipment and vehicles are anticipated:

- excavator,
- manlift(s),
- skidsteer,
- water truck,
- boom truck,
- forklift, and
- haul truck(s).

An existing bridge is located east of the Redwood Cabin on the unpaved road that provides access to the project site. A temporary bridge may be required to span this existing bridge due to limitations in the bridge's current load capacity. The temporary bridge would be placed over the existing bridge deck to span the drainage without temporary or permanent encroachments into the streambank. The temporary bridge would be removed after construction.

The total acreage of the project (which includes the staging area and project site boundaries) is identified in Figure 2-2 (approximately 0.7 acres). All construction-related hazardous materials and waste will be covered and secured at the end of each working day. The secure location shall be determined by the Midpen project manager and should be positioned away from sources of water. Waste generated by project construction activities would be disposed of offsite. If the building materials are in good condition, Midpen will conduct salvage operations per the process outlined in Midpen's Board of Directors Policy 4.08 - Construction and Demolition Waste Diversion. Likely waste disposal locations are provided below in Table 2-1 and have been used by Midpen on past projects.

Table 2-1 Potential Waste Disposal Facilities

Waste Facility	Location	Waste Facility Information
Republic Services Ox Mountain Sanitary Landfill	12310 San Mateo Road, Half Moon Bay, CA	Ox Mountain is a Class III landfill that accepts motor oil and most solid wastes, including clean metals, recyclables, construction debris, and greenwaste; it does not accept hazardous wastes.
Waste Management Kettleman Hills Landfill	35251 Old Skyline Road, Kettleman City, CA	1,600-acre hazardous waste treatment, storage, and disposal facility. Accepts municipal solid waste and most types of hazardous wastes as defined by the USEPA and/or state of California (e.g., Class I hazardous wastes, asbestos debris, petroleum and/or metal contaminated soils/debris, various sludges)

Source: City of Half Moon Bay 2014; Waste Management 2020

2.6 PERMITS AND APPROVALS

Table 2-2 below discloses the potential permits and approvals that may be required to implement the project.

Table 2-2 Potential Permits and Approvals

Permit/Approval	Agency	Purpose/Applicability
Project Approval	Midpen	Midpen Board of Directors – approval of the project
General Construction Permit	RWQCB	Regional Water Quality Control Board – general construction permit
Building	County of San Mateo	San Mateo County Planning and Building Department – demolition and grading permits
Construction	BAAQMD	Bay Area Air Quality Management District – register all portable equipment permits with BAAQMD; notify BAAQMD of all demolition activities 10 days prior to occurrence of activity.

Compiled by Ascent in 2021.

2.7 BEST MANAGEMENT PRACTICES

Midpen has adopted numerous best management practices (BMPs) that are intended to avoid and minimize environmental impacts and comply with applicable laws and regulations. For the purposes of these guidelines, references to "Midpen" also encompasses any contractors hired to implement the treatments. These BMPs would be incorporated into the design of the project.

2.7.1 La Honda Creek Open Space Preserve Master Plan EPGs

The environmental protection guidelines (EPGs) listed below are identified in Midpen's La Honda Creek Open Space Preserve Master Plan and the associated 2012 Initial Study/Mitigated Negative Declaration (IS/MND) (Midpen 2012a; 2012b), many of which were based on, and therefore reference, the San Mateo Coastal Annexation EIR. The Project is not located within the designated Coastal Area; however the EPG's can be applied, if appropriate. The EPGs below have minor text modifications (shown in strike-through and underline) to reflect subsequent changes in Midpen's guidelines, such as adoption of the Integrated Pest Management Program (IPMP), since the time the 2012 IS/MND and Master Plan were approved. These minor changes were addressed in the White Barn Stabilization Project Addendum (Ascent 2021) and do not affect the effectiveness of the measures, but instead provide clarity and specificity. Additional project-specific revisions to the EPGs (shown in double strike-through and double underline) are included to increase their direct application to the current project and thereby enhance their effectiveness. Explanations for the revisions are shown as footnotes. These revisions will not apply to future Midpen projects.

AIR QUALITY

EPG AQ-1: Midpen shall insure that the following measures are included ~~in all future~~ as part of construction contracts to control fugitive dust emissions:

- Water all active construction areas at least twice daily and more often during windy periods~~. Active areas adjacent to existing land uses shall be kept damp at all times, of shall be treated with non-toxic stabilizers or dust palliatives~~;[1]
- Cover all trucks hauling ~~soil, sand and other~~ [2] loose materials and/or require all trucks to maintain at least two feet of freeboard;
- ~~Pave or, a~~Apply water up to three times daily~~, or apply (non-toxic) soil stabilizers~~ on all unpaved access roads, ~~parking areas~~ and staging areas~~ for construction sites~~;[3]
- Sweep daily (preferably with water sweepers) all paved access roads if visible soil material is carried onto paved access roads~~, parking areas and staging areas at construction sites~~;[4]
- Sweep streets daily (preferably with water sweepers) if visible soil material is carried onto adjacent public streets;
- ~~Hydroseed or apply non-toxic soil stabilizers to inactive construction areas;~~
- Enclose, cover, or water twice daily ~~or apply non-toxic soil binders to~~ any exposed stockpiles (dirt, sand, etc.);
- Limit traffic speeds on unpaved roads to 15 mph;
- Install sandbags or other wildlife friendly erosion control measures to prevent silt runoff to public roadways;
- Replant vegetation in disturbed areas as quickly as possible with locally appropriate native plants;
- Suspend excavation and grading activity whenever the wind is so high that it results in visible dust plumes despite control efforts.

[1] There are no existing land uses adjacent to the project site.
[2] No sand or soil will be hauled during project implementation.
[3] Paving is not occurring with the project and the project site does not include paved parking or staging areas.
[4] The project site does not include paved parking or staging areas.

BIOLOGICAL RESOURCES

EPG BIO-10: Revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed by facility construction. The project includes r~~R~~evegetation work to enhance the natural open space values of the site~~ shall be implemented prior to or concurrently with the development~~. The ~~design of an appropriate~~ revegetation work~~ program shall~~ will be designed to return native species to the site, including the areas underlying footprint of where the Redwood Cabin structure and other accessory structure currently stand.[5] ~~fully compensate for the lost habitat, with no net loss of habitat functions and values. Riparian and wetland habitat impacts will typically be mitigated at a 3:1 ratio for high-quality habitat areas and at lower ratios where lower habitat quality justifies a lower ratio. A lower ratio may also be justified if habitat mitigation is implemented and verified as successful prior to the occurrence of impacts. Mitigation shall be based on in-kind replacement of impacted habitat with habitat of equal or better biotic value.~~ [6]The revegetation ~~program~~ work ~~shall~~ will be designed by a ~~qualified~~ District-approved biologist or ecologist and submitted to the appropriate regulatory or trustee agency for approval, if required. ~~At a minimum, the revegetation program shall include a description of project impacts, mitigation calculations, the mitigation site, revegetation techniques, maintenance measures, a long-term monitoring program, and contingency measures. Native plant materials suited to the site will be utilized in all mitigation work.~~[7]

CULTURAL RESOURCES

EPG CUL-1: Midpen will apply the Standard Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials:

- **Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials**. In the event that any cultural resources are exposed during construction, work at the location of the find will halt immediately within 10 meters (30 feet) of the find. If an archaeologist is not present at the time of the discovery, Midpen will contact an archaeologist for identification and evaluation in accordance with CEQA criteria.

  A reasonable effort will be made by Midpen and archaeologist to avoid or minimize harm to the discovery until significance is determined and an appropriate treatment can be identified and implemented. Methods to protect finds include fencing, covering remains with protective material and culturally sterile soil or plywood. If vandalism is a threat, 24-hour security shall be provided. During this evaluation period, construction operations outside of the find location can continue preferably with an archaeologist monitoring any subsurface excavations.

  If the resource cannot be avoided, the archaeologist will develop an appropriate Action Plan for treatment within 48 hours to minimize or mitigate the adverse effects. Midpen will not proceed with construction activities that could affect the discovery until the Action Plan has been reviewed and approved. The treatment effort required to mitigate the inadvertent exposure of significant cultural resources will be guided by a research design appropriate to the discovery and potential research data inherent in the resource in association with suitable archaeological field techniques and analytical strategies. The recovery effort will be detailed in a professional report in accordance with current archaeological standards. Any non-grave associated artifacts will be curated with an appropriate repository.

EPG CUL-2: Application of the Native American Burial Plan (NABP) will be applied:

- **Native American Burial Plan**

  1. In the event of an inadvertent discovery of human remains and cultural items during project construction, the field crew supervisor shall take immediate steps, if necessary, to secure and protect any remains and cultural materials. This shall include but is not limited to such measures as (a) temporary avoidance by construction

[5] Restoration is not proposed as part of the project. Seeding of native species is considered revegetation and will not lead to increased ecological function such as with full restoration.

[6] Biological mitigation for loss of habitat is not required for this project. As described in Section 3.1, "Biological Resources," the impact to riparian and wetland habitat is less than significant.

[7] Because mitigation for habitat loss is not required, these items are not applicable.

until the remains and items can be removed; (b) posting a security person; (c) placement of a security fence around the area of concern; or, (d) some combination of these measures. Any such measures employed will depend upon the nature and particular circumstances of the discovery.

2. The County Medical Examiner (Coroner) shall be notified by the field crew supervisor or other designated Midpen manager and informed of the find and of any efforts made to identify the remains as Native American. If the remains are identified as a prehistoric Native American by either a professional archaeologist under contract to Midpen or the Medical Examiner's forensic archaeologist, the Medical Examiner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours of notification of the find. The Medical Examiner may choose to document and remove the remains at his/her discretion depending on the circumstances of the discovery. The NAHC then designates and notifies a Most Likely Descendant (MLD). The MLD has 24 hours to consult and provide recommendations for the treatment or disposition, with proper dignity, of the human remains and grave goods [Note: Other culturally affiliated Native Americans [Indians] may be consulted by the MLD during the consultation and recommendation process to determine treatment of the skeletal remains].
3. Each burial and associated cultural items shall be stored as a unit in a secure facility, which shall be accessible to the MLD and other Native American representative(s) or their designated alternates upon prior arrangement.
4. The remains and associated cultural items shall be reburied in a secure location as near as possible to the area of their discovery or at an off-site location acceptable to the MLD that has minimal potential for future disturbance. The reburial shall be done in a manner that shall discourage or deter future disturbance. Reburial shall be conducted by persons designated by the MLD, with the assistance, if requested, of Midpen's field crew. The location shall be fully documented, filed with the NAHC and the California Historical Resources Information System, Northwest Information Center, California State University, Sonoma and treated as confidential information.
5. If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or Midpen or designate rejects the recommendation of the MLD and mediation (as per Section 5097.94 subdivision (k)) fails, reinterment of the human remains and associated cultural items associated shall take place with appropriate dignity on the property in a location not subject to further subsurface disturbance.
6. For security reasons, no news releases, including but not limited to photographs, videotapes, written articles, or other such means that contains information about human remains or burial-related items of Native American origin shall be released by any party during the discovery, recovery and reburial unless approved by the MLD.
7. Any disputes that arise among the MLD and representatives of affected Native American groups and/or between Midpen or designee ~~designate~~ and the MLD concerning cultural affiliation or the ultimate disposition of Native American human remains and associated funerary objects and unassociated funerary objects shall be resolved according to the dispute resolution procedures in Section 5097.94 of the State of California Public Resources Code.
8. The Archaeological Data Recovery/Native American Burial Treatment Report(s) shall be prepared by professional archaeologists. The report shall include, but not be limited to, the following: project overview; ethnographic section; previous archaeological research in the region and on-site; circumstances of discovery; recovery procedures and techniques; artifact analysis; faunal analysis; osteological analysis and interpretation; and, conclusions. The MLD and other interested Native American representative(s) shall be provided an opportunity to review the report and submit comments within the same time period as accorded any other reviewers.
9. Objects not associated with the human remains and recovered from private land shall be transferred to Midpen. If curation of any objects is required, curation will be at repository approved by Midpen. Repositories can include the History Museums of San Jose collections, the Tiburon Archaeological Research Group, San Francisco State University and the Collections Facility, Department of Anthropology, Sonoma State University, Rohnert Park.

EPG CUL-3: The protocol for determining if structures are of historic value is as follows:

1. The property and building types will be identified and evaluated by a qualified cultural consultant;
2. The cultural consultant will determine if the structures in question are currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places;
3. If it is determined that the structures in question are not currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places, a DPR 523 form issued by the California Department of Parks and Recreation (DPR) will be completed by the cultural consultant and the structural and building data sent to a qualified architectural historian.
4. ~~The following measure applies only to the Southern La Honda Creek Area: As required by Mitigation CUL-1a(4) of the San Mateo Coastal Annexation EIR, if it is determined that the structures in question are currently on the California Register of Historic Resources or if the building has been determined to be of historic value, there are two options that would mitigate any impact to the historic values:~~

   a) ~~Retain and rehabilitate the building according to the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). New construction near this building should be consistent with its historic character; or~~

   b) ~~Move the building to a different location on its current parcel or to a different parcel appropriate to its historic character.~~[8]

HAZARDS AND HAZARDOUS MATERIALS

Although the La Honda Creek Open Space Preserve Master Plan does not contain specific hazardous material EPGs that apply to this specific project, the document does list the following required hazards BMPS:

1. Remove all trash and construction-related waste to a secured, covered location at the end of each working day to maintain a clean worksite. Dispose of hazardous materials according to all specified regulations.
2. Store chemicals in a non-reactive container. Store bagged, dry reactive materials in a secondary container. Protect storage areas from vandalism.
3. ~~Mix concrete no closer than 25 feet from any waterway or open ditches. Concrete shall be mixed in secure containments. Cleaning of tools shall occur in secured containments; no concrete cleaning is allowed in drainages or water bodies. All concrete waste shall be off hauled; concrete is allowed to first evaporate in containments for ease of off haul.~~[9]
4. Good housekeeping practices shall be followed to minimize storm water contamination from any petroleum products or other chemicals. Maintain spill cleanup materials where readily accessible during use.
5. Conduct proper & timely maintenance of vehicles and equipment. Cleaning or equipment maintenance shall be prohibited except in designated areas located near preserve entrances. If fueling must occur onsite, use designated areas located away from drainages and a drip pan to catch spills. Place drip pans under heavy equipment stored onsite overnight.
6. Instruct all personnel regarding the correct procedure for spill prevention and control, waste disposal, use of chemicals, and storage of materials.

[8] This applies to the Southern La Honda Creek Area only and therefore is not relevant to the project.
[9] The project does not include the use of concrete.

EPG HAZ-9: In order to reduce fire ignition risk, Midpen shall require the following measures for all maintenance and construction activities within the Preserve:

- All equipment to be used during ~~construction and maintenance~~ demolition[10] activities must have an approved spark arrestor.
- Grass and fuels around ~~construction~~ demolition sites where ~~construction~~[11] vehicles are allowed to be parked will be cut or reduced.
- Mechanical ~~construction~~[12] equipment that can cause an ignition will not be used when the National Weather Service issues a Red Flag Warning for the San Francisco Bay Area.
- Hired contractors will be required to:
  - Provide water to suppress potential fires caused by the work performed.
  - Remind workers that smoking is prohibited at the work site and on any District land per contract conditions and District Ordinance.
  - Maintain working ABC fire extinguishers on all vehicles in the work area.
  - Contact both Mountain View Dispatch at (650) 968-4411 and CAL FIRE, Skylonda, at (650) 851-1860 for emergency response in the event of a fire.

HYDROLOGY AND WATER QUALITY

EPG WQ-2: Storm water quality Best Management Practices (BMPs) as listed in this section shall be implemented to reduce potential water quality impacts. BMPs include:

1. Flow of runoff from drainage structures will be directed to vegetated areas, away from creeks and drainages as is practical.
2. ~~Conduct any trail maintenance work during low flow periods.~~ [13]
3. Use erosion and sediment control measures to minimize water quality impacts and ensure no sediment at heavily traveled trails flows into creeks. To the extent feasible, all measures will be 100 percent biodegradable and/or certified weed-free. These measures include:
   - Silt Fences
   - Straw Bale Barriers
   - Brush or Rock Filters
   - Storm Drain Inlet Protection
   - Sediment Traps
   - Sediment Basins
   - Erosion Control Blankets and Mats
   - Midpen shall prevent erosion on steep slopes by using erosion control material according to manufacturer's specifications.
4. If soil is to be stockpiled for any reason at creeksides, no run-off will be allowed to flow back to the creek.

[10] No new construction is proposed. The project entails demolition activities.
[11] No new construction is proposed. The project entails demolition activities.
[12] No new construction is proposed. The project entails demolition activities.
[13] The project does not include trail maintenance.

- Additional required Best Management Practices to project water quality:

  5. Schedule project during the dry season to avoid erosion due to surface runoff during ~~the construction phase~~ demolition and site revegetation activities. [14]

  ~~6. Construct rolling dips in areas where trail gradients exceed five percent to reduce runoff concentration; outslope trail surfaces where feasible.~~ [15]

  ~~7. Implement road and trail seasonal closures to vehicles and our recreation use, where and when appropriate.~~[16]

NOISE AND VIBRATION

EPG NOI-1: Midpen will ensure that all construction activity associated with implementation of the Master Plan will occur during the less sensitive daytime hours between 7:00 a.m. and 5:00 p.m. daily.

2.7.2 Integrated Pest Management Program BMPs

In addition, the BMPs listed below from Midpen's 2014 IPMP (Midpen 2014) and subsequent 2019 IPMP (Midpen 2019) addendum would be incorporated into the design of the project.

IPMP BMP 11: Sanitation and Prevention of Contamination -All personnel working in infested areas shall take appropriate precautions to not carry or spread weed seed or SOD-associated spores outside of the infested area. Such precautions will consist of, as necessary based on site conditions, cleaning of soil and plant materials from tools, equipment, shoes, clothing, or vehicles prior to entering or leaving the site.

IPMP BMP 12: All staff, contractors, and volunteers shall be properly trained to prevent spreading weeds and pests to other sites.

IPMP BMP 14: Midpen staff shall ensure that rental equipment and project materials (especially soil, rock, erosion control material and seed) are free of invasive plant material prior to their use at a worksite.

IPMP BMP 21: A Midpen-approved biologist shall survey all selected treatment sites shortly before work to determine site conditions and develop any necessary site-specific measures. Treatment sites are defined as areas where IPM activity, including manual, mechanical, and chemical treatment, is expected to occur. In addition, on a repeating basis, grassland treatment sites shall be surveyed by a Midpen-approved biologist once every five years and brushy and wooded sites shall be surveyed once every five years. Brush removal on rangelands will require biological surveys before work is conducted in any year. Site inspections shall evaluate existing conditions at a given treatment site including the presence, population size, growth stage, and percent cover of target weeds and pests relative to native plant cover and the presence of special-status species and their habitat, or sensitive natural communities.

In addition, annual worker environmental awareness training shall be conducted for all treatment field crews and contractors for special-status species and sensitive natural communities determined to have the potential to occur on the treatment site by a Midpen approved biologist. The education training shall be conducted prior to starting work at the treatment site and upon the arrival of any new worker onto sites with the potential for special-status species or sensitive natural communities. The training shall consist of a brief review of life history, field identification, and habitat requirements for each special-status species, their known or probable locations in the vicinity of the treatment site, potential fines for violations, avoidance measures, and necessary actions if special-status species or sensitive natural communities are encountered.

[14] No new construction is proposed with the project.
[15] No new construction is proposed with the project.
[16] There is currently no public access to the project site.

2.7.3 Project Specific BMPs

In addition, to the La Honda Creek Open Space Preserve Master Plan EPGs and the IPMP BMPs, Midpen has identified additional BMPs that are specific to this project to avoid and minimize environmental impacts and comply with applicable laws and regulations. For the purposes of these guidelines, references to "Midpen" also encompasses any contractors hired to implement the treatments. These BMPs would be incorporated into the design of the project.

BMP AQ-1: Midpen is responsible for implementing the following Basic Construction Mitigation Measures in addition to EPG AQ-1 to reduce emissions from construction-related activities and to satisfy BAAQMD's BMP requirements.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure CCR Title 13, Section 2485). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

BMP GHG-1: To satisfy GHG emission reduction measures provided by BAAQMD, the project contractor is responsible for using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment for at least 15 percent of the fleet. An exemption from this requirement may be granted if the contractor documents that alternative fuel is not reasonably available within the County.

3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

APPROACH TO THE ENVIRONMENTAL ANALYSIS

This draft environmental impact report (Draft EIR) evaluates and discloses the environmental impacts associated with the Redwood Cabin Removal Project, in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulation, Title 14, Chapter 3, Section 1500, et seq.). Sections 3.1 and 3.2 of this Draft EIR present a discussion of regulatory background, existing conditions, environmental impacts associated with construction and operation of the project, mitigation measures to reduce the level of impact, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). Issues evaluated in these sections consist of the environmental topics identified for review in the Redwood Cabin Removal Project Initial Study (IS) (see Appendix B). Sections 3.1 and 3.2 of this Draft EIR also include a "Cumulative Impacts" discussion which presents an analysis of the project's impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines. Chapter 4, "Alternatives," presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed project, as required by Section 15126.6 of the State CEQA Guidelines. Chapter 5, "Other CEQA Sections," includes an analysis of the project's growth inducing impacts, as required by Section 21100(b)(5) of CEQA.

STANDARD TERMINOLOGY

This Draft EIR uses the following standard terminology:

"No impact" means no change from existing conditions (no mitigation is needed).

"Less-than-significant impact" means no substantial adverse change in the physical environment (no mitigation is needed).

"Potentially significant impact" means an impact that might cause a substantial adverse change in the environment (mitigation is recommended because potentially significant impacts are treated as significant).

"Significant impact" means an impact that would cause a substantial adverse change in the physical environment (mitigation is recommended).

"Significant and unavoidable impact" means an impact that would cause a substantial adverse change in the physical environment and that cannot be avoided, even with the implementation of all feasible mitigation.

INTRODUCTION TO THE ANALYSIS

In accordance with Section 15126.2 of the State CEQA Guidelines, this Draft EIR identifies and focuses on the significant direct and indirect environmental effects of the project, giving due consideration to both its short-term and its long-term effects. Short-term effects are generally those associated with construction, and long-term effects are generally those associated with project operations. As part of the IS prepared for the project and provided in Appendix B, the project was determined to have either less-than-significant impacts with mitigation incorporated, less-than-significant impacts, or no impact for the majority of environmental resource categories. The following discussion summarizes the analysis conducted for these resource categories, and presents any mitigation determined to be necessary to reduce impacts to less than significant. Refer to Appendix B for further clarification.

ENVIRONMENTAL RESOURCE CATEGORIES NOT EVALUATED FURTHER

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CCR Sections 15126.2[a] and 15128). Effects dismissed in an IS as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the lead agency subsequently receives information inconsistent with the finding in the IS (CCR Section 15143).

Based on comments received as part of the public scoping process (Appendix A) and a review of the information presented in the IS prepared for the project (Appendix B), as well as additional research and analysis of relevant project data during preparation of this Draft EIR, the following were identified as resources that would not experience any significant environmental impacts from the project.

- Aesthetics
- Agriculture and Forest Resources
- Air Quality
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards / Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire

As described in the IS, project impacts related to air quality (discussed on pages 3-5 through 3-12), energy (discussed on pages 3-18 through 3-19), and greenhouse gasses (discussed on pages 3-24 through 3-27) were determined to be less than significant with implementation of project-specific BMPs, as described in Section 2.7.3 of Chapter 2, "Project Description."

ENVIRONMENTAL RESOURCE CATEGORIES EVALUATED FURTHER

This EIR's analysis provides a more detailed evaluation of the following two environmental resource topics that require or merit additional explanation beyond what is provided in the IS:

- Section 3.1, Biological Resources
- Section 3.2, Cultural Resources

Sections 3.1 and 3.2 of this Draft EIR each include the following components as they relate to the two environmental resource topics:

- **Regulatory Setting:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from the federal, state, and local levels are each discussed as appropriate.
- **Environmental Setting:** This subsection presents the existing environmental conditions on the project site and in the surrounding area as appropriate, in accordance with State CEQA Guidelines Section 15125. The discussions of the environmental setting focus on information relevant to the issue under evaluation. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected.
- **Environmental Impacts and Mitigation Measures:** This subsection presents thresholds of significance and discusses potentially significant effects of the project on the existing environment, including the environment beyond the project boundaries, in accordance with State CEQA Guidelines Section 15126.2. The methodology for

impact analysis is described, including technical studies upon which the analyses rely. The thresholds of significance are defined and thresholds for which the project would have no impact are disclosed and dismissed from further evaluation. Project impacts and mitigation measures are numbered sequentially in each subsection (Impact 3.2-1, Impact 3.2-2, Impact 3.2-3, etc.). A summary impact statement precedes a more detailed discussion of the environmental impact. The discussion includes the analysis, rationale, and substantial evidence upon which conclusions are drawn. The determination of level of significance of the impact is defined in bold text. A "less-than-significant" impact is one that would not result in a substantial adverse change in the physical environment. A "potentially significant" impact or "significant" impact is one that would result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation. Mitigation measures are identified, as feasible, to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section 15126.4. Unless otherwise noted, the mitigation measures presented are recommended in the EIR for consideration by Midpen's Board of Directors to adopt as conditions of approval.

Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and would avoid an impact or maintain it at a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance. Where existing laws or regulations specify a mandatory permit process for future projects, performance standards without prescriptive actions to accomplish them, or other requirements that allow substantial discretion in how they are accomplished, or have a substantial compensatory component, the level of significance is determined before applying the influence of the regulatory requirements. In this circumstance, the impact would be potentially significant or significant, and the regulatory requirements would be included as a mitigation measure.

This subsection also describes whether mitigation measures would reduce project impacts to less-than-significant levels. Significant-and-unavoidable impacts are identified as appropriate in accordance with State CEQA Guidelines Section 15126.2(b). Significant-and-unavoidable impacts are also summarized in Chapter 5, "Other CEQA Sections."

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3.1 BIOLOGICAL RESOURCES

This section addresses common and sensitive biological resources that could be affected by implementation of the Redwood Cabin Project.

No comment letters were received in response to the Notice of Preparation (see Appendix A) that expressed concerns related to biological resources.

3.1.1 Regulatory Setting

FEDERAL

Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) (16 U.S.C. Section 1531 et seq.), the U.S. Fish and Wildlife Service (USFWS) regulates the taking of species listed in the ESA as threatened or endangered. In general, persons subject to ESA (including private parties) are prohibited from "taking" endangered or threatened fish and wildlife species on private property, and from "taking" endangered or threatened plants in areas under federal jurisdiction or in violation of state law. Under Section 9 of the ESA, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS has also interpreted the definition of "harm" to include significant habitat modification that could result in take.

Section 10 of the ESA applies if a non-federal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of the ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS.

Clean Water Act

Section 404 of the Clean Water Act (CWA) requires project proponents to obtain a permit from the U.S. Army Corps of Engineers (USACE) before performing any activity that involves any discharge of dredged or fill material into waters of the United States, including wetlands. Waters of the United States include navigable waters of the United States, interstate waters, tidally influenced waters, and all other waters where the use, degradation, or destruction of the waters could affect interstate or foreign commerce, tributaries to any of these waters, and wetlands that meet any of these criteria or that are adjacent to any of these waters or their tributaries. Many surface waters and wetlands in California meet the criteria for waters of the United States.

In accordance with Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredged or fill material must obtain water quality certification from the appropriate regional water quality control board (RWQCB) indicating that the action would uphold state water quality standards.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), first enacted in 1918, provides for protection of international migratory birds and authorizes the Secretary of the Interior to regulate the taking of migratory birds. The MBTA provides that it will be unlawful, except as permitted by regulations, to pursue, take, or kill any migratory bird, or any part, nest, or egg of any such bird. Under the MBTA, "take" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities." A take does not include habitat destruction or alteration, as long as there is not a direct taking of birds, nests, eggs, or parts thereof. The current list of species protected by the MBTA can be found in Title 50 of the Code of Federal Regulations (CFR), Section 10.13 (50 CFR 10.13). The list includes nearly all birds native to the United States.

STATE

California Endangered Species Act

Pursuant to the California Endangered Species Act (CESA), a permit from CDFW is required for projects that could result in the "take" of a plant or animal species that is listed by the state as threatened or endangered. Under CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species, but does not include "harm" or "harass," as does the federal definition. As a result, the threshold for take is higher under CESA than under the federal ESA. Authorization for take of state-listed species can be obtained through a California Fish and Game Code Section 2081 incidental take permit.

California Fish and Game Code Sections 3503 and 3503.5—Protection of Bird Nests and Raptors

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders *Falconiformes* and *Strigiformes*), including their nests or eggs. Typical violations include destruction of active nests as a result of tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs and/or young.

Fully Protected Species under the California Fish and Game Code

Protection of fully protected species is described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Act requires that each of the nine RWQCBs prepare and periodically update basin plans for water quality control. Each basin plan sets forth water quality standards for surface water and groundwater and actions to control nonpoint and point sources of pollution to achieve and maintain these standards. Basin plans offer an opportunity to protect wetlands through the establishment of water quality objectives. The RWQCB's jurisdiction includes waters of the United States, as well as areas that meet the definition of "waters of the state." "Waters of the state" is defined as any surface water or groundwater, including saline waters, within the boundaries of the state. The RWQCB has the discretion to take jurisdiction over areas not federally protected under CWA Section 404 provided they meet the definition of waters of the state and the State Water Resources Control Board published a new set of procedures for discharges of dredged or fill material into waters of the state on March 22, 2019. Mitigation requiring no net loss of wetlands functions and values of waters of the state typically is required by the RWQCB.

The State Water Resources Control Board has adopted the following definition of wetlands:

> *An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater or shallow surface water or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.*

California Fish and Game Code Section 1602—Streambed Alteration

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources are subject to regulation by CDFW under Section 1602 of the California Fish and Game Code. Under Section 1602, it is unlawful for any person, governmental agency, or public utility to do the following without first notifying CDFW:

- substantially divert or obstruct the natural flow of, or substantially change or use any material from, the bed, channel, or bank of any river, stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

The regulatory definition of a stream is a body of water that flows at least periodically or intermittently through a bed or channel that has banks and supports fish or other aquatic life. This definition includes watercourses with a surface or subsurface flow that supports or has supported riparian vegetation. CDFW's regulatory authority within altered or artificial waterways is based on the value of those waterways to fish and wildlife. A CDFW streambed alteration agreement must be obtained for any action that would result in an impact on a river, stream, or lake.

LOCAL

La Honda Creek Open Space Preserve Master Plan

The La Honda Creek Open Space Preserve (Preserve) Master Plan, prepared in June 2012, represents a long-term comprehensive planning effort for the Preserve. The Biological Resource Management section of the Master Plan provides biological resource protection measures, which are identified in Chapter 2, "Project Description," and listed below. As explained in Chapter 2, "Project Description," the Environmental Protection Guidelines (EPGs) below have minor text modifications. Those shown in single strike-through and underline reflect changes in Midpen's guidelines and were adopted with Midpen Board approval of the White Barn Stabilization Project Addendum (Ascent 2021). Additional project-specific revisions to the EPGs (shown in double strike-through and double underline) are included to increase their direct application to the current project and thereby enhance their effectiveness. Explanations for the revisions are shown as footnotes. These revisions will not apply to future Midpen projects.

- **EPG BIO-10:** Revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed by facility construction. The project includes r~~R~~evegetation work to enhance the natural open space values of the site ~~shall be implemented prior to or concurrently with the development~~. The ~~design of an appropriate~~ revegetation work ~~program shall~~ will be designed to return native species to the site, including the areas underlying the footprint of where the Redwood Cabin structure and other accessory structure currently stand.[1] ~~fully compensate for the lost habitat, with no net loss of habitat functions and values. Riparian and wetland habitat impacts will typically be mitigated at a 3:1 ratio for high-quality habitat areas and at lower ratios where lower habitat quality justifies a lower ratio. A lower ratio may also be justified if habitat mitigation is implemented and verified as successful prior to the occurrence of impacts. Mitigation shall be based on in-kind replacement of impacted habitat with habitat of equal or better biotic value.~~ [2]The revegetation ~~program~~ work ~~shall~~ will be designed by a ~~qualified~~Midpen-approved biologist or ecologist and submitted to the appropriate regulatory or trustee agency for approval, if required. ~~At a minimum, the revegetation program shall include a description of project impacts, mitigation calculations, the mitigation site, revegetation techniques, maintenance measures, a long-term monitoring program, and contingency measures. Native plant materials suited to the site will be utilized in all mitigation work.~~[3]
- **EPG WQ-2:** Storm water quality Best Management Practices (BMPs) as listed in this section shall be implemented to reduce potential water quality impacts. BMPs include:
    1. Flow of runoff from drainage structures will be directed to vegetated areas, away from creeks and drainages as is practical.
    2. ~~Conduct any trail maintenance work during low flow periods.~~ [4]

[1] Restoration is not part of the project. Seeding of native species is considered revegetation and will not lead to increased ecological function such as with full restoration.

[2] Biological mitigation for loss of habitat is not required for this project. As described in Section 3.1, "Biological Resources," the impact to riparian and wetland habitat is less than significant.

[3] Because mitigation for habitat loss is not required, these items are not applicable.

[4] The project does not include trail maintenance.

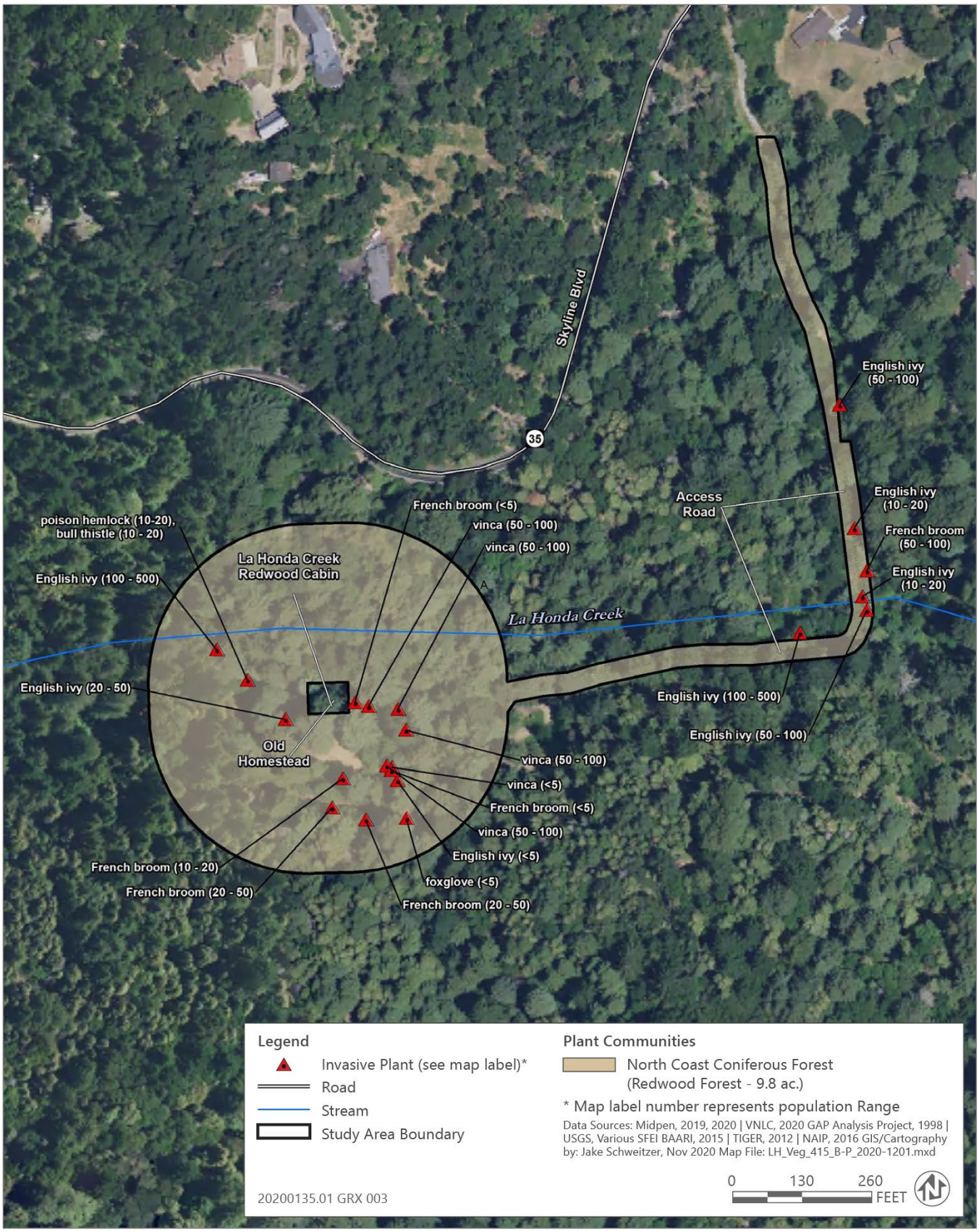
3. Use erosion and sediment control measures to minimize water quality impacts and ensure no sediment at heavily traveled trails flows into creeks. To the extent feasible, all measures will be 100 percent biodegradable and/or certified weed-free. These measures include:
    - Silt Fences
    - Straw Bale Barriers
    - Brush or Rock Filters
    - Storm Drain Inlet Protection
    - Sediment Traps
    - Sediment Basins
    - Erosion Control Blankets and Mats
    - Midpen shall prevent erosion on steep slopes by using erosion control material according to manufacturer's specifications.
4. If soil is to be stockpiled for any reason at creeksides, no run-off will be allowed to flow back to the creek.

3.1.2 Environmental Setting

LAND COVER AND COMMON WILDLIFE SPECIES

The project site is located entirely within the north coast coniferous forest land cover type (Figure 3.1-1). Coast redwood (*Sequoia sempervirens*) is the dominant species, which together with Douglas fir (*Psuedotsuga menziezii*), make up the upper forest canopy. A lower canopy of tan oak (*Notholithocarpus densiflorus*), big leaf maple (*Acer macrophyllum*), and California bay (*Umbellularia californica*) is also present. The understory within the project site is relatively sparse due to the dense tree canopy and includes shrubs and vines such as California blackberry (*Rubus ursinus*), California hazelnut (*Corylus cornuta*), and blood current (*Ribes sanquineum*). Herbaceous species found under the redwood canopy on the project site include those adapted to deep shade including redwood sorrel (*Oxalis oregana*), fetid adderstongue (*Scoliopus bigelovii*), western swordfern (*Polystichum munitum*), trail plant (*Adenocaulon bicolor*) and trillium (*Trillium* spp.). Invasive and non-native plants within the project site include French broom (*Genista monspessulana*), vinca (*Vinca* spp.), English ivy (*Hedera helix*) and broadleaved forget-me-not (*Myosotis latifolia*) (Figure 3.1-1). Vegetation along the portion of La Honda Creek within the project area is limited and patchy due to the steep banks of the creek, but includes Thimbleberry (*Rubus parviflorus*), giant chain fern (*Woodwardia fimbriata*), sedges (*Carex* spp.) and giant horsetail (*Equisetum telmateia*) (Vollmar Natural Lands Consulting 2020). Additionally, slender false brome (*Brachypodium sylvaticum*) has historically been identified at the project site. Midpen has been treating it with the objective of eradication within the site.

The project site provides habitat for many common wildlife species. Common birds that may be present within the project site include acorn woodpecker (*Melanerpes formicivorus*), Steller's jay (*Cyanocitta stelleri*), dark-eyed junco (*Junco hyemalis*), red-shouldered hawk (*Buteo lineatus*), and band-tailed pigeon (*Patagioenas fasciata*). Common amphibians and reptiles that may be found within the project site include Santa Cruz gartersnake (*Thamnophis atratus atratus*), California slender salamander (*Batrachoseps attenuates*), and rough-skinned newt (*Taricha granulosa granulosa*). Mammals that may commonly occur within the project site include Columbian black-tailed deer (*Odocoileus hemionus columbianus*), racoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*).



Source: Image produced and provided by Vollmar Natural Lands Consulting 2020, adapted by Ascent Environmental 2021

Figure 3.1-1 Landcover and Invasive Plants in the Project Site and Vicinity

SENSITIVE BIOLOGICAL RESOURCES

Special-Status Species

Special-status species are legally protected or otherwise considered sensitive by federal, state, or local resource agencies. Special-status species are species, subspecies, or varieties that fall into one or more of the following categories, regardless of their legal or protection status:

- species listed or proposed for listing as threatened or endangered under ESA (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species) or candidates for possible future listing as threatened or endangered under ESA (75 CFR 69222);
- species listed or candidates for listing by the State of California as threatened or endangered under CESA (14 CCR Section 670.5);
- species identified by CDFW as Species of Special Concern;
- species listed as Fully Protected under the California Fish and Game Code (FGC) (Section 3511 for birds, Section 4700 for mammals, Section 5050 for reptiles and amphibians, and Section 5515 for fish);
- plants listed as rare under the California Native Plant Protection Act (FGC Section 1900 et seq.);
- species ranked by the Western Bat Working Group as 'high' or 'medium' on the Regional Priority Matrix;
- species afforded protection under local or regional plans, policies, or ordinances;
- plants considered by CDFW to be "rare, threatened or endangered in California" (California Rare Plant Ranks of 1A, presumed extinct in California and either rare or extinct elsewhere; 1B, considered rare or endangered in California and elsewhere; 2A, presumed extinct in California but common elsewhere; 2B, considered rare or endangered in California but more common elsewhere; 3, about which more information is needed; and 4 of limited distribution). Note that while these rankings do not afford the same type of legal protection as ESA or CESA, the uniqueness of these species requires special consideration under Section 15380 of the CEQA Guidelines (14 CCR Section 15000 et seq.); or
- taxa (i.e., taxonomic category or group) that otherwise meet the definition of rare or endangered under Section 15380 of the CEQA Guidelines (14 CCR Section 15000 et seq.).

The term "California species of special concern" is applied by CDFW to animals not listed under ESA or CESA, but that are considered to be declining at a rate that could result in listing, or that historically occurred in low numbers and known threats to their persistence currently exist. CDFW's fully protected status was California's first attempt to identify and protect animals that were rare or facing extinction. Most species listed as fully protected were eventually listed as threatened or endangered under CESA; however, some species remain listed as fully protected but do not have simultaneous listing under CESA. Fully protected species may not be taken or possessed at any time and no take permits can be issued for these species except for scientific research purposes or for relocation to protect livestock.

Appendix C provides a list of special-status species potentially occurring in the project vicinity. The list was developed through a review of biological studies previously conducted in the area and a query of the California Native Plant Society Inventory of Rare and Endangered plants (CNPS); and the California Natural Diversity Database (CNDDB), a statewide inventory of the locations and conditions of the state's rarest plant and animal taxa and vegetation types. The query of the CNDDB and CNPS was conducted for the following U.S. Geological Survey 7.5' quadrangles surrounding the project site: Montara Mountain, San Mateo, Redwood Point, Half Moon Bay, Woodside, Palo Alto, San Gregorio, La Honda, and Mindego Hill. The CNDDB is based on actual recorded occurrences and does not constitute an exhaustive inventory of every resource.

Based on a review of the CNPS and CNDDB, there are six special-status botanical species, three special-status amphibians, one special-status bird, and six special-status mammals that are known to occur or could occur in the project site (CNPS 2021; CNDDB 2021). Refer to Appendix C for the full list of special-status species known to occur within the IPM Program Area region and the potential for each species to occur within the IPM Program Area.

Sensitive Natural Communities

Sensitive natural communities include those that are of special concern to resource agencies or are afforded specific consideration through CEQA or other federal or state laws. Sensitive natural communities may be of special concern to regulatory agencies and conservation organizations for a variety of reasons, including their locally or regionally declining status, or because they provide important habitat to common and special-status species. Many of these communities are tracked in CDFW's CNDDB. The north coast coniferous forest within the project site consists of coast redwood that meets the definition of Redwood Forest in the Manual of California Vegetation (Vollmar Natural Lands Consulting 2020) and is classified by CDFW as a sensitive natural community (CDFW 2020).

3.1.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This impact evaluation is based on a visit to the project site on February 1, 2021; the *La Honda Creek Preserve, Sierra Azul Preserve, Purisima Uplands, and Rancho San Antonio Preserve – Structural Surveys for Special-Status Mammal Species* (Swaim Biological 2019); the *Botanical Resources Survey Report, La Honda Structural Stabilization Project, La Honda Creek Open Space Preserve, San Mateo County, California* (Vollmar Natural Lands Consulting 2020); a review of aerial photographs of the project site and vicinity; a search of the CNDDB (CNDDB 2021); CNPS (CNPS 2021); and other relevant data sources.

THRESHOLDS OF SIGNIFICANCE

An impact on biological resources is considered significant if implementation of the project would do any of the following:

- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; or
- interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

ISSUES NOT DISCUSSED FURTHER

All potential biological resource issues identified in the significance criteria are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.1-1: Loss or Degradation of Habitat for Special-Status Botanical Species

Suitable habitat for special-status botanical species is present within the project site; however, no special-status botanical species were identified during surveys of the site in 2020, and no loss of individual special-status plants is anticipated. With the removal of the cabin, the recontouring of the project site, and implementation of EPG BIO-10, the project would result in an increase in suitable habitat for special-status botanical species. In addition, the implementation of IPMP BMPs would avoid habitat degradation that may result from the introduction and spread of invasive plants. Therefore, the project would have a **less-than-significant** impact on special-status botanical species.

The project site provides suitable habitat for six special-status botanical species (Appendix C). Of these six species, Western leatherwood (*Dirca occidentalis*), Dudley's lousewort (*Pedicularis dudleyi*), and white-flowered rein orchid (*Piperia candida*) are considered rare or endangered in California and elsewhere and are moderately threatened (CRPR 1B.2). The remaining three special-status botanical species, California bottle-brush grass (*Elymus californicus*), harlequin lotus (*Hosackia gracilis*), and Methuselah's beard lichen (*Usnea longissimi*) are of limited distribution and moderately threatened (CRPR 4.2). Although, the project site provides habitat for these species, no special-status botanical species were observed during protocol-level botanical surveys conducted of the project site in 2020 (Vollmar Natural Lands Consulting 2020). If project implementation does not occur before the current survey results expire (i.e., after 5 years or changed site conditions), another botanical survey would occur, and avoidance and/or other measures (e.g., consultation with CDFW, seed collection, transplantation) would be implemented, as required by the La Honda Creek Open Space Preserve Master Plan and the associated 2012 Initial Study/Mitigated Negative Declaration (Section 2.7.1).

The proposed removal of the Redwood Cabin and associated features, regrading, and staging of equipment would result in temporary ground disturbance; however, no special-status botanical species were detected during the 2020 protocol survey and therefore it is unlikely that any special-status botanical species would be crushed or removed by project activities. In addition, the project would result in an increase in habitat for special-status botanical species through the removal of the Redwood Cabin, regrading of the site, and the implementation of applicable measures from EPG BIO-10, which requires that revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed.

Ground disturbance during project implementation could potentially lead to the spread of invasive plants that occur on the project site (e.g., English ivy, French broom, slender false brome) (Vollmar Natural Lands Consulting 2020) (Figure 3.1-1) and introduction of new invasive plants that could degrade the habitat and outcompete special-status plants for space and nutrients should they occur on the project site in the future. However, these potential impacts would be avoided by the implementation of the IPMP BMPs, such as staff and contractor training, use of weed free material, and cleaning of tools and equipment (Section 2.7.2 of Chapter 2, "Project Description"). The project would not have direct impacts to individual special-status botanical species during project activities, EPG BIO-10 would require restoration of the site, and the implementation of IPMP BMPs would avoid habitat degradation of the site through the introduction and spread of invasive plants; therefore, the impact of the project on special-status botanical species would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.1-2: Injury or Mortality of Special-Status Amphibians

Special-status amphibians may be found within the project site. The recontouring of the site and implementation of EPG BIO-10 would ensure that there is no loss of habitat for these species. Project activities including the demolition of the Redwood Cabin and associated structures, recontouring, and staging of materials could result in the injury or mortality of special-status amphibians, and any injury or mortality of individual special-status amphibians would be a **significant** impact.

Three special-status amphibians could be found on the project site; the California red-legged frog (*Rana draytonii*), which is listed as threatened under the ESA and is a CDFW species of special concern; as well as the California giant salamander (*Dicamptodon ensatus*) and Santa Cruz black salamander (*Aneides flavipunctatus niger*), which are both CDFW species of special concern. The project would not include any construction activities within aquatic habitat for California red-legged frog within La Honda Creek; however, California red-legged frogs may use the project site seasonally for migration, sheltering, and foraging when summer rains and fogs provide adequate moisture (Bulger et al. 2003). The deep redwood forest habitat would also be suitable habitat for both California giant salamander and Santa Cruz black salamander. The project would not result in a reduction of suitable habitat for these species, because the site would be recontoured following demolition, and Midpen would apply EPG BIO-10, which requires that revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed.

Special-status amphibians may use vegetation, leaf litter, or logs and debris within the project area for shelter and may also shelter in staged materials associated with the project. Therefore, the movement of equipment and materials, the demolition of the Redwood Cabin, and recontouring of the site may result in the injury or mortality of special-status amphibians. The mortality of individual special-status amphibians would be a potentially substantial adverse effect on the local populations of these species and the impact would therefore be **significant**.

Mitigation Measures

Mitigation 3.1-2a: Protection Measures for California Red-Legged Frog

To avoid loss of individual California red-legged frog, Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.

- Activities including the use of mechanical equipment, excavating, and bulldozing will require pre-activity visual surveys as well as monitoring during the activities. All maintenance activity proposals involving mechanized equipment and associated monitoring proposals will be approved by CDFW and USFWS prior to implementation of the project.
- Biological monitors will check for any listed species under vehicles and equipment parked for more than 30 minutes.
- Refueling of equipment will be conducted using heavy-gauge tarps made of chemically resistant polypropylene or other impervious material with vertical sides for spill containment. These containment tarps will be set up under the equipment prior to servicing or refueling. Once the work is completed, the tarp and its contents must be immediately removed from the property and all contaminants properly disposed of off-site. Standard operating procedures will be implemented immediately in case of fuel spillage.
- All vehicles must stay on designated roads, paved and unpaved, and if it is necessary for a vehicle to travel off the designated road (paved or 2 track unpaved), a monitor will precede the vehicle to clear wildlife from the pathway of the vehicle.
- Prior to the start of work, an educational program regarding the sensitivity of the California red-legged frog and its habitat will be conducted for all personnel.
- Prior to the start of work, areas will be identified by the biological monitor and approved by the USFWS and CDFW as acceptable locations for the relocation of California red-legged frog if the species is encountered within the project site. Relocation areas will be a minimum of 500-feet from the boundary of the project site and will not include staging areas or roads. No California red-legged frog will be removed from Midpen property or maintained in captivity overnight without prior notification and written approval from the USFWS and CDFW unless the animal is in need of emergency medical assistance. Medical assistance will be provided by a USFWS-approved, certified wildlife veterinarian familiar with amphibian care.
- If a California red-legged frog enters the project site, all work shall stop until the animal leaves on its own. If the frog does not leave on its own, a biological monitor specifically authorized by the USFWS and CDFW will be allowed to handle and relocate the California red-legged frog to the pre-approved relocation area.

Mitigation 3.1-2b: Biological Monitoring for California Giant Salamander and Santa Cruz Black Salamander

To avoid loss of individual California giant salamander and Santa Cruz black salamander, Midpen will implement the following measures.

- Prior to the start of demolition each day, the access road and portions of the project site where activities will occur will be surveyed by a qualified biologist for the presence of California giant salamander and Santa Cruz black salamander. The survey will include the inspection of any debris from demolition or materials staged overnight for the presence of these species.

- If individual California giant salamanders or Santa Cruz black salamanders are discovered during daily inspections, work shall stop until the individual salamander moves on its own to a point where it is no longer at risk of incidental injury or death from project activities, or until the individual salamander is moved outside of the project site by a qualified biologist.

Significance after Mitigation

Implementation of Mitigation Measures 3.1-2a and 3.1-2b would reduce the impacts to special-status amphibians to a **less-than-significant** level, because these measures would survey for the presence of special-status amphibians on a daily basis during project activities; monitor for these species during project activities; stop work that may harm these species until the individual leaves on its own, or is moved by a biologist; and provide for other measures to address the protection of California red-legged frog.

Impact 3.1-3: Disturbance of Nesting Marbled Murrelet

The nearest mapped nesting habitat for marbled murrelet (*Brachyramphus marmoratus*) is located approximately one-half mile west of the project site. However, unmapped nesting habitat could occur within a quarter mile of the project site, and implementation of the project could result in loss of eggs and young from nest disturbance during the breeding season (March 24 – September 15). If nesting marbled murrelets are within a quarter mile of the project site, the project would have a **significant** impact on this species.

Marbled murrelet is listed under ESA as threatened and under CESA as endangered. Marbled murrelets forage at sea off the coast during the winter and nest in conifer forests within the coast range of California from approximately April through September. During incubation and prior to chicks fledging, adults continue to fly to and from the nest location to the sea to forage (H.T. Harvey 2007). Marbled murrelets do not build actual nests, but rather lay eggs directly on a branch of a large tree. Trees within the project site are not currently large enough to provide suitable nesting habitat for marbled murrelet, and the project would not remove trees that could adversely affect the quantity of future suitable habitat in the project site. However, there are areas of suitable nesting trees located on the preserve approximately one-half mile of the project site (H.T. Harvey 2007). While the distance from the project site to the nearest mapped suitable murrelet nesting habitat makes it unlikely that demolition activities would result in nest disturbance within this mapped habitat, other unmapped nesting habitat may be present within a quarter mile of the project site. If unmapped nesting habitat occurs within a quarter mile of the project site and project implementation occurs during the breeding season (March 24 to September 15), the flushing of adults off of the nest and disturbance of feeding could occur and result in a loss of eggs and young. Any loss of eggs or young as a result of nest disturbance would be a **significant** impact on the species.

Mitigation Measures

Mitigation 3.1-3: Preconstruction surveys and nest buffers marbled murrelet

To avoid disturbance and loss of the nests of marbled murrelet Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.

- Pre-demolition nest tree survey within a quarter mile of the project site for trees that meet the Pacific Seabird Group definition of potential murrelet nesting trees.
- If a potential nesting tree is detected within 300 feet of the project site or if a murrelet nest is detected, Midpen will notify the USFWS before work begins.
- If a potential nesting tree is detected greater than 300 feet and less than a quarter mile from the project site, the following will apply:
  - If possible, work within the project site shall be confined to September 15 to November 1.

- If work is scheduled to be performed during the breeding season (March 24 to September 15), disturbance minimization buffers determined by the sound level anticipated from the project will be implemented based on sound level monitoring studied, submitted to USFWS and the table below.

Buffer distance in feet based on anticipated project sound levels and ambient sound conditions

	Anticipated Project-Generated Sound Level (dB)[2]			
Ambient Pre-Project Sound Level (dB)[1]	Moderate (71-80)	High (81-90)	Very High (91-100)	Extreme (101-110)
Natural Ambient (≤50)[3]	50 (165)[4,5]	150 (500)	400 (1,320)	400 (1,320)
Very Low (51-60)	0	100 (300)	250 (825)	400 (1,320)
Low (61-70)	0	50 (165)	250 (825)	400 (1,320)
Moderate (71-80)	0	50 (165)	100 (330)	400 (1,320)
High (81-90)	0	50 (165)	50 (165)	150 (500)

[1] Ambient sound level includes all natural and human-induced sounds occurring at the project stie prior to the project, and not related to the project.

[2] Project-generated sound levels measured at 50 feet from the source

[3] "Natural Ambient" refers to sound levels generally experienced in habitats not substantially influenced by human activities

[4] All distances are given in meters, with rounded equivalent feet in parentheses.

[5] For murrelets, activities conducted during the dawn and dusk periods have special considerations for ambient sound level.

Source: USFWS 2016; USFWS 2020

- Project activities shall not be conducted within a visual line-of-site distance of 132 feet from a suitable nest tree as designated by a qualified biologist.
- If a sound study is not conducted, no project activities shall occur within a quarter mile of potential nest trees during the marbled murrelet breeding season (March 24 to September 15).
- If project activity takes place during the breeding season (March 24 to September 15) regardless of the distance to potential nest trees, activity will be restricted to 2 hours after sunrise and 2 hours before sunset to minimize disturbance to murrelets that may be flying over the project site to forage at the coast.
- If marbled murrelet protocol level surveys are conducted and do not indicate that the habitat is occupied by marbled murrelet, the seasonal and distance work restrictions may be lifted with written approval from the USFWS.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-3 would reduce the impacts to nests of marbled murrelets to a **less-than-significant** level because it would require surveys for the presence of nest trees and active nests and no-activity buffers around active nests to avoid disturbance during the nesting season.

Impact 3.1-4: Disturbance of Common Raptor and Other Common Bird Nests

The project site provides suitable nesting habitat for common raptors and other common nesting birds, and project activities could result in the disturbance of active nests if demolition occurs during the nesting season. The disturbance of active nests could result in the abandonment of nests and the mortality of eggs and young, which would be a **potentially significant** impact.

The redwood forest on the project site, and potentially the cabin itself, provides nesting habitat for common raptors and other nesting bird species including red-shouldered hawk, acorn woodpecker, Steller's jay, dark-eyed junco, and band-tailed pigeon. The proposed removal of the Redwood Cabin and associated features, regrading, and staging of equipment could result in the removal or disturbance of the active nests of common raptors and other nesting birds, if the activities occur during the nesting season (approximately February 15 to August 30). The removal or disturbance

of nests could result in nest abandonment by adults and the mortality of eggs and chicks. The mortality of eggs and chicks may be a substantial adverse effect on the local populations of some bird species and therefore this impact would be **potentially significant**.

Mitigation Measures

Mitigation 3.1-4: Preconstruction surveys and nest buffers for common raptors and other nesting birds

To avoid disturbance and loss of the nests of common raptors and other nesting birds Midpen will implement the following measures.

- If work is scheduled to be performed during the nesting season (the specific start and end dates of the season will be determined by a qualified biologist but are typically February 15 to August 30), a pre-demolition survey will be performed within 1,000 feet of the project site, no more than 14 days prior to the start of demolition related activities. If no active nests are detected during surveys, no further mitigation is required.
- If active nests are found during the pre-demolition survey, a buffer will be established around each nest. No project activity will occur within a buffer of 1,000-feet around large raptor nests (e.g., buteos) 500-feet around small common raptor nests (e.g., accipiters) and 250-feet around the nests of other common bird species. The size of the buffer around any individual nest maybe reduced by a qualified biologist in consultation with CDFW, depending on screening of the nest from project activities and other site-specific conditions. These buffers will be maintained until a qualified biologist determines that any young have fledged, and the nest is no longer active.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-4 would reduce the impacts to nests of common raptors and other common nesting birds to a **less-than-significant** level, because it would require surveys for the presence of active nests and no-activity buffers around active nests to avoid disturbance during the nesting season.

Impact 3.1-5: Loss of San Francisco Dusky-Footed Wood Rat Nests

The Redwood Cabin contains multiple San Francisco dusky-footed wood rat (*Neotoma fuscipes annectens*) nests. The demolition of the cabin would destroy these nests and could result in the injury or mortality of young woodrats if demolition occurs during the rearing season (approximately April 1 to July 15). The destruction of these nests and the injury or mortality of young woodrats would be a **significant** impact.

The San Francisco dusky-footed wood rat is a CDFW species of special concern that builds nests of sticks and other similar materials that may be used by multiple generations. The Redwood Cabin contains multiple San Francisco dusky-footed wood rat nests and other signs of occupancy (Swaim Biological 2019); however, no nests were observed outside of the cabin on the project site. Demolition of the Redwood Cabin would remove these woodrat nests and may also result in the injury or mortality of young woodrats in the nest if demolition occurs during the rearing season (approximately April 1 to July 15). The loss of multiple woodrat nests and injury or mortality of young woodrats would be an adverse effect on the local population of San Francisco dusky-footed wood rat and therefore the impact of the project on the species would be **significant**.

Mitigation Measures

Mitigation 3.1-5: Minimize impacts from loss of San Francisco dusky-footed wood rat nests

- To avoid loss of San Francisco dusky-footed wood rat during demolition, work will be conducted outside of the rearing season (before April 1 or after July 15).
- Prior to demolition, debris piles will be constructed outside of and adjacent to the project footprint to provide shelter for wood rats that are displaced by demolition. These debris piles will be constructed under the guidance of a qualified biologist and will consist of dead branches of various sizes (0.5 to 6 inches in diameter) collected from the surrounding area. Each pile will be approximately 3 to 5 feet high by 8 to 10 feet in diameter. The number of

debris piles will be determined by a qualified biologist based on the number of nests in the Redwood Cabin prior to demolition.

- To avoid death of wood rats, wood rat nest materials will be removed by hand from the Redwood Cabin prior to demolition of the structure.
- If wood rats are observed during demolition, work will stop until the animal leaves the area on its own, or until a qualified biologist determines that work can continue without harm to the animal.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-5 would reduce the impacts to San Francisco dusky-footed wood rat to a **less-than-significant** level, because it would ensure that nest removal does not occur during the rearing season when the project could result in the death of young wood rats, and it would require the construction of debris piles that provide shelter for wood rats that are displaced by demolition of the structure.

Impact 3.1-6: Loss of Bat Roosts and Mortality of Individuals

The Redwood Cabin provides potential roosts for common and special-status bats. The demolition of the Redwood Cabin could result in disturbance of active bat roosts, which could result in the loss of adult and young bats. The loss of individual special-status bats, or the loss of a maternity roost of any bat species would be a **potentially significant** impact.

The Redwood Cabin was surveyed for bats and bat roosts in 2019 (Swaim Biological 2019). This survey did not detect either pallid bat (*Antrozous pallidus*) or Townsend's big-eared bat (*Corynorhinus townsendii*), which are both CDFW species of special concern and considered special-status species in this analysis. However, both pallid bat and Townsend's big-eared bat have been documented to occur on the preserve and these species may occur within the project site at the time of demolition. The 2019 acoustic survey did detect fringed myotis (*Myotis thysanodes*) in the vicinity of the cabin, but no bats were observed emerging from the cabin and no bat sign was observed. While no bats or bat signs were found, the cabin and large trees on the project site provide potential roosting habitat that may be occupied at the time of demolition. Due to the deep shade on the site, the cabin is not likely to be warm enough to support a bat maternity roost (Swaim Biological 2019).

The project would not remove any trees, and therefore no tree roosts would be removed. If bats are roosting in the cabin during demolition, these individuals may be injured or killed by equipment or crushed between materials that are removed from the cabin. While unlikely due to the deep shade on the project site, if the cabin is used as a maternity roost during demolition, the death of young bats may also occur. The loss of pallid bat or Townsend's big-eared bat individuals, or the loss of a maternity roost of any bat species would be a potentially substantial adverse effect on the local population of these species and would therefore be a **potentially significant** impact.

Mitigation Measures

Mitigation 3.1-6: Pre-demolition surveys and measures to reduce impacts to bat roosts and special-status bats

- A pre-demolition bat roost survey shall be conducted at the project site by a qualified biologist no more than two days prior to the start of demolition.
- In addition, if demolition is anticipated to occur during the bat wintering period (from November 16 through February 15), a pre-demolition winter roost survey shall be conducted by a qualified biologist.
- If individual nonbreeding and non-special-status bats are roosting within the structure, a qualified biologist may remove the bats and work may proceed during any time of the year. If special-status bats or a maternity roost of any bat species is detected, demolition will not be allowed to occur during the April through August maternity season; outside of the maternity season, bats shall be excluded and provided alternate roost sites before demolition.

- Midpen will develop a project specific bat roost deterrent plan if special-status bats or a maternity roost of any bat species is detected in the Redwood Cabin. The deterrent plan will be submitted to CDFW for approval and will include measures such as acoustic deterrents and one-way bat doors installed outside of the maternity season (April through August), and other similar methods.
- Demolition will occur when forecast nighttime lows are not below 50 degrees Fahrenheit.
- The materials around crevices that may provide roosting sites within the structure will be first demolished with hand tools to minimize the risk of injuring bats.
- Initial demolition will be performed in the early evening after sunset, or if evening work is not feasible, the work shall be initiated in the afternoon to ensure that any bats present are not in torpor and unable to escape. Once demolition has been started, further work may be performed at any point in the day. A qualified bat biologist will be present at the initiation of demolition to capture and temporarily hold any bats present for release the evening of the same day.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-6 would reduce the impacts to special-status and common bat species to a **less-than-significant** level, because it would ensure that the project does not result in disturbance of hibernacula or maternity roots and applies measures such as the timing of demolition and bat exclusion methods that would minimize the risk of injury or death of special-status and common bat species.

Impact 3.1-7: Disturbance or Loss of Special-Status Mammal Den Sites

The project site and adjacent redwood forest provide potential denning sites for special-status mammals. The demolition of the Redwood Cabin could result in disturbance of active dens and the injury or mortality of pups if the demolition occurs during the breeding season. The loss of active dens and injury of mortality of special-status mammal pups would be a **potentially significant** impact.

The Southern California/Central Coast evolutionary significant unit of the mountain lion (*Puma concolor*) is listed under the CESA as candidate threatened species, and mountain lions have been detected in the project area and vicinity (Santa Cruz Puma Project 2021). However, the project site is not likely to be used by mountain lions as nursery habitat due to its proximity to residential development and recreational use. The project site may be used for foraging habitat by mountain lions, and although there would be no permanent loss of habitat due to project activities, mountain lions would likely avoid the project site during demolition, resulting in a temporary loss of foraging habitat. This temporary loss of foraging habitat would not be substantial given the relatively small area of the project when compared to the available foraging habitat in the vicinity.

Unlike mountain lion, the CDFW fully protected ringtail (*Bassariscus astutus*), and CDFW species of special concern American badger (*Taxidea taxus*) may use the project site as denning and foraging habitat. While ringtail has not been reported to occur within the project site or vicinity, this species is not tracked in the CNDDB. It is a nocturnal species that may often go unobserved. Ringtails use boulder piles, underground cavities, brush piles, or hollow trees or tree cavities for denning, often in riparian areas (Belluomini 1980). American badger, which dens underground, is most often associated with grassland habitats, but may be found in forested habitats as well. American badger has been documented to occur on the preserve (CNDDB 2021). As discussed for mountain lion, loss of foraging habitat for ringtail and American badger from implementation would be temporary and not a substantial loss of habitat. However, demolition of the Redwood Cabin and associated features could result in disturbance of ringtail or American badger den sites if any are located within or adjacent to the project site. If the disturbance of dens occurs during the breeding season when pups are potentially in the den, this could result in injury or death of the pups. Any loss of pups would be a substantial adverse effect to the local populations of these species, and therefore the project has a potential for a **potentially significant** impact to ringtail and American badger.

Mitigation Measures

Mitigation 3.1-7: Pre-demolition surveys and den buffers for American badger and ringtail

- If the project occurs during the period when pups are potentially in the den February 15 through July 1, a qualified biologist shall conduct pre-demolition surveys within 100 feet of the project site for potential American badger and ringtail dens. The survey will occur no more than 7-days prior to implementation of demolition activities.
- If any potentially occupied American badger dens are located during surveys, no work shall be performed within a 100-foot buffer around dens during the period when pups are potentially in the den (February 15 through July 1).
- If any potentially occupied ringtail dens (e.g., brush piles, appropriately sized burrows, hollow logs, hollow trees) are located during surveys, the same buffers as described for American badger will be applied during breeding season for ringtail (May 1 through June 30).

Significance after Mitigation

Implementation of Mitigation Measure 3.1-7 would reduce the impacts to ringtail and American badger to a **less-than-significant** level, because it would ensure that the project does not result in disturbance of natal dens that could result in the death of pups though pre-demolition survey and the establishment of buffers where work would not occur.

Impact 3.1-8: Disturbance or Loss of Riparian Habitat or Other Sensitive Natural Communities

The project does not contain riparian woodland; however, herbaceous riparian habitat is present along the adjacent La Honda Creek. The project would not directly affect this habitat and the implementation of EPG WQ-2 would avoid and minimize impacts from the runoff of sediment from the project. The site also contains a CDFW-designated sensitive natural community, Redwood Forest; however, this community would not be adversely affected by the project because the project would not remove any trees, would treat on-site invasive species, and would restore the area disturbed by the project through the implementation of EPG BIO-10. Therefore, the impact of the project on riparian habitat and other sensitive natural communities would be **less-than-significant**.

The riparian zone along La Honda Creek does not form a true riparian woodland and is limited in area due to the steep banks, cobbled stream bed, and dense canopy of the north coast coniferous forest. A relatively small band of wetland riparian herbaceous vegetation (e.g., sedges and giant horsetail) is present within the creek banks below the bridge where the access road crosses the creek and along a swale adjacent to the access road (Vollmar Natural Lands Consulting 2020). The limited riparian habitat along La Honda Creek would not be directly modified by implementation of the project. In addition, sedimentation due to runoff of disturbed soils on the project site would be minimized or avoided by the implementation of EPG WQ-2. As described in Chapter 2, "Project Description," EPG WQ-2 includes measures such as the use of silt fences, straw bale barriers, and other erosion and sediment control measures.

The Redwood Forest that makes up the vegetation community on the project site is identified as a CDFW-designated sensitive natural community (CDFW 2020). The project would not remove any trees or result in any substantial removal of vegetation on site. The habitat function of Redwood Forest would be maintained with implementation of the project. In addition, following recontouring of the site, EPG BIO-10 would be implemented, which requires that revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed. Further, the Redwood Cabin Removal Project would provide the opportunity to improve biological resources at the site through invasive plant treatment, soil decompaction and amendments, or revegetation, which could improve the quality of the habitat.

Due to the lack of tree removal; avoidance of disturbance to riparian habitats along La Honda Creek; implementation of EPG WQ-2, which would avoid or minimize runoff to riparian habitat; maintenance of Redwood Forest habitat function; and implementation of EPG BIO-10, which would restore the area disturbed by the project, the impact of the project on riparian habitat and other sensitive natural communities would be **less than significant**.

Mitigation Measures
No mitigation is required for this impact.

Impact 3.1-9: Degradation or loss of protected wetlands and other waters

The access road to the project site crosses La Honda Creek and an un-named tributary. A temporary bridge may be required to move equipment across the tributary; however, no dredge or fill of the creek or tributary will occur as a result of the project. In addition, EPG WQ-2 will be implemented to avoid and minimize impacts to La Honda Creek and its tributary due to runoff from the project site. Therefore, the impact to protected wetlands and other waters would be **less than significant**.

La Honda Creek is located outside of the project site and adjacent to the unpaved access road to the site. La Honda Creek, associated swales, and its un-named tributary are potential waters of the United States, and waters of the state, and the only potential waters of the United States and the state on or adjacent to the project site. The access road crosses the creek and an un-named tributary between the site and Highway 35 over a pair of bridges. As described in Chapter 2, "Project Description, section 2.5, "Construction Access, Equipment, Staging, and Logistics," a temporary bridge may be installed over the existing bridge across the un-named tributary of La Honda Creek due to load limitations of the current structure. The temporary bridge would be placed over the existing bridge and would not disturb the bed or bank of the tributary. No disturbance or fill would occur in either La Honda Creek or its un-named tributary as a result of the project. In addition, indirect effects from runoff of disturbed soils on the project site would be minimized or avoided by the implementation of EPG WQ-2, which includes measures such as the use of silt fences, straw bale barriers, and other erosion and sediment control measures. Due to the avoidance of disturbance to La Honda Creek and its un-named tributary and implementation of EPG WQ-2, which would avoid or minimize runoff to these waters, the impact of the project on protected wetlands and other waters would be **less than significant**.

Mitigation Measures
No mitigation is required for this impact.

Impact 3.1-10: Potential to Interfere with Wildlife Movement and Nursery Sites

The demolition of the Redwood Cabin would not result in any changes in habitat or new structures that would interfere with wildlife movement. The noise and human activity associated with the project could result in temporary impacts to wildlife movement that would not be substantial, due to the short duration and limited footprint of the project in relation to other habitat in the vicinity. Therefore, the projects impact would be **less than significant**.

The demolition of the Redwood Cabin, demolition of associated structures, and site recontouring would not modify or remove natural habitats to the extent that these habitats would be unsuitable for wildlife movement. In addition, the project does not include the construction of any permanent barriers that could obstruct wildlife movement. The project would instead remove a structure from an otherwise natural habitat. However, the noise and human activity that would occur during demolition of the Redwood Cabin and associated structures would cause wildlife to avoid the area and could result in temporary interference with wildlife movement and foraging activity (see Impact 3.1-7 for additional discussion of special-status mammal movement). Due to the short duration of the demolition and the overall availability of natural habitats in the project vicinity this interference with wildlife movement would not be substantial. Other than the San Francisco dusky footed woodrat nests that occur within the Redwood Cabin and the potential bat roosts that may also be present (see Impact 3.1-5 and Impact 3.1-6 for mitigation measures to reduce impacts on these special-status species to less than significant), there are no additional wildlife nursery sites documented to occur within or adjacent to the project site. Therefore, due to the temporary and non-substantial interference with wildlife movement and the lack of other nursery sites in the project site and vicinity, the impact of the project would be **less than significant**.

Mitigation Measures
No mitigation is required for this impact.

Impact 3.1-11: Potential to Contribute to a Significant Cumulative Impact to Biological Resources

Implementation of the proposed project in the context of historical effects on the landscape and in combination with other cumulative projects in the area could result in impacts to biological resources. However, through the implementation of EPGs, BMPs, and mitigation measures, the contribution of the project would not have a cumulative impact. Therefore, this impact would be **less than significant**.

The cumulative context for the analysis of biological resources is the portion of the Santa Cruz Mountains that extends approximately from the Purisima Creek Redwoods Preserve and Phleger Estate in the North, South to the Skyline Ridge Open Space Preserve, and west to the San Mateo County Coast. This portion of the Santa Cruz Mountains was subject to extensive logging that extended from the mid 1800's to the early 1900's, and the majority of the habitats in the area reflect this history of logging. The southern portion of this area, was burned during the CZU Complex Fire in 2020 and habitat for many species, including marbled murrelet, was adversely affected by the fire.

Currently, this portion of the Santa Cruz Mountains contains limited residential and commercial development, consisting of mostly single-family homes, confined to the corridor around the major roads in the area. There is also an extensive network of public land in the area, including several Midpen preserves, Huddart County Park, and lands owned by the San Francisco Public Utility Commission. The majority of these lands are open for recreational uses. The area west to the San Mateo County Coast remains mostly agricultural with little development south of Half Moon Bay.

The proposed project in combination with other projects in the area, such as San Francisco Public Utility Commission's South Skyline Ridge Trail Extension; Midpen's Fuel Reduction Implementation projects; and natural resource protection and restoration projects, infrastructure improvement projects, and Integrated Pest Management Program projects on Midpen preserves, could contribute to cumulative impacts to biological resources.

All potential cumulative projects must comply with federal, state, and local regulations, including ESA, CESA, CWA, and CEQA regarding listed or other protected species and habitats. Potential impacts to special-status plants, special-status wildlife, and sensitive natural communities will require mitigation to reduce project impacts to a less-than-significant level on each of these projects. In addition, cumulative projects on the La Honda Creek Open Space Preserve would be subject to the BMPs discussed in Chapter 2, "Project Description.

The proposed project could have adverse effects on special-status botanical species, special-status amphibians, marbled murrelet, common nesting birds, bats, mountain lion, American badger, ringtail, redwood forest, waters of the US and state, and wildlife movement. However, these adverse effects would be temporary, and very limited in scope due to the small footprint of the project. As discussed above the EPGs, BMPs, and mitigation measures would reduce or avoid project related impacts to such an extent that they are not expected to not result in a considerable contribution to a cumulative impact. In addition, the Redwood Cabin Removal Project would provide the opportunity to improve biological resources at the site through invasive plant treatment, soil decompaction and amendments, or revegetation. Therefore, the project would not result in a cumulatively considerable incremental contribution to a cumulatively significant biological resource impact; the cumulative impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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3.2 CULTURAL RESOURCES

This section analyzes and evaluates the potential impacts of the project on known and unknown cultural resources. Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include pre-historic resources and historic-era resources.

Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical (or architectural) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes. A cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

Comment letters received in response to the Notice of Preparation (see Appendix A) expressed concerns related to the historic value of the Redwood Cabin. Additionally, the Native American Heritage Commission (NAHC) requested AB 52 and SB 18 compliance information; SB 18 does not apply to the project because there is no General Plan amendment associated with the project (which is the trigger for SB 18 compliance), and SB 18 is not a CEQA requirement and therefore is not discussed in this section. For project information related to AB 52 and tribal consultation, please refer to Section 3.18, "Tribal Cultural Resources," of the Initial Study, provided in Appendix B.

3.2.1 Regulatory Setting

FEDERAL

Section 106 of the National Historic Preservation Act

Federal protection of resources is legislated by (a) the National Historic Preservation Act (NHPA) of 1966 as amended by 16 U.S. Code 470, (b) the Archaeological Resource Protection Act of 1979, and (c) the Advisory Council on Historical Preservation. These laws and organizations maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP).

Section 106 of the NHPA and accompanying regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the main federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed in or may be eligible for listing in the NRHP. The NRHP is the nation's master inventory of known historic resources. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, and cultural districts that are considered significant at the national, state, or local level.

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1. The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
2. It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
3. It possesses at least one of the following characteristics:

   Criterion A Association with events that have made a significant contribution to the broad patterns of history (events).

   Criterion B Association with the lives of persons significant in the past (persons).

Criterion C Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).

Criterion D Has yielded, or may be likely to yield, information important to prehistory or history (information potential).

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee recognition in planning for federal or federally-assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

The National Register Bulletin also provides guidance in the evaluation of archaeological site significance. If a heritage property cannot be placed within a particular theme or time period, and thereby lacks "focus," it is considered not eligible for the NRHP. In further expanding upon the generalized National Register criteria, evaluation standards for linear features (such as roads, trails, fence lines, railroads, ditches, flumes, etc.) are considered in terms of four related criteria that account for specific elements that define engineering and construction methods of linear features: (1) size and length; (2) presence of distinctive engineering features and associated properties; (3) structural integrity; and (4) setting. The highest probability for National Register eligibility exists within the intact, longer segments, where multiple criteria coincide.

Cultural and Historic Landscapes

Under the NRHP, historic properties may be defined as sites, buildings, structures (such as bridges or dams), objects, or districts, including cultural or historic landscapes. A cultural landscape differs from a historic building or district in that it is understood through the spatial organization of the property, which is created by the landscape's cultural and natural features. Some features may create viewsheds or barriers (such as a fence), and others create spaces or "rooms" (such as an arrangement of buildings and structures around a lawn area). Some features, such as grading and topography, underscore the site's development in relationship to the natural setting. To be listed in the NRHP, a cultural landscape must meet one of the four evaluation criteria and must retain its integrity.

Historic landscapes include residential gardens and community parks, scenic highways, rural communities, institutional grounds, cemeteries, battlefields and zoological gardens. They are composed of a number of character-defining features which individually or collectively contribute to the landscape's physical appearance as they have evolved over time. In addition to vegetation and topography, cultural landscapes may include water features, such as ponds, streams, and fountains; circulation features, such as roads, paths, steps, and walls; buildings; and furnishings, including fences, benches, lights, and sculptural objects.

A cultural landscape is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes (NPS 1994).

- Historic Designed Landscape—a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person(s), trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates.
- Historic Vernacular Landscape—a landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes.

- Historic Site—a landscape significant for its association with a historic event, activity, or person. Examples include battlefields and president's house properties.
- Ethnographic Landscape—a landscape containing a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, religious sacred sites, and massive geological structures. Small plant communities, animals, subsistence, and ceremonial grounds are often components.

Secretary of the Interior's Standards

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards) provide guidance for working with historic properties. The Secretary's Standards are used by lead agencies to evaluate proposed rehabilitative work on historic properties. The Secretary's Standards are a useful analytic tool for understanding and describing the potential impacts of proposed changes to historic resources. Projects that comply with the Secretary's Standards benefit from a regulatory presumption that they would not result in a significant impact to a historic resource.

In 1992 the Secretary's Standards were revised so they could be applied to all types of historic resources, including landscapes. They were reduced to four sets of treatments to guide work on historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

STATE

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are eligible for the CRHR. The CRHR is a listing of State of California resources that are significant within the context of California's history. The CRHR is a statewide program of similar scope and with similar criteria for inclusion as those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historic resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations (CCR) Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are similar to the NRHP criteria and are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

1. Is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. Is associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Similar to the NRHP, a resource must meet one of the above criteria and retain integrity. The CRHR uses the same seven aspects of integrity as the NRHP.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "historical resources" and "unique archaeological resources." Pursuant to PRC Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 requires agencies to determine whether projects would have effects on unique archaeological resources.

Historical Resources

"Historical resource" is a term with a defined statutory meaning (PRC, Section 21084.1; determining significant impacts to historical and archaeological resources is described in the State CEQA Guidelines, Sections 15064.5[a] and [b]). Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC, Section 5024.1).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).
4. The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or 5024.1.

Unique Archaeological Resources

CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources. Public Resources Code, Section 21083.2, subdivision (g), states that unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The Act requires that upon discovery of human remains, construction or excavation activity cease and the County coroner be notified. If the remains are of a Native American, the coroner must notify NAHC, which notifies and has the authority to designate the most likely descendant (MLD) of the deceased. The Act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Health and Safety Code, Sections 7050.5 and 7052

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. Section 7052 states that the disturbance of Native American cemeteries is a felony.

Public Resources Code, Section 5097

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American burial falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

LOCAL

La Honda Creek Open Space Preserve Master Plan

The La Honda Creek Open Space Preserve (Preserve) Master Plan, prepared in June 2012, represents a long-term comprehensive planning effort for the Preserve. The Cultural Resource Management section of the Master Plan provides cultural resource protection measures, which are identified Chapter 2, "Project Description," and listed below.

EPG CUL-1: Midpen will apply the Standard Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials:

Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials. In the event that any cultural resources are exposed during construction, work at the location of the find will halt immediately within 10 meters (30 feet) of the find. If an archaeologist is not present at the time of the discovery, Midpen will contact an archaeologist for identification and evaluation in accordance with CEQA criteria.

A reasonable effort will be made by Midpen and archaeologist to avoid or minimize harm to the discovery until significance is determined and an appropriate treatment can be identified and implemented. Methods to protect finds include fencing, covering remains with protective material and culturally sterile soil or plywood. If vandalism is a threat, 24-hour security shall be provided. During this evaluation period, construction operations outside of the find location can continue preferably with an archaeologist monitoring any subsurface excavations.

If the resource cannot be avoided, the archaeologist will develop an appropriate Action Plan for treatment within 48 hours to minimize or mitigate the adverse effects. Midpen will not proceed with construction activities that could affect the discovery until the Action Plan has been reviewed and approved. The treatment effort required to mitigate the inadvertent exposure of significant cultural resources will be guided by a research design appropriate to the discovery and potential research data inherent in the resource in association with suitable archaeological field techniques and analytical strategies. The recovery effort will be detailed in a professional report in accordance with current archaeological standards. Any non-grave associated artifacts will be curated with an appropriate repository.

EPG CUL-2: Application of the Native American Burial Plan (NABP) will be applied:

Native American Burial Plan

1. In the event of an inadvertent discovery of human remains and cultural items during project construction, the field crew supervisor shall take immediate steps, if necessary, to secure and protect any remains and cultural materials. This shall include but is not limited to such measures as (a) temporary avoidance by construction until the remains and items can be removed; (b) posting a security person; (c) placement of a security fence around

the area of concern; or, (d) some combination of these measures. Any such measures employed will depend upon the nature and particular circumstances of the discovery.

2. The County Medical Examiner (Coroner) shall be notified by the field crew supervisor or other designated Midpen manager and informed of the find and of any efforts made to identify the remains as Native American. If the remains are identified as a prehistoric Native American by either a professional archaeologist under contract to Midpen or the Medical Examiner's forensic archaeologist, the Medical Examiner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours of notification of the find. The Medical Examiner may choose to document and remove the remains at his/her discretion depending on the circumstances of the discovery. The NAHC then designates and notifies a Most Likely Descendant (MLD). The MLD has 24 hours to consult and provide recommendations for the treatment or disposition, with proper dignity, of the human remains and grave goods [Note: Other culturally affiliated Native Americans [Indians] may be consulted by the MLD during the consultation and recommendation process to determine treatment of the skeletal remains].
3. Each burial and associated cultural items shall be stored as a unit in a secure facility, which shall be accessible to the MLD and other Native American representative(s) or their designated alternates upon prior arrangement.
4. The remains and associated cultural items shall be reburied in a secure location as near as possible to the area of their discovery or at an off-site location acceptable to the MLD that has minimal potential for future disturbance. The reburial shall be done in a manner that shall discourage or deter future disturbance. Reburial shall be conducted by persons designated by the MLD, with the assistance, if requested, of Midpen's field crew. The location shall be fully documented, filed with the NAHC and the California Historical Resources Information System, Northwest Information Center, California State University, Sonoma and treated as confidential information.
5. If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or Midpen or designate rejects the recommendation of the MLD and mediation (as per Section 5097.94 subdivision (k)) fails, reinterment of the human remains and associated cultural items associated shall take place with appropriate dignity on the property in a location not subject to further subsurface disturbance.
6. For security reasons, no news releases, including but not limited to photographs, videotapes, written articles, or other such means that contains information about human remains or burial-related items of Native American origin shall be released by any party during the discovery, recovery and reburial unless approved by the MLD.
7. Any disputes that arise among the MLD and representatives of affected Native American groups and/or between Midpen or designee and the MLD concerning cultural affiliation or the ultimate disposition of Native American human remains and associated funerary objects and unassociated funerary objects shall be resolved according to the dispute resolution procedures in Section 5097.94 of the State of California Public Resources Code.
8. The Archaeological Data Recovery/Native American Burial Treatment Report(s) shall be prepared by professional archaeologists. The report shall include, but not be limited to, the following: project overview; ethnographic section; previous archaeological research in the region and on-site; circumstances of discovery; recovery procedures and techniques; artifact analysis; faunal analysis; osteological analysis and interpretation; and, conclusions. The MLD and other interested Native American representative(s) shall be provided an opportunity to review the report and submit comments within the same time period as accorded any other reviewers.
9. Objects not associated with the human remains and recovered from private land shall be transferred to Midpen. If curation of any objects is required, curation will be at repository approved by Midpen. Repositories can include the History Museums of San Jose collections, the Tiburon Archaeological Research Group, San Francisco State University and the Collections Facility, Department of Anthropology, Sonoma State University, Rohnert Park.

EPG CUL-3: The protocol for determining if structures are of historic value is as follows:

1. The property and building types will be identified and evaluated by a qualified cultural consultant;
2. The cultural consultant will determine if the structures in question are currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places;
3. If it is determined that the structures in question are not currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places, a DPR 523 form issued by the California Department of Parks and Recreation (DPR) will be completed by the cultural consultant and the structural and building data sent to a qualified architectural historian.
4. ~~The following measure applies only to the Southern La Honda Creek Area: As required by Mitigation CUL-1a(4) of the San Mateo Coastal Annexation EIR, if it is determined that the structures in question are currently on the California Register of Historic Resources or if the building has been determined to be of historic value, there are two options that would mitigate any impact to the historic values:~~
    a) ~~Retain and rehabilitate the building according to the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). New construction near this building should be consistent with its historic character; or~~
    b) ~~Move the building to a different location on its current parcel or to a different parcel appropriate to its historic character.~~[1]
5. If it is determined that the structures in question are currently listed on or are eligible for listing on the California Register of Historic Resources, Midpen may retain and either mothball or rehabilitate the structure per Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). OR Midpen may move the structure to a different location on its current parcel or to a different parcel appropriate to its historic character and mothball or rehabilitate the structure per Secretary of the Interior's Standards.

County of San Mateo General Plan

Chapter 5 of the San Mateo County General Plan Policies document (January 2013) contains goals and policies related to historical and archaeological resources. Applicable policies related to the Redwood Cabin Removal Project are listed below:

- **Policy 5.11a**: Identify high priority resources in the comprehensive inventory and apply for their designation as State Point of Historic Interest, State Historical Landmark, or inclusion in the National Register of Historic Places.
- **Policy 5.12:** Encourage the rehabilitation and recycling of historic structures.
- **Policy 5.13:** Encourage the use of innovative techniques such as density transfer, facade easements, etc., to protect historic structures.
- **Policy 5.14:** Recommend State and/or national register status for significant archaeological/paleontological sites.
- **Policy 5.16**: Discourage the demolition of any designated historic district or landmark
- **Policy 5.19a**: Encourage compatible and adaptive residential, commercial or public uses of historic structures as a means for their protection.
- **Policy 5.21:** (a) Encourage the protection and preservation of archaeological sites; (b) Temporarily suspend construction work when archaeological/paleontological sites are discovered. Establish procedures which allow for the timely investigation and/or excavation of such sites by qualified professionals as may be appropriate. (c) Cooperate with institutions of higher learning and interested organizations to record, preserve, and excavate sites.

[1] This applies to the Southern La Honda Creek Area only and therefore is not relevant to the project.

- Policy 5.22b: Expand and maintain a comprehensive inventory of all historic resources located in both unincorporated and incorporated areas.
- Policy 5.23: Encourage and coordinate efforts with groups to acquire structures of historic merit in order to prevent their loss and/or promote their adaptation for other uses.
- Policy 5.25: Maintain and update a comprehensive archaeological/paleontological data base.

3.2.2 Environmental Setting

REGIONAL PREHISTORY

The regional prehistory setting, discussed below, is informed by the San Francisco Bay-Delta Regional Context and Research Design for Native American Archaeological Resources, prepared for Caltrans District 4 in 2017 (Caltrans 2017).

Human occupation in the San Francisco Bay-Delta is generally subdivided into distinct time periods, each of which is marked by various adaptive patterns and geographical distributions. San Francisco Bay-Delta archaeology is divided among three patterns: Terminal Pleistocene (13,500–11,700 calibrated years before present [cal BP]), Early Holocene (11,700–8200 cal BP), Middle Holocene (8200–4200 cal BP), and Late Holocene (4200 cal BP, onward).

Terminal Pleistocene (13,500–11,700 cal BP)

The Terminal Pleistocene is largely contemporaneous with the Clovis and Folsom periods of the Great Plains and the Southwest and is generally considered to be represented by wide-ranging, mobile hunters and gatherers who periodically exploited large game. Throughout California, Terminal Pleistocene occupation is infrequently encountered and poorly understood, and most often represented by isolated fluted points. No fluted points or archaeological deposits dated to the Terminal Pleistocene have been documented in the Bay-Delta Area. The Borax Lake site, situated near Clear Lake in the North Coast Ranges, is the nearest locality where fluted points are reported.

The absence of Terminal Pleistocene archaeological remains is undoubtedly the result of several factors, most notably the likelihood that initial human populations were small, highly mobile, and traveled rapidly across the continent. Therefore, their archeological signature on the landscape was generally faint and wide-spaced. For coastal areas, sea level rise, coastal erosion, and localized subsidence have further reduced the likelihood of documenting initial occupation of the region, and some sites may be preserved under water.

Early Holocene (11,700–8,200 cal BP)

It is typically thought that evidence for Early Holocene human occupation in central California is the product of semi-mobile hunter-gatherers exploiting a wide range of plant and animal foods from marine, lacustrine, and terrestrial contexts. Early Holocene assemblages often include stemmed points, crescents, and steepedged formed flake tools that share many attributes with contemporaneous material in the Great Basin and southern North Coast Ranges. However, milling tools (handstones and millingslabs) are ubiquitous in these early deposits, a characteristic which distinguishes Early Holocene occupations in California from those in the Great Basin.

There are only four Early Holocene deposits archaeologically documented in the Bay-Delta Area, resulting in few and poorly established patterns. No sites from this time span have been documented as yet in paleo-bay or paleo-outer coast settings, in part because these contexts are now submerged making them difficult to discover.

Diverse resource exploitation is indicated by artifact and ecofact assemblages from these sites. They include handstones and millingslabs (but not mortars and pestles), large, flaked cores and cobble tools, flake tools, well-made bifaces, and a single flaked stone crescent. Trace amounts of marine shellfish have been recovered from some inland sites, while faunal assemblages are varied and include deer, elk, rabbit, ground squirrel, coyote, and grizzly bear. Carbonized plant remains are dominated by acorn, which is indicative of fall-winter occupation.

Middle Holocene (8,200–4,200 cal BP)

More than 60 Bay-Delta Area archaeological sites have produced radiocarbon dates indicating occupation during the Middle Holocene. Both surface and buried deposits are present, including a number of substantial residential settlements. Notably, the Middle Holocene includes a series of buried sites with diverse cultural assemblages and occasional burials. In addition, several isolated human burials have been found in buried contexts, including several in the northern Santa Clara Valley of the South Bay and along the edge of the bay in the Southwest region.

Artifact assemblages are varied and include ground stone (some only with millingslabs and handstones, some with mortars and pestles, and some with both); side-notched dart points; cobble-based chopping, scraping, and pounding implements; and shell beads and ornaments. Current evidence suggests that the mortar and pestle were in use by 6000 cal BP, primarily at sites in the Amador-Livermore, Kellogg Creek, and San Ramon Valleys in the East Bay region. Mortars and pestles were the predominant milling tools used thereafter throughout the East and South Bay regions. The first evidence for extensive use of estuarine resources occurs during the middle Holocene with the expansion of San Francisco Bay's mud flats, and tidal marshes.

Shellfish exploitation included bay oyster (*Ostrea*) and mussel (*Mytilus*), while inland East Bay sites include freshwater shellfish. Faunal remains reveal diverse, local, niche-based exploitation strategies that included hunting seasonal waterfowl and capture of estuary, anadromous, and freshwater fish. Archaeobotanical assemblages from Middle Holocene contexts are varied.

Evidence for long-distance exchange, greater investment in processing technologies (e.g., mortar and pestle), and extensively occupied habitation sites, including the basal layers of many bay shore shell mounds, suggest higher population levels, more complex adaptive strategies, and longer seasonal occupation that took place during the Early Holocene. Along with burial by alluviation, undoubtedly pre-6000 cal BP sites situated along the bay margin would have been inundated by subsequent sea level rise. In part, this may explain why habitation sites from between about 8000 and 7000 cal BP are extremely rare in the wider Bay-Delta Area.

Late Holocene (4200–180 cal BP)

The Late Holocene is generally divided into the following five main time periods: Early (4200–2550 cal BP), Early/Middle Transition (2550–2150 cal BP), Middle (2150–930 cal BP), Middle/Late Transition (930–685 cal BP), and Late (685–180 cal BP). The Late Holocene is very well-documented in the Bay-Delta Area, with more than 240 radiocarbon-dated sites reflecting widespread occupation. Over the last 4,000 years it is generally thought that regional human population increased and there was an upward trend in social, political, and economic complexity, in part reflected by distinct, geographically specific cultural traditions.

The Early Period (+4050–2550 cal BP) marks the establishment or expansion of a number of large shell mounds. The earliest shell mound artifact assemblages consisted of stemmed and short, broad leaf projectile points; square-based knife blades; mortars (both unshaped and cylindrical), pestles (short and sturdy, cylindrical); crescentric stones; perforated charmstones; bone awls; polished ribs; notched and grooved net sinkers; rectangular and spire lopped *Olivella* beads; rectangular abalone (*Haliotis* sp.) beads and various pendant types; antler wedge; and stone bars or "pencils." Bay margin sites reveal a strong emphasis on marine shellfish, marine fishes, and marine mammals. Nuts, berries, and small seeds appear to have been particularly important plant foods.

Very large cemeteries first occur in the Late Holocene, and graves are common at most sites. Burials are almost exclusively found in a loose to tightly flexed position in Bay margin and Santa Clara Valley sites, and the regular occurrence of grave offerings, including shell beads and ornaments, bone objects, and charmstones, suggests well-developed mortuary practices. Artifacts recovered mostly from burial contexts reflect extensive trade networks, providing access to finely crafted implements made of obsidian originating east of the Sierra Nevada and from Napa County. *Haliotis* (abalone) and *Olivella* (olive snail) beads and ornaments also represent trade items, since manufacturing sites are undocumented in the local region. Multi-season plant and animal foods, residential structures, cemeteries, mortars and pestles, and evidence for regular exchange, all suggest that relatively sedentary communities had emerged by the Early Period.

The Middle Period (2150–930 cal BP) is often considered to have witnessed greater settlement permanence—characterized by either sedentary or multi-season occupation. This time interval is also often considered to have been the heyday of mound building (as many of the bay margin shell mounds have dates within this time span) and correlated with greater social complexity and ritual elaboration. A series of changes in artifact types has been documented, including barbless and single-barbed bone fishing spears; large, shaped mortars and equally large pestles; and ear spools and varied forms of *Haliotis* and *Olivella* beads and ornaments. Mortuary practices were often highly ritualized, and some individuals, typically males, were buried with thousands of shell beads. Terrestrial resources appear to have been more heavily exploited than previously, based on food remains and isotopic analysis of human bone. Shifts in resource emphasis included greater use of deer; less reliance on oysters and more on mussels, clams or horn snail; and increased acorn exploitation.

The Late Period (685–180 cal BP) is the best-documented era, and current evidence suggests that Bay-Delta Area populations grew in size, sedentary villages flourished, and material signatures of ritual activity increased. Artifact assemblages at the end of this period included clamshell disk beads, distinctive *Haliotis* pendants, flanged steatite pipes, chevron-etched bone whistles and tubes, and needle-sharp coiled basketry awls." The bow and arrow also are first documented in the region circa 700 cal BP, near the start of the Late Period. Funerary rituals were strongly patterned and included flexed interments and intentionally broken grave offerings, along with occasional cremations.

HISTORIC SETTING

Regional History

The Redwood Cabin is situated on land that was historically occupied by the Ohlone peoples prior to Spanish and Mexican settlement. The Redwood Cabin is located in the former Rancho San Gregorio, which stretched from the coast of the Pacific Ocean up to the forested heights of the Santa Cruz Mountains.

The California Gold Rush and the rapid development of the city of San Francisco triggered a logging boom in the Santa Cruz Mountains. By the late 1800s and early 1900s, commercial timber logging in the Santa Cruz Mountains had subsided. Beginning in the mid 1800s, the Santa Cruz Mountains were becoming a prime area for recreation, including camping, hunting, and fishing. The area's proximity to San Francisco and other Bay Area cities, paired with the rise of the personal automobile in the early twentieth century made the forests of the San Francisco Peninsula ideal locations for middle-class and wealthy families to vacation. Tourism became the livelihood of La Honda, a nearby former logging town located south of the Redwood Cabin. Lodges and hotels were also constructed during this period to accommodate non-campers and long-term visitors.

During the early 1920s, San Francisco, San Mateo, Santa Clara and Santa Cruz counties established a joint highway district in order to build Skyline Boulevard. Following the construction of Skyline Boulevard, the area was made more accessible to both visitors and year-round residents. The 1920s and 1930s brought the peak of residential development for the area. Developments like Skylonda (located directly east of the Redwood Cabin on Skyline Boulevard), Cuesta La Honda, the Middleton Tract, Sierra Morena Woods, Kings Mountain Park, and La Honda Park followed in the subsequent two decades, bringing hundreds of summer houses and cabins to the immediate area.

Despite their early popularity, most of the lodges and hotels along Skyline Ridge and in La Honda did not remain open past the Depression. As other recreation areas became accessible, the popularity of La Honda and the Santa Cruz Mountains waned. With the rise of the conservation movement in the 1970s, the remaining forests, coastal areas, and open spaces of the Santa Cruz Mountains were preserved. As a result, much of the surrounding area, including the Redwood Cabin, has been incorporated into local and state parks and open space preserves. Today, the area serves yet again as a popular day recreation area and the occasional permanent residence or vacation home (Page & Turnbull 2020).

Project Site History

The Redwood Cabin is situated on land within the boundary of the former Rancho San Gregorio and is near the site of former lumber mills, including Harrington Mill. According to Midpen's records, the Redwood Cabin was constructed by W.B. Allen as a family retreat from 1927-1928. Allen settled in Palo Alto in 1903 and owned and

operated Palo Alto Hardware. By 1918, he purchased 400 acres in La Honda including the subject parcel. With the assistance of Norwegian laborers, Allen constructed the lodge on a bedrock foundation using local timber pieced together without nails. In addition to the lodge, Allen imported stones from the coast to construct walls, stairs, and numerous stone-lined hiking trails throughout the property. In the 1930s, the California Conservation Corps assisted with the improvement of some roads near the property. The Allen family as well as local groups, including the YMCA and the rotary club, used the lodge as a summer retreat for decades. The property remained in the Allen (Paulin) family until 1988 when Midpen purchased it.

By the early 1940s, Skyline Boulevard had been fully constructed along the Peninsula and a dirt road extended south, partially along the footprint of the road that connects to the Redwood Cabin. The Redwood Cabin first appeared on a USGS topographic map in 1961. During this time, the Skylonda development had grown and a section of Allen Road that connected the Redwood Cabin to Dyer Ranch and the White Barn was converted to a "Jeep trail," (i.e., an unimproved dirt road). A 1991 USGS topographic map shows the Redwood Cabin on the access road to Skyline Boulevard and a re-configured Allen Road.

An appraisal report from the San Mateo County Assessor's Office, dated June 10, 1953 and July 21, 1954, is the earliest and only known official record of the Redwood Cabin on file at the County of San Mateo. The record lists the date of construction as approximately 1920 and indicates a 66-foot by 30-foot rectangular building labeled "lodge" with a wraparound open plank deck and a larger rear deck. The lodge is described as a 6-room building with one bathroom and redwood log walls; light shake roof; exposed rustic along rake of rafters; mud sills and large rustic posts; pine floor; large natural stone fireplace; and deck pillars set on concrete piers. Three other buildings accompany the lodge on the appraisal report and are noted as being removed in 1966. The buildings appear to have been situated around the circular driveway and included two garages and a caretaker's cabin with an open deck at the front. The caretaker's cabin and two garages are no longer extant on the site, and it is unknown whether they were demolished or relocated.

RECORDS SEARCHES AND REPORTS

A cultural resources literature search was conducted in July 2021 by the Northwest Information Center (NWIC) of the California Historical Resources Information System at Sonoma State University. The records search was conducted to determine if prehistoric or historic cultural resources had been previously recorded within the project site, the extent to which the project site had been previously surveyed, and the number and type of cultural resources within a 0.25-mile radius of the project site. The following information was reviewed as part of the records search:

- NRHP and CRHR,
- California Office of Historic Preservation Historic Property Directory,
- California Inventory of Historic Resources,
- California State Historic Landmarks,
- California Points of Historical Interest, and
- Historic properties reference map.

The NWIC records search indicated that no resources were located within the project area or within a 0.25-mile radius of the project area.

As described in Chapter 2, "Project Description," the *La Honda Creek Redwood Cabin Historic Resources Evaluation Report* (Historic Resources Evaluation) was prepared for the Redwood Cabin structure by Page & Turnbull, Inc. in 2020. The report indicated that the building was not included in the San Mateo County Inventory of County Historic Resources (Page & Turnbull 2020).

CRHR criteria were used to evaluate the significance of the historic features and archaeological sites. The CRHR is discussed in more detail above in Section 3.2.1, "Regulatory Setting." Eligibility for listing in the CRHR rests on twin factors of significance and integrity. A resource must have both significance and integrity to be considered eligible.

Loss of integrity, if sufficiently great, will become more important than the historical significance a resource may possess and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible.

California Register of Historical Resources Eligibility

Findings of the Historic Resources Evaluation determined that the Redwood Cabin is a historical resource per CEQA because it appears to be eligible for listing in the CRHR under the following criteria:

Criterion 1. The La Honda Creek Redwood Cabin does appear to be significant under Criterion 1 (Events) as a property associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States. The cabin was constructed at a peak of outdoor recreation in the Santa Cruz Mountains. The Redwood Cabin's construction appears representative of a broader pattern of recreational development in the Santa Cruz Mountains following the San Francisco Peninsula's logging boom, specifically at a time when recreation shifted from camps to cabins and early subdivisions. While the cabin does not appear to be one of the earliest recreational cabins (from the late 1800s and early 1900s), it appears to be one of the last remaining ones intact from the transition era to permanent structures. Most of the original lodges and hotels appear nonextant. The Redwood Cabin appears to be a rare building typology and retains its original rural setting. Therefore, the property does appear to be individually eligible for listing under Criterion 1 with its period of significance, 1927-1928, the years of its construction.

Criterion 3. The La Honda Creek Redwood Cabin does appear to be individually eligible for listing in the California Register under Criterion 3 (Architecture) as a building that embodies the distinctive characteristics of a type, period, region, or method of construction, or that represents the work of a master or possesses high artistic values. The Redwood Cabin is a large, one-story side-gabled rectangular log cabin. It is constructed of barked redwood logs of various sizes, with saddle notches that are set unconventionally and upside down. The cabin is supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The cabin features a large, centered stone chimney that connects to an expansive interior fireplace, its foundation visible from beneath the cabin. Its openings consist of what appear to be original wood sash multi-lite windows, a large, handmade redwood door with iron details, and paneled one-lite wood doors and wood multi-lite French doors throughout. Much of the cabin appears to be original. The building clearly utilizes local materials, and while its construction method appears slightly "primitive," it appears indicative of the rural, woodsy character of the area and the period in which the region was transitioning to more permanent recreational structures. As such, the Redwood Cabin does appear to be a unique property type or architectural style such that it would rise to the level of individual significance within a local context (Page & Turnbull 2020).

Integrity

As determined in the Historic Resources Evaluation, the Redwood Cabin retains sufficient historic integrity to be eligible for listing in the CRHR as an individual resource under each of the following categories:

- Location,
- Setting,
- Design,
- Materials,
- Workmanship,
- Feeling, and
- Association.

In summary, CRHR eligibility was determined for the Redwood Cabin because it appears to be one of few remaining examples of a permanent recreational cabin from the 1920s with a high degree of integrity and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is an example of an uncommon rustic recreational cabin in the Bay Area (CRHR Criterion 3). Further, the Historic Resource Evaluation determined that the Redwood Cabin retains a sufficient historic integrity to be eligible for listing in the CRHR as an individual resource (Page & Turnbull 2020).

Historic Landscape

In 2021, the La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum (memo) was prepared by Page & Turnbull. The memo indicates that while the Redwood Cabin, itself, was constructed around 1927 to 1928 for owner W.B. Allen, research has not definitively revealed the original date of construction, builder, use, and any other historic associations of the individual landscape features on the site. Without this information, it is not known whether these features contribute to the property's overall significance under Criteria 1 and 3 for listing on the CRHR. The features are clustered around the cabin and most likely served a support function for the cabin and its occupants. Due to their ancillary nature, the historic significance of these landscape features is likely to be dependent upon and inextricably connected to the cabin. Thus, removing the cabin but retaining the surrounding contributing landscape features would result in a loss of any associative historic significance that the landscape features may possess, as well.

Furthermore, the landscape features at the Redwood Cabin property do not appear to be individually historically significant as separate entities from the Redwood Cabin. The stone walls along the circular driveway, as well as the stairs leading up to the cabin and various hiking trails throughout the site, were reportedly constructed by W.B. Allen, using stones imported from the California coast. There is speculation that the Civilian Conservation Corps may have assisted with the construction of these walls and helped improve other roads in the surrounding area in the 1930s. However, no clear documentary evidence has been uncovered to date that confirms that the Civilian Conservation Corps did, in fact, construct the walls or any other features at the La Honda Creek Redwood Cabin property.

Ultimately, the features do not appear to possess individual historic significance apart from the Redwood Cabin and do not comprise a historic landscape. The landscape features were likely built as auxiliary features that served the Redwood Cabin and its occupants; therefore, any potential historic significance they may possess is likely to be as site features associated with the cabin itself (Page & Turnbull 2021).

3.2.3 Impacts and Mitigation Measures

METHODOLOGY

The impact analysis for archaeological and historical resources is based on the findings and recommendations of the *La Honda Creek Redwood Cabin Historic Resources Evaluation Report* (Page &Turnbull 2020) as well as the *La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum* (Page & Turnbull 2021). The analysis is also informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources.

Section 21083.2 of the State CEQA Guidelines defines "unique archaeological resource" as an archeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following CRHR-related criteria: 1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) that it as a special and particular quality, such as being the oldest of its type or the best available example of its type; or 3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person. An impact on a "nonunique resource" is not a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.5[c][4]). If an archaeological resource qualifies as a resource under CRHR criteria, then the resource is treated as a unique archaeological resource for the purposes of CEQA.

In addition, according to PRC Section 15126.4(b)(1), if a project adheres to the Secretary of the Interior's Standards for the Treatment of Historic Properties, the project's impact "will generally be considered mitigated below the level of a significance and thus is not significant".

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, the project would result in a significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines; or
- cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.

ISSUES NOT DISCUSSED FURTHER

All potential archaeological and historical resource issues identified in the significance criteria are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Implementation of the project would result in a substantial adverse change in the significance of a recommended-eligible historical resource and would not implement Preserve Master Plan EPG CUL-3 No. 5, as stated. This would result in a **significant** impact as described in State CEQA Guideline 15064.5(b)(1).

As discussed previously, the Redwood Cabin was evaluated for CRHR eligibility in 2020. The Historic Resources Evaluation concluded that the structure appears eligible for listing in the CRHR because it appears to be one of few remaining examples of a permanent recreational cabin from the 1920s with a high degree of integrity and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is an example of an uncommon rustic recreational cabin in the Bay Area (CRHR Criterion 3) (Page & Turnbull 2020).

As described in Section 3.2.2, "Environmental Setting," the *La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum* concluded that landscape features surrounding the project site do not appear to possess individual historic significance apart from the Redwood Cabin and do not comprise a historic landscape. These landscape features were likely built as auxiliary features that served the Redwood Cabin and its occupants; therefore, any potential historic significance they may possess is likely to be as site features associated with the cabin itself (Page & Turnbull 2021).

Implementation of the project would involve demolition of the Redwood Cabin and removal of associated site features, including the stone retaining wall, barbeque, and fire pits. The demolition of the Redwood Cabin would result in a substantial adverse change in the significance of this historical resource because the building would no longer exist. Because associated site features were determined not to possess individual historic significance and do not comprise a historic landscape, removal of these features, in tandem with the Redwood Cabin would not result in an adverse change to the significance of a historic resource.

EPG CUL-3 No. 5 of the Preserve Master Plan calls for retaining/mothballing or moving historical resources. However, the Master Plan recommends historical and structural evaluations of the Redwood Cabin for future Midpen Board of Directors consideration on the disposition of the structure. Consistent with the Master Plan, historical and structural evaluations for the Redwood Cabin were prepared in 2020. Based on those evaluations, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin.

Because the Redwood Cabin structure was recommended eligible for listing in the CRHR under criterion 1 and 3, and project activities would result in an adverse change in the significance of a CEQA historic resource, impacts would be **significant**.

Mitigation 3.2-1a: Document historic buildings prior to removal.

Midpen shall complete Historic American Building Survey documentation of the Redwood Cabin before any demolition work is conducted. Documentation shall consist of written history of the property, plans and drawings of the historic resources, and photographs, as described below:

- **Written History.** The report shall be reproduced on archival bond paper.
- **Plans and Drawings.** An architectural historian (or historical architect, as appropriate) shall conduct research into the availability of plans and drawings of the Redwood Cabin as the building currently exists. If such plans/drawings exist, their usefulness as documentation for the building shall be evaluated by the architectural historian. If deemed adequate, the plans/drawings shall be reproduced on archival mylar. If no plans/drawings are available, or if the existing plans/drawings are not found to be useful in documenting the historic resource, a historical architect shall prepare dimensioned plans and exterior elevations of the building. A combination of existing and new drawings is acceptable. All drawings shall be reproduced on archival mylar.
  - The architectural historian shall conduct research into the existence of the original architectural plans and drawings of the building. If found, the plans shall be reproduced on archival mylar. Alternatively, the architectural plans can be scanned and saved as TIFF files. The scanning resolution shall be not less than 300 dpi.
  - All digital files, including drawing files, shall be saved on media and labeled following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Specifications.
- **Photographs.** Digital photographs shall be taken of the Redwood Cabin following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Standards.

The documentation shall be prepared by an architectural historian, or historical architect as appropriate, meeting the Secretary's Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards. The documentation shall be submitted to the San Mateo County Library, the San Mateo County Historical Association, the Northwest Information Center, and the Midpen office in Los Altos.

Mitigation 3.2-1b: Redwood Cabin interpretation.

Midpen will create an interpretive resource outlining the Redwood Cabin's historic status, historic context, and significance. This resource will be available in a digital and/or physical format for public engagement and may be shared with a relevant local organization such as the San Mateo County Historical Association.

Mitigation Measure 3.2-1c: Salvage of useable materials.

Should any of the demolished structure materials (i.e., redwood logs) be found to be in acceptable condition (i.e., no lead paint, minimal dry rot), Midpen shall reserve materials for potential future uses and/or salvage in compliance with Midpen's waste diversion requirements outlined in Midpen's Board of Directors Policy 4.08 - Construction and Demolition Waste Diversion. If these materials are free of pests, Midpen will coordinate with local historic salvage organization, such as Garden City Recycle and Salvage in Santa Cruz, Whole House Building Supply & Salvage in San Mateo, or Heritage Salvage in Petaluma for their reuse.

Significance after Mitigation

Implementation of Mitigation Measures 3.2-1a,3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin through structure documentation, creation of an interpretive resource, and salvage of useable materials. However, because the historically eligible structure would no longer exist, impacts to the Redwood Cabin would remain **significant and unavoidable**.

Impact 3.2-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources

Project-related ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. However, because project excavation activities would occur in previously disturbed areas, the potential for encountering archaeological material is low. Additionally, because EPG CUL-1 would be implemented in the event of a discovery, this would be a **less-than-significant** impact.

As previously described, result of the NWIC records search indicated that no resources were located within the project area or within a 0.25-mile radius of the project area. Implementation of the project would result in demolition of the Redwood Cabin, removal of associated site features (e.g., stone retaining wall and barbeque and fire pits), and site recontouring activities post-construction. Demolition activities and staging associated with project implementation would result in ground disturbance at the project site. As described in Chapter 2, "Project Description," the wooden posts that support the Redwood Cabin structure would be removed as part of structure demolition. Removal of these wood posts would involve excavation of up to 2 to 5 feet in an area that had been disturbed during the installation of these posts. The project site is relatively disturbed from previous site uses, such as the construction of the retaining wall, and as indicated by the negative NWIC records search results, no known archaeological resources are present within the project site. Nevertheless, because the project would result in earth-moving activities, there is the potential that previously undiscovered archaeological materials could be encountered during construction.

In the event of that unanticipated archaeological materials are encountered during construction, Midpen and the construction contractor would implement EPG CUL-1, Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials as identified in Section 3.2.1, "Regulatory Setting," and originally described in the La Honda Creek Open Space Preserve Master Plan. CUL-1 includes discovery protocol such as stopping work within 30 feet of the discovery, notifying a qualified professional, and implementing methods to protect the find (e.g., fencing) until the significance of the find is determined and a treatment plan can be identified and implemented.

Because excavation would occur previously disturbed areas of the project, the potential for encountering archaeological material is low, and because EPG CUL-1 would be implemented in the event of a discovery, project impacts related to archaeological resources would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.2-3: Potential to Contribute to a Significant Cumulative Impact to Cultural Resources

The project, in combination with other cumulative development in the area, could result in impacts to cultural resources in the area. Through the implementation of environmental protection measures, the contribution of the project would not be cumulatively considerable with respect to archaeological resources. However, because the project would result in permanent removal of a historic architectural resource, impacts to historical resources would be significant. Therefore, cumulative impacts to cultural resources as a whole would be **significant**.

The cumulative context for the cultural resources analysis considers a broad regional system of which the resources are a part. The cumulative context for archaeological resources is the San Francisco Bay-Delta region, where archaeologists have developed a taxonomic framework describing patterns characterized by technology, particular artifacts, economic systems, trade, burial practices, and other aspects of culture. The cumulative context for historical resources includes recreational development in the Santa Cruz Mountains.

Because all significant cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant cultural resources, all adverse effects erode a dwindling resource base. The loss of any one archaeological site could affect the scientific value of others in a region because these resources are best

understood in the context of the entirety of the cultural system of which they are a part. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather than on a single project or parcel boundary.

Archaeological Resources

No known unique archaeological resources are located within the boundaries of the proposed project site; nonetheless, project-related earth-disturbing activities could damage undiscovered archaeological resources. The proposed project in combination with other projects in the area, such as Midpen's Fuel Reduction Implementation projects, Agricultural Workforce Housing at La Honda Creek Open Space Preserve, and bridge replacement and repair projects in the Preserve, could contribute to ongoing substantial adverse changes in the significance of unique archaeological resources. As described above, implementation of EPG CUL-1, would avoid potential adverse effects to archaeological resources by ensuring proper identification, evaluation, and treatment of previously unidentified archaeological material, such that impacts would be less than significant. Therefore, implementation of the project would not contribute to a cumulative loss of archaeological resources. Similarly, cumulative project under Midpen's jurisdiction would be required to implement EPG CUL-1 to avoid/reduce impacts to archaeological resources.

Historical Resources

The Redwood Cabin was constructed during a peak of outdoor recreation activities in the Santa Cruz Mountains. The Redwood Cabin's construction appears representative of a broader pattern of recreational development in the Santa Cruz Mountains following the San Francisco Peninsula's logging boom, specifically at a time when recreation shifted from camps to cabins and early subdivisions. A small number of other redwood cabins are located in the Bay Area; however, they do not appear to have been evaluated for CRHR- or NRHP-eligibility, and, therefore, it is not known if they are historical resources under CEQA. While the Redwood Cabin does not appear to be one of the earliest recreational cabins (from the late 1800s and early 1900s), it appears to be one of the last remaining ones intact from the transition era to permanent structures, in the area. Additionally, as described in Impact 3.2-1, the Redwood Cabin is an eligible historic architectural resource. As such, implementation of the project would result in removal of a CEQA historical resource as well as one of the few remaining structures representative of recreational development in the region. Implementation of Mitigation Measures 3.2-1a, 3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin, however, would not reduce the project's impact associated with an adverse change to the significance of a historical resource. This permanent loss in the resource would result in a cumulatively considerable contribution to a historic impact.

Conclusion

Therefore, although cumulative impacts to archaeological resources would be less than significant, cumulative impacts to cultural resources as a whole would be **significant and unavoidable**.

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4 ALTERNATIVES

4.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The range of alternatives studied in an EIR is governed by the "rule of reason," requiring evaluation of only those alternatives "necessary to permit a reasoned choice" (State CEQA Guidelines Section 15126.6[f]). Further, an agency "need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (State CEQA Guidelines Section 15126.6[f][3]). The analysis should focus on alternatives that are feasible (i.e., that may be accomplished in a successful manner within a reasonable period of time, taking economic, environmental, social, and technological factors into account). Alternatives that are remote or speculative or that do not feasibly meet most of the project objectives need not be discussed. Furthermore, the alternatives analyzed for a project should focus on reducing or avoiding significant environmental impacts associated with the project, as proposed.

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety;
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings;
- Reduce structure and wildland fire risk by removing a structure with a history of vandalism;
- Improve natural visual character and scenic open space qualities at the site; and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

4.2 SUMMARY OF ENVIRONMENTAL IMPACTS

The purpose of this section is to briefly summarize the significant impacts to the environment with implementation of the Redwood Cabin Removal Project, as identified in Chapter 2 of this document. Potentially significant impacts, which implementation of feasible mitigation measures would reduce to a less-than-significant level, were identified for biological resources (special-status species and associated habitats) and archaeological resources.

Significant impacts were identified for cultural resources for which further mitigation is not available and the impact remains significant and unavoidable. Specifically, the proposed project would result in demolition of a structure that has been recommended eligible for listing in the California Register of Historical Resources (CRHR). Although mitigation measures require documentation of the building before removal, because the building would be lost, the impact is considered significant and no additional feasible mitigation measures are available. This is also considered a significant contribution to a cumulative impact.

See Section 3.1, "Cultural Resources" and Section 3.2, "Biological Resources" of this Draft EIR for a more detailed summary of the impact conclusions and mitigation measures identified.

4.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision maker(s). (See Pub. Resources Code, § 21081(a)(3).) At the time of action on the project, the decision maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered but are not evaluated further in this Draft EIR.

4.3.1 Retain Site Elements Alternative

The Retain Site Elements Alternative would be similar to the proposed project in that it would remove the Redwood Cabin, but this alternative would retain other site elements outside of the immediate cabin footprint, such as the horseshoe pit, barbeque, and stone retaining walls. No long-term operations and maintenance would occur to manage the features left on site. This alternative was mentioned by a Midpen Board of Director's member during a June 2021 Board scoping meeting.

The horseshoe pit, barbeque, and stone retaining walls do not have historical significance on their own and, as described in Section 3.1, "Cultural Resources," are not recommended eligible for listing in the CRHR as landscape features. This alternative was eliminated from further consideration because it would not avoid project-related

significant and unavoidable impacts associated with removal of historic structures and would also not meet the project objectives. For these reasons discussed, the Retain Site Elements Alternative has been eliminated from further consideration in this Draft EIR.

4.3.2 Relocate and Stabilize Alternative

This alternative involves relocating the Redwood Cabin to a new location, either within La Honda Creek Open Space Preserve or to a site not owned by Midpen, if a feasible site were identified, as allowed by EPG CUL-3. Currently, there is no public access to or around the Redwood Cabin; the Relocate and Stabilize Alternative would select a location that would allow public viewing and historic interpretation of the cabin. In order to retain the structure's historic integrity and therefore its eligibility for listing in the CRHR, the site would have to be in a similar setting to the current location. Under the Relocate and Stabilize Alternative, the Redwood Cabin would be stabilized so that visitors could walk around the perimeter and view the structure up close; however, interior access would not be permitted.

This alternative was eliminated from further consideration because it fails to meet two project objectives. Objective 2, enhance habitat at the Redwood Cabin site and immediate surroundings, would not be met because preparing a new building site for the Redwood Cabin would expand the disturbed project footprint by impacting new areas of undisturbed, natural habitat. This could result in significant impacts to biological resources. Objective 6, implement a fiscally sustainable project, would not be met because relocating the cabin would significantly increase costs to disassemble, move and reconstruct the building, which would then require additional stabilization improvements to reduce public safety hazards at the relocation site. Thus, this alternative would not achieve a fiscally sustainable project. For these reasons discussed, the Relocate and Stabilize Alternative has been eliminated from further consideration in this Draft EIR.

4.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

California Code of Regulations Section 15126.6(e) (1) requires that the no project alternative be described and analyzed "to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss "the existing conditions at the time the notice of preparation is published…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (Section 15126.6[e][2]). "If the project is… a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (Section 15126[e][3][B].)

The following alternatives are evaluated in this Draft EIR.

- Alternative 1: No Project Alternative assumes no demolition of the existing structure. The project site would remain in its current condition.
- Alternative 2: Stabilize Alternative assumes no demolition of the existing structure but includes stabilizing the building and site.
- Alternative 3: Repair and Rehabilitate Alternative assumes the repair and rehabilitation of the building for eventual reuse as a retreat space, meeting space, or hikers hut (or similar use).

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed project, are provided below.

4.4.1 Alternative 1: No Project Alternative

Under Alternative 1, the No Project Alternative, no actions would be taken by Midpen and the project site would remain unchanged. The Redwood Cabin would remain vacant and in its current deteriorated condition. The No Project Alternative would not meet the project objectives. However, as required by CEQA, the No Alternative is evaluated in this Draft EIR. This alternative would not meet any of the objectives identified in Section 4.1.

Biological Resources. The No Project Alternative includes no demolition or excavation activities and no changes in the current activities at the project site. Therefore, no impact to biological resources would occur. However, this alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. No invasive plant treatment would occur as part of this alternative, nor would site enhancements, including soil decompaction and amendments, or revegetation. The proposed project includes environmental protection guidelines, best management practices, and requires mitigation measures to reduce construction-related impacts to special-status species and habitat. Because of this loss of opportunity to improve biological resources if the Redwood Cabin were retained, compared to the proposed project, the No Project Alternative would result in *Slightly Greater* impact to biological resources than the proposed project.

Cultural Resources. No sub-surface archaeological resources would have the potential to be affected by implementation of the No Project Alternative because it includes no excavation or other ground-disturbing activities. However, the proposed project includes EPGs to reduce construction-related impacts to archaeological resources. The existing historical resource on the site, the Redwood Cabin, would not be demolished. Although implementation of the No Project Alternative might appear to avoid the significant impact of the proposed project by avoiding demolition of a CRHR-eligible building, further deterioration under the No Project Alternative would likely ultimately result in an overall similar impact because over time, this deterioration and on-going vandalism would further compromise the already deteriorating nature of the building. It is likely that the cabin would become so greatly deteriorated, it would no longer be able to convey its historical significance and no longer be eligible for listing in the CRHR. Compared to the proposed project, the No Project Alternative would, in the long-term, result in *Slightly Less* impact to cultural resources than the proposed project and would not ultimately substantially reduce or avoid the significant impact since the structure would continue to fall in disrepair over time.

4.4.2 Alternative 2: Stabilize Alternative

The Stabilize Alternative would address structural deficiencies to retain and stabilize the structure over the long term. The goal of this alternative is to freeze or reduce building deterioration over time while preserving as many of the exterior character-defining features as possible. The stabilize alternative would require incurring short- and long-term costs to maintain the site.

The stabilization methods under the Stabilize Alternative target only the gravity related structural deficiencies and would not allow for re-occupancy of the building. The following methods would be implemented under this alternative:

- Mothball the structure per Secretary of the Interior's standards: board up and secure the structure's windows, doors, skylights, and openings/gaps; restrict access to the interior of the structure; provide passive ventilation to the interior; develop and implement a maintenance and monitoring plan. Mothballing also includes wildlife exclusion plans. The mothballing plan would also include hazardous material abatement to encapsulate or remove the existing lead paint in the structure.
- Exterior: remove collapsed and unsafe portions of the porch framing, and handrail – replace only what is necessary for ongoing maintenance of the structure; repair the roof for waterproofing; repair the chinking

between the exterior logs for waterproofing and treating for insects. Additional site security, including cyclone fencing and no trespassing signs would likely be needed.

- Site preparation: prepare the subfloor and surrounding area for foundation repairs, stabilize the underside of the structure with wood box cribbing, remove shrubs and weeds adjacent to the structure, remove five trees that are either dead, growing at a heavy lean towards the structure, or unhealthy.
- Wildlife management: pest control, preconstruction surveys for bats and woodrats prior to stabilization activities, removal of wildlife in the structure.
- Utilities: disconnect and remove power, electrical panel, and plumbing.

This alternative would achieve only one of the project objectives identified in Section 4.1. Because the Redwood Cabin would not be removed under the Stabilize Alternative, it would not enhance the habitat of the site and surroundings or improve natural visual character and scenic qualities to the degree of the proposed project. Although some habitat improvement activities would occur under this option, such as shrub, weed, and dead tree removal, they would be limited to areas outside the footprint of the building. Additionally, because the cabin would not be removed, continued vandalism and risk of fire, either to the structure itself or to both the structure and surrounding area, would remain. Stabilizing the Redwood Cabin would remove physical hazards for improved public safety.

Biological Resources. The Stabilize Alternative includes no demolition or excavation activities and no changes in the current activities at the project site. Bats and woodrats exclusion activities would occur prior to stabilization activities as part of the mothballing plan; however, long-term exclusion would require on-going inspection and maintenance and is unlikely to be effective, given the frequency the building has been vandalized. Invasive plant treatment would occur under this alternative, however, any additional site enhancements, including soil decompaction and amendments, or revegetation would only occur under Midpen's Invasive Pest Management Program or the Wildland Fire Resiliency Program. Therefore, this alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. This alternative would also include the environmental protection guidelines, best management practices, and similar mitigation measures to the proposed project to reduce construction-related impacts to special-status species, including bats and woodrats. Because of this loss of opportunity to improve biological resources if the Redwood Cabin were retained, compared to the proposed project, the Stabilize Alternative would result in *Slightly Greater* impact to biological resources than the proposed project.

Cultural Resources. No sub-surface archaeological resources are likely to be affected by implementation of the Stabilization Alternative because it includes only minor ground-disturbing activities in previously disturbed areas (i.e., foundation repair, utility removal). The alternative would include EPGs to reduce any potential impacts to archaeological resources. The existing historical resource on the site, the Redwood Cabin, would not be demolished thereby avoiding a significant and unavoidable impact. Stabilization of the Redwood Cabin would reduce building deterioration over time. Through up front and ongoing stabilization repairs and maintenance investments, the building would retain its historical significance and remain eligible for listing in the CRHR. Compared to the proposed project, the Stabilize Alternative would result in *Less* impact to cultural resources than the proposed project.

4.4.3 Alternative 3: Repair and Rehabilitate Alternative

Under Alternative 3, the Repair and Rehabilitate Alternative, the building would be rehabilitated for eventual reuse as a retreat space, meeting space, or hikers hut (or similar use). Under this alternative, the Redwood Cabin would remain off-limits to the public. The building would be rehabilitated following the recommendations of the Secretary of the Interior's Standards for the Treatment of Historic Properties. Rehabilitating the structure to allow for a retreat space, meeting space, or hikers hut, would likely require upgrades and alterations of several building and site elements. The Repair and Rehabilitate Alternative would require substantial investment and ongoing costs to improve and maintain the structure.

- Exterior: Fully reconstruct porch and railing; repair the roof for waterproofing; repair the chinking between the exterior logs for waterproofing and treat for insects; prepare hazardous material abatement plan to encapsulate or remove the existing lead paint in the structure.

- Foundation: remove and replace the lower three courses of horizontal logs on the exterior; lift the foundation back to its original level and pin the underside for stability; pour concrete footings for each post that extends into the ground.
- Wildlife management: pest control, preconstruction surveys for bats and woodrats prior to stabilization activities; remove wildlife in the structure; prepare a wildlife exclusion plan.
- Interior finishes: remodel bathroom and kitchen for reuse.
- Site utilities: install a new septic system; provide a safe drinking water source by verifying viability of existing water source for reuse or drilling for a new water source; replace interior plumbing and electrical.

This alternative would achieve only two of the project objectives identified in Section 4.1. Because the Redwood Cabin would not be removed under the Repair and Rehabilitate Alternative, it would not enhance the habitat of the site and surroundings or improve natural visual character and scenic qualities to the degree of the proposed project. Rehabilitating the Redwood Cabin would remove physical hazards to ensure public safety. Additionally, by eventually activating the project site, the potential for vandalism and associated fire risk would be reduced, but not eliminated since the building would remain vacant for extended periods of time between occupancy.

Biological Resources. The Repair and Rehabilitate Alternative includes construction and excavation activities related to the installation of new concrete footings, site utilities, and a new septic system which were not included in the proposed project. Invasive plant treatment would occur under this alternative, however, any additional site enhancements, including soil decompaction and amendments, or revegetation would only occur under Midpen's Invasive Pest Management Program or the Wildland Fire Resiliency Program. Therefore, this alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. This alternative would also include the environmental protection guidelines, best management practices, and similar mitigation measures to the proposed project to reduce construction-related impacts to special-status species and habitat. However, unlike the proposed project or other alternatives, this alternative includes an eventual operational component—opening the structure for limited gatherings—that could result in additional effects related to biological resources. Intensifying use in this area as a destination site that accommodates gatherings, especially with the use of an operational kitchen, would generate food waste, which could attract invasive wildlife species (especially birds and rodents), which could affect the ecology of the site and negatively impact future marbled murrelet nesting success. Compared to the proposed project, the Repair and Rehabilitate Alternative would result in *Greater* impacts to biological resources than the proposed project.

Cultural Resources. Because the Repair and Rehabilitate Alternative includes ground-related construction activities associated with the installation of concrete footings, site utilities and a septic system, potential impacts to sub-surface archaeological resources would be slightly greater than the proposed project. However, the alternative would include EPGs to reduce construction-related impacts to archaeological resources. The existing historical resource on the site, the Redwood Cabin, would not be demolished thereby avoiding a significant and unavoidable impact. Rehabilitation of the Redwood Cabin would be consistent with recommendations of the Secretary of the Interior's Standards for the Treatment of Historic Properties. The building would retain its historical significance and remain eligible for listing in the CRHR. Compared to the proposed project, the Repair and Rehabilitate Alternative would result in *Less* impact to cultural resources than the proposed project.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As illustrated in Table 4-1, below, the Stabilize Alternative would be the environmentally superior alternative. It would result in slightly greater impacts to biological resources but would avoid the proposed project's significant and unavoidable cultural resource impact. This significant and unavoidable impact would not be avoided under the No Project Alternative, and impacts to biological resources would be slightly greater under the No Project Alternative than under the proposed project because it would not provide the long-term opportunity to improve biological resources.

The Repair and Rehabilitate Alternative would also avoid the proposed project's significant and unavoidable cultural resource impact, however, impacts to biological resources would be greater under this alternative. As with the Stabilize Alternative, the Repair and Rehabilitate Alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. Additionally, although the site is not currently open to the public, there would be a greater area of ground disturbance once the site is open to the public. The Master Plan identified this area for future public access opportunities, but the timeline for opening this area of La Honda Creek Open Space Preserve is many multiple years out given other public access priorities for the preserve.

Table 4-1 Summary of Environmental Effects of the Alternatives Relative to the Proposed Redwood Cabin Project

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Stabilize Alternative	Alternative 3: Repair and Rehabilitate Alternative
Biological Resources	LTSM	Slightly Greater	Slightly Greater	Greater
Cultural Resources	SU	Slightly Less	Less	Less

Notes: LTSM = Less Than Significant with Mitigation SU = Significant and Unavoidable

Source: Compiled by Ascent in 2021

Table 4-2 identifies which project objectives are met by the alternatives described above. As described in Section 4.4.2, the Stabilize Alternative meets only one of the objectives: removing physical hazards to ensure public safety. The remaining four objectives would not be met by this alternative. Therefore, while the Stabilize Alternative would be the environmentally superior action alternative, it would not meet the objectives of the project as presented above in Section 4.1.

Table 4-2 Objectives Achieved by Project Alternatives

Project Objective	Objective Met? Alternative 1: No Project Alternative	Objective Met? Alternative 2: Stabilize Alternative	Objective Met? Alternative 3: Repair and Rehabilitate Alternative
Remove physical hazards to ensure public safety	No	Yes	Yes
Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings	No	No	No
Reduce structure and wildland fire risk by removing a structure with a history of vandalism	No	No	Yes
Improve natural visual character and scenic open space qualities at the site	No	No	No
Implement a fiscally sustainable project consistent with Midpen's mission as an open space district	No	No	No

Source: Compiled by Ascent in 2021

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5 OTHER CEQA SECTIONS

5.1 GROWTH INDUCEMENT

California Environmental Quality Act (CEQA) Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an environmental impact report (EIR). Section 15126.2(d) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

5.1.1 Growth-Inducing Impacts of the Project

Project construction activities would involve construction crews of approximately eight people over a period of 10 weeks. It is anticipated that construction crews would be part of the existing workforce in the greater San Mateo County area and therefore would not result in the need to hire new construction employees within the region. Once project construction activities are complete, the project site would remain inaccessible to the public. Implementation of the Redwood Cabin Removal Project would not induce population growth because it would not introduce new land uses associated with population increases (e.g., housing, employment centers.) The project would not include land uses that would result in people relocating to the area and would not displace housing units or people. Additionally, project activities would not extend utilities to an area not currently served, and would, therefore, not contribute to future growth of the project area. As such, implementation of the project would not cause growth inducing impacts.

5.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3 (project level and cumulative impacts) of this Draft EIR, after implementation of the recommended mitigation measures, most of the impacts associated with the Redwood Cabin Removal Project would be reduced to a less-than-significant level. The following impact is considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

5.2.1 Cultural Resources

Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Implementation of the project would involve removal of the Redwood Cabin which has been recommended eligible for listing in the California Register of Historical Resources. Thus, the project would adversely result in significant changes to a CEQA historical resource. Mitigation Measure 3.2-1 requires Midpen to complete documentation of the structure, which involves preparation of written history for the property, plans and drawings of the historical resource, and photographs. However, even after implementation of Mitigation Measure 3.2-1, the project would still result in a **significant and unavoidable** impact because the historical resource would no longer exist.

5.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, the State CEQA Guidelines section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generation to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The project would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation, including the following:

- water supply for project construction activities; and
- energy expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and transportation vehicles that would be needed for project construction activities.

These nonrenewable resources would represent only a very small portion of the resources available in the region and would not affect the availability of these resources for other needs within the region.

Construction activities would not result in inefficient use of energy or natural resources. Demolished materials would be salvaged, reused, and/or recycled as feasible. During removal of the Redwood Cabin, construction contractors would use best available engineering techniques, construction and design practices, and equipment operating procedures. Once construction activities are complete, the project site would be vacant, would not be accessible to the public, and would not result in any consumption of energy and natural resources above what is currently used for periodic monitoring, and fuel reduction activities.

6 REPORT PREPARERS

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Chapter 3 Environmental Impacts and Mitigation Measures

None

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Chapter 4 Alternatives

None

Chapter 5 Other CEQA Sections

None

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Appendix A

Notice of Preparation and Comments

NOTICE OF PREPARATION
REDWOOD CABIN REMOVAL PROJECT
Midpeninsula Regional Open Space District

Date Published:	June 9, 2021
Project Title:	Redwood Cabin Removal Project
Project Location:	La Honda Creek Open Space Preserve, San Mateo County, CA
Lead Agency:	Midpeninsula Regional Open Space District 330 Distel Circle Los Altos, CA 94022
Contact:	Alex Casbara, Planner III acasbara@openspace.org
Review Period:	June 9, 2021 – July 9, 2021

INTRODUCTION

The Midpeninsula Regional Open Space District (Midpen) issues this Notice of Preparation (NOP) to announce preparation of an Environmental Impact Report (EIR) for the Redwood Cabin Removal Project (Project). Midpen will prepare an EIR for the Project to satisfy the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and will serve as the lead agency for CEQA compliance. In accordance with CEQA Statute and Guidelines (Guidelines) Section 15082, the purpose of this NOP is to describe the Project, identify potential environmental effects, and invite interested parties to comment on the scope and content of the EIR (CEQA Guidelines Section 15082[b]).

PROJECT LOCATION

The Redwood Cabin is situated within the upper portion of Midpen's La Honda Creek Open Space Preserve (Preserve). The Preserve encompasses 6,142 acres in the Santa Cruz Mountains within unincorporated San Mateo County (Attachment 1) and is bounded by Highway 35 (Skyline Boulevard) to the north, Highway 84 (La Honda Road) to the east and south, and Bogess Creek to the west.

The Redwood Cabin occupies a portion of Assessor's Parcel Number 075-330-260 and is located west of the community of Sky Londa, California. The Project site is designated for Forest/Timber Production land uses under the San Mateo County General Plan and is zoned as Timberland Preserve District under the San Mateo County Zoning Ordinance. Access to the Redwood Cabin is provided via an unpaved road accessible from Skyline Boulevard, which travels through two locked gates. The final segment of this unpaved road requires a four-wheel drive vehicle or access by foot.

EXISTING CONDITIONS

The Redwood Cabin is located in a heavily wooded area within a portion of the Preserve that is currently closed to the public. The building site is situated atop sloping terrain overlooking a circular dirt driveway and stone retaining walls that surround a small grove of redwood trees. Various remnants of the Redwood Cabin's recreational history are scattered throughout the property, including horseshoe pits, a stone barbeque pit, and a brick planter.

The Redwood Cabin is approximately 66 feet long by 30 feet wide with an exterior consisting of redwood logs, timber roof framing, and hinged windows, skylights, and doors. The building interior

contains a large stone fireplace in the living room, two small bedrooms, a bathroom, and a kitchen. The structure appears to be in generally poor to fair condition with obvious structural damage and deterioration.

PROJECT BACKGROUND

Midpen acquired the Redwood Cabin in 1998 and the building has been vacant since acquisition. In 2020, Page & Turnbull, Inc. prepared a Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (California Register). The Historic Resource Evaluation determined that that the Redwood Cabin is an historic resource per CEQA because it appears to be eligible for individual listing in the California Register for the following reasons:

- The Redwood Cabin appears to be associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- The Redwood Cabin appears to embody the distinctive characteristics of a type, period, region, or method of construction, or that represents the work of a master or possesses high artistic values.

On April 8, 2020, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin and implementing habitat enhancements to reflect native ecological conditions.

PROJECT OBJECTIVES

The Project would achieve the following objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety;
- Enhance habitat at the Redwood Cabin site and immediate surroundings;
- Provide focused interpretive and educational opportunities consistent with open space values;
- Improve natural visual character and scenic qualities; and
- Implement a fiscally sustainable Project.

DESCRIPTION OF THE PROPOSED PROJECT

The Project would entail demolition of the Redwood Cabin and removal of associated features onsite, including retaining walls and barbeque pits. After demolition, the site would be left to return to its natural condition. Excavations that extend below finish grade would be backfilled, compacted, and would entail minor grading as necessary for drainage and erosion control. No public access facilities would be constructed as part of this Project.

POTENTIAL PERMITS AND APPROVALS REQUIRED

- Midpen Board of Directors: Project approval
- Regional Water Quality Control Board: general construction permit
- County of Santa Mateo: demolition and grading permits
- Bay Area Air Quality Management District (BAAQMD): register all portable equipment permits with BAAQMD; notify BAAQMD of all demolition activities 10 days prior to occurrence of activity.

POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will describe direct and indirect environmental impacts associated with the Project and will identify feasible mitigation measures to reduce potentially significant impacts. The EIR will focus on significant or potentially significant impacts to the following resources:

- Biological Resources: Impacts to sensitive species during construction activities.
- Cultural Resources: Impacts to a historic building that is eligible for listing on the California Register.

CEQA allows a lead agency to limit detailed discussion of environmental effects that would not be potentially significant (PRC Section 21100, CEQA Guidelines Sections 15126.2[a] and 15128). An Initial Study will accompany the EIR to discuss the following environmental topics that are unlikely to result in significant impacts and do not warrant detailed analysis in the EIR.

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

ALTERNATIVES TO BE EVALUATED IN THE EIR

In accordance with CEQA Guidelines Section 15126.6, the EIR will describe a reasonable range of alternatives capable of meeting most of the Project objectives that would avoid or substantially lessen significant effects resulting from the Project. The EIR will also evaluate a No Project Alternative and will discuss alternatives that were considered but rejected as infeasible by Midpen.

OPPORTUNITY FOR PUBLIC COMMENT

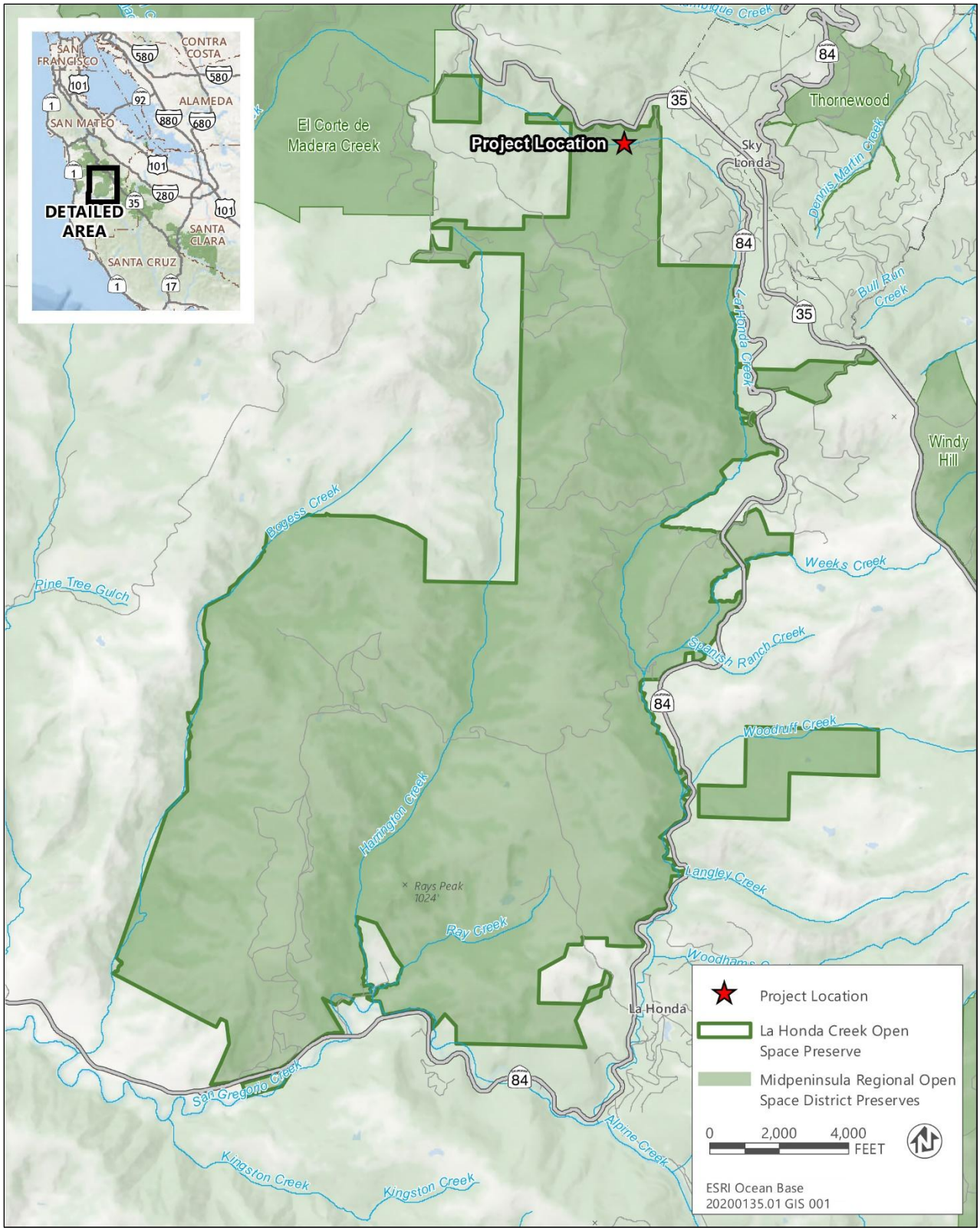
All comments on environmental issues received during the public comment period will be considered and addressed in the EIR. Midpen will accept written or emailed comments submitted by July 9, 2021 to the following address:

Alex Casbara, Planner III
Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022
Via email: acasbara@openspace.org

Comments provided via email should include *Redwood Cabin Removal Project NOP Scoping Comment* in the subject line, and the name and physical address of the commenter in the body of the email. Other inquiries related to the Project may be directed to Alex Casbara via email at acasbara@openspace.org.

PUBLIC SCOPING MEETING

Midpen will host a public scoping meeting to inform stakeholders about the Project and solicit input regarding environmental topics and alternatives to be evaluated in the EIR. The scoping meeting will occur during the Midpen Board of Directors meeting scheduled for June 23, 2021. In accordance with public health orders, all Midpen board meetings are held via teleconference only. The meeting may be viewed online and links to the meetings will be posted with each agenda at the following website: https://www.openspace.org/about-us/board-meetings.



Source: Adapted by Ascent Environmental in 2021

Attachment 1 Redwood Cabin Removal Project Location

From: Chris MacIntosh <chrismac@alumni.upenn.edu>
Sent: Friday, July 9, 2021 12:27 PM
To: Alex Casbara <acasbara@openspace.org>
Subject: Comment on La Honda cabin

EXTERNAL

Dear Alex Casbara,
I would like to request that the redwood cabin at upper La Honda Open Space Preserve not be demolished.

It has historic value, as noted in the report.
We remove so much that is too expensive or inconvenient to preserve, and then in later decades people regret that that was done. That is likely to be the case here:
This cabin is a testament to the building skills of 20th century immigrants who built it, and the generations who've lived and recreated in the Skyline area.

I understand and appreciate that MROSD is not in the building management business. However, if MROSD could partner with another organization, the cabin has great potential for continued use: perhaps as an event center, for nature education, a visitor center for the Sky Londa and Skyline region, or a combination of all.
MROSD preserves natural habitats for future generations: let's find a way to preserve this piece of human history for future generations also.

I urge the Board to reconsider the recommendation for demolition.
Thank you.

Chris MacIntosh
chrismac@alumni.upenn.edu

County of Santa Clara

Roads and Airports Department
Planning, Land Development and Survey

101 Skyport Drive
San Jose, CA 95110-1302
(408) 573-2460 FAX 441-0276

July 1, 2021

Alex Casbara,
Planner Ill
Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022
acasbara@openspace.org

SUBJECT: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Redwood Cabin Removal Project

The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Redwood Cabin Removal Project, and is submitting the following comments:

- Please have the project to provide construction Traffic Control Plan (TCP) for County to review if any County roads are included in the hauling routes.

If you have any questions or concerns about these comments, please contact me at 408-573-2462 or ben.aghegnehu@rda.sccgov.org

Thank you.

From: Karyn Ellis <karyn@karynhunt.com>
Sent: Sunday, July 4, 2021 6:34 PM
To: Alex Casbara <acasbara@openspace.org>
Subject: Comment on the Redwood Cabin

EXTERNAL

I'm writing to oppose demolition of the Redwood Cabin in La Honda Creek Open Space Preserve. Because the report on the cabin finds that it has historical significance, and because we have so little of our history preserved in the Skylonda area, it would be a shame to let this remaining piece go. The history of logging and summer camps in the Skylonda area is rich and significant to the development of the Peninsula. Please try to save this one piece for future generations to study and enjoy.
Karyn Ellis

Karyn Ellis
415-279-4868
KarynHunt.org

"I never saw a discontented tree." John Muir

NATIVE AMERICAN HERITAGE COMMISSION

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

June 9, 2021

Alex Casbara
Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

Re: 2021060146, Redwood Cabin Removal Project, San Mateo County

Dear Mr. Casbara:

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

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

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

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

AB 52

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

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

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

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

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

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

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

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

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

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

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

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

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

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

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

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

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

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

SB 18

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

Some of SB 18's provisions include:

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

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

NAHC Recommendations for Cultural Resources Assessments

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

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

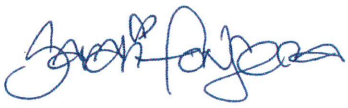
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted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

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

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

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

Sincerely,



Sarah Fonseca
Cultural Resources Analyst

cc: State Clearinghouse

Appendix B

Initial Study

INITIAL STUDY

Redwood Cabin Removal Project

Prepared for

Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

April 2022

INITIAL STUDY

Redwood Cabin Removal Project

Prepared for:

Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

Prepared by

Ascent Environmental, Inc.
455 Capitol Mall, Suite 300
Sacramento, CA 95814

April 2022

TABLE OF CONTENTS

Attachments

Tables

LIST OF ABBREVIATIONS

AB	Assembly Bill
BAAQMD	Bay Area Air Quality Management District
BMP	best management practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CH_4	methane
CHRIS	California Historical Resources Information System
CO	carbon monoxide
CO_2	Carbon dioxide
CRHR	California Register of Historical Resources
DTSC	Department of Toxic Substances Control
EECAP	Energy Efficiency Climate Action Plan
EIA	U.S. Energy Information Administration
EIR	environmental impact report
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPG	environmental protection guideline
FEMA	Federal Emergency and Management Agency
GHG	greenhouse gases
GHG	greenhouse gases
H_2S	hydrogen sulfide
HAP	hazardous air pollutants
HFC	hydrofluorocarbons
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study

L_{eq}	Equivalent Continuous Sound Level
L_{max}	Maximum Sound Level
Midpen	Midpeninsula Regional Open Space District
$MTCO_2e$	metric tons of CO_2 equivalents
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
OEHHA	Office of Environmental Health Hazard Assessment
PFC	perfluorocarbons
PM_{10}	Particulate matter 10 micrometers or less in diameter
$PM_{2.5}$	Particulate matter 2.5 micrometers or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
Preserve	La Honda Creek Open Space Preserve
Program	Wildland Fire Resiliency Program
project	Redwood Cabin Removal Project
RMS	root-mean-square
ROG	reactive organic gases
RPS	Renewables Portfolio Standard
SB	Senate Bill
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SO_2	sulfur dioxide
SPL	sound pressure level
TAC	toxic air contaminants
TPZ	Timber Land Preserve District
VdB	decibel notation
VMT	vehicle miles traveled

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1 INTRODUCTION

1.1 PROJECT OVERVIEW

This Initial Study (IS) has been prepared by the Midpeninsula Regional Open Space District (Midpen) to evaluate potential environmental effects resulting from the Redwood Cabin Removal Project (project). The approximately 100-year-old structure is currently vacant. The project would remove the existing Redwood Cabin structure and other human-made features (i.e., retaining walls, fire/barbeque pits) within the project site. After demolition and removal activities, site recontouring would ensure soil stabilization and erosion control within disturbed portions of the site. No public access facilities would be constructed as part of this project. Please see Chapter 2, "Project Description," in the accompanying environmental impact report (EIR) for detailed information about the project.

1.2 PURPOSE OF THIS DOCUMENT

This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.). Under CEQA, an IS can be prepared by a lead agency to determine if a project may have a significant effect on the environment (CEQA Guidelines Section 15063[a]), and thus to determine the appropriate environmental document. In this circumstance, the lead agency has prepared the following analysis that identifies potential environmental impacts requiring further evaluation and preparation of an EIR. Under CEQA, the lead agency is the public agency with primary responsibility over approval of the project; therefore, Midpen is the CEQA lead agency for this project. This IS is being made available to the public and is included as Appendix B within the Redwood Cabin Removal Project EIR.

1.3 DOCUMENT ORGANIZATION

This IS is organized as follows:

Chapter 1: Introduction. This chapter introduces the environmental review process, describes the purpose and organization of this document, and presents a summary of findings.

Chapter 2: Environmental Checklist. This chapter presents an analysis of a range of environmental issues identified in the CEQA Environmental Checklist and determines if project actions would result in no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact. If any impacts were determined to be potentially significant, an EIR would be required.

Chapter 3: References. This chapter lists the references used in preparation of this IS.

Chapter 4: Report Preparers. This chapter identifies report preparers.

1.4 SUMMARY OF FINDINGS

The environmental factors checked below would be potentially affected by this project, involving at least two impacts that are "Potentially Significant Impacts" as indicated by the checklist on the following pages. Where checked below, the topic with a potentially significant impact will be addressed in an EIR.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards / Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance
	☐ None	☐ None with Mitigation Incorporated

As indicated above, potentially significant impacts were identified for cultural resources and mandatory findings of significance. Impacts to air quality and biological resources were identified to be less than significant with mitigation incorporated. The project's potential environmental effects to biological and cultural resources, and mandatory findings of significance are addressed in an EIR. Impacts to air quality are addressed in Section 2.3 of this Initial Study.

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project could not have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☐ I find that although the proposed project COULD have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

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

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

DocuSigned by:
Susanna Chan
0D9D898F2A384CD...

Signature

04/07/2022

Date

Susanna Chan

Assistant General Manager

Midpeninsula Regional Open Space District

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2 ENVIRONMENTAL CHECKLIST

2.1 AESTHETICS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics.				
Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

2.1.1 Environmental Setting

As described in Chapter 2, "Project Description," of the accompanying EIR, the project site is located within the upper portion of the La Honda Creek Open Space Preserve (Preserve), west of the community of Sky Londa, California and south of Skyline Boulevard/Highway 35. The project site includes the approximate 2,000 square foot Redwood Cabin, a circular dirt driveway, a small grove of redwood trees, as well as several stone retaining walls, a stone barbeque pit, and a fire pit. No existing sources of light are present within the project site and public access is not currently available.

Overall, the visual character of the Preserve, as well as scenic vistas from and onto the Preserve, are generally very high quality (Midpen 2012a). The visual character of the project site consists of the existing Redwood Cabin, sloped terrain, and heavily wooded surroundings. Because of these visual obstructions, views to and from the site are unavailable from any publicly accessible area or property not owned by Midpen. For the same reasons, the project site is not visible from Highway 35, which is an officially-designated State Scenic Highway located approximately 800 feet north of the project site (Caltrans 2018).

2.1.2 Discussion

a) Have a substantial adverse effect on a scenic vista?

No impact. A scenic vista is generally defined as a distant public view along or through an opening or corridor that is recognized and valued for its scenic quality, or a natural or cultural resource that is indigenous to the area. As

described above, various locations within the Preserve offer views of scenic vistas both to and from the Preserve. However, due to the dense wooded area surrounding the project site, long distance views are limited. For this reason, there are no scenic vistas visible to or from the project site. Project demolition and site recontouring activities would therefore not result in adverse effects on a scenic vista; the project would restore the site to its natural state. No impact would occur, and no mitigation would be required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less-than-significant impact. Highway 35, which is an officially designated State Scenic Highway, is located approximately 800 feet north of the project site (Caltrans 2018). The Redwood Cabin has been evaluated as appearing eligible for listing in the California Register of Historical Resources (CRHR) and is therefore a historical resource under CEQA. As described in Criterion (a), views to and from the project site are limited due to the surrounding wooded areas. Further, the project site, including the Redwood Cabin, is not visible from Highway 35. Therefore, although project activities would include demolition of the Redwood Cabin and recontouring within the project site, it would not substantially damage scenic resources, within a state scenic highway because the project site is not visible from the state scenic highway. Impacts would be less than significant, and no mitigation would be required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less-than-significant impact. As previously described, the visual character of the site consists of the existing Redwood Cabin, sloped terrain, and surrounding wooded area which shields views towards and from the project site. No public access to the site is currently permitted and as such, no public views towards the site are available. Project activities would alter the visual character of the project site through removal of the existing Redwood Cabin. Once the structure has been demolished and materials have been removed from the site, disturbed areas would be revegetated and recontoured to ensure adequate erosion control and site drainage. No maintenance or operational activities would be required at the project site after construction and the site would remain closed to the public. Because the project site is not visible or accessible to the public, and would remain closed once project activities are complete, implementation of the project would not degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be less than significant, and no mitigation would be required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No impact. Construction activities associated with removal of the Redwood Cabin structure and site recontouring would occur during daylight hours and would not require nighttime lighting. Construction equipment is unlikely to have reflective surfaces, other than what is required for safety purposes, and would not create a substantial source of glare in the area. Once construction activities are complete, the site would remain undeveloped, secured and closed to the public; no sources of light or glare would be present at the project site. Therefore, no impact would occur, and no mitigation would be required.

2.2 AGRICULTURE AND FOREST RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forest Resources.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

2.2.1 Environmental Setting

While areas suitable for grazing are identified within the Preserve (Midpen 2012a: 3-12), no areas identified as Important Farmland, meaning Farmland of Statewide or Local Importance, Unique Farmland, or Prime Farmland are identified within the Preserve. No grazing land, Important Farmland, or land under Williamson Act contract is present within the project site (CDOC 2021). The parcel containing the project site is classified as "other land."

According to the San Mateo County General Plan land use map, the project site is within an area zoned for Forest resources and Timber Production (TPZ) (San Mateo County 2021). However, no logging or other timber harvest activities currently occur on or adjacent to the project site.

2.2.2 Discussion

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

No impact. No Important Farmland is located within the Preserve or on the project site. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. Therefore, the project would not result in conversion of designated Important Farmland, and there would be no impact.

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

No impact. No parcels with active Williamson Act Contracts are present within or adjacent to the project site. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. Therefore, the project would not conflict with any agricultural land uses or Williamson Act Contracts and would have no impact.

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

No impact. The parcel containing the project site does contain forest resources and is designated as a Timber Production Zone per the San Mateo County General Plan. No timber harvest occurs on the project site. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, grading and recontouring, and site revegetation. The project does not propose zoning or land use changes, and project activities would not substantially limit availability or affect quality of forest or timber resources within the vicinity of the project. Therefore, the project would have no impact.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No impact. See discussion under item c) above.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No impact. No agricultural or forestry operations are located adjacent to or within the project vicinity. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation; the project does not propose any land use or zoning changes. Implementation of the project would not involve any uses that would impede or otherwise alter agricultural or forestry operations. For this reason, project activities would not result in a direct or indirect conversion of existing or surrounding land uses into non-agricultural use and would not impact the availability of forest resources. Therefore, the project would have no impact.

2.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

2.3.1 Environmental Setting

The project site is located in the San Francisco Bay Area Air Basin (SFBAAB) within the County of San Mateo. The SFBAAB is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

CLIMATE AND TOPOGRAPHY

The climate of the SFBAAB is determined largely by a high-pressure system that is often present over the eastern Pacific Ocean. High-pressure systems are characterized by an upper layer of dry air that warms as it descends, restricting the mobility of cooler marine-influenced air near the ground surface, resulting in subsidence inversions restricting the dispersion of air masses. During summer and fall, locally generated emissions can, under the restraining influences of topography and subsidence inversions, cause conditions that are conducive to the formation of photochemical pollutants, such as ozone and secondary particulates (e.g., nitrates and sulfates). In the winter, the Pacific high-pressure system shifts southward, allowing storms to pass through the area (BAAQMD 2017a).

AMBIENT AIR QUALITY

Air Pollutants

As required by the federal Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) has identified National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, which are particulate matter 10 microns or less in diameter and 2.5 microns or less in diameter, respectively), and lead. The State of California has also established California Ambient Air Quality Standards (CAAQS) for these six pollutants as well as sulfates, hydrogen sulfide (H_2S), vinyl chloride, and visibility reducing particles. NAAQS and CAAQS were established to protect the public

from adverse health impacts caused by exposure to air pollution. A brief description of the criteria air pollutants and their effects on health is provided in Table 2.3-1.

Table 2.3-1 Air Pollutants

Pollutant	Sources	Effects
Ozone	Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG), also sometimes referred to as volatile organic compounds by some regulating agencies) and nitrogen oxides (NO_X). The main sources of ROG and NO_X, often referred to as ozone precursors, are products of combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and fuels.	Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.
Carbon monoxide	CO is usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicle engines; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration.	Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal.
Particulate matter	Some sources of particulate matter, such as wood burning in fireplaces, demolition, and construction activities, are more local in nature, while others, such as vehicular traffic, have a more regional effect.	Scientific studies have suggested links between fine particulate matter and numerous health problems, including asthma, bronchitis, and acute and chronic respiratory symptoms, such as shortness of breath and painful breathing. Recent studies have shown an association between morbidity and mortality and daily concentrations of particulate matter in the air.
Nitrogen dioxide	NO_2 is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO_2.	Aside from its contribution to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility.
Sulfur dioxide	SO_2 is a combustion product of sulfur or sulfur-containing fuels such as coal and diesel. SO_2 is also a precursor to the formation of particulate matter, atmospheric sulfate, and atmospheric sulfuric acid formation that could precipitate downwind as acid rain.	Exposure can lead to the irritation of upper respiratory tract and heighten asthma symptoms.
Lead	Leaded gasoline, lead-based paint, smelters (metal refineries), and the manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere, with lead levels in the air decreasing substantially since leaded gasoline was eliminated in the United States.	Lead has a range of adverse neurotoxic health effects.

Notes: CO = carbon monoxide; NO_2 = nitrogen dioxide; NO_X = oxides of nitrogen; ROG = reactive organic gases; SO_2 = sulfur dioxide.

Sources: EPA 2018

Attainment Area Designations

The CAA and the California Clean Air Act (CCAA) require all areas of California to be classified as attainment, non-attainment, or unclassified as to their status relative to the NAAQS and CAAQS. Under the CAA and the CCAA, the California Air Resources Board (CARB) designates portions of the state based on air quality monitoring data. Attainment statuses for San Mateo County are shown in Table 2.3-2. San Mateo County is designated as nonattainment for ozone, PM_{10}, and $PM_{2.5}$ with respect to the CAAQS and ozone and $PM_{2.5}$ with respect to the NAAQS.

Table 2.3-2 Attainment Status Designations for San Mateo County

Pollutant	NAAQS	CAAQS
Ozone	Attainment (1-hour)[1]	Nonattainment (1-hour) Classification[2]
	Nonattainment (8-hour)[3] Classification – Marginal	Nonattainment (8-hour)
	Nonattainment (8-hour)[3] Classification – Marginal	Nonattainment (24-hour)
Respirable particulate matter (PM_{10})	Attainment (24-hour)	Nonattainment (24-hour)
	Attainment (24-hour)	Nonattainment (Annual)
Fine particulate matter ($PM_{2.5}$)	Nonattainment (24-hour)	(No State Standard for 24-Hour)
	Nonattainment (Annual)	Nonattainment (Annual)
Carbon monoxide (CO)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen dioxide (NO_2)	Unclassified/Attainment (1-hour)	Attainment (1-hour)
	Unclassified/Attainment (Annual)	Attainment (Annual)
Sulfur dioxide (SO_2)[4]	(Attainment) (1-Hour)	Attainment (1-hour)
	Attainment (3-month rolling avg.)	Attainment (24-hour)
Lead (Particulate)	Attainment (3-month rolling avg.)	Attainment (30-day average)
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)
Visibly Reducing Particles		Unclassified (8-hour)
Vinyl Chloride		Unclassified (24-hour)

Notes: NAAQS = national ambient air quality standards; CAAQS = California ambient air quality standards

[1] Air Quality meets federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply.

[2] Per Health and Safety Code Section 40921.5(c), the classification is based on 1989–1991 data, and therefore does not change.

[3] 2015 Standard.

[4] 2010 Standard.

Source: EPA 2019; CARB 2018

Air Quality Planning

The BAAQMD is responsible for ensuring that the federal and State ambient air quality standards are attained and maintained in the SFBAAB. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities. BAAQMD updates its Clean Air Plan every three years to reflect progress in meeting the NAAQS and CAAQS and to incorporate new information regarding the feasibility of control measures and new emission inventory data. BAAQMD's record of progress in implementing previous measures must also be reviewed. BAAQMD prepared these plans in cooperation with the Metropolitan Transportation Commission and the Association of Bay Area Governments. On April 19, 2017, BAAQMD adopted the most recent revision to the Clean Air Plan, titled the 2017 Clean Air Plan: Spare the Air, Cool the Climate (BAAQMD 2017b). This plan serves to:

- define a vision for transitioning the region to a post-carbon economy needed to achieve 2030 and 2050 greenhouse gas reduction targets;
- decrease emissions of air pollutants most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants (TACs);

- reduce emissions of methane and other potent climate pollutants; and
- decrease emissions of carbon dioxide by reducing fossil fuel combustion.

Projects located in the SFBAAB are subject to BAAQMD's rules and regulations. Specific rules applicable to the project include:

- **Regulation 2, Rule 1, General Permit Requirements.** Includes criteria for issuance or denial of permits, exemptions, appeals against decisions of the Air Pollution Control Officer and BAAQMD actions on applications.
- **Regulation 6, Rule 1, General Requirements.** Limits the quantity of particulate matter in the atmosphere by controlling emission rates, concentration, visible emissions and opacity.
- **Regulation 7, Odorous Substances.** Regulation 7 places general limitations on odorous substances and specific emission limitations on certain odorous compounds. A person (or facility) must meet all limitations of this regulation, but meeting such limitations shall not exempt such person from any other requirements of BAAQMD, state, or national law. The limitations of this regulation shall not be applicable until BAAQMD receives odor complaints from 10 or more complainants within a 90-day period, alleging that a person has caused odors perceived at or beyond the property line of such person and deemed to be objectionable by the complainants in the normal course of their work, travel, or residence. When the limits of this regulation become effective, as a result of citizen complaints described above, the limits shall remain effective until such time as no citizen complaints have been received by BAAQMD for 1 year. The limits of this Regulation shall become applicable again if BAAQMD receives odor complaints from five or more complainants within a 90-day period. BAAQMD staff investigate and track all odor complaints it receives and make attempts to visit the site and identify the source of the objectionable odor and assist the owner or facility in finding a way to reduce the odor.

TOXIC AIR CONTAMINANTS

TACs, or in federal parlance, hazardous air pollutants (HAPs), are a defined set of airborne pollutants that are known to pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the *2013 Edition of the California Almanac of Emissions and Air Quality*, health risks from TACs can largely be attributed to relatively few compounds, the most important being diesel PM (CARB 2013:5-2 to 5-4). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene. However, diesel PM poses the greatest health risk among the ten TACs mentioned. Overall, levels of most TACs, except para-dichlorobenzene and formaldehyde, have decreased since 1990 (CARB 2013).

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting

operations, rendering plants, and food packaging plants (BAAQMD 2017a). None of these odorous land uses are within proximity to the project site.

SENSITIVE RECEPTORS

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residences, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants.

The closest sensitive receptors are the private residences off Highway 35. The closest residence is located approximately 840 feet north of the project boundary.

BAAQMD Thresholds

The BAAQMD's significance thresholds in the May 2017 CEQA Air Quality Guidelines for a project-level analysis are the most appropriate thresholds for use in determining air quality impacts of the proposed project. Table 2.3-3 presents the significance thresholds for construction and operations-related criteria air pollutant and precursor emissions used for this analysis. These thresholds were developed by BAAQMD to achieve and maintain the NAAQS and CAAQS, which are standards intended to protect the public health. The thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing nonattainment air quality conditions.

Table 2.3-3 BAAQMD Air Quality Significance Thresholds

Pollutant	Construction Average Daily Emissions (lb/day)	Operational Average Daily Emissions (lb/day)	Operational Maximum Annual Emissions (typ)
Reactive Organic Compounds (ROG)	54	54	10
Oxides of Nitrogen (NO_X)	54	54	10
Respirable Particulate Matter (PM_{10})	82 (Exhaust)	82	15
Fine Particulate Matter ($PM_{2.5}$)	54 (Exhaust)	54	10

Notes: tpy = tons per year; lb/day = pounds per day. PM_{10} and $PM_{2.5}$ fugitive dust emissions require implementation of best management practices (BMPs).

Source: BAAQMD 2017a

BAAQMD has not adopted quantitative thresholds for fugitive dust emissions during construction. Instead, the BAAQMD recommends best management practices (BMPs) be implemented to reduce fugitive dust emissions. The 2012 La Honda Creek Open Space Preserve Master Plan EIR requires projects to implement BMPs consistent with the BAAQMD Basic Construction Mitigation Measures. These measures would be part of the standards condition of approval for project construction.

BAAQMD has established the following Thresholds of Significance for local community risks and hazards associated with TACs and $PM_{2.5}$ for assessing individual source impacts at a local level. Impacts would be significant if:

- The project would result in an increased cancer risk of > 10 in one-millions
- The project would result in an increased non-cancer (i.e., Chronic or Acute) risk of > 1.0 Hazard Index
- The project would result in an ambient $PM_{2.5}$ concentration increase of > 0.3 micrograms per cubic meters ($\mu g/m^3$) annual average

A project would be considered to have a cumulatively considerable impact if the aggregate total of current and proposed TAC sources within a 1,000 feet radius of the project fence-line in addition to the project would exceed the Cumulative Thresholds of Significance. Thresholds would be exceeded if:

- The project would result in an increased cancer risk of > 100 in one million
- The project would result in an increased non-cancer (i.e., Chronic or Acute) risk of > 10 Hazard Index
- The project would result in an ambient $PM_{2.5}$ concentration increase of > 0.8 µg/m^3 annual average

Excess cancer risks are defined as those occurring in excess of or above and beyond those risks that would normally be associated with a location or activity if toxic pollutants were not present. Non-carcinogenic health effects are expressed as a hazard index, which is the ratio of expected exposure levels to an acceptable reference exposure level.

The BAAQMD provides minimum distances for siting of new odor sources in Table 3-3 of their CEQA Guidelines document. The odor screening distances in Table 3-3 of the BAAQMD CEQA Guidelines should not be used as absolute screening criteria, rather as information to consider along with the odor parameters and complaint history. BAAQMD does not provide guidance or recommendations to assess odors from construction activities, thus these odors are discussed qualitatively for informational purposes.

2.3.2 Discussion

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less-than-significant impact. The emission inventories used to develop a region's air quality attainment plans are based primarily on projected population growth and vehicle miles traveled (VMT) for the region that are determined, in part, based on the planned growth identified in regional and community plans. Therefore, projects that would result in population or employment growth beyond that projected in regional or community plans could result in increases in VMT and overall emissions above that planned in the attainment plan, further resulting in emissions that could conflict with a region's air quality planning efforts. Increases in VMT and emissions beyond that projected in the air quality attainment plans generally would be considered to have a significant adverse incremental effect on the region's ability to attain or maintain the CAAQS and NAAQS.

The project involves the demolition of a vacant cabin and would not result in any new long-term employment opportunities or new housing, and it would not change the amount of development projected in the SFBAAB. Therefore, it would be consistent with the population growth and VMT projections used in BAAQMD's 2017 Clean Air Plan. Also, as discussed below under criterion (b), the project would not result in any short-term construction emissions or new stationary sources of emissions that would result in a significant impact. Thus, implementation of the project would not conflict with or obstruct implementation of the BAAQMD 2017 Clean Air Plan and the impact would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than significant with mitigation incorporated. Under a project level analysis, the BAAQMD CEQA Guidelines identify whether a project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard through average pounds per day significance thresholds. The project level thresholds were developed to bring the SFBAAB into attainment for the NAAQS and CAAQS and to be protective of human health.

Project construction would involve demolition and recontouring that have the potential to generate air pollutant emissions. Project activities may also include soil decompaction and revegetation, as described in Section 2.4.2 of Chapter 2, "Project Description," of the accompanying EIR. Construction emissions were modeled using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 computer program (CAPCOA 2021). Attachment A includes

modeling inputs and parameters used for this analysis. Table 2.3-4 summarizes the estimated average daily emissions of ROG, NO_X, PM_{10} (exhaust) and $PM_{2.5}$ (exhaust) during project construction. As shown in Table 3.3-4, project construction emissions for all criteria pollutants would be below the BAAQMD average daily thresholds of significance. It should be noted that this project only requires the demolition and recontouring of the site, thus, no operational emissions were evaluated. To reduce operational fugitive dust and help with erosion control the project would spread native grass seed mix in the disturbed areas and weed free or native grass straw would be placed on the disturbed areas.

Table 2.3-4 Summary of Average Daily Pounds Per Day Construction Emissions of Criteria Pollutants and Precursor Emissions

Emissions Source	ROG	NOx	CO	PM_{10}	$PM_{2.5}$	SO_X
2023	1	10	12	<1	<1	<1
Average Daily Emissions	1	10	12	<1	<1	<1
BAAQMD Emissions Threshold	54	54	N/A	82[1]	54[1]	N/A

Notes: CO = Carbon Monoxide; ROG = Reactive Organic Gases; NOx = Oxides of Nitrogen; PM_{10} = Particulate matter 10 micrometers or less in diameter; $PM_{2.5}$ = Particulate matter 2.5 micrometers or less in diameter; SO_X = Sulfur Dioxide.

[1] Exhaust emissions only

Source: Ascent Environmental, Inc. 2021

Fugitive Dust Emissions

The construction activities of demolition and recontouring would result in fugitive dust emissions from soil movement and equipment use. For all proposed projects, BAAQMD recommends the implementation of all BMPs, whether or not construction-related emissions exceed applicable thresholds of significance. To satisfy this requirement and to reduce emissions from construction-related sources, the project would implement environmental protection guideline (EPG) AQ-1, Minimize Air Pollutant Emissions, as outlined in Chapter 2, "Project Description" of the accompanying EIR. While EPG AQ-1 contains many of the BMPs required by BAAQMD, such as watering exposed surfaces twice daily and covering haul trucks, not all BMPs are provided in EPG AQ-1. Therefore, this impact would be potentially significant.

The project would implement BMP AQ-1, as described in Section 2.7.3, "Project Specific BMPs" of Chapter 2, "Project Description" of the accompanying EIR. With the implementation of project-specific BMP AQ-1, which contains BMPs required by BAAQMD but not provided in EPG AQ-1, the project would be consistent with the BPMs required by BAAQMD and reduce emissions from construction activities. This impact would be less than significant with mitigation.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less-than-significant impact. As discussed previously, sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. The closest sensitive receptor is a residence off Highway 35, located approximately 840 feet north of the project boundary.

The potential cancer risk from inhaling diesel PM outweighs the potential for all other diesel PM–related health impacts (i.e., non-cancer chronic risk, short-term acute risk) and health impacts from other TACs (CARB 2003:K-1). With regard to exposure to diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. Thus, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment (OEHHA), when a health risk assessment is prepared to project the results of exposure of sensitive receptors to selected compounds, exposure of sensitive receptors to TAC emissions should be based on a 70- or 30-year exposure period, however, such assessments should be limited to the duration of activities associated with the proposed project if emissions occur for shorter periods (OEHHA 2015:5-23, 5-24).

Construction-related activities would result in temporary, intermittent emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment. Construction activities would occur at a minimum of 840 feet away from the

nearest sensitive receptor. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are also a source of diesel PM, however, their operations would be dispersed throughout the roadway network in the plan area, and they would not operate at any one location for extended periods of time such that they would expose a single receptor to excessive diesel PM emissions.

The results of emissions modeling show that average daily emissions of exhaust $PM_{2.5}$, of which diesel PM is a subset, would not exceed 1 lb/day during construction. Additionally, movement of haul trucks would occur near a sensitive receptor intermittently over a 10-week period.

Considering the highly dispersive properties of diesel PM, the relatively low mass of diesel PM emissions that would be generated at any single place during project construction, the relatively short period during which diesel PM–emitting construction activities would take place, and the fact that the nearest sensitive receptor (occupied residence) is 840 feet away, construction-related TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a Health Index greater or equal to 1.0. As a result, this impact would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-than-significant impact. The proposed project is the demolition of a vacant cabin and would not result in the introduction of any new permanent sources of odors to the area. Because construction-related odors would be intermittent, temporary, and would disperse rapidly with distance from the source, construction-related odors would not result in the frequent exposure of a substantial number of individuals to objectionable odors. Short-term exposure to odorous emissions would therefore be considered less than significant. For these reasons, odorous emissions generated during construction under the project would also be less than significant.

2.4 BIOLOGICAL RESOURCES

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

2.4.1 Environmental Setting

A Botanical Resources Survey Report was prepared in November 2020 for an area encompassing the project site. Findings of the Botanical Resources Survey Report indicate that the project site encompasses a single plant community, a North Coast Coniferous Forest. The understory of the forest features a mix of native and introduced plants, including a number of invasive species. The underlying shrub and vine layer consists largely of native California blackberry (*Rubus ursinus*), California hazelnut (*Corylus cornuta*), and blood current (*Ribes sanguineum*). Invasive French broom, English ivy, and vinca were found primarily along historically graded or otherwise disturbed areas. Thimbleberry (*Rubus parviflorus*) is fairly common along the margins of La Honda Creek, and western burning bush (*Euonymus occidentalis var. occidentalis*) is a reflection of the relatively high level of moisture even in upland habitats—the species is known only from coastal and montane habitats and does not occur south of Santa Cruz County. As with

the shrub/vine stratum, the most common herbs observed in this habitat are primarily those well adapted to the deep shade of the tree canopy. Most of them typically feature broad or highly dissected leaves that spread out parallel to the forest floor, allowing for maximum absorption of the briefly available stippled sun. The only widespread introduced plant was broadleaved forget-me-not (*Myosotis latifolia*), which was observed primarily along the access road and leveled areas. Herbaceous plants that were found only below or along the banks of La Honda Creek include giant chain fern (*Woodwardia fimbriata*), sedges (e.g., *Carex amplifolia* and *C. bolanderi*), and giant horsetail (*Equisetum telmateia*). Such wetland plants were relatively sparse as a result of the generally steep stream banks and limited floodplain as well as the paucity of sunlight and the high cover of cobbles and boulders within the stream. (Vollmar Natural Lands Consulting 2020).

A Marbled Murrelet Habitat Assessment and Management Recommendations Report was prepared for Midpen in 2007. Findings of the report indicate that Marbled Murrelet (*Brachyramphus marmoratus*), a seabird listed as federally-threatened under the Federal Endangered Species Act, may nest in coniferous forests on Midpen lands (H.T. Harvey and Associates 2007). Additionally, a report on sensitive amphibian and reptiles was prepared for Midpen in 2007. The report concluded that California red-legged frog (*Rana aurora draytonii*) and western pond turtle (*Emys marmorata*) were present within Midpen preserves. Further, though San Francisco garter snake was not observed during the surveys, the report indicated that the possibility of San Francisco garter snake occurrence cannot be ruled out due to the presence of appropriate habitat within Midpen's property (Richard Seymour and Associates 2007).

No signs of roosting bats were detected during a 2019 biological survey of the Redwood Cabin, however, four dusky-footed woodrat nest structures were observed inside the structure. Although no bats were observed emerging from the Redwood Cabin, acoustic recordings identified fringed myotis (*Myotis thysanodes*) foraging calls in the vicinity (Swaim 2019).

La Honda Creek, a semi-perennial stream that supports some wetland habitat as well as open water, is located directly north of the project site (Vollmar Natural Lands Consulting 2020).

2.4.2 Discussion

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

Less than significant with mitigation incorporated. The project area has the potential to support sensitive species. As such, project activities could result in substantial adverse effect to candidate, sensitive, or special-status species within the project vicinity. Midpen has adopted standard mitigation measures as part of the Preserve Master Plan and its various land management program, which continue to be used onsite to reduce impacts to candidate, sensitive, or special-status species to a less than significant level. Therefore, these impacts would be less than significant with mitigation incorporated and will be discussed further in the Biological Resources section of the EIR.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

Less than significant with mitigation incorporated. The project area has the potential to support sensitive natural communities. As such, project activities could result in substantial adverse effect to riparian habitat and sensitive communities within the project vicinity. Midpen has previously adopted standard mitigation measures as part of the Preserve Master Plan and its various land management programs that will reduce impacts to riparian habitat and sensitive communities within the project vicinity to a less than significant level. These impacts would be less than significant with mitigation incorporated and will be discussed further in the Biological Resources section of the EIR.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than significant with mitigation incorporated. As described above, La Honda Creek, which supports wetland habitat as well as open water, is located directly north of the project site. As such, project activities could result in substantial adverse effect to federally protected wetlands. Midpen has adopted standard mitigation measures as part of the Preserve Master Plan and its various land management program, which continue to be used onsite that will reduce impacts to federally protected wetlands to a less than significant level. Therefore, these impacts would be less than significant with mitigation incorporated and will be discussed further in the Biological Resources section of the EIR.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than significant with mitigation incorporated. The project area has the potential to support migratory wildlife species. As such, project activities could result in interference with wildlife species within the project vicinity. Midpen has adopted standard mitigation measures as part of the Preserve Master Plan and its various land management program, which continue to be used onsite that will reduce interference with wildlife species within the project vicinity to a less than significant level. Therefore, these impacts would be less than significant with mitigation incorporated and will be discussed further in the Biological Resources section of the EIR.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No impact. Implementation of the project would comply with existing policies and ordinances related to the protection of biological resources. Further, the project would not involve any tree removal, such that conflicts related to tree preservation would occur. As such, no impact would occur and no mitigation is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No impact. The project site is not within an area designated under a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, the proposed project would have no impact on adopted habitat conservation plans and no mitigation is required.

2.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources.				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐
c) Substantially disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

2.5.1 Environmental Setting

As described in Chapter 2, "Project Description," of the accompanying EIR, the Historic Resource Evaluation prepared by Page & Turnbull, Inc. in 2020 determined that the Redwood Cabin is a historical resource per CEQA because it appears to be eligible for listing in the CRHR. CRHR eligibility was determined for the Redwood Cabin because it appears to be one of few remaining examples of a permanent recreational cabin from the 1920s with a high degree of integrity and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3) (Page & Turnbull 2020).

A cultural resources literature search was conducted in July 2021 by the Central California Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University. The records search was conducted to determine if prehistoric or historic cultural resources had been previously recorded within the project site, the extent to which the project site had been previously surveyed, and the number and type of cultural resources within a 0.25-mile radius of the project area. The NWIC records search indicated that no resources were located within the project area or within a 0.25-mile radius of the project area.

2.5.2 Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Potentially significant impact. Because the Redwood Cabin is considered eligible for listing in the CRHR and is therefore considered a resource under CEQA, impacts related to the project could be potentially significant. This issue will be analyzed further in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Potentially significant impact. Ground-disturbing activities could damage previously unrecorded archaeological resources. This would be a potentially significant impact. This issue will be analyzed further in the EIR.

c) Substantially disturb human remains, including those interred outside of formal cemeteries?

Less-than-significant impact. No human remains have been found previously on the project site. However, the potential for human remains to occur below the ground surface in the project area is currently unknown. Implementation of the project would involve soil disturbance during construction, which could result in impacts on any interred on-site human remains.

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and PRC Section 5097.

These statutes require that, if human remains are discovered during any construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the San Mateo County coroner and Native American Heritage Commission (NAHC) shall be notified immediately, in accordance with to PRC Section 5097.98 and Section 7050.5 of California's Health and Safety Code. If the remains are determined by NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the archaeologist, the NAHC-designated Most Likely Descendant, and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.

Compliance with California Health and Safety Code Sections 7050.5 and PRC Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered. Therefore, this impact would be less than significant, and no mitigation is required.

2.6 ENERGY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy.				
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

2.6.1 Environmental Setting

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources:

- Natural gas: Almost two-thirds of California households use natural gas for home heating, and about half of California's utility-scale net electricity generation is fueled by natural gas (U.S. Energy Information Administration [EIA] 2021).
- Petroleum: Petroleum products (gasoline, diesel, jet fuel), which are consumed almost exclusively by the transportation sector, account for almost 99 percent of the energy used in California by the transportation sector, with the rest provided by ethanol, natural gas, and electricity (Bureau of Transportation Statistics 2017). Gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet specific formulations required by the California Air Resources Board (CARB) (EIA 2021).
- Electricity and renewables: The California Energy Commission (CEC) estimates that 34 percent of California's retail electricity sales in 2018 were provided by Renewables Portfolio Standard (RPS)-eligible renewable resources (EIA 2021).
- Alternative fuels: Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many alternative transportation fuels (e.g., biodiesel, hydrogen, electricity). Use of alternative fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, California's 2017 Climate Change Scoping Plan [2017 Scoping Plan]).

The project would not require use of natural gas or electricity because the project would only require demolition and recontouring of the site.

San Mateo County adopted an Energy Efficiency Climate Action Plan (EECAP) in June 2013 to align with the State's GHG emission reductions set by Assembly Bill 32 of a 15 percent reduction below 1990 levels by 2020. The EECAP established the goals of achieving a 17 percent reduction in GHG emissions from 2005 levels by 2020. To reach its goals, the EECAP established several GHG reduction measures that would reduce the county's overall energy use from both residential and nonresidential sources through increasing efficiency. The EECAP includes Measure 15.1 which is specific to this project's construction activities by minimizing idling times from equipment and utilizing cleaner fuels.

In October 2018, Midpen adopted a Climate Action Plan (CAP) to reduce its operational GHG emissions 20 percent by 2022, 40 percent by 2030, and 80 percent by 2050 from 2016 levels to be in line with State GHG emission reduction goals. To reach its goals, the CAP advises Midpen to reduce emissions from its vehicle fleets, equipment, and business-related travel, employee commutes, buildings and facilities, and adoption of renewable electricity by its residences. In

addition to these strategies, Midpen proposes to reduce or offset livestock emissions, enhance carbon sequestration, reduce visitor transportation emissions, and increase staff and visitor awareness and action on climate change.

2.6.2 Discussion

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less-than-significant impact. Energy would be required to operate and maintain construction equipment and transport construction materials. The one-time energy expenditure required for demolition associated with the project would be nonrecoverable. Most energy consumption would result from operation of off-road construction equipment and on-road vehicle trips associated with commutes by construction workers and haul trucks trips. It should be noted that the demolition material may contain hazardous material. Although it is possible that some of the historical materials from the cabin would be salvaged, for a conservative estimate, it is assumed that all material would be disposed at the Kettleman Hills Landfill located approximately 180 miles from the project site. See Attachment B for modeling inputs and parameters. An estimated 207 gallons of gasoline and 2,327 gallons of diesel fuel would be used during construction of the project (see Attachment B).

The energy needs for project construction would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. Associated energy consumption would be typical of that associated with demolition projects of this size in a rural setting. Automotive fuels would be consumed to transport people and materials to and from the project site. There is no atypical construction-related energy demand associated with the proposed project. Non-renewable energy would not be consumed in a wasteful, inefficient or unnecessary manner when compared to other construction activity in the region. This impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

Less than significant. Because the proposed project would only include demolition, site recontouring, and possible soil decompaction and revegetation, it would only require fuel use from construction equipment and commutes from workers and haul trucks. The proposed removal of the cabin would remove any potential future energy use of the site. The energy use associated with the project would be subject to BAAQMD's requirements, the County's EECAP, and Midpen's CAP. As discussed in Section 2.3, "Air Quality," while EPG AQ-1 contains many of the BMPs required by BAAQMD, not all BMPs are provided in EPG AQ-1. Therefore, Midpen would adhere to project-specific BMP AQ-1, as described in Section 2.7.3, "Project Specific BMPs," of Chapter 2, "Project Description," of the accompanying EIR.

Project-specific BMP AQ-1 would minimize equipment idling times and requires all equipment to be properly tuned to meet manufacturer specifications as advised by BAAQMD's CEQA Guidelines. BMP AQ-1 would ensure that the project would also be consistent with the County's EECAP which requires minimization of idling to no more than five minutes. In addition, off- and on-road vehicles would be subject to State and federal regulations regarding fuel efficiency standards for vehicles which would not conflict with the vehicle emission reduction provided in the Midpen CAP. Therefore, the project would not conflict with or obstruct plans for renewable energy or energy efficiency. This impact would be less than significant.

2.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils.				
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

2.7.1 Environmental Setting

A geotechnical investigation was prepared by Romig Engineers in August 2019. The investigation determined that the Preserve is not included in current Alquist-Priolo fault zone maps, however, noted that the Preserve is located within a seismically active region of the San Andreas Fault System, and that the La Honda Fault bisects the preserve, but is not within or adjacent to the project site. The San Andreas Fault is located to the northeast of the Preserve, approximately 2 miles from the project site, and that no faults are mapped within or adjacent to the project site. The report determined that the potential for fault-related ground rupture at the project site was low, but that the project site would "undoubtably" experience strong ground shaking during a seismic event (Romig 2019:6).

The report noted that the project site is located in an area that is potentially susceptible to "Earthquake-Induced Landslides" per the State Seismic Hazards Map of the Woodside Quadrangle, and that the topography of the project vicinity indicates previous "movement of material in the downslope direction", but that landslides were not observed within approximately 50 feet from the cabin (Romig 2019:4-5). The investigation determined that soils present at and around the project site revealed that soils at the site consisted of "stiff" sandy clay with moderate to low potential for expansion. Groundwater was not encountered during the investigation, however, groundwater levels were assumed to vary with season, drainage, and precipitation levels.

2.7.2 Discussion

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

Less-than-significant impact. The project site is located within a seismically active region. The nearest fault line to the project site is the San Andreas Fault, which runs approximately north-south and is located approximately two miles east of the project site and the Preserve. The geotechnical report prepared for the project site determined that the potential for fault-related ground rupture at or adjacent to the project site was low.

The existing character of the project site and surrounding areas are remote and rural. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The project would not place development such as homes, commercial facilities, or other structures or land uses that could increase the potential for fault rupture or otherwise result in harm, loss, injury, or death in the event of fault rupture.

Since potential for fault rupture at the site was determined to be low, and project activities would not result in development on the site, the project would therefore not substantially increase risk of loss, injury, or death resulting from fault rupture on the project site. This impact would be less than significant.

ii) Strong seismic ground shaking?

Less-than-significant impact. The project site is located within a seismically active region. The geotechnical investigation conducted for the project determined that the project site may be subject to strong ground shaking in the event of a nearby seismic event. However, project activities would not result in development on the site, and the project would therefore not substantially increase the potential for seismic ground shaking or otherwise increase the risk of loss, injury, or death resulting from seismic shaking on the project site. This impact would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less-than-significant impact. The project site is located within a seismically active region. The geotechnical investigation conducted for the proposed project determined that the project site may be subject to strong ground shaking in the event of a nearby seismic event.

Factors such as groundwater level, soil type, and shaking potential can affect the potential of a site to experience ground failure such as liquefaction. Groundwater was not encountered at the project site during the time of the investigation; however, the geotechnical report mentioned that groundwater and soil water levels would likely vary by season and precipitation (Romig 2019:4). The potential for soils at the site to undergo liquefaction was not determined by the soil report. However, given the potential for strong shaking at the site, variable topography, seasonally varying

water levels, and evidence of material movement at the project site, the possibility of seismic related ground failure such as liquefaction does exist.

Project activities would not result in development on the site, and the project would therefore not substantially increase liquefaction potential or potential for other types of seismic-related ground failure. The project would not otherwise increase risk of loss, injury, or death resulting from ground failure on the project site in the event of a seismic event. This impact would be less than significant.

iv) Landslides?

Less-than-significant impact. The geotechnical investigation found evidence of landslides and downslope movement in vicinity of the project site. The existing character of the project site and surrounding areas are remote and rural. Besides the Redwood Cabin and associated features, the project site does not contain additional structures, residences, or other development. The site is not accessible to the public.

Project activities would not result in new development on the site. Therefore, the project would not substantially increase landslide potential or otherwise increase the risk of loss, injury, or death resulting from landslides on the project site. This impact would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Less-than-significant impact. Demolition of the Redwood Cabin, construction staging, and waste removal, would result in some disturbance of topsoil on the site. Removal of the wooden posts supporting the Redwood Cabin may require excavation of 2 to 5 feet. After demolition of the Cabin, disturbed areas under the structure would be graded and recontoured as necessary to ensure adequate erosion control and site drainage. All demolition and graded areas would be compacted to 75 percent relative compaction. Native grass seed mix would be spread in the disturbed areas, and weed free or native grass straw would be placed in the disturbed areas, on top of the native grass seed mix, to assist with soil stabilization and erosion control. Any wood chips or mulch generated from unsalvageable building materials may also be used to stabilize disturbed areas.

Site recontouring and revegetation would reduce the potential for erosion at the site that may result from project activities. After completion of demolition, recontouring, and revegetation, the project would not involve any additional operation or maintenance activities at the site. The project site would remain closed off from public access. Due to the limited nature of soil disturbance at the project site, and site recontouring and revegetation activities that would occur, the project would not result in substantial erosion of topsoil, and this impact would be less than significant.

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

Less-than-significant impact. According to the geotechnical investigation and report prepared, the project site may be subject to strong shaking and ground movement such as landslides during a seismic event (Rowig 2019:6, 8). However, the project consists of demolition and revegetation activities, and would not place additional structures, development, or land uses on the project site. After completion of demolition, recontouring, and revegetation, the project would not involve any additional operation or maintenance activities at the site. The project site would remain closed to public access. Therefore, this impact would be less than significant.

D) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

Less-than-significant impact. The geotechnical report prepared for the project indicated that soil on the project site had a low to moderate potential for expansion (Romig 2019: 3). Project activities would remove an existing structure on the project site and would not result in additional development on the project site that could increase risk of damage from expansive soils. Therefore, this impact would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The suitability of the soils at the project sit for septic tanks was not evaluated, however, the project does not propose addition of septic tanks and would not result in development that may generate wastewater requiring septic tanks.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-significant impact. The University of California Museum of Paleontology Specimen Data search reflected that there are 1,696 known records of paleontological specimens within San Mateo County (UCMP 2021). Most of the specimens listed were microfossils, and were found in areas of the County outside the Preserve, such as Moss Beach, San Bruno, and Oil Creek, which are approximately 14 miles northwest, 20 miles northeast, and 10 miles southwest of the project site, respectively. No unique geologic features are identified within the project area. While no known paleontological resources are known to occur within ¼ miles of the project site, potential for unexpected discovery of paleontological exists.

Demolition of the Redwood Cabin, construction staging, and waste removal, would result in some ground disturbance at the project site. In order to remove the wooden posts that support the Redwood Cabin structure, excavation of up to 2-5 feet would be required. As excavation would occur in areas of the project site which have already been disturbed, the potential for encounter of paleontological material is low.

However, in the event of that unanticipated paleontological resources are encountered during construction, Midpen and the construction contractor would implement EPG CUL-1, Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials as described in Chapter 2, "Project Description" of the accompanying EIR and as originally outlined in the La Honda Creek Open Space Preserve Master Plan. CUL-2 includes steps such as stopping work within 30 feet of the discovery, notifying a qualified professional, and implementing methods to protect the resources (such as fencing) until the significance of the resources is determined and a treatment plan can be identified and implemented.

Potential for encounter of paleontological material at the project site is low, given that excavation would be limited to previously disturbed areas of the project site, However, if paleontological materials are discovered, implementation of CUL-2 would minimize impacts. Therefore, the project would have a less-than-significant impact.

2.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions.				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

2.8.1 Environmental Setting

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. Most solar radiation passes through GHGs, however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). GHG emissions contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic factors together (Intergovernmental Panel on Climate Change [IPCC] 2014: 5).

Climate change is a global problem. GHGs are global pollutants because even local GHG emissions contribute to global impacts. GHGs have long atmospheric lifetimes (one to several thousand years) and persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any particular GHG molecule is dependent on multiple variables and cannot be determined with any certainty, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration (IPCC 2013:467).

GREENHOUSE GAS EMISSION SOURCES AND SINKS

As discussed previously, GHG emissions are attributable in large part to human activities. CO_2 is the main byproduct of fossil fuel combustion. Methane, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices, organic material decomposition in landfills, and the burning of forest fires (Black et al. 2017). Nitrous oxide emissions are largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution (CO_2 dissolving into the water); respectively, these are the two of the most common processes for removing CO_2 from the atmosphere.

The total GHG inventory for the unincorporated San Mateo County in 2005 was 782,080 metric tons of CO_2 equivalents ($MTCO_2e$) (San Mateo County 2013). The 2005 and most recent local GHG inventory for the unincorporated San Mateo County is presented in Table 2.8-1 to provide context for the GHG emissions associated with the project.

Table 2.8-1 2005 Unincorporated San Mateo County GHG Emissions Inventory

Sector	Emissions $MTCO_2e$	Percent
Transportation	479,400	61
Commercial and Industrial Energy	160,900	21
Residential Energy	93,100	12
Off-Road	35,800	5
Solid Waste	8,380	1
Agriculture	3,000	<1
Water and Wastewater	1,500	<1
Total	782,080	100

Source: San Mateo County 2013

The Midpen inventory of administrative GHG emissions in 2018 was 1,307 $MTCO_2e$ (Midpen 2019). Table 2.8-2 presents the breakdown of Midpen's emissions.

Table 2.8-2 2018 Midpen GHG Emissions Inventory

Sector	Emissions $MTCO_2e$	Percent
Vehicles, Equipment, Business Travel	608	46
Employee Commute	389	30
Facilities	170	13
Tenant Residences	139	11
Total	1,307	100

Source: Midpen 2019

Statewide GHG Emission Targets and the Climate Change Scoping Plan

Reducing GHG emissions in California has been the focus of the State government for approximately two decades (State of California 2018). GHG emission targets established by the State legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill 32 [AB 32] of 2006) and reducing them to 40 percent below 1990 levels by 2030 (Senate Bill 32 [SB 32] of 2016). Executive Order (EO) S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. EO B-55-18 calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets align with the scientifically established levels needed globally to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (UN 2015:3).

The 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by CARB, outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). The State has also passed more detailed legislation addressing GHG emissions associated with industrial sources, transportation, electricity generation, and energy consumption.

Bay Area Air Quality Management District

BAAQMD is the primary agency responsible for addressing air quality concerns in the San Francisco Bay Area, including San Mateo County. BAAQMD also recommends methods for analyzing project-related GHGs in CEQA analyses and recommends multiple GHG reduction measures for land use development projects. BAAQMD developed thresholds of significance to provide a uniform scale to determine the CEQA significance of GHG emissions associated with land use and stationary source projects that align with the statewide GHG target mandated by AB 32 (BAAQMD 2017). BAAQMD's goals in developing GHG thresholds include ease of implementation; use of standard analysis tools; and emissions mitigation consistent with AB 32.

The proposed project's GHG emissions are primarily related to construction activities, however, BAAQMD has not adopted thresholds for evaluating GHG emissions from construction activities. Nevertheless, BAAQMD recommends that the lead agency quantify and disclose GHG emissions that would occur during construction and make a determination on the significance of these construction-generated GHG emission impacts in relation to meeting AB 32 GHG reduction goals. Furthermore, BAAQMD does not advise that a project should be consistent with the State's latest GHG emission reduction targets established by SB 32 (i.e., 40 percent below 1990 levels by 2030). Because BAAQMD has not adopted a threshold under SB 32 targets, a project generated GHG emissions threshold was estimated to evaluate the project in a statewide context. Thus, this analysis presumes that a 40 percent reduction in the BAAQMD's existing bright-line threshold (resulting in 660 MT CO_2e) is necessary to achieve the State's 2030 GHG reduction goal (which is a 40 percent reduction below 1990 GHG emissions levels). This threshold is presented to demonstrate the progress required under SB 32.

Also as previously discussed in Section 2.6, "Energy," San Mateo County has adopted an EECAP to be in line with the State's GHG emission reductions and Midpen has adopted a CAP to reduce its operational GHG emissions

2.8.2 Discussion

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

Less than significant. BAAQMD's bright-line threshold of 1,100 $MTCO_2e$ was developed with the intention of attributing an appropriate share of GHG emission reductions necessary to reach AB 32 goals for proposed land use development projects in BAAQMD's jurisdiction under CEQA. However, AB 32's GHG reduction target date of 2020 has passed and GHG emission reduction are now to be analyzed in meeting updated targets provided by SB 32. At the time of preparing this analysis, BAAQMD has not updated its bright-line threshold to be consistent with SB 32 reduction targets. Thus, a project-specific threshold was developed by applying SB 32's reduction target of 40 percent below 1990 GHG emissions level to the 1,100 $MTCO_2e$ bright-line threshold, which equates to 600 $MTCO_2e$. This threshold is presented to demonstrate the progress required under SB 32. This linear reduction approach oversimplifies the threshold development process. It is not the intent of this document to propose the adoption of this threshold as a mass emissions limit or CEQA GHG threshold for general use, but rather to provide this additional information to put the project-generated GHG emissions in the appropriate statewide context.

The proposed project would result in construction activities associated with demolition and recontouring of the site. Construction-related GHG emissions would result from the use of construction equipment (haul trucks, excavator, forklifts, etc.) and vehicle trips from construction workers over a 10-week construction period. The proposed construction activities were estimated to generate a total of 46 $MTCO_2e$ which is under the project-specific threshold of 660 $MTCO_2e$ per year.

In addition to comparing the project to a threshold consistent with State targets, BAAQMD's CEQA Guidelines encourage Lead Agencies to incorporate BMPs which include using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment for at least 15 percent of the fleet; using local building materials for at least 10 percent of materials required; and recycling or reusing at least 50 percent of construction waste or demolition materials. The project would implement BMP GHG-1, as described in Section 2.7.3, "Project Level BMPs" of Chapter 2, "Project Description," of the accompanying EIR.

With incorporation of BMP GHG-1, the project would be consistent with the BMPs required by BAAQMD and reduce emissions from construction activities. This impact would be less than significant.

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

Less-than-significant impact. Midpen's CAP evaluated the operational emissions of the agency. Because the project would not result in any long-term operational emissions, the proposed project would not conflict with any of the GHG

emission reduction efforts provided in the CAP. Furthermore, the project would not exceed the project-related threshold and is consistent with the State's latest reduction goals of the 2017 Scoping Plan and SB 32. Thus, the project would not have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purposes of reduction the emissions of GHGs. This impact would be less than significant.

2.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials.				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

2.9.1 Environmental Setting

An Asbestos and Lead Survey was prepared by Terracon Consultants for the Redwood Cabin in November 2019. No asbestos containing material were detected in any of the samples collected from the Redwood Cabin, however, several sources of paint within the cabin were determined to contain lead (ZFA 2020). Considering the historic use of the Redwood Cabin as a temporary recreational residence, it is possible that residential hazardous materials such as paint and cleaning solutions/materials were used at the site and could be present within the soils.

No known hazardous waste sites are located within the project site or surrounding area (DTSC 2021; SWRCB 2021a). There are two former leaking underground storage tank sites within the community of Sky Londa, however, both sites have been considered closed for over 10 years (SWRCB 2021b; SWRCB 2021c).

The nearest school, Portola Valley Elementary School, is located over 2.5 miles southeast of the project site. No public airports or private airstrips are within 2 miles of the project site. The San Carlos Airport is located approximately 8.5 miles northeast of the project site.

Fire protection within Midpen's boundaries is provided by the jurisdictional local fire departments and CAL FIRE. Midpen works cooperatively with these jurisdictional fire agencies to reduce fire risk. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Viewer, the project site is within a zone of high fire hazard severity in a State Responsibility Area (CAL FIRE 2021). In May 2021, Midpen released the Wildland Fire Resiliency Program (Program) which includes a Vegetation Management Plan, Prescribed Fire Plan, Wildland Pre-Fire Plan/Resource Advisor Maps, and Monitoring Plan. Section 6 of the Program, "Wildland Pre-Fire Plan/Resource Advisor Maps," includes guidance for Open Space Preserves within Midpen's jurisdiction to include in their Wildland Pre-Fire Plan. Specifically, guidance related to emergency access and evacuation elements as well as best management practices to be implemented during and post-fire activities are identified (Midpen 2021).

2.9.2 Discussion

a,b) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

Less-than-significant impact. Project activities would involve the use of hazardous materials, such as fuels, solvents, gasoline, asphalt, and oil. Further, demolition of the Redwood Cabin would require removal of existing lead-containing materials present in the structure. The use, disposal, and storage of these materials could potentially expose and adversely affect workers, the public, or the environment as a result of improper handling or use, accident, environmentally unsound disposal methods, fire, explosion, or other emergencies, resulting in adverse health or environmental effects. Project operation would not involve the use of hazardous materials.

Disturbance of lead-containing paints and materials would occur in accordance with CCR Title 8, Section 1532, which provides requirements related to removal and disturbance of lead and lead containing materials. The California Highway Patrol and Caltrans are responsible for enforcing regulations related to the transportation of hazardous materials on local roadways, and the use of these materials is regulated by the California Department of Toxic Substances Control (DTSC), as outlined in CCR Title 22. Midpen and its construction contractors would be required to comply with the California Environmental Protection Agency's (Cal EPA's) Unified Program, which protects Californians from hazardous waste and hazardous materials by ensuring consistency throughout the state regarding the implementation of administrative requirements, permits, inspections, and enforcement at the local regulatory level. Regulated activities would be managed by the San Mateo County Environmental Health Services, which is the designated Certified Unified Program Agency, and in accordance with the regulations included in the Unified Program (e.g., hazardous materials release response plans and inventories, California Uniform Fire Code hazardous material management plans and inventories). Such compliance would reduce the potential for accidental release of hazardous materials during project construction.

The project would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials. These regulations are specifically designed to protect the public health and the environment and must be adhered to during project construction and operation. Compliance with applicable regulations would ensure that this impact would be less than significant, and no mitigation is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No impact. As described above, there are no schools within one-quarter miles of the project site. Because the nearest school, Portola Valley Elementary School, is located over 2.5 miles southeast of the project site, the project would not emit hazardous emissions or handle hazardous materials within the one-quarter mile of the project site. Further, as

discussed under criterion (a), the project would be required to comply with existing regulations associated with the transport, use, and disposal of hazardous materials. No impact would occur, and no mitigation is required.

D) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No impact. Government Code Section 65962.5 requires that DTSC compile and maintain a list of hazardous waste facilities subject to corrective action, land designated as hazardous waste property, or hazardous waste disposals on public land. This list is known as the Cortese List, which can be accessed on Cal EPA's website. As described above, there are no hazardous materials sites located within the project site or surrounding area. Therefore, the project site is not listed within the Cortese list database. No impact would occur, and no mitigation is required.

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

No impact. The San Carlos Airport is located approximately 8.5 miles northeast of the project site. The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip, and implementing the project would not result in an aviation-related safety hazard for people residing or working in the project area. Therefore, no impact would occur, and no mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-than-significant impact. The project includes demolition and site recontouring activities and does not include any modification to an adopted emergency plan. During construction, the eastern portion of the project site would be utilized for staging activities. The project would not result in any temporary closures of Highway 35 for construction vehicle trips or staging and public access is not permitted within the project site. However, because Highway 35 is a windy, two-lane road, it is possible that construction vehicles turning off Highway 35 could temporarily interfere with traffic, which has the potential to reduce emergency access. As described in Chapter 2, "Project Description," of the accompanying EIR, a traffic control plan would be developed and followed. Emergency services access to local land uses shall be maintained at all times and require the use of flaggers to direct traffic. This impact would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less-than-significant impact. As described above, the project site is located within a very-high fire hazard severity zone. Project activities would involve removal of the Redwood Cabin structure and site recontouring activities to ensure adequate erosion control and drainage within the site. The operation of construction-related vehicles and equipment has the potential for fire ignition risk. As described in Section 2.7.1, "La Honda Creek Open Space Preserve Master Plan EPGs," EPG HAZ-9 requires that all equipment used during construction have an approved spark arrestor, that grass and fuels where construction vehicles are allowed to be parked be cut or reduced, and that construction equipment that can cause an ignition will not be used when the National Weather Service issues a Red Flag Warning for the San Francisco Bay Area. Once the structure has been removed and site recontouring activities have been completed, no public access would be permitted within the project site. Project implementation would not include construction of any new inhabitable structures or facilities such that significant risks associated with wildland fire occur. Therefore, impacts would be less than significant, and no mitigation is required.

2.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality.				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

2.10.1 Environmental Setting

The Preserve is located within the San Gregorio Creek watershed, which drains an area of approximately 53 square miles in southwestern San Mateo County. Three major creek tributaries of San Gregorio flow through its center (La Honda, Harrington, Weeks); and Bogess Creek flows along the western boundary. The creeks reach their confluence with San Gregorio Creek to the south of the Driscoll Ranch area. The creek and its tributaries are sediment-impaired by accelerated rates of erosion and sedimentation resulting from natural geological and climatic processes and augmented by human land use practices. The largest anthropogenic sources of sediment are believed to be active and abandoned roads on unstable slopes near stream channels and hillside gullies on agricultural and range lands in the lower watershed, formed primarily as a result of hillside row cropping in the 1930's (Midpen 2012a:3-58).

There are nearly four miles of intermittent or ephemeral tributary streams within Preserve boundaries. While some of these may dry by late summer, they experience significant flows during the wet months. Although it is considered a perennial stream, low gradient reaches within La Honda Creek may also go dry in certain conditions. There are a number of natural springs and seeps in the Preserve. Several springs were improved to serve as watering sources for cattle and provide year-round flows. Twenty-three permanent and seasonal ponds are located on the Preserve, all but three of which are associated with providing a water source for the cattle operation on Driscoll Ranch (Midpen 2012a:3-58).

The project site is located within the La Honda Creek Watershed, approximately 200 feet south of the La Honda Creek. The Redwood Cabin is located approximately 60 feet above the creek in elevation at its nearest point (refer to Figure 2-2, Project Site in Chapter 2, "Project Description," of the accompanying EIR). The distance from La Honda Creek to the Redwood Cabin in densely vegetated, rural in nature, and does not contain any impervious surfaces.

Water quality and hydrology policies applicable to the project includes EPG WQ-2 from the 2012 La Honda Creek Preserve Master Plan. EPG WQ-2 outlines storm water quality BMPs, including directing runoff flow to vegetated areas and away from creeks and drainages, conducting trail maintenance during low flow periods, using erosion and sediment control features such as silt fences, straw bale barriers, brush/rock filters, inlet protection, etc.

The project is located in an area of minimal flood hazard per the Federal Emergency and Management Agency (FEMA)'s National Flood Hazard Layer Viewer tool (FEMA 2021).

2.10.2 Discussion

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less-than-significant impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. After demolition is complete, site recontouring would be implemented to reduce potential runoff, erosion, and to ensure proper site drainage consistent with the surrounding drainage patterns.

Furthermore, best management practices included in the project from the La Honda Creek Open Space Preserve Master Plan would minimize water quality impacts. As outlined in Chapter 2, "Project Description," of the accompanying EIR, BMPs included in EPG WQ-2 include: directing flow toward vegetated areas away from creeks as practical; using erosion and sediment control measures such as silt fences, straw bale barriers, sediment traps, or other materials, to minimize sediment flow into creeks; and conducting work during low flow periods to reduce potential runoff impacts. The project would not increase impervious area on the site or otherwise result in development that could impact water quality. Therefore, the project would not violate applicable water quality requirements or degrade surface or groundwater quality. This impact would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No impact. During the geotechnical investigation conducted for the project, no groundwater was encountered at the project site (Rowig 2019:4). However, the report noted that water levels may vary depending on season and precipitation levels. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation, and would not require extraction of groundwater. No structures or other development requiring a water supply exists on or adjacent to the project site. By their nature, project activities would not create demand for groundwater extraction. Therefore, the project would not decrease groundwater supplies, and this impact would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on or offsite erosion or siltation;

Less-than-significant impact. Project activities such as removal of the Redwood Cabin and subsequent site contouring and revegetation may alter the drainage patterns at the project site compared to existing conditions. However, site recontouring activities and revegetation would be implemented with the purpose of reducing site run off, siltation, and erosion. The project would not alter or otherwise disturb the course of a stream or river and would not add impervious surfaces.

Furthermore, best management practices included in the project from the La Honda Creek Open Space Preserve Master Plan would minimize potential impacts related to runoff or erosion. As outlined in Chapter 2, "Project Description," of the accompanying EIR, BMPs included in EPG WQ-2 include: directing flow toward vegetated areas away from creeks as practical; using erosion and sediment control measures such as silt fences, straw bale barriers, sediment traps, or other materials, to minimize sediment flow into creeks; and conducting work during low flow periods to reduce runoff flows that may occur during project activities. Implementation of these measures would reduce potential erosion or siltation at the project site, and this impact would be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less-than-significant impact. The project would conduct recontouring to maintain adequate site drainage and would not add impervious surfaces on the site. After completion of demolition activities, the project would not result in any additional land uses that may increase the rate or amount of surface run off. Revegetation activities would reduce potential run off from the site. Furthermore, best management practices included in the project from the La Honda Creek Open Space Preserve Master Plan would minimize potential impacts related to runoff or erosion. As outlined in Chapter 2, "Project Description," of the accompanying EIR, BMPs included in EPG WQ-2 include: directing flow toward vegetated areas away from creeks as practical; using erosion and sediment control measures such as silt fences, straw bale barriers, sediment traps, or other materials, to minimize sediment flow into creeks; and conducting work during low flow periods to reduce potential runoff impacts. The project does not propose activities or substantially altered drainage patterns that would increase opportunities for increased run-off or flooding. Therefore, this impact would be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

No impact. The setting of the project is rural. No built stormwater drainage systems exist on or in vicinity of the project site. The project does not propose development that would result in increased sources of pollution on the project site. Therefore, there would be no impact.

iv) Impede or redirect flood flows?

No impact. No regular flood flows are known to occur for the project site. The project does not proposed activities that could impede or redirect flood flows. Therefore, the project would have no impact.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No impact. The project is located in an area of minimal flood hazard per FEMA's National Flood Hazard Layer mapping tool (FEMA 2019). The project site is not located in an area with notable risk for tsunamis or seiches, as the Preserve is more than 200 feet above sea level at its lowest point and the Pacific Ocean is located more than seven

miles to the west. Furthermore, the project would not result in permanent sources of pollution or hazardous waste on the project site. Therefore, there would be no impact.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No impact. The proposed project is not located within the plan area of an existing water quality control plan or a sustainable groundwater quality control plan. The project would therefore not conflict with the implementation of any such plan, and there would be no impact.

2.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning.				
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

2.11.1 Environmental Setting

The Redwood Cabin was historically used as a temporary, recreational residence. However, the structure is no longer in use and does not have any future long-term uses. The project site is in a rural, remote setting, and no additional residential structures or other built communities are present within or adjacent to the project site. No other residential structures or other built communities exist on or adjacent to the project site.

According to the County of San Mateo Planning and Building Map Viewer, the project site is within the "Forest/Timber Production" land use designation and is zoned as Timber Land Preserve District (TPZ) (San Mateo County 2021). The project site, located in the northern portion of the Preserve, south of Highway 35, is within the State Scenic Corridor portion of Highway 35. See Section 2.1, "Aesthetics," of this document for a discussion of potential impacts of the project on scenic resources.

The project site is also within the plan area of the La Honda Creek Open Space Preserve Master Plan (Midpen 2012b). The project is consistent with Theme 8 from the Master Plan "Address the presence of existing and potential hazards" by "removing dilapidated structures that can become a nuisance…" (Midpen 2012b: 27).

2.11.2 Discussion

a) Physically divide an established community?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The project site does not contain residential structures or any form of established living community. The project does not propose any activities that would result in the division of an established community. Therefore, there would be no impact.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No impact. The project is consistent with the activities proposed in the La Honda Creek Open Space Master Plan and analyzed in the Master Plan IS/MND (Midpen 2012a). The Master Plan recommends historical and structural evaluations of the Redwood Cabin for future Midpen Board of Directors consideration on the disposition of the structure. Consistent with the Master Plan, historical and structural evaluations for the Redwood Cabin were prepared in 2020. Based on those evaluation, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin. The project does not propose changes in

the Open Space Master Plan or in the County's land use designation or zoning of the site. The project also does not propose any activities that may conflict with the land use designation or zoning. Therefore, there would be no impact.

2.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources.				
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

2.12.1 Environmental Setting

The 2012 La Honda Creek Open Space Preserve Master Plan IS/MND identified one Significant Mineral Resource Area in the southwestern portion of the preserve, within the area formerly known as Driscoll Ranch. This site was known as the La Honda Oil Field and is no longer active (Midpen 2012a:3-67). It was sealed in 1985 and the availability of oil from this resource is unknown. No mineral resource extraction is currently occurring within the preserve. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. No other mineral resources are identified within or adjacent to the project site (CDOC 2018).

2.12.2 Discussion

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

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. No known mineral resources are identified within or adjacent to the project site. Demolition and removal of materials, from the project site may involve excavation of up to 5 feet required to remove posts and bases that are associated with the existing structure (see Chapter 2, "Project Description" of the accompanying EIR).

Due to the nature of project activities, the project would not impact the existing potential for mineral resource extraction within the preserve in the event that resources are discovered or extraction is permitted. Excavation required to remove subsurface posts and foundation associated with the structure would be limited to 5 feet and would be unlikely to disturb or otherwise impact mineral resources within the area, given that the occurrence of mineral resources in the area is unknown, and given the limited extent of excavation.

Since mineral resources are not known to occur within the project area, and since project activities would not impact future availability of mineral resources, the project would have no impact.

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

No impact. As discussed above, mineral resources are not known to occur within the project site, and the site is not zoned for mineral resource recovery according to the County's General Plan, or the La Honda Creek Preserve Open Space Preserve Master Plan. Therefore, there would be no impact.

2.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.Noise.				
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

2.13.1 Environmental Setting

ACOUSTIC FUNDAMENTALS

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. Sound is the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a human ear. Noise is defined as loud, unexpected, annoying, or unwanted sound. As sound travels through the atmosphere from the source to the receiver, noise levels attenuate (i.e., decrease) depending on a variety of factors, including geometric spreading (i.e., spherical or cylindrical spreading), ground absorption (i.e., hard versus soft sites), atmospheric conditions (e.g., wind direction and speed, air temperature, humidity, turbulence), and shielding by natural or human-made features.

The amplitude of pressure waves generated by a sound source determines the loudness of that source, also called the sound pressure level (SPL). SPL is most commonly described by using decibels (dB) because this logarithmic unit best corresponds to the way the human ear interprets sound pressures. However, the decibel scale does not adequately characterize how humans perceive noise because the human ear is not equally sensitive to loudness at all frequencies (i.e., pitch) in the audible spectrum. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Then, an "A-weighted" sound level (expressed in units of A-weighted decibels or dBA) can be computed based on this information. All sound levels discussed in this section are expressed in A-weighted decibels.

Because decibels are logarithmic units, SPLs expressed in dB cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3-dB increase. In typical noisy environments, changes in noise of 1–2 dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness (Caltrans 2013:2-10).

Various noise descriptors have been developed to describe time-varying noise levels. The noise descriptors used in this chapter include:

- Equivalent Continuous Sound Level (L_{eq}): L_{eq} represents an average of the sound energy occurring over a specified period. In effect, L_{eq} is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period (Caltrans 2013:2-48). For instance, the 1-hour equivalent sound level, also referred to as the hourly L_{eq}, is the energy average of sound levels occurring during a 1-hour period.
- Maximum Sound Level (L_{max}): L_{max} is the highest instantaneous sound level measured during a specified period (Caltrans 2013:2-48; FTA 2018:207–208).

GROUND VIBRATION

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Groundborne vibration is vibration of and through the ground. Sources of ground-borne of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) and those introduced by human activity (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, (e.g., operating factory machinery) or transient in nature (e.g., explosions).

Ground-borne vibration amplitudes are commonly expressed in peak particle velocity (PPV) or root-mean-square (RMS) vibration velocity. PPV and RMS vibration velocity are normally described in inches per second (in/sec) but can also be expressed in decibel notation (VdB), which is used mainly in evaluating human response to vibration.

EXISTING NOISE SOURCES

Because the project site is located in a heavily forested area within the upper La Honda Creek Open Space Preserve, there are few existing noise sources. The most predominant noise source in the vicinity of the project site is vehicular traffic along Highway 35 which is approximately 495 feet north of the project site.

NOISE AND VIBRATION-SENSITIVE RECEPTORS

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels, and because of the potential for nighttime noise to result in sleep disruption. Vibration-sensitive land uses are generally considered to be buildings or structures that could be damaged due to vibration or land uses where vibration levels could interfere with operations or cause human annoyance. The nearest noise-sensitive receptor is a single-family residence located on the opposite side of Highway 35 from the project site, approximately 840 feet north of the project site boundary. The Bechtel House, the second closest residence, shown on Figure 2-2 of Chapter 2, "Project Description," of the accompanying EIR is located approximated 1,250 feet northeast of the project site boundary.

2.13.2 Discussion

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Less-than-significant impact. Temporary noise would result from the use of heavy-duty equipment for demolition of the existing Redwood Cabin structure and other features (i.e., retaining walls, fire/barbeque pits) and site recontouring. No permanent increases in ambient noise levels would occur after these activities are completed because the project would not involve any operational activities. Demolition noise would be short-term and temporary, and operation of

heavy-duty construction equipment would be intermittent throughout the day during construction. The types of equipment that would be used for demolition activities include an excavator, manlift, boom truck, skid steer, water truck, forklift, and haul trucks. Reference noise levels for these types of equipment are shown in Table 2.13-1.

Table 2.13-1 Noise Emission Levels from Construction Equipment

Equipment Type	Typical Noise Level (dBA) at 50 Feet
Boom Truck/Crane	85
Excavator	85
Forklift/Manlift	85
Haul Truck	84
Skid Steer/Front End Loader	80
Water Truck[1]	82

1 Noise level of a concrete pump truck was used to represent the noise level for a water truck, as these pieces of equipment provide similar tasks and produce similar noise levels.

Source: FHWA 2006:3

For noise modeling conducted, it was conservatively assumed that the loudest three pieces of equipment (a boom truck/crane, an excavator, and a forklift/manlift) would operate simultaneously in close proximity to each other, combining to generate a maximum possible noise level from construction activity. Note that pieces of construction equipment move around a construction site and generally are not close to each other for safety reasons; thus, noise levels would fluctuate throughout the day, depending on the actual activity taking place and equipment used at any one location on the site.

Within San Mateo County, the County Code Section 4.88.360 exempts certain activities, including demolition activities, from the County's noise standards as long as the activities are limited to the hours of 7 a.m. to 6 p.m. on weekdays and 9 a.m. to 5 p.m. on Saturdays. All project demolition activity would occur during the daytime hours when construction noise is exempt.

Assuming simultaneous operation of a boom truck/crane, an excavator, and a forklift/manlift and accounting for typical use factors of individual pieces of equipment and activity types along with typical attenuation rates, on-site construction-related activities could result in hourly average noise levels of approximately 84 L_{eq} and 90 dBA L_{max} at 50 feet. As described above, the nearest sensitive land uses are residences located approximately 840 feet north of the project site. At this distance, noise from the use of heavy-duty equipment would attenuate, from distance alone, to 52 dBA L_{eq} and 58 dBA L_{max}. Refer to Attachment C for detailed calculations. The County's daytime noise standards for single-family residential land uses are 55 dB L_{eq} and 75 dB L_{max}. Because the County's applicable noise standards would not be exceeded at the nearest residential receptors and demolition activities would be exempt per Section 4.88.360 of the County Code, this impact would be less than significant, and no mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less-than-significant impact. Project demolition would not involve the use of ground vibration–intensive activities, such as pile driving and blasting. Activities involving pile driving and blasting typically generate the highest vibration levels compared to other construction methods and are, therefore, of greatest concern when evaluating construction-related vibration impacts. Pieces of equipment that generate lower levels of ground vibration, such as excavators and haul trucks, would be used during demolition. These types of common construction equipment do not generate substantial levels of ground vibration that could result in structural damage, except at extremely close distances (i.e., within at least 10 feet). Because demolition activities would occur at least 840 feet away from all adjacent residential land uses, would not require vibration-intensive equipment, and would be limited to the hours of 7 a.m. to 6 p.m. on weekdays and 9 a.m. to 5 p.m. on Saturdays, project demolition would also not result in human annoyance. Therefore, this impact would be less than significant, and no mitigation is required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No impact. The project is not located within an airport land use plan or within two miles of a public airport or public use airport. Additionally, the project is not located within two miles of a private airstrip. San Carlos Airport is the closest airport and is located approximately 8 miles north of the project site. Also, the project would not include any new land uses where people would live or work. Thus, the project would have no impact regarding the exposure of people residing or working in the project area to excessive aircraft-related noise levels, and no mitigation is required.

2.14 POPULATION AND HOUSING

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

2.14.1 Environmental Setting

San Mateo County was estimated to have a population of 766,573 in 2018 (US Census Bureau 2019). The project site is located within the La Honda Creek Open Space Preserve. While some residential properties are scattered within and adjacent to the preserve, no housing is located on or adjacent to the project site. The Redwood Cabin is not currently used as a residential structure.

2.14.2 Discussion

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. No housing is located on the project site. Project activities would not result in any changes that could directly or indirectly induce population growth in vicinity of the project site or elsewhere.

As described in Chapter 2, "Project Description," of the accompanying EIR, public access to the project site is limited, and there are no paved roadways leading to the project site. The project does not propose new or expanded roadways, additional housing, commercial facilities, or other development that could induce population growth. Therefore, the project would not result in unplanned population growth, and no impact would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No impact. The project would remove the Redwood Cabin, which was historically used as a recreational retreat, but has been uninhabited since at least 1988. No other housing or other community is present on the project site. Project activities would therefore not displace existing communities or people, and the construction of replacement housing would not be required. There would be no impact.

2.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services.				
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

2.15.1 Environmental Setting

Fire protection for the Preserve is provided by collaboration of Midpen with other agencies, including the jurisdictional fire agencies of CAL FIRE/County of San Mateo Fire Department (CAL FIRE/County Fire) and La Honda Fire Brigade. First response is typically provided by Midpen Ranger Staff (Midpen 2012a).

Police protection for the preserve is provided by the San Mateo County Sherriff's Department.

Recreational uses such as hiking and horseback riding, are permitted in the Preserve; however the portion of the Preserve where the Redwood Cabin is located is closed to the public. The El Corte De Madera Creek Preserve is located approximately one mile northwest of the project site. Wunderlich County Park is located 1300 feet north of the project site, on the other side of Highway 35. The Thornwood Open Space Preserve is located approximately 1 mile east of the project site.

The Preserve is served by multiple school districts. The project site and nearby areas are within the service areas of the Portola Valley School District and the Sequoia Valley Elementary School District.

2.15.2 Discussion

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

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

Less-than-significant impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The project would not introduce new housing, commercial facilities, roadways, or other development such that the provision of new or expansion of existing public services including fire protection, police protection, schools, parks, or other public facilities would be required beyond existing levels.

Construction activities may temporarily increase risk of fire within the project area, due to presence of motorized vehicles and construction equipment on site. The operation of construction-related vehicles and equipment has the potential for fire ignition risk. As described in Section 2.7.1, "La Honda Creek Open Space Preserve Master Plan EPGs," EPG HAZ-9 requires that all equipment used during construction have an approved spark arrestor, that grass and fuels where construction vehicles are allowed to be parked be cut or reduced, and that construction equipment that can cause an ignition will not be used when the National Weather Service issues a Red Flag Warning for the San Francisco Bay Area. Fire services in the event of an emergency would be met with existing services. Access by fire response and other emergency services such as medical emergency and police responders would be maintained during construction activities to minimize delays to the project site. The project's potential need for fire response or protection services would be temporary and would not require expanded fire response services. Therefore, this impact would be less than significant.

2.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

2.16.1 Environmental Setting

In addition to the Preserve itself, three recreational areas or preserves are located near the project site. The El Corte De Madera Creek Preserve is located approximately one mile northwest of the project site. Wunderlich County Park is located 1300 feet north of the project site, on the other side of Highway 35. Thornwood Open Space Preserve is located approximately 1 mile east of the project site. Several equestrian and hiking trails are present within the northern portion of the preserve. Within La Honda Creek Preserve, the Cielo Trail and the Coho Vista Loop trail are located approximately 2,000 and 400 feet south of the project site, respectively. Redwood Cabin is located within a portion of the Preserve that is closed to the public.

2.16.2 Discussion

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

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The project site does not currently support public recreational use.

The project does not propose new housing, commercial facilities, roadway, or other development that may increase use of nearby trails, parks, or other recreational facilities. Project activities are designed to improve and maintain the habitat and reduce hazards associated with the Redwood Cabin project site. Therefore, the project would not result in increased use or deterioration of recreational facilities, and there would be no impact.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. These activities are intended to maintain and improve quality, safety, and environmental quality of nearby recreational facilities. The project would not require the construction of additional recreational features and there would be no impact.

2.17 TRANSPORTATION

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

2.17.1 Environmental Setting

Access to the Redwood Cabin is provided via an unpaved road accessible from Highway 35, which travels through two locked gates. The final segment of this unpaved road requires a four-wheel drive vehicle or access by foot. Generally, the project site is rural in nature, and vehicle traffic within the Preserve is limited.

The Preserve is within the plan areas of the San Mateo Countywide Transportation Plan, which primarily addresses transportation issues and policies within the urbanized areas of San Mateo County. The La Honda Creek Open Space Preserve Master Plan does not contain policies that specifically pertain to transportation or circulation within the preserve.

2.17.2 Discussion

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less-than-significant impact. Equipment and vehicles would access the project area from Highway 35 (via Highways 92 or 84), then to the unpaved driveway extended from Highway 35 to the project site. Construction equipment, materials, and vehicle staging would occur within the driveway area of the project site. Project activities may temporarily increase use of the unpaved road used to access the site. Project activities may result in vehicle trips to transport equipment, materials, and waste on and off of the project site, which would not result in permanent traffic increase on any nearby roadways or trail. Impacts of construction to traffic would be temporary and limited in nature. Therefore, the project would not conflict with any applicable plans or policies addressing the local circulation system, and this impact would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less-than-significant impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. Potential trips generated from project activities could result from transport of materials on and off site, transport of construction vehicles, and commute trips from construction workers.

The project would generate limited trips during construction activities because only 8 crew members are expected to be onsite for a period of 10 weeks. Additionally, because there is no construction associated with the project, the only daily hauling would be associated with the removal of demolition debris. These trips would be temporary and would not directly or indirectly result in a permanent increase in vehicle miles traveled. Therefore, this impact would be less than significant.

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

No impact. Project activities would not construct additional roadways or alter existing ones. Therefore, the project would not increase hazards related to geometric roadway design. There would be no impact.

d) Result in inadequate emergency access?

Less-than-significant impact. Access to the project site is provided by an unpaved road that may be accessed from Highway 35. The project site is located in a rural setting with no adjacent housing, commercial areas, or other facilities that require consistent emergency access. Demand for emergency services within the vicinity of the project is therefore low, however, temporary reduction of emergency vehicle access may occur as materials and construction equipment are transported on and off site. As described in Chapter 2, "Project Description," of the accompanying EIR, a traffic control plan would be developed. Emergency services access to local land uses shall be maintained at all times and require the use of flaggers to direct traffic. This impact would be less than significant.

2.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?	☒ Yes		☐ No	
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

2.18.1 Environmental Setting

Under PRC section 21080.3.1 and 21082.3, Midpen must consult with tribes traditionally and culturally affiliated with the project area that have requested formal notification and responded with a request for consultation. The parties must consult in good faith. Consultation is deemed concluded when the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource when one is present or when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed on during the consultation process must be recommended for inclusion in the environmental document.

On June 9, 2021, Midpen sent notification letters that the project was being addressed under CEQA, as required by PRC 21080.3.1, to the following Native American tribal representatives:

- Muwekma Ohlone Indian Tribe of the SF Bay Area, Monica Arellano, Vice Chairwoman
- Amah Mutsun Tribal Band of Mission San Juan Bautista, Irene Zwierlein, Chairperson
- Muwekma Ohlone Indian Tribe of the SF Bay Area, Charlene Nijmeh, Chairperson
- Indian Canyon Mutsun Band of Costanoan, Kanyon Sayers-Roods, MLD Contact
- Indian Canyon Mutsun Band of Costanoan, Ann Marie Sayers, Chairperson
- Rumšen Am:a Tur:ataj Ohlone, Dee Dee Ybarra, Chairperson
- The Ohlone Indian Tribe, Andrew Galvan
- Costanoan Rumsen Carmel Tribe, Tony Cerda, Chairperson

On June 11, 2021, an email from Kanyon Konsulting on behalf of the Indian Canyon Band of Costanoan Ohlone People, was received in response to Midpen's AB 52 tribal consultation notification. Midpen responded on July 9, 2021 and again on August 2, 2021 requesting additional information from Kanyon Konsulting, however, no response was received.

As described in Section 2.5, "Cultural Resources," the NWIC records search indicated that no resources were located within the project site or within a 0.25-mile radius.

2.18.2 Discussion

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a, b) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less-than-significant impact. As described above, no additional consultation between Midpen and Kanyon Konsulting has occurred. Therefore, there are no known tribal cultural resources as defined in PRC Section 21074 present within the project area. The project would involve demolition of the Redwood Cabin and site recontouring activities. As discussed in Chapter 2, "Project Description," of the accompanying EIR, it is expected that excavation of posts and bases associated with the structure would be approximately 2 feet below grade, however, it is possible that maximum depth of excavation could reach up to 5 feet. Excavation would occur within the footprint of the disturbed footings, which is unlikely to yield any significant materials and/or features.

Because no known tribal cultural resources are located within the project site or surrounding area and project excavation activities would occur within existing disturbed portions of the Redwood Cabin footprint, the potential for disturbance or destruction of tribal cultural resources, such that a substantial adverse change in the significance of a resource occur, would be less than significant. No mitigation is required.

2.19 UTILITIES AND SERVICE SYSTEMS

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

2.19.1 Environmental Setting

The project site is located in a remote rural setting. Water, wastewater electricity and gas connections exist at the project site, however these utility connections have not been used since 1988.

2.19.2 Discussion

a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The project would not introduce new housing, commercial facilities, roadway, or other development such that the provision of new or expanded water, wastewater, electric power, gas, telecommunications, or other utilities or service systems would be required. The existing utility lines would be abandoned in place. Therefore, the project would have no impact.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, recontouring, and site revegetation. The project would not introduce new housing, commercial facilities, roadways, or other development that would create new demand for water on the project site; there would be no impact.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

No impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, grading and recontouring, and site revegetation. The project would not introduce new housing, commercial facilities, roadway, or other development that would generate wastewater. The project would therefore not exceed local wastewater provision capacity, and there would be no impact.

d, e) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-significant impact. Project activities include demolition of the Redwood Cabin, removal of materials and associated features, grading and recontouring, and site revegetation. The project would not introduce new housing, commercial facilities, roadway, or other development that would generate operational solid waste. However, demolition of the Redwood Cabin and associated site features may result in up to 60 tons of waste removal from the project site. Per Chapter 4.105 "Recycling and Diversion of Debris from Construction and Demolition," of the San Mateo County Code, demolition projects in unincorporated San Mateo County would be required to submit a Waste Management Plan to assist in the County's goal of the diversion of inert solids such as concrete and untreated wood waste, or waste that is not treated with hazardous preservatives. Additionally, if the building materials are in good condition, Midpen will conduct salvage operations per the process outlined in Midpen's Board of Directors Policy 4.08 – Construction and Demolition Waste Diversion. Although it is possible that some of the historical materials from the cabin would be salvaged, for a conservative estimate it is assumed that all material would be disposed at the Kettleman Hills Landfill located approximately 180 miles from the project site. For additional information on the disposal of hazardous materials, refer to Section 2.9, "Hazards and Hazardous Materials". The project would be required to comply with all applicable local, state, and federal regulations regarding the production of solid construction waste and would not generate waste in excess of standards or capacity. This impact would be less than significant.

2.20 WILDFIRE

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

2.20.1 Environmental Setting

According to the CAL FIRE Fire Hazard Severity Zone Viewer, the project site is within a zone of high fire hazard severity in a State Responsibility Area (CAL FIRE 2021). As described in Chapter 2, "Project Description," of the accompanying EIR, the project site is located in a heavily wooded area within a portion of the Preserve and is situated atop sloped terrain.

Fire protection within Midpen's boundaries is provided by the jurisdictional local fire departments and CAL FIRE. Midpen works cooperatively with these jurisdictional fire agencies to reduce fire risk. In May 2021, Midpen released the Wildland Fire Resiliency Program (Program) which includes a Vegetation Management Plan, Prescribed Fire Plan, Wildland Pre-Fire Plan/Resource Advisor Maps, and Monitoring Plan. Section 6 of the Program, "Wildland Pre-Fire Plan/Resource Advisor Maps," includes guidance for Open Space Preserves within Midpen's jurisdiction to include in their Wildland Pre-Fire Plan. Specifically, guidance related to emergency access and evacuation elements as well as best management practices to be implemented during and post-fire activities are identified (Midpen 2021).

2.20.2 Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-significant impact. The project includes demolition and site recontouring activities within the northern portion of the Preserve. During construction, the eastern portion of the project site would be utilized for temporary staging activities. The project site is accessed via an unpaved driveway off Highway 35. As described in Chapter 2, "Project Description," of the accompanying EIR, a traffic control plan would be developed to insure that emergency services access to local land uses shall be maintained at all times. The project would not result in any temporary closures of Highway 35 for construction vehicle trips or staging and public access is not permitted within the project site. Therefore, project implementation is not expected to substantially impair or interfere with emergency response or evacuation plans within the area. As such, no impact would occur, and no mitigation is required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less-than-significant impact. The project includes demolition and recontouring activities within the project site. The operation of construction-related vehicles and equipment has the potential for fire ignition risk. As described in Section 2.7.1, "La Honda Creek Open Space Preserve Master Plan EPGs," EPG HAZ-9 requires that all equipment used during construction have an approved spark arrestor, that grass and fuels where construction vehicles are allowed to be parked be cut or reduced, and that construction equipment that can cause an ignition will not be used when the National Weather Service issues a Red Flag Warning for the San Francisco Bay Area. Once construction activities are complete, the project site would remain vacant and inaccessible by the public. Though the project site is situated atop sloped terrain, project implementation does not include new structures or facilities that would be occupied. Further, site recontouring activities would ensure soil stabilization and erosion control within the project site. Therefore, the project would not result in exposure to pollutant concentrations from wildfire. No impact would occur, and no mitigation is required.

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No impact. The project involves removal of existing site structures as well as site recontouring and does not include installation of any utility infrastructure. Once project activities are complete, the site would remain closed and would not be accessible by the public. As such, the project would not exacerbate fire risks associated with the installation of utility infrastructure. No impact would occur, and no mitigation is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No impact. As described in Chapter 2, "Project Description," of the accompanying EIR, following completion of demolition activities, disturbed areas underneath the Redwood Cabin and within the staging area would be graded and/or recontoured to ensure adequate erosion control and site drainage. Once site recontouring activities are complete, no additional maintenance or operational activities would be required at the project site and no public access would be available. As such, the project would not result in the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability and drainage changes. No impact would occur, and no mitigation is required.

2.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

2.21.1 Discussion

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

Potentially significant. The project could affect sensitive species, sensitive communities, and protected wetlands, and interfere with wildlife species, however Midpen has previously adopted, and will implement, standard mitigation measures as part of the Preserve Master Plan and its various land management program that would reduce these potential impacts to a less-than-significant level. Additional evaluation is necessary to determine whether the project with the proposed removal of the Redwood Cabin would result in substantial adverse effects to historic and archaeological resources. Impacts to cultural resources would be potentially significant and will be analyzed further in the EIR.

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

Potentially significant. Generally, due to the limited scope of the project, implementation would not result in cumulatively considerable contributions to cumulative cultural and biological resource effects in the project area. Evaluation of the project's contribution to cumulative impacts related to cultural and biological resources will be evaluated once the project impacts are characterized in the EIR. This impact would be potentially significant, and this issue will be analyzed further in the EIR.

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

Less than significant. Effects on human beings associated with the project include air quality, hazards, and noise impacts. As described in this IS, impacts related noise would be less than significant because the County's applicable noise standards would not be exceeded at the nearest residential receptors and demolition activities would be exempt per Section 4.88.360 of the County Code. The project would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials. Also as described in Chapter 2, "Project Description," of the accompanying EIR, a traffic control plan would be prepared to ensure the safety of Highway 35 road users. These actions would ensure that hazards impacts would be less than significant. Air quality impacts would be reduced to a less-than-significant level with the implementation of BMP AQ-1 to reduce emissions from construction activities. Therefore, this impact would be less than significant.

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3 REFERENCES

2.1 Aesthetics

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2.2 Agriculture and Forest Resources

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Attachment A

Air Quality and Greenhouse Gas Emissions Modeling Results

MidPen Redwood Cabin Demo - San Mateo County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

MidPen Redwood Cabin Demo

San Mateo County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Recreational	1.00	User Defined Unit	0.70	0.00	0

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	70
Climate Zone	5			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Site acreage = 0.7

Construction Phase - 10 week construction timeframe

Trips and VMT - 8 workers; 2 trips/day for water trucks

On-road Fugitive Dust - No paved roads

Demolition -

Grading -

Construction Off-road Equipment Mitigation - BAAQMD BMPs

Off-road Equipment - Client provided equipment

Off-road Equipment - Client provided equipment

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	9

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	10.00	42.00
tblConstructionPhase	NumDays	2.00	9.00
tblConstructionPhase	NumDaysWeek	5.00	6.00
tblConstructionPhase	NumDaysWeek	5.00	6.00
tblGrading	AcresOfGrading	0.00	6.75
tblLandUse	LotAcreage	0.00	0.70
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.37	0.37
tblOffRoadEquipment	LoadFactor	0.20	0.20
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.37	0.37
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	LoadFactor	0.20	0.20
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOnRoadDust	HaulingPercentPave	100.00	0.00
tblOnRoadDust	HaulingPercentPave	100.00	0.00
tblOnRoadDust	VendorPercentPave	100.00	0.00
tblOnRoadDust	VendorPercentPave	100.00	0.00
tblOnRoadDust	WorkerPercentPave	100.00	0.00
tblOnRoadDust	WorkerPercentPave	100.00	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblTripsAndVMT	HaulingTripLength	20.00	181.00
tblTripsAndVMT	VendorTripNumber	0.00	2.00
tblTripsAndVMT	VendorTripNumber	0.00	2.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0207	0.2165	0.2592	5.1000e-004	5.9646	8.7600e-003	5.9734	0.5954	8.0600e-003	0.6035	0.0000	45.0579	45.0579	0.0132	4.9000e-004	45.5353

MidPen Redwood Cabin Demo - San Mateo County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Maximum	**0.0207**	**0.2165**	**0.2592**	**5.1000e-004**	**5.9646**	**8.7600e-003**	**5.9734**	**0.5954**	**8.0600e-003**	**0.6035**	**0.0000**	**45.0579**	**45.0579**	**0.0132**	**4.9000e-004**	**45.5353**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0207	0.2165	0.2592	5.1000e-004	3.6514	8.7600e-003	3.6602	0.3641	8.0600e-003	0.3721	0.0000	45.0579	45.0579	0.0132	4.9000e-004	45.5352
Maximum	**0.0207**	**0.2165**	**0.2592**	**5.1000e-004**	**3.6514**	**8.7600e-003**	**3.6602**	**0.3641**	**8.0600e-003**	**0.3721**	**0.0000**	**45.0579**	**45.0579**	**0.0132**	**4.9000e-004**	**45.5352**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**38.78**	**0.00**	**38.73**	**38.86**	**0.00**	**38.34**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

1	**9-25-2023**	**9-30-2023**	0.0240	0.0240
		Highest	0.0240	0.0240

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/25/2023	11/11/2023	6	42	
2	Grading	Grading	11/13/2023	11/22/2023	6	9	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 6.75

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Rubber Tired Dozers	0	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Grading	Graders	0	6.00	187	0.41
Grading	Rubber Tired Dozers	0	6.00	247	0.40
Grading	Tractors/Loaders/Backhoes	0	7.00	97	0.37
Demolition	Excavators	1	8.00	158	0.38
Demolition	Aerial Lifts	2	8.00	63	0.31
Demolition	Skid Steer Loaders	1	8.00	65	0.37
Demolition	Forklifts	1	8.00	89	0.20
Demolition	Cranes	1	8.00	231	0.29
Grading	Excavators	1	8.00	158	0.38
Grading	Aerial Lifts	2	8.00	63	0.31
Grading	Skid Steer Loaders	1	8.00	65	0.37
Grading	Cranes	1	8.00	231	0.29
Grading	Forklifts	1	8.00	89	0.20

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Demolition	6	15.00	2.00	6.00	10.80	6.60	181.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	2.00	0.00	10.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

3.2 Demolition - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					6.4000e-004	0.0000	6.4000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1729	0.2058	3.8000e-004		7.1700e-003	7.1700e-003		6.6000e-003	6.6000e-003	0.0000	32.9496	32.9496	0.0107	0.0000	33.2161
Total	**0.0163**	**0.1729**	**0.2058**	**3.8000e-004**	**6.4000e-004**	**7.1700e-003**	**7.8100e-003**	**1.0000e-004**	**6.6000e-003**	**6.7000e-003**	**0.0000**	**32.9496**	**32.9496**	**0.0107**	**0.0000**	**33.2161**

MidPen Redwood Cabin Demo - San Mateo County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	4.0000e-005	3.8400e-003	1.1100e-003	2.0000e-005	0.6460	3.0000e-005	0.6460	0.0645	3.0000e-005	0.0645	0.0000	1.7956	1.7956	1.8000e-004	2.9000e-004	1.8864
Vendor	4.0000e-005	1.8300e-003	6.7000e-004	1.0000e-005	0.3298	1.0000e-005	0.3298	0.0329	1.0000e-005	0.0329	0.0000	0.8120	0.8120	5.0000e-005	1.2000e-004	0.8490
Worker	6.8000e-004	4.4000e-004	6.1200e-003	2.0000e-005	4.0468	1.0000e-005	4.0468	0.4039	1.0000e-005	0.4039	0.0000	1.8662	1.8662	5.0000e-005	5.0000e-005	1.8811
Total	**7.6000e-004**	**6.1100e-003**	**7.9000e-003**	**5.0000e-005**	**5.0226**	**5.0000e-005**	**5.0226**	**0.5013**	**5.0000e-005**	**0.5014**	**0.0000**	**4.4738**	**4.4738**	**2.8000e-004**	**4.6000e-004**	**4.6165**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.9000e-004	0.0000	2.9000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1729	0.2058	3.8000e-004		7.1700e-003	7.1700e-003		6.6000e-003	6.6000e-003	0.0000	32.9496	32.9496	0.0107	0.0000	33.2160
Total	**0.0163**	**0.1729**	**0.2058**	**3.8000e-004**	**2.9000e-004**	**7.1700e-003**	**7.4600e-003**	**4.0000e-005**	**6.6000e-003**	**6.6400e-003**	**0.0000**	**32.9496**	**32.9496**	**0.0107**	**0.0000**	**33.2160**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	4.0000e-005	3.8400e-003	1.1100e-003	2.0000e-005	0.3955	3.0000e-005	0.3956	0.0395	3.0000e-005	0.0395	0.0000	1.7956	1.7956	1.8000e-004	2.9000e-004	1.8864
Vendor	4.0000e-005	1.8300e-003	6.7000e-004	1.0000e-005	0.2019	1.0000e-005	0.2020	0.0202	1.0000e-005	0.0202	0.0000	0.8120	0.8120	5.0000e-005	1.2000e-004	0.8490
Worker	6.8000e-004	4.4000e-004	6.1200e-003	2.0000e-005	2.4778	1.0000e-005	2.4778	0.2470	1.0000e-005	0.2470	0.0000	1.8662	1.8662	5.0000e-005	5.0000e-005	1.8811
Total	**7.6000e-004**	**6.1100e-003**	**7.9000e-003**	**5.0000e-005**	**3.0753**	**5.0000e-005**	**3.0753**	**0.3066**	**5.0000e-005**	**0.3067**	**0.0000**	**4.4738**	**4.4738**	**2.8000e-004**	**4.6000e-004**	**4.6165**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5800e-003	0.0000	3.5800e-003	3.9000e-004	0.0000	3.9000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.4900e-003	0.0371	0.0441	8.0000e-005		1.5400e-003	1.5400e-003		1.4100e-003	1.4100e-003	0.0000	7.0606	7.0606	2.2800e-003	0.0000	7.1177
Total	**3.4900e-003**	**0.0371**	**0.0441**	**8.0000e-005**	**3.5800e-003**	**1.5400e-003**	**5.1200e-003**	**3.9000e-004**	**1.4100e-003**	**1.8000e-003**	**0.0000**	**7.0606**	**7.0606**	**2.2800e-003**	**0.0000**	**7.1177**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.0000e-005	3.9000e-004	1.4000e-004	0.0000	0.0707	0.0000	0.0707	7.0600e-003	0.0000	7.0600e-003	0.0000	0.1740	0.1740	1.0000e-005	3.0000e-005	0.1819
Worker	1.5000e-004	1.0000e-004	1.3100e-003	0.0000	0.8672	0.0000	0.8672	0.0866	0.0000	0.0866	0.0000	0.3999	0.3999	1.0000e-005	1.0000e-005	0.4031
Total	**1.6000e-004**	**4.9000e-004**	**1.4500e-003**	**0.0000**	**0.9378**	**0.0000**	**0.9379**	**0.0936**	**0.0000**	**0.0936**	**0.0000**	**0.5739**	**0.5739**	**2.0000e-005**	**4.0000e-005**	**0.5850**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.6100e-003	0.0000	1.6100e-003	1.7000e-004	0.0000	1.7000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.4900e-003	0.0371	0.0441	8.0000e-005		1.5400e-003	1.5400e-003		1.4100e-003	1.4100e-003	0.0000	7.0606	7.0606	2.2800e-003	0.0000	7.1177
Total	**3.4900e-003**	**0.0371**	**0.0441**	**8.0000e-005**	**1.6100e-003**	**1.5400e-003**	**3.1500e-003**	**1.7000e-004**	**1.4100e-003**	**1.5800e-003**	**0.0000**	**7.0606**	**7.0606**	**2.2800e-003**	**0.0000**	**7.1177**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.0000e-005	3.9000e-004	1.4000e-004	0.0000	0.0433	0.0000	0.0433	4.3200e-003	0.0000	4.3200e-003	0.0000	0.1740	0.1740	1.0000e-005	3.0000e-005	0.1819
Worker	1.5000e-004	1.0000e-004	1.3100e-003	0.0000	0.5310	0.0000	0.5310	0.0529	0.0000	0.0529	0.0000	0.3999	0.3999	1.0000e-005	1.0000e-005	0.4031
Total	**1.6000e-004**	**4.9000e-004**	**1.4500e-003**	**0.0000**	**0.5742**	**0.0000**	**0.5742**	**0.0573**	**0.0000**	**0.0573**	**0.0000**	**0.5739**	**0.5739**	**2.0000e-005**	**4.0000e-005**	**0.5850**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Recreational	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Recreational	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Recreational	0.465403	0.073585	0.235906	0.146720	0.025583	0.006412	0.010355	0.002060	0.001446	0.000572	0.028871	0.000432	0.002657

5.0 Energy Detail

Historical Energy Use: N

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use		Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	tons/yr	MT/yr			
User Defined Recreational	0		0.0000	0.0000	0.0000	0.0000
Total			**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated

	Electricity Use		Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	tons/yr	MT/yr			
User Defined Recreational	0		0.0000	0.0000	0.0000	0.0000
Total			**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Unmitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

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Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**2.0000e-005**

7.0 Water Detail

7.1 Mitigation Measures Water

		Total CO2	CH4	N2O	CO2e
Category	tons/yr	MT/yr			
Mitigated		0.0000	0.0000	0.0000	0.0000
Unmitigated		0.0000	0.0000	0.0000	0.0000

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use		Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr	MT/yr			
User Defined Recreational	0 / 0		0.0000	0.0000	0.0000	0.0000
Total			**0.0000**	**0.0000**	**0.0000**	**0.0000**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Mitigated

	Indoor/Outdoor Use		Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr	MT/yr			
User Defined Recreational	0 / 0		0.0000	0.0000	0.0000	0.0000
Total			**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

		Total CO2	CH4	N2O	CO2e
	tons/yr	MT/yr			
Mitigated		0.0000	0.0000	0.0000	0.0000
Unmitigated		0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed		Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr	MT/yr			
User Defined Recreational	0		0.0000	0.0000	0.0000	0.0000
Total			**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Waste Disposed		Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr	MT/yr			
User Defined Recreational	0		0.0000	0.0000	0.0000	0.0000
Total			**0.0000**	**0.0000**	**0.0000**	**0.0000**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Redwood Cabin Project Emissions Calculations

Total and Annual Emissions Summary - Construction - Unmitigated (for AQ and GHG Analysis)

	tons										MT			
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	CO2	CH4	N2O	CO2e
Total	0.02	0.22	0.26	0.00	3.65	0.01	3.66	0.36	0.01	0.37	45.06	0.01	0.00	45.54

	tons										MT			
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	CO2	CH4	N2O	CO2e
Total Onsite	0.02	0.21	0.25	0.00	0.00	0.01	0.01	0.00	0.01	0.01	40.01	0.01	0.00	40.33
Total Offsite	0.00	0.01	0.01	0.00	3.65	0.00	3.65	0.36	0.00	0.36	5.05	0.00	0.00	5.20

	tons/year										MT/year			
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	CO2	CH4	N2O	CO2e
Total 2023	0.02	0.22	0.26	0.00	3.65	0.01	3.66	0.36	0.01	0.37	45.06	0.01	0.00	45.54

	tons/year										MT/year			
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	CO2	CH4	N2O	CO2e
2023 Onsite	0.02	0.21	0.25	0.00	0.00	0.01	0.01	0.00	0.01	0.01	40.01	0.01	0.00	40.33
2023 Offsite	0.00	0.01	0.01	0.00	3.65	0.00	3.65	0.36	0.00	0.36	5.05	0.00	0.00	5.20

SUMMARY OF MODELING RESULTS

Demolition - 2023

Unmitigated Construction

	tons/yr										MT/yr			
Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	CO2	CH4	N2O	CO2e
Fugitive Dust					0.0003	0.0000	0.0003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1729	0.2058	0.0004		0.0072	0.0072		0.0066	0.0066	32.9496	0.0107	0.0000	33.2160
Hauling	0.0000	0.0038	0.0011	0.0000	0.3955	0.0000	0.3956	0.0395	0.0000	0.0395	1.7956	0.0002	0.0003	1.8864
Vendor	0.0000	0.0018	0.0007	0.0000	0.2019	0.0000	0.2020	0.0202	0.0000	0.0202	0.8120	0.0001	0.0001	0.8490
Worker	0.0007	0.0004	0.0061	0.0000	2.4778	0.0000	2.4778	0.2470	0.0000	0.2470	1.8662	0.0001	0.0001	1.8811
Total	0.0171	0.1790	0.2137	0.0004	3.0755	0.0072	3.0829	0.3067	0.0067	0.3133	37.4234	0.0110	0.0005	37.8350

TOTAL ONSITE	0.0163	0.1729	0.2058	0.0004	0.0003	0.0072	0.0075	0.0000	0.0066	0.0066	32.9496	0.0107	0.0000	33.2160
TOTAL OFFSITE	0.0008	0.0061	0.0079	0.0001	3.0752	0.0001	3.0754	0.3067	0.0001	0.3067	4.4738	0.0003	0.0005	4.6165

Grading (Recontouring) - 2023

Unmitigated Construction

	tons/yr										MT/yr			
Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	CO2	CH4	N2O	CO2e
Fugitive Dust					0.0016	0.0000	0.0016	0.0002	0.0000	0.0002	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0035	0.0371	0.0441	0.0001		0.0015	0.0015		0.0014	0.0014	7.0606	0.0023	0.0000	7.1177
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0004	0.0001	0.0000	0.0433	0.0000	0.0433	0.0043	0.0000	0.0043	0.1740	0.0000	0.0000	0.1819
Worker	0.0002	0.0001	0.0013	0.0000	0.5310	0.0000	0.5310	0.0529	0.0000	0.0529	0.3999	0.0000	0.0000	0.4031
Total	0.0037	0.0376	0.0456	0.0001	0.5759	0.0015	0.5775	0.0574	0.0014	0.0588	7.6345	0.0023	0.0000	7.7039

TOTAL ONSITE	0.0035	0.0371	0.0441	0.0001	0.0016	0.0015	0.0032	0.0002	0.0014	0.0016	7.0606	0.0023	0.0000	7.1177
TOTAL OFFSITE	0.0002	0.0005	0.0015	0.0000	0.5743	0.0000	0.5743	0.0572	0.0000	0.0572	0.5739	0.0000	0.0000	0.5850

Average Daily Emissions Summary - Construction - Unmitigated

Construction Schedule

	Start Date	End Date	Working Days (5 Days per week)	Hours per Day
2023	9/25/2023	11/22/2023	43	8
Total Working Days	9/25/2023	11/22/2023	43	8

	lb/day									
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total
Average Daily Emissions (Calculated from total construction emissions)	0.96	10.07	12.06	0.02	169.83	0.41	170.25	16.94	0.37	17.31
BAAQMD Threshold	**54**	**54**	NA	NA	BMP	**82**	NA	BMP	**54**	NA
Exceeds Threshold	**No**	**No**	NA	NA	NA	**No**	NA	NA	**No**	NA

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total
Total Onsite	0.92	9.77	11.62	0.02	0.09	0.41	0.49	0.01	0.37	0.38
Total Offsite	0.04	0.31	0.43	0.00	169.74	0.00	169.75	16.93	0.00	16.93

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total
Total 2023	0.96	10.07	12.06	0.02	169.83	0.41	170.25	16.94	0.37	17.31

Greenhouse Gas Emissions Summary

Construction

Construction	MT/yr
Unmitigated	**Const.**
2023	46
Total Construction	46

Attachment B

Energy Modeling Results

Energy Calculations Summary

Construction Fuel Usage Summary

	Diesel	Gasoline	Diesel	Diesel
Construction Year	Off-road Equipment (gallons)	On-road (gallons)	On-road (gallons)	Combined
2023	2,146	207	181	2,327

Total Gasoline	**207**	**gallons**
Total Diesel	**2,327**	**gallons**

2022 Construction Offroad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	Number of days	Average Daily Factor	Diesel Fuel Usage
Demolition	Excavators	1	8.00	158	0.38	35	0.6	504
Demolition	Aerial Lifts	2	8.00	63	0.31	35	0.6	328
Demolition	Skid Steer Loaders	1	8.00	65	0.37	35	0.6	202
Demolition	Forklifts	1	8.00	89	0.20	35	0.6	150
Demolition	Cranes	1	8.00	231	0.29	35	0.6	563
Grading	Excavators	1	8.00	158	0.38	8	0.6	115
Grading	Aerial Lifts	2	8.00	63	0.31	8	0.6	75
Grading	Skid Steer Loaders	1	8.00	65	0.37	8	0.6	46
Grading	Cranes	1	8.00	231	0.29	8	0.6	129
Grading	Forklifts	1	8.00	89	0.20	8	0.6	34
							TOTAL	**2,146**

	Year	Start Date	End Date	Network Days
Demolition	2023	9/25/2023	11/11/2023	35
Grading (Recontouring)	2023	11/13/2023	11/22/2023	8

Trips and VMT

2023

Phase Name	Daily Worker Trip	Days per Year	Total Worker Trips	Total Vendor Trips	Total Hauling Trips	Worker Trip Length (miles)	Vendor Trip Length (miles)	Haul Trip Length (miles)	Total Worker Trip Length (miles)	Total Vendor Trip Length (miles)	Total Haul Trip Length (miles)	**Total gallons of gasoline**	**Total gallons of diesel**
Demolition	15	35	525	2	6	10.80	6.60	181.00	5670	13.2	1086	**207**	**181**
Grading (Recontouring)	15	8	120	2	0	10.80	6.60	20.00	1296	13.2	0	**47**	**2**
											TOTAL	**207**	**181**

Notes: Consistent with CalEEMod, worker vehicles assumed to be gasoline and 50% LDA, 25% LDT1, and 25% LDT2. Vendor and haul trips are assumed to be 100% diesel Heavy-Duty Trucks (T7).

Source: EMFAC2021 (v1.0.1) Emissions Inventory
Region Type: County
Region: San Mateo
Calendar Year: 2023
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	CalYr	VehClass	MdlYr	Speed miles/hr	Fuel	Population vehicles	VMT miles/day	Trips trips/day	Fuel gas 1,000 gallons/day	Diesel gas 1,000 gallons/day	Miles per gallon	Gasoline miles per gallon	Diesel miles per gallon
San Mateo	2023	LDA	Aggregate	Aggregate	Gasoline	240378.7755	7727537.252	1129354.924	259.343852	0.00	29.80	27.36	6.08
San Mateo	2023	LDT1	Aggregate	Aggregate	Gasoline	24557.61445	732297.8125	111855.32	28.87343542	0.00	25.36		
San Mateo	2023	LDT2	Aggregate	Aggregate	Gasoline	139222.3344	4716888.169	668266.1465	192.6175289	0.00	24.49		
San Mateo	2023	T7 Tractor	Aggregate	Aggregate	Diesel	173.2071705	13783.10051	2516.700187	0.00	2.267454612	6.08		

Notes: Consistent with CalEEMod, worker vehicles assumed to be gasoline and 50% LDA, 25% LDT1, and 25% LDT2. Vendor and haul trips are assumed to be 100% diesel Heavy-Duty Trucks (T7).

Attachment C

Noise Modeling Results

Construction Source Noise Prediction Model

Location	Distance to Nearest Receptor in feet	Combined Predicted Noise Level (L_{eq} dBA)
Single-family residences in the Tahoe Park East neighborhood	840	51.5

Equipment	Reference Noise Levels (L_{max}) at 50 feet[1]	Usage Factor[1]
Crane	85	0.16
Excavator	85	0.4
Man Lift	85	0.2

Ground Type	soft
Source Height	8
Receiver Height	5
Ground Factor[2]	0.63

Predicted Noise Level	L_{eq} dBA at 50 feet[3]
Crane	77.0
Excavator	81.0
Man Lift	78.0

Combined Predicted Noise Level (L_{eq} dBA at 50 feet)
83.8

Sources:

[1] Obtained from the FHWA Roadway Construction Noise Model, January 2006. Table 1.

[2] Based on Table 4-26 from the Federal Transit Noise and Vibration Impact Assessment, 2018 (pg 86).

[3] Based on the following from the Federal Transit Noise and Vibration Impact Assessment, 2018 (pg 176 and 177).

$L_{eq}(equip) = E.L.+10*\log (U.F.) - 20*\log (D/50) - 10*G*\log (D/50)$

Where: E.L. = Emission Level;

U.F.= Usage Factor;

G = Constant that accounts for topography and ground effects (FTA 2018: pg 86); and

D = Distance from source to receiver.

Construction Source Noise Prediction Model

Location	Distance to Nearest Receptor in feet	Combined Predicted Noise Level (L_{max} dBA)
Phoenix Sacramento apartment complex	840	57.5

Equipment	Reference Emission Noise Levels (L_{max}) at 50 feet[1]	Usage Factor[1]
Crane	85	1
Excavator	85	1
Man Lift	85	1

Ground Type	soft
Source Height	8
Receiver Height	5
Ground Factor[2]	0.63

Predicted Noise Level	L_{eq} dBA at 50 feet[3]
Crane	85.0
Excavator	85.0
Man Lift	85.0

Combined Predicted Noise Level (L_{max} dBA at 50 feet)
89.8

Sources:

[1] Obtained from the FHWA Roadway Construction Noise Model, January 2006. Table 1.

[2] Based on Table 4-26 from the Federal Transit Noise and Vibration Impact Assessment, 2018 (pg 86).

[3] Based on the following from the Federal Transit Noise and Vibration Impact Assessment, 2018 (pg 176 and 177).

L_{eq}(equip) = E.L.+10*log (U.F.) - 20*log (D/50) - 10*G*log (D/50)

Where: E.L. = Emission Level;

U.F.= Usage Factor;

G = Constant that accounts for topography and ground effects (FTA 2018: pg 86); and

D = Distance from source to receiver.

Equipment Description	Acoustical Usage Factor (%)	Spec 721.560 Lmax @ 50ft (dBA slow)	Actual Measured Lmax @ 50ft (dBA slow)	No. of Actual Data Samples (count)	Spec 721.560 LmaxCalc	Spec 721.560 Leq	Distance	Actual Measured LmaxCalc	Actual Measured Leq
Auger Drill Rig	20	85	84	36	79.0	72.0	100	78.0	71.0
Backhoe	40	80	78	372	74.0	70.0	100	72.0	68.0
Bar Bender	20	80	na	0	74.0	67.0	100		
Blasting	na	94	na	0	88.0		100		
Boring Jack Power Unit	50	80	83	1	74.0	71.0	100	77.0	74.0
Chain Saw	20	85	84	46	79.0	72.0	100	78.0	71.0
Clam Shovel (dropping)	20	93	87	4	87.0	80.0	100	81.0	74.0
Compactor (ground)	20	80	83	57	74.0	67.0	100	77.0	70.0
Compressor (air)	40	80	78	18	74.0	70.0	100	72.0	68.0
Concrete Batch Plant	15	83	na	0	77.0	68.7	100		
Concrete Mixer Truck	40	85	79	40	79.0	75.0	100	73.0	69.0
Concrete Pump Truck	20	82	81	30	76.0	69.0	100	75.0	68.0
Concrete Saw	20	90	90	55	84.0	77.0	100	84.0	77.0
Crane	16	85	81	405	79.0	71.0	100	75.0	67.0
Dozer	40	85	82	55	79.0	75.0	100	76.0	72.0
Drill Rig Truck	20	84	79	22	78.0	71.0	100	73.0	66.0
Drum Mixer	50	80	80	1	74.0	71.0	100	74.0	71.0
Dump Truck	40	84	76	31	78.0	74.0	100	70.0	66.0
Excavator	40	85	81	170	79.0	75.0	100	75.0	71.0
Flat Bed Truck	40	84	74	4	78.0	74.0	100	68.0	64.0
Front End Loader	40	80	79	96	74.0	70.0	100	73.0	69.0
Generator	50	82	81	19	76.0	73.0	100	75.0	72.0
Generator (<25KVA, VMS s	50	70	73	74	64.0	61.0	100	67.0	64.0
Gradall	40	85	83	70	79.0	75.0	100	77.0	73.0
Grader	40	85	na	0	79.0	75.0	100		
Grapple (on Backhoe)	40	85	87	1	79.0	75.0	100	81.0	77.0
Horizontal Boring Hydr. Jac	25	80	82	6	74.0	68.0	100	76.0	70.0
Hydra Break Ram	10	90	na	0	84.0	74.0	100		
Impact Pile Driver	20	95	101	11	89.0	82.0	100	95.0	88.0
Jackhammer	20	85	89	133	79.0	72.0	100	83.0	76.0
Man Lift	20	85	75	23	79.0	72.0	100	69.0	62.0
Mounted Impact Hammer (	20	90	90	212	84.0	77.0	100	84.0	77.0
Pavement Scarafier	20	85	90	2	79.0	72.0	100	84.0	77.0
Paver	50	85	77	9	79.0	76.0	100	71.0	68.0
Pickup Truck	40	55	75	1	49.0	45.0	100	69.0	65.0
Pneumatic Tools	50	85	85	90	79.0	76.0	100	79.0	76.0
Pumps	50	77	81	17	71.0	68.0	100	75.0	72.0
Refrigerator Unit	100	82	73	3	76.0	76.0	100	67.0	67.0
Rivit Buster/chipping gun	20	85	79	19	79.0	72.0	100	73.0	66.0
Rock Drill	20	85	81	3	79.0	72.0	100	75.0	68.0
Roller	20	85	80	16	79.0	72.0	100	74.0	67.0
Sand Blasting (Single Nozzl	20	85	96	9	79.0	72.0	100	90.0	83.0
Scraper	40	85	84	12	79.0	75.0	100	78.0	74.0
Shears (on backhoe)	40	85	96	5	79.0	75.0	100	90.0	86.0
Slurry Plant	100	78	78	1	72.0	72.0	100	72.0	72.0
Slurry Trenching Machine	50	82	80	75	76.0	73.0	100	74.0	71.0
Soil Mix Drill Rig	50	80	na	0	74.0	71.0	100		
Tractor	40	84	na	0	78.0	74.0	100		
Vacuum Excavator (Vac-tru	40	85	85	149	79.0	75.0	100	79.0	75.0
Vacuum Street Sweeper	10	80	82	19	74.0	64.0	100	76.0	66.0
Ventilation Fan	100	85	79	13	79.0	79.0	100	73.0	73.0
Vibrating Hopper	50	85	87	1	79.0	76.0	100	81.0	78.0
Vibratory Concrete Mixer	20	80	80	1	74.0	67.0	100	74.0	67.0

Equipment Description	Acoustical Usage Factor (%)	Spec 721.560 Lmax @ 50ft (dBA slow)	Actual Measured Lmax @ 50ft (dBA slow)	No. of Actual Data Samples (count)	Spec 721.560 LmaxCalc	Spec 721.560 Leq	Distance	Actual Measured LmaxCalc	Actual Measured Leq
Vibratory Pile Driver	20	95	101	44	89.0	82.0	100	95.0	88.0
Warning Horn	5	85	83	12	79.0	66.0	100	77.0	64.0
Welder / Torch	40	73	74	5	67.0	63.0	100	68.0	64.0

Source:
FHWA Roadway Construction Noise Model, January 2006. Table 9.1
U.S. Department of Transportation
CA/T Construction Spec. 721.560

Appendix C

Special-Status Species Tables

Methods

The species tables in this appendix were developed through a review of relevant databases and a botanical resources survey report conducted for the project site (Vollmar 2020). CDFW's California Natural Diversity Database (CNDDB) (CNDDB 2021) was reviewed for specific information on documented observations of special-status species previously recorded in the IPM Program Area and vicinity. A search of the CNDDB and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (CPNS 2021) was conducted for the following U.S. Geological Survey 7.5' quadrangles surrounding the project site: Montara Mountain, San Mateo, Redwood Point, Half Moon Bay, Woodside, Palo Alto, San Gregorio, La Honda, and Mindego Hill.

Table A-1 Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site

Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
San Mateo thorn-mint *Acanthomintha duttonii*	E	E	1B.1	Chaparral, valley and foothill grassland. Uncommon serpentinite vertisol clays; in relatively open areas. 160–980 feet in elevation. Blooms April–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species. There are no serpentine soils on the project site.
Blasdale's bent grass *Agrostis blasdalei*			1B.2	Coastal dunes, coastal bluff scrub, coastal prairie. Sandy or gravelly soil close to rocks; often in nutrient-poor soil with sparse vegetation. 20–1,200 feet in elevation. Blooms May–July.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Franciscan onion Allium *peninsulare* var. *franciscanum*			1B.2	Cismontane woodland, valley and foothill grassland. Clay soils; often on serpentine; sometimes on volcanics. Dry hillsides. 20–1,150 feet in elevation. Blooms May–June and as early as April in some locations.	**Not expected to occur:** Although suitable habitat for the species is present within the preserve (Vollmar2020), the north coast coniferous forest that covers the project site does not provide habitat for this species.
Bent-flowered fiddleneck *Amsinckia lunaris*			1B.2	Cismontane woodland, valley and foothill grassland, coastal bluff scrub. 10–2,600 feet in elevation. Blooms March–June.	**Not expected to occur:** Although suitable habitat for the species is present within the preserve (Vollmar2020), the north coast coniferous forest that covers the project site does not provide habitat for this species.
Anderson's manzanita *Arctostaphylos andersonii*			1B.2	Broadleaved upland forest, chaparral, north coast coniferous forest. Open sites, redwood forest. 200–2,500 feet in elevation. Blooms November–May.	**Not expected to occur:** Suitable habitat for this species is found within the preserve (Vollmar 2020); however, the north coast coniferous forest that covers the project site does not contain sufficient openings to provide habitat for this species.

Table A-1	Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site				
Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Montara manzanita *Arctostaphylos montaraensis*			1B.2	Chaparral, coastal scrub. Slopes and ridges. 900–1,510 feet in elevation. Blooms January–March.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Kings Mountain manzanita *Arctostaphylos regismontana*			1B.2	Broadleaved upland forest, chaparral, north coast coniferous forest. Granitic or sandstone outcrops. 790–2,310 feet in elevation. Blooms December–April.	**Not expected to occur:** The species is documented to occur within the preserve and north coast coniferous forest is suitable habitat for the species (Vollmar 2020); however, the north coast coniferous forest that covers the project site does not contain sufficient openings to provide habitat for this species.
Coastal marsh milk-vetch *Astragalus pycnostachyus* var. *pycnostachyus*			1B.2	Coastal dunes,marshes and swamps, coastal scrub. Mesic sites in dunes or along streams or coastal salt marshes. 0–510 feet in elevation. Blooms April–October.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Brewer's calandrinia *Calandrinia breweri*			4.2	Coastal scrub, disturbed sites and burns on sandy or loamy soils. 30 – 4,000 feet in elevation. Blooms March – June and as early as January in some locations.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Congdon's tarplant *Centromadia parryi* ssp. *congdonii*			1B.1	Valley and foothill grassland. Alkaline soils, sometimes described as heavy white clay. 0–760 feet in elevation. Blooms May–October and as late as November in some locations.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Pappose tarplant *Centromadia parryi* ssp. *parryi*			1B.2	Chaparral, coastal prairie, meadows and seeps, coastal salt marsh, valley and foothill grassland. Vernally mesic, often alkaline sites. 7–1378 feet in elevation. Blooms May–November.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Point Reyes salty bird's-beak *Chloropyron maritimum* ssp. *palustre*			1B.2	Usually in coastal salt marsh with *Salicornia, Distichlis, Jaumea, Spartina*, etc. 0–375 feet in elevation. Blooms June–October.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
San Francisco Bay spineflower *Chorizanthe cuspidata* var. *cuspidata*			1B.2	Coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub. Closely related to C. pungens. Sandy soil on terraces and slopes. 10–705 feet in elevation. Blooms April–July (August).	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Franciscan thistle *Cirsium andrewsii*			1B.2	Coastal bluff scrub, broadleaved upland forest, coastal scrub, coastal prairie. Serpentine seeps. 0–490 feet in elevation. Blooms March–July.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.

Table A-1	Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site				
Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Santa Clara red ribbons *Clarkia concinna* ssp. *automixa*			4.3	Chaparral and cismontane Woodland. 300 – 4,920 feet in elevation. Blooms as early as April and as late as July in some locations, but primarily May - June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Crystal Fountain thistle *Cirsium fontinales* var. *fontinale*	E	E	1B.1	Valley and foothill grassland, chaparral, cismontane woodland, meadows and seeps, ultramafic, wetland. Serpentine seeps and grassland. 150–610 feet in elevation. Blooms (April), May–October.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Lost thistle *Cirsium praeteriens*			1A	Little information exists on this plant; it was collected from the Palo Alto area at the turn of the 20th Century. Although not seen since 1901, this Cirsium is thought to be quite distinct from other Cirsiums acc. to D. Keil. 0–330 feet in elevation. Blooms June–July.	**Not expected to occur:** The species has not been recorded since 1901. The north coast coniferous forest that covers the project site does not provide habitat for this species.
Santa Clara red ribbons *Clarkia concinna* ssp. *automixa*			4.3	Cismontane woodland, chaparral. On slopes and near drainages. 300–4,920 feet in elevation. Blooms (April), May–June (July).	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Round-headed Chinese-houses *Collinsia corymbosa*			1B.2	Coastal dunes. 30–100 feet in elevation. Blooms April–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
San Francisco collinsia *Collinsia multicolor*			1B.2	Closed-cone coniferous forest, coastal scrub. On decomposed shale (mudstone) mixed with humus; sometimes on serpentine. 100–820 feet in elevation. Blooms (February), March–May.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Western leatherwood *Dirca occidentalis*			1B.2	Broadleafed upland forest, chaparral, closed-cone coniferous forest, cismontane woodland, north coast coniferous forest, riparian forest, riparian woodland. On brushy slopes, mesic sites; mostly in mixed evergreen and foothill woodland communities. 80–1,390 feet in elevation. Blooms January–March (April).	**Could occur:** Documented to occur within the preserve and suitable north coast coniferous forest habitat is present within the project site.
California bottle-brush grass *Elymus californicus*			4.2	Broadleaf upland forest, cismontane woodland, north coast coniferous forest, and riparian woodland. 50-1,540 feet. Blooms May-August (November).	**Could occur:** Suitable north coast coniferous forest habitat is present within the project site.
San Mateo woolly sunflower *Eriophyllum latilobum*	E	E	1B.1	Cismontane woodland, coastal scrub, lower montane coniferous forest. Often on roadcuts; found on and off of serpentine. 98–2,000 feet in elevation. Blooms May–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.

Table A-1	Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site				
Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Hoover's button-celery *Eryngium aristulatum* var. *hooveri*			1B.1	Vernal pools, wetland. Alkaline depressions, vernal pools, roadside ditches and other wet places near the coast. 0–160 feet in elevation. Blooms June -August.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Jepson's coyote-thistle *Eryngium jepsonii*			1B.2	Vernal pools, valley and foothill grassland. Clay. 10–980 feet in elevation. Blooms April–August.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Minute pocket moss *Fissidens pauperculus*			1B.2	North coast redwood forest. Moss growing on damp soil along the coast. In dry streambeds and on stream banks. 30–3,360 feet in elevation.	**Could occur:** Suitable north coast coniferous forest and stream habitat for minute pocket moss occurs within project site.
Hillsborough chocolate lily *Fritillaria biflora* var. *ineziana*			1B.1	Cismontane woodland, valley and foothill grassland. Probably only on serpentine; most recent site is in serpentine grassland. 300–530 feet in elevation. Blooms March–April.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Fragrant fritillary *Fritillaria liliacea*			1B.2	Coastal scrub, valley and foothill grassland, coastal prairie, cismontane woodland. Often on serpentine; various soils reported though usually on clay, in grassland. 10–1,300 feet in elevation. Blooms February–April.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
San Francisco gumplant *Grindelia hirsutula* var. *maritima*			3.2	Coastal scrub, coastal bluff scrub, valley and foothill grassland. Sandy or serpentine slopes, sea bluffs. 50–1,000 feet in elevation. Blooms June–September.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Short-leaved evax *Hesperevax sparsiflora* var. *brevifolia*			1B.2	Coastal bluff scrub, coastal dunes, coastal prairie. Sandy bluffs and flats. 0–700 feet in elevation. Blooms March–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Marin western flax *Hesperolinon congestum*	T	T	1B.1	Chaparral, valley and foothill grassland. In serpentine barrens and in serpentine grassland and chaparral. 200–1,210 feet in elevation. Blooms April–July.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Kellogg's horkelia *Horkelia cuneata* var. *sericea*			1B.1	Closed-cone coniferous forest, coastal scrub, coastal dunes, chaparral. Old dunes, coastal sandhills; openings. 20–700 feet in elevation. Blooms April–September.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not contain sufficient openings to provide habitat for this species.
Point Reyes horkelia *Horkelia marinensis*			1B.2	Coastal dunes, coastal prairie, coastal scrub. Sandy flats and dunes near coast; in grassland or scrub plant communities. 10–2,540 feet in elevation. Blooms May–September.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.

Table A-1	Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site				
Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Harlequin lotus *Hosackia gracilis*			4.2	Broadleaf upland forest, coastal bluff scrub, closed-cone coniferous forest, cismontane woodland, coastal prairie, coastal scrub, meadows and seeps, marshes and swamps, north coast coniferous forest, and valley and foothill grassland. 0-2,300 feet in elevation. Blooms March – July.	**Could occur:** Suitable north coast coniferous forest habitat is present within the project site.
Island tube lichen *Hypogymnia schizidiata*			1B.3	Chaparral, closed-cone coniferous forest. On bark and wood of hardwoods and conifers. 1,180–1,330 feet in elevation.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Coast Iris *Iris longipetala*			4.2	Coastal prairie. Lower montane coniferous forest, meadows and seeps. 0-1,970 feet in elevation.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Perennial goldfields *Lasthenia californica* ssp. *macrantha*			1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. 20–610 feet in elevation. Blooms January–November.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Legenere *Legenere limosa*			1B.1	Vernal pools, wetland. In beds of vernal pools. 0–2,890 feet in elevation. Blooms April–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Coast yellow leptosiphon *Leptosiphon croceus*		SC	1B.1	Coastal bluff scrub, coastal prairie. 30–490 feet in elevation. Blooms April–May.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Rose leptosiphon *Leptosiphon rosaceus*			1B.1	Coastal bluff scrub. 30–460 feet in elevation. Blooms April–July.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Crystal Springs lessingia *Lessingia arachnoidea*			1B.2	Coastal sage scrub, valley and foothill grassland, cismontane woodland. Grassy slopes on serpentine; sometimes on roadsides. 300–660 feet in elevation. Blooms July–October.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Ornduff's meadowfoam *Limnanthes douglasii* ssp. *ornduffii*			1B.1	Meadows and seeps, agricultural fields. 30–70 feet in elevation. Blooms November–May.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Arcuate bush-mallow *Malacothamnus arcuatus*			1B.2	Chaparral, cismontane woodland. Gravelly alluvium. 0–2,410 feet in elevation. Blooms April–September.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide sufficient open habitat for this species.

Table A-1	Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site				
Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Marsh microseris *Microseris paludosa*			1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland. 20–980 feet in elevation. Blooms April–June and as late as July in some locations.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Woodland woollythreads *Monolopia gracilens*			1B.2	Chaparral, valley and foothill grassland, cismontane woodland, broadleafed upland forest, north coast coniferous forest. Grassy sites, in openings; sandy to rocky soils. Often seen on serpentine after burns but may have only weak affinity to serpentine. 330–3,940 feet in elevation. Blooms March–July and as early as February in some locations.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not contain sufficient openings to provide habitat for this species.
Dudley's lousewort *Pedicularis dudleyi*			1B.2	Chaparral, north coast coniferous forest, valley and foothill grassland. Deep shady woods of older coast redwood forests; also, in maritime chaparral. 200–2,950 feet in elevation. Blooms April–June.	**Could occur:** Suitable north coast coniferous forest habitat for Dudley's lousewort occurs within project site.
White-rayed pentachaeta *Pentachaeta bellidiflora*	E	E	1B.1	Valley and foothill grassland, cismontane woodland. Open dry rocky slopes and grassy areas, often on soils derived from serpentine bedrock. 120–2,000 feet in elevation. Blooms March–May.	**Not expected to occur:** The north coast coniferous forest that covers the project ste does not provide habitat for this species.
White-flowered rein orchid *Piperia candida*			1B.2	North coast coniferous forest, lower montane coniferous forest, broadleafed upland forest. Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. 150–5,300 feet in elevation. Blooms May–September and as early as March in some locations.	**Could occur:** Suitable north coast coniferous forest and stream habitat for White-flowered rein orchid occurs within project site.
Choris' popcornflower *Plagiobothrys chorisianus* var. *chorisianus*			1B.2	Chaparral, coastal scrub, coastal prairie. Mesic sites. 50–525 feet in elevation. Blooms March–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Oregon polemonium *Polemonium carneum*			2B.2	Coastal prairie, coastal scrub, lower montane coniferous forest. 0–6,000 feet in elevation. Blooms April–September.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Hickman's cinquefoil *Potentilla hickmanii*	E	E	1B.1	Coastal bluff scrub, closed-cone coniferous forest, meadows and seeps, marshes and swamps. Freshwater marshes, seeps, and small streams in open or forested areas along the coast. 20–410 feet in elevation. Blooms April–August.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.

Table A-1	Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site				
Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Chaparral ragwort *Senecio aphanactis*			2B.2	Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. 70–2,810 feet in elevation. Blooms January–April and as late as May in some locations.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Scouler's catchfly *Silene scouleri* ssp. *scouleri*			2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland. 0–1,9670 feet in elevation. Blooms as early as March–May in some locations. In most locations blooms June–August and sometimes as late as September.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
San Francisco campion *Silene verecunda* ssp. *verecunda*			1B.2	Coastal scrub, valley and foothill grassland, coastal bluff scrub, chaparral, coastal prairie. Often on mudstone or shale; one site on serpentine. 100–2,120 feet in elevation. Blooms March–June; although, may bloom as early as February and as late as August.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Slender-leaved pondweed *Stuckenia filiformis* ssp. *alpina*			2B.2	Marshes and swamps. Shallow, clear water of lakes and drainage channels. 980–7,050 feet in elevation. Blooms May–July.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Two-fork clover *Trifolium amoenum*	E		1B.1	Valley and foothill grassland, coastal bluff scrub. Sometimes on serpentine soil, open sunny sites, swales. Most recently cited on roadside and eroding cliff face. 20–1,020feet in elevation. Blooms April–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Santa Cruz clover *Trifolium buckwestiorum*			1B.1	Coastal prairie, broadleafed upland forest, cismontane woodland. Moist grassland. Gravelly margins. 340–2,000 feet in elevation. Blooms April–October.	**Not expected to occur:** The preserve does contain suitable habitat for this species; however, the north coast coniferous forest that covers the project site does not provide habitat for this species.
Saline clover *Trifolium hydrophilum*			1B.2	Marshes and swamps, valley and foothill grassland, vernal pools. Mesic, alkaline sites. 0–980 feet in elevation. Blooms April–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
San Francisco owl's-clover *Triphysaria floribunda*			1B.2	Coastal prairie, coastal scrub, valley and foothill grassland. On serpentine and non-serpentine substrate (such as at Pt. Reyes). 5–490 feet in elevation. Blooms April–June.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.
Coastal triquetrella *Triquetrella californica*			1B.2	Coastal bluff scrub, coastal scrub. Grows within 30m from the coast in coastal scrub, grasslands and in open gravels on roadsides, hillsides, rocky slopes, and fields. On gravel or thin soil over outcrops. 30–330 feet in elevation.	**Not expected to occur:** The north coast coniferous forest that covers the project site does not provide habitat for this species.

Table A-1 Special-Status Botanical Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site

Species	Status [1]			Habitat and Blooming Period	Potential for Occurrence [2]
	Federal	State	CRPR		
Methuselah's beard lichen *Usnea longissima*			4.2	Old growth redwood forest, broadleafed upland forest. Grows in the "redwood zone" on tree branches of a variety of trees, including big leaf maple, oaks, ash, Douglas fir, and bay. 150–4,800 feet in elevation.	**Could occur:** Suitable north coast coniferous forest habitat for Methuselah's beard occurs within project site.

Notes: CRPR = California Rare Plant Rank; CNPS California Native Plant Society; ESA = Federal Endangered Species Act; CESA = California Endangered Species Act;

[1] Legal Status Definitions

Federal :

E Endangered (legally protected by ESA)

T Threatened (legally protected by ESA)

C Candidate (legally protected by ESA)

State:

E Endangered (legally protected by CESA)

T Threatened (legally protected by CESA)

California Rare Plant Ranks:

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

2 Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

3 Plants about which more information is needed (a review list) (may be protected under CEQA, but not legally protected under ESA or CESA)

4 Plants of limited distribution (a watch list) (may be protected under CEQA, but not legally protected under ESA or CESA)

Threat Ranks

0.1-Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

0.2-Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

[2] Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present on the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

Could occur: Suitable habitat is available at the project site; however, there are little to no other indicators that the species might be present.

Known to occur: The species, or evidence of its presence, was observed at the project site during reconnaissance surveys, or was reported by others.

Sources: CNPS 2021; Vollmar 2020.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
Invertebrates				
Bay checkerspot butterfly *Euphydryas editha bayensis*	T		Coastal dunes, ultramafic, valley and foothill grassland. Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. *Plantago erecta* is the primary host plant; *Orthocarpus densiflorus* and *O. purpurscens* are the secondary host plants.	**Not expected to occur:** The project site does not contain suitable serpentine grassland habitat for Bay checkerspot butterfly. Not documented to occur in the Santa Cruz Mountain portions of San Mateo or Santa Clara Counties (CNDDB 2021).
Crotch bumble bee *Bombus crotchii*		S1S2*	Coastal California east to the Sierra-Cascade crest and south into Mexico in grassland and woodland habitats. Food plant genera include *Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia*, and *Eriogonum.*	**Not expected to occur:** The project site does not contain suitable grassland and woodland habitat with sufficient nectar resources for the Crotch bumblebee.
Mission blue butterfly *Plebejus icarioides missionensis*	E		Coastal prairie. Inhabits grasslands of the San Francisco peninsula. Three larval host plants: *Lupinus albifrons, L. variicolor,* and *L. formosus*, of which *L. albifrons* is favored.	**Not expected to occur:** The project site does not contain suitable grassland habitat for the mission blue butterfly.
Monarch - California overwintering population *Danaus plexippus*	C		Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	**Not expected to occur:** Overwintering roost sites for monarchs are found an average of 1.5 miles from the coast, which makes it unlikely that the species overwinters in the project site.
Myrtle's silverspot butterfly *Speyeria zerene myrtleae*	E		Coastal dunes. Restricted to the foggy, coastal dunes/hills of the Point Reyes peninsula; extirpated from coastal San Mateo County. Larval foodplant thought to be *Viola adunca*.	**Not expected to occur:** The project site does not contain suitable coastal habitat for Myrtle's silverspot butterfly. Extirpated from coastal San Mateo County
San Bruno elfin butterfly *Callophrys mossii bayensis*	E		Valley and foothill grassland. Coastal, mountainous areas with grassy ground cover, mainly in the vicinity of San Bruno Mountain, San Mateo County. Colonies are located on steep, north-facing slopes within the fog belt. Larval host plant is *Sedum spathulifolium*.	**Not expected to occur:** The project site does not contain suitable grassland habitat for San Bruno elfin butterfly. Project is outside of the range of the species which is restricted to Northern San Mateo County.
western bumble bee *Bombus occidentalis*		S1S2*	Meadows and grasslands with nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	**Not expected to occur:** The project site does not contain suitable grassland and woodland habitat with sufficient nectar resources for the species.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
Fish				
Longfin smelt *Spirinchus thaleichthys*	C	SC	Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15-30 ppt, but can be found in completely freshwater to almost pure seawater.	**Not expected to occur:** The project site does not contain the estuary habitat suitable for this species.
Coho Salmon-Central CA Coast ESU *Oncorhynchus kisutch*	E	E	Clear, cool, perennial sections of relatively undisturbed low gradient streams, with high dissolved oxygen levels. Prefer streams with dense canopy over without rooted or aquatic vegetation. Require stream temperatures between 40 degrees and 58 degrees F. Gravel substrates are needed for spawning habitat.	**Not expected to Occur**: La Honda Creek adjacent to the project site is above a total barrier that prevents passage upstream by salmon (CDFW 2021).
Steelhead - central California coast DPS *Oncorhynchus mykiss irideus* pop. 8	T		Clear, cool, perennial sections of relatively undisturbed low gradient streams, with high dissolved oxygen levels. Prefer streams with dense canopy over without rooted or aquatic vegetation. Require stream temperatures between 40 degrees and 58 degrees F. Gravel substrates are needed for spawning habitat. Rearing habitat contains pools formed by logjams and loose woody debris.	**Not expected to Occur**: La Honda Creek adjacent to the project site is above a total barrier that prevents passage upstream by steelhead (CDFW 2021).
Tidewater goby *Eucyclogobius newberryi*	E	SC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	**Not expected to occur:** The project site does not contain the lagoon and lower stream reaches that are suitable for this species.
Amphibians and Reptiles				
California giant salamander *Dicamptodon ensatus*		SC	Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.	**Could Occur**: La Honda Creek adjacent to the project site could support California giant salamander and the project site itself could provide upland habitat for the species. Species is known to occur on the preserve (CNDDB 2021).
California red-legged frog *Rana draytonii*	T	SC	Found in artificial flowing waters, artificial standing waters, freshwater marsh, marsh and swamp, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, and south coast flowing waters. Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	**Could Occur:** Suitable aquatic and upland habitat present in the project site. Documented to occur on the preserve in multiple locations (CNDDB 2021). The project is located within designated critical habitat for the species.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
California tiger salamander *Ambystoma californiense*	T	T	Cismontane woodland, meadow and seep, riparian woodland, valley and foothill grassland, vernal pool, and wetlands. Central Valley DPS federally listed as threatened. Santa Barbara and Sonoma counties DPS federally listed as endangered. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	**Not expected to occur:** The project site does not contain suitable woodland and grassland habitat for California tiger salamander. Not documented to occur in the Santa Cruz Mountain portions of San Mateo or Santa Clara Counties (CNDDB 2021).
foothill yellow-legged frog *Rana boylii*		CE	Aquatic, chaparral, cismontane woodland, coastal scrub, Klamath/north coast flowing waters, lower montane coniferous forest, meadow and seep, riparian forest, riparian woodland, and Sacramento/San Joaquin flowing waters. Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	**Not expected to occur:** La Honda Creek adjacent to the project site is potentially suitable habitat for this species. However, foothill yellow-legged frog has not been detected within the San Gregorio Creek/La Honda Creek drainage since 1951 (CNDDB 2021), and surveys conducted on the preserve concluded that the species is not likely to be present (MidPen 2012).
Red-bellied newt *Taricha rivularis*		SC	Broadleaved upland forest, north coast coniferous forest, redwood, riparian forest, and riparian woodland. Coastal drainages from Humboldt County south to Sonoma County, inland to Lake County. Isolated population of uncertain origin in Santa Clara County. Lives in terrestrial habitats, juveniles generally underground, adults active at surface in moist environments. Will migrate over 1 km to breed, typically in streams with moderate flow and clean rocky substrate.	**Not expected to occur:** Occurrences south of Sonoma County are isolated within the drainage of Steven's Creek approximately 9 miles south of the project site (CNDDB 2021).
San Francisco gartersnake *Thamnophis sirtalis tetrataenia*	E	E FP	Artificial standing waters, marsh and swamp, Sacramento/San Joaquin standing waters, wetland. Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	**Not expected to occur:** La Honda Creek within the project site does not contain the deep, slow-moving stream, marsh, or pond habitat with dense vegetation need for this species. The nearest suitable aquatic habitat is greater than 0.25 mile from the project site; therefore, the site is not suitable upland habitat for the species.
Santa Cruz black salamander *Aneides niger*		SC	Mixed deciduous and coniferous woodlands and coastal grasslands in San Mateo, Santa Cruz, and Santa Clara counties. Adults found under rocks, talus, and damp woody debris.	**Could Occur.** Suitable habitat is present within the project site for this species, and the project site is within the range of the species.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
western pond turtle *Actinemys marmorata*		SC	Aquatic, artificial flowing waters, Klamath/north coast flowing waters, Klamath/north coast standing waters, marsh and swamp, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South coast flowing and standing waters. A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	**Not expected to occur**: La Honda Creek adjacent to the project site could support western pond turtle; however, the deeply shaded nature of the site does not provide basking sites for the species or open upland habitat for egg laying. Species is known to occur on the preserve (CNDDB 2021).
Birds				
Alameda song sparrow *Melospiza melodia pusillula*		SC	Salt marsh. Resident of salt marshes bordering south arm of San Francisco Bay. Inhabits Salicornia marshes; nests low in Grindelia bushes (high enough to escape high tides) and in Salicornia.	**Not expected to occur:** Suitable salt marsh habitat for the species is not found within the project site.
American peregrine falcon *Falco peregrinus anatum*	D	D FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	**Not expected to occur:** Buildings, cliffs, or other elevated places needed for nesting habitat are not found within the project site.
bald eagle *Haliaeetus leucocephalus*	D	E FP	Lower montane coniferous forest, old growth. Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	**Not expected to occur:** Trees that could support nests are present within the project site; however, the project site is too far from waterbodies of sufficient size to support nesting.
bank swallow *Riparia riparia*		T	Riparian scrub, riparian woodland. Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	**Not expected to occur: V**ertical cut banks and cliffs needed for nesting habitat are not found within the project site.
burrowing owl *Athene cunicularia*		SC	Coastal prairie, coastal scrub, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Sonoran desert scrub, and valley and foothill grassland. Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	**Not expected to occur:** Suitable habitat for the species is not found within the project site.
California black rail *Laterallus jamaicensis coturniculus*		T FP	Brackish marsh, freshwater marsh, marsh and swamp, salt marsh, wetland. Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	**Not expected to occur:** Suitable marsh or swamp habitat for the species is not found within the project site.
California least tern *Sternula antillarum browni*	E	E FP	Alkali playa, wetland. Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.	**Not expected to occur:** Suitable habitat for the species is not found within the project site.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
Long-eared owl *Asio otus*		SSC	Cismontane woodland, Great Basin scrub, riparian forest, riparian woodland, and upper montane coniferous forest. Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	**Not Likely to Occur**: One historical (1987) occurrence within San Mateo County. Suitable Long-eared owl nesting habitat is not present in the project site, due to a lack of adjacent open habitat.
Marbled murrelet *Brachyramphus marmoratus*	T	E	Lower montane coniferous forest, old growth, redwood. Feeds near-shore; nests inland along coast from Eureka to Oregon border and from Half Moon Bay to Santa Cruz. Nests in old-growth redwood-dominated forests, up to six miles inland, often in Douglas-fir.	**Could Occur**: The redwood forest within the project footprint does not contain trees that provide the large branches suitable for nesting; however, suitable marbled murrelet nesting habitat has been documented within ½ mile of the project site (MidPen 2007).
Northern harrier *Circus cyaneus*		SC	Coastal scrub, Great Basin grassland, marsh and swamp, riparian scrub, valley and foothill grassland, and wetlands. Coastal salt and fresh-water marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	**Not expected to occur:** The densely forested habitat in the project site does not provide the open marshland and grassland habitat needed for this species.
Saltmarsh common yellowthroat *Geothlypis trichas sinuosa*		SC	Marsh and swamp. Resident of the San Francisco Bay region, in fresh and salt water marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	**Not expected to occur:** Suitable marsh or swamp habitat for the species is not found within the project site.
Short-eared owl *Asio flammeus*		SSC	Great Basin grassland, marsh and swamp, meadow and seep, valley and foothill grassland, and wetlands. Found in swamp lands, both fresh and salt; lowland meadows; irrigated alfalfa fields. Tule patches/tall grass needed for nesting/daytime seclusion. Nests on dry ground in depression concealed in vegetation.	**Not expected to occur:** Suitable grasslands, marsh, or swamp habitat for the species is not found within the project site.
Western snowy plover *Charadrius alexandrinus nivosus*	T	SC	Great Basin standing waters, sand shore, wetland. Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	**Not expected to occur:** Suitable habitat for the species is not found within the project site.
White-tailed kite *Elanus leucurus*		FP	Cismontane woodland, marsh and swamp, riparian woodland, valley and foothill grassland, and wetlands. Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	**Not expected to occur:** The densely forested habitat in the project site does not provide the open woodland and grassland habitat needed for this species.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
yellow rail *Coturnicops noveboracensis*		SC	Freshwater marsh, meadow and seep. Summer resident in eastern Sierra Nevada in Mono County. Fresh-water marshlands.	**Not expected to occur:** Suitable marsh, wet meadow, or seep habitat for the species is not found within the project site.
Mammals				
American badger *Taxidea taxus*		SC	Alkali marsh, alkali playa, alpine, alpine dwarf scrub, bog a fen, brackish marsh, broadleaved upland forest, chaparral, chenopod scrub, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie. Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	**Could Occur**: The species has been documented on the preserve (CNDDB 2021); although more often found within grassland and chaparral habitats, could occur within the project site.
Big free-tailed bat *Nyctinomops macrotis*		SSC	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	**Not expected to occur:** Only one documented historical occurrence within San Mateo County (CNDDB 2021). No high cliffs or rocky outcrops for roosting habitat in the project site or vicinity.
Mountain lion-Southern California/Central Coast evolutionary significant unit *Puma concolor*		CT	Found in most habitats within Central California. Uses caves, other natural cavities, and brush thickets for cover and denning, often within riparian habitats.	**Known to Occur**: A male mountain lion was documented to be using the project site in 2012 (Sant Cruz Puma Project 2021). Suitable habitat exists in the project site.
pallid bat *Antrozous pallidus*		SC	Chaparral, coastal scrub, desert wash, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, riparian woodland, Sonoran desert scrub, upper montane coniferous forest, valley and foothill grassland. Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	**Could Occur**: A survey of the redwood cabin in 2019 (Swaim 2019) did not find evidence of roosting bats, and acoustic recordings did not identify the species in the project site. However, the species is known to occur on the preserve (CNDDB 2021), and could use the redwood cabin during project implementation.
ringtail *Bassariscus astutus*		FP	Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations.	**Could Occur**: Suitable habitat for the species is found within the project site.

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		
Salt-marsh harvest mouse *Reithrodontomys raviventris*	E	E FP	Marsh and swamp, wetland. Only in the saline emergent wetlands of San Francisco Bay and its tributaries. Pickleweed is primary habitat, but may occur in other marsh vegetation types and in adjacent upland areas. Does not burrow, build loosely organized nests. Requires higher areas for flood escape.	**Not expected to occur:** Suitable marsh or swamp habitat for the species is not found within the project site.
Salt-marsh wandering shrew *Sorex vagrans halicoetes*		SC	Marsh and swamp, wetland. Salt marshes of the south arm of San Francisco Bay. Medium high marsh 6-8 feet above sea level where abundant driftwood is scattered among Salicornia.	**Not expected to occur:** Suitable marsh or swamp habitat for the species is not found within the project site.
San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*		SC	Chaparral, redwood. Forest habitats of moderate canopy and moderate to dense understory. May prefer chaparral and redwood habitats. Constructs nests of shredded grass, leaves and other material. May be limited by availability of nest-building materials.	**Known to Occur:** A survey of the redwood cabin in 2019 (Swaim 2019) discovered woodrat nests within the structure.
Santa Cruz kangaroo rat *Dipodomys venustus venustus*			Chaparral. Silverleaf manzanita mixed chaparral in the Zayante Sand Hills ecosystem of the Santa Cruz Mountains. Needs soft, well-drained sand.	**Not expected to occur:** Suitable chaparral habitat for the species is not found within the project site, which occurs outside of the Zayante Sand Hills ecosystem.
Steller (=northern) sea-lion *Eumetopias jubatus*	D		Marine intertidal and splash zone communities, protected deepwater coastal communities, rock shore. Breeds on Ano Nuevo, San Miguel and Farallon islands, Pt. St. George, and Sugarloaf. Hauls-out on islands and rocks. Needs haul-out and breeding sites with unrestricted access to water, near aquatic food supply and with no human disturbance.	**Not expected to occur:** Suitable habitat for the species is not found within the project site, which occurs above the intertidal zone.
Townsend's big-eared bat *Corynorhinus townsendii*		SC	Broadleaved upland forest, chaparral, chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, lower montane coniferous forest, meadow and seep, Mojavean desert scrub, riparian forest, riparian woodland, Sonoran desert scrub. Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	**Could Occur**: A survey of the redwood cabin in 2019 (Swaim 2019) did not find evidence of roosting bats, and acoustic recordings did not identify the species in the project site. However, the species is known to occur on the preserve (CNDDB 2021), and could use the redwood cabin during project implementation.

Note: CNDDB = California Natural Diversity Database; USFWS = U.S. Fish and Wildlife Service; ESU = Evolutionary Significant Unit; DPS= Distinct Population Segment

* This species is included as special-status species due to the previous listing as Candidate Endangered by the California Fish and Game Commission. This candidate status was overturned by the courts in 2020; however, the species still warrants consideration under CEQA (see Section 3.3, Biological Resources).

[1] Legal Status Definitions

Federal:

E Endangered (legally protected)
T Threatened (legally protected)
C Candidate (no formal protection)
D Delisted

State:

FP Fully protected (legally protected)
SC Species of special concern (no formal protection other than CEQA consideration)
CE Candidate Endangered (legally protected)
E Endangered (legally protected)
T Threatened (legally protected)

Table A-2	Special-Status Animal Species Known to Occur in the Project Region and their Potential for Occurrence in the Redwood Cabin Project site			
Species	Status [1]		Habitat	Potential for Occurrence [2]
	Federal	State		

S1 Critically Imperiled (no formal protection other than CEQA consideration)
S2 Imperiled (no formal protection other than CEQA consideration)

Other:
WBWG: M Western Bat Working Group - Medium

[2] Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present in the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

Could occur: Suitable habitat is available in the project site; however, there are little to no other indicators that the species might be present.

Known to occur: The species, or evidence of its presence, has been reported by others.

Source: Authority 2010; CNDDB 2021; Midpen 2012; Santa Cruz Puma Project 2021; Swaim 2019

Appendix D

Cultural Resource Reports

LA HONDA CREEK REDWOOD CABIN
HISTORIC RESOURCE EVALUATION REPORT

SAN MATEO COUNTY, CALIFORNIA
[19019A]

PREPARED FOR:
MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

PAGE & TURNBULL

imagining change in historic environments through design, research, and technology

MARCH 26, 2020

DRAFT

TABLE OF CONTENTS

I. INTRODUCTION

This Historic Research Evaluation has been prepared at the request of the Midpeninsula Regional Open Space District ("District," "MROSD") for the La Honda Creek Redwood Cabin ("Redwood Cabin") (San Mateo County APN 075-330-260)[1] **(Figure 1)**. The Redwood Cabin is situated within the La Honda Creek Open Space Preserve and is under the jurisdiction of the Midpeninsula Regional Open Space District. The subject building is located in unincorporated San Mateo County, just west of the town of Woodside, California.

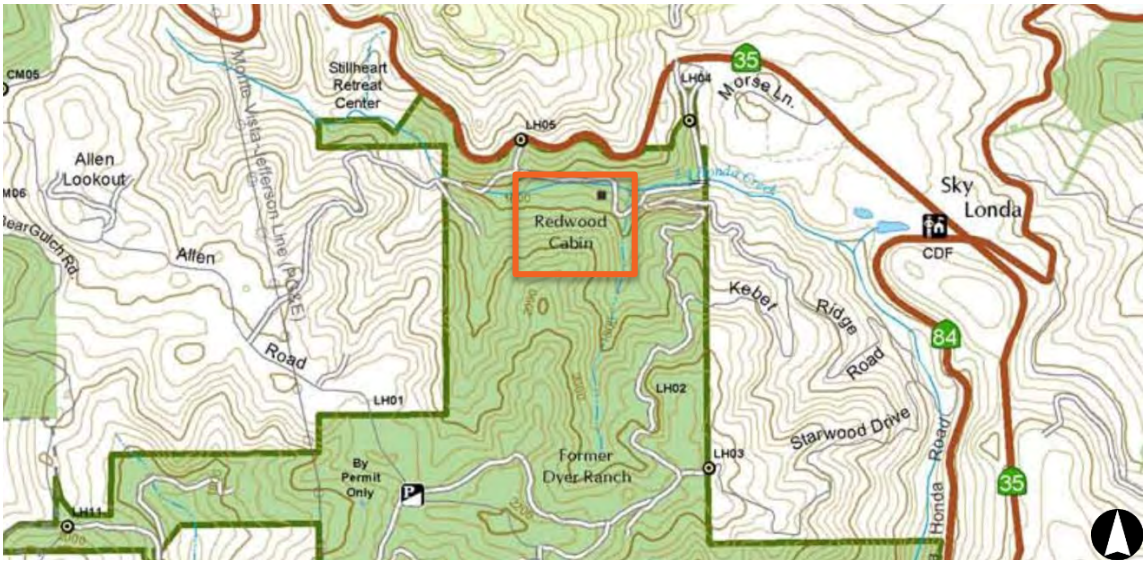


Figure 1. Approximate location of the La Honda Creek Redwood Cabin. Route 35 is also known as Skyline Boulevard. Source: La Honda Creek Open Space Preserve Master Plan, August 2012. Edited by Page & Turnbull.

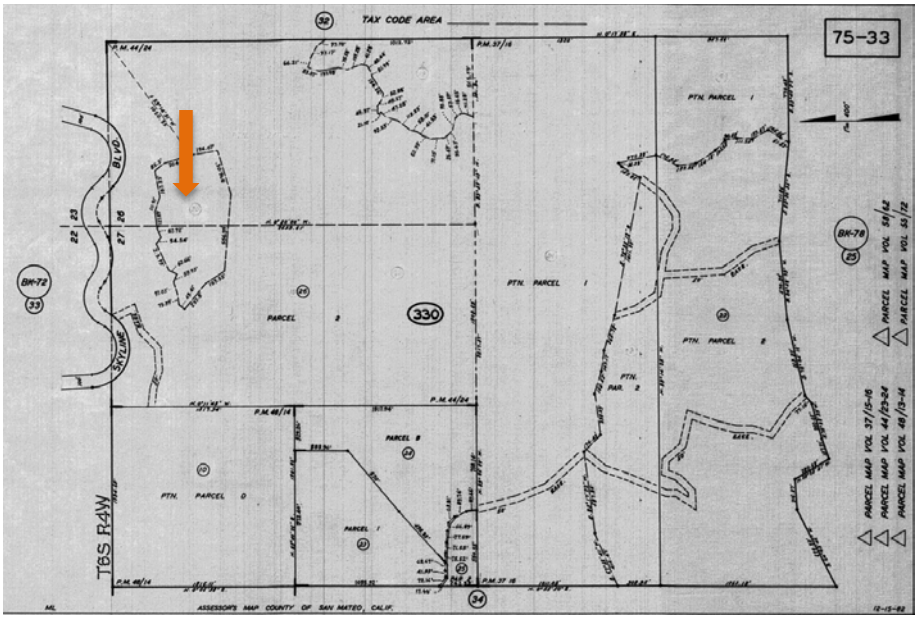


Figure 2. San Mateo County Assessor's Map. Approximate location of subject building marked by orange arrow. Source: San Mateo County Property Maps Portal. Edited by Page & Turnbull.

[1] There is currently not a formal address commonly associated with the Redwood Cabin.

The La Honda Creek Redwood Cabin is not currently listed in the National Register of Historic Places (National Register) or the California Register of Historical Resources (California Register). According to the District, the cabin has not been previously evaluated.

METHODOLOGY

This report provides a summary of the current historic status, a building description, historic context, and an evaluation for the La Honda Creek Redwood Cabin for listing in the California Register. Page & Turnbull prepared this report using research collected at various local repositories, including the Palo Alto Historical Association, San Mateo County History Museum Archives, as well as various online sources including Ancestry.com and the California Digital Newspaper Collection. Key primary sources consulted and cited in this report include San Mateo County Assessor-County Clerk-Recorder records, historical newspapers and photographs, local historic accounts, and USGS topographical maps. Due to its rural location in a heavily forested area, aerial photographs did not provide useful information regarding the Redwood Cabin and Sanborn maps appear to not have been drawn for this area.

All photographs in this report were taken by Page & Turnbull during a site visit on February 20, 2020, unless otherwise noted.

SUMMARY OF FINDINGS

This HRE finds that the La Honda Creek Redwood Cabin **appears to qualify as an eligible historic resource** for the purposes of review under the California Environmental Quality Act (CEQA).

II. EXISTING HISTORIC STATUS

The following section examines the national, state, and local historic status currently assigned to the La Honda Creek Redwood Cabin.

NATIONAL REGISTER OF HISTORIC PLACES

The National Register of Historic Places (National Register) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

The La Honda Creek Redwood Cabin is not currently listed in the National Register of Historic Places.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

The La Honda Creek Redwood Cabin is not currently listed in the California Register of Historical Resources.

CALIFORNIA HISTORICAL RESOURCE STATUS CODE

Properties listed or under review by the State of California Office of Historic Preservation are assigned a California Historical Resource Status Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register of Historic Places (National Register or NR) or California Register of Historical Resources (California Register or CR). Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register or are already listed in one or both of the registers. Properties assigned Status Codes of "3" or "4" appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of "5" have typically been determined to be locally significant or to have contextual importance. Properties with a Status Code of "6" are not eligible for listing in either register. Finally, a Status Code of "7" means that the resource has not been evaluated for the National Register or the California Register, or needs reevaluation.

The La Honda Creek Redwood Cabin is not listed in the California Office of Historic Preservation (OHP) Historic Property Data File for San Mateo County with a Status Code. The most recent update to the Historic Property Data File for San Mateo County that lists the Status Codes was in April 2012.

SAN MATEO COUNTY INVENTORY OF COUNTY HISTORIC RESOURCES

San Mateo County maintains an inventory of historic resources ("inventory") located in unincorporated San Mateo County. The 1986 San Mateo County General Plan state that:

> The inventory was compiled by the County Historic Resources Advisory Board and is based on earlier research don by a previous bod, the County Historic Sites Advisory Committee. The Inventory contains all resources that are designated National or State Historic Landmarks, and those listed in the National Register of Historic Places, the Historic American Building Survey, the Historic American Engineering Record, and the State Inventor of Historic Resources. It is by no means a 'final' list. It represents the beginnings of an inventory in the county and provides a basis for work on a more comprehensive survey to be completed later.[2]

However, the San Mateo County Historic Resources Inventory does not appear to have been updated since 1986. The inventory contains a list of 69 historic and archeological resources, and a list of 49 cultural resources "found within the San Mateo County Coastal Zone."[3] The inventory was adopted "by reference as part of the Historic Resources Element."[4]

The La Honda Creek Redwood Cabin is <u>not</u> included in the San Mateo County Inventory of County Historic Resources.

[2] "Chapter 5 – Historic and Archaeological Resources," in *San Mateo County General Plan*, prepared by Environmental Services Agency for the San Mateo County Planning & Building Division (November 1986), 5.6A, accessed online March 4, 2020, https://planning.smcgov.org/sites/planning.smcgov.org/files/SMC-GP%201986.pdf.
[3] Ibid, 5.25A.
[4] Ibid, 5.25A.

III. ARCHITECTURAL DESCRIPTION

EXTERIOR

The La Honda Creek Redwood Cabin is a large, side-gabled log cabin with a rectangular plan and an open wraparound plank deck **(Figure 3)**. The Redwood Cabin measures approximately 66 feet long by 30 feet wide. It is constructed solely of barked redwood logs of various sizes, with saddle notches that are set unconventionally **(Figure 4)**.[5] The east and west façades are each composed of four bays, some delineated by a vertical set log or opening.[6] The cabin and deck are supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The side-gabled roof has exposed rafter tails of various widths, with full barked logs set as decorative fascia, and is topped with wood shingles and five skylights **(Figure 12)**. There is also a central interior stone chimney that connects to an expansive interior fireplace, whose foundation is visible from beneath the cabin **(Figure 5)**. The cabin has wood sash multi-lite double casement windows of various sizes throughout all façades, hereafter referred to as "typical" windows. There are multiple paneled one-lite wood doors and wood multi-lite French doors throughout the north, east, and west façades.

The deck previously wrapped around all four façades. Two sections of the wraparound deck have rotted and collapsed, the north façade deck and the open deck that extended from the northwest corner. At the south façade and part of the west façade the deck is on grade, and elsewhere it is elevated by the large rustic wood posts. The deck has wood plank flooring and is supported by pressure treated timber. Horizontal rustic log railing is set between the large rustic support logs; the railing wraps around the entire primary (east) façade and part of the south façade. A U-shaped wood and stone staircase is located at the northeast corner and connects the driveway to deck. It features a lower flight made of large stones and an upper flight of redwood treads and railing.

Figure 3. Primary (east) façade, facing southwest from the circular driveway.

[5] According to the Basis of Design and Alternative Evaluation by Page & Turnbull, the cabin notches appear to be saddle notched yet "assembled with the notches facing up rather than down."
[6] The cabin is not oriented true north; for the purpose of this report, façade directions will be referred to as true cardinal directions. Façade directions are based on USGS topographical maps.

Figure 4. Close up of the cabin's typical saddle notching, facing northeast.

Figure 5. View of stone chimney foundation and on-grade cabin piers.

Primary (East) Façade

The primary (east) façade of the Redwood Cabin overlooks the driveway downhill. The façade is primarily characterized by the large rustic support piers and the wraparound deck **(Figure 5 and Figure 7)**. The façade has four sets of log bays, two of which are separated by vertically set logs. The main entry is centered on the façade and features a thick redwood burl door with ironwork and decorative ironwork hardware **(Figure 8 and Figure 9)**. A set of divided-lite wood French doors is situated at the south end of the east façade. There are five sets of typical windows along the entire façade **(Figure 10)**. The five skylights are evident on the east-facing roof gable and are aligned with window and door openings along the primary façade **(Figure 11)**.

Figure 6. View of terrain, site features, and primary façade (right) and partial view of the south façade (left), facing north.

Figure 7. Primary (east) façade, facing northwest. Driveway stone walls are in the forefront.

Figure 8. Front entry door and three typical wood casement windows, as seen from the interior, facing east.

Figure 9. Detail of front entry door and ironwork.

Figure 10. Typical wood sash casement window, as seen from the interior, facing southeast.

Figure 11. Typical aluminum skylight, as seen from the interior.

South Façade

The south façade of the Redwood Cabin is located on grade, at the top of the steep terrain. The driveway spur rises up the steep terrain and terminates next to the façade. There are three typical divided wood sash casement windows, one of which is shorter and is located at the east side **(Figure 12)**. Various mechanical and electrical hookups that lead to the interior are attached to the south façade. The wraparound porch is partially intact at the south façade. The railing is only evident at the southeast corner, where a safety sign and railings restrict access to the rest of the porch.

Figure 12. South elevation of the Redwood Cabin, facing northeast from top of hill.

Rear (West) Façade

The rear (west) façade of the Redwood Cabin is similar to the east façade. It has four bays, each with an entry door and an accompanying typical window **(Figure 13)**. Many of the windows and doorways are currently boarded with plywood or have a screen covering. The rear (west) section of the wraparound porch appears to be hidden under ground cover and has no railing **(Figure 14 and Figure 15)**.

Figure 13. View of west façade (left), and south façade (right), facing northeast.

Figure 14. Close-up of south end of west façade, facing southeast.

Figure 15. North half of west façade, facing north. Wraparound porch planks are located on grade, below ground cover.

North Façade

The north façade is set above grade, supported by large rustic wood posts, and the north section of the wraparound porch has been intentionally removed within the past year as a safety precaution **(Figure 16 and Figure 17).** The north façade has one partially glazed wood door, which is currently not accessible from the exterior as the porch has been removed. There are two typical windows, one of which has a storm window. Remnants of the rear porch projection are located at the northwest corner **(Figure 18)**. The main exterior U-shaped stone and wood staircase can be seen from the north façade **(Figure 19)**.

Figure 16. North façade, facing east. The wraparound porch along this façade and the porch projection (right) are no longer extant.

Figure 17. North façade, facing southwest from entry staircase.

Figure 18. Remnants of rear porch projection at the northwest façade.

Figure 19. Entry staircase at northeast corner of the Redwood Cabin, facing southeast.

SITE FEATURES

The Redwood Cabin is located in a heavily wooded rural area, within a section of the La Honda Creek Open Space Preserve that is currently not accessible to the general public. The building is accessed via a narrow dirt road that connects to Skyline Boulevard. The Redwood Cabin is situated on top of sloped terrain, overlooking a circular dirt driveway to the east that surrounds a small grove of redwood trees **(Figure 20)**. A spur splits from the southeast corner of the circular driveway, rises up the slope, and terminates next to the south façade of the cabin **(Figure 21).** The driveway is partially delineated by stone walls **(Figure 22)**. A stone staircase rises from the driveway to the east and connects to the wood deck of the Redwood Cabin **(Figure 23)**. Various remnants of the Redwood Cabin's recreational history are scattered throughout the property; these include a horseshoe pit, a stone barbeque pit, and a brick planter or pit **(Figure 24 through Figure 26)**.

Figure 20. View of the Redwood Cabin from the dirt driveway approach, facing west.

Figure 21. Spur, facing northeast towards the rest of the circular driveway and grove.

Figure 22. One of multiple stone walls that delineate the circular driveway.

Figure 23. View of the U-shaped entry staircase, facing north.

Figure 24. Remnants of horseshoe pit at rear of property.

Figure 25. Barbeque pit located at rear of property.

Figure 26. Brick planter or pit, located at rear of property.

IV. HISTORIC CONTEXT

The Redwood Cabin is located in unincorporated San Mateo County, within the Santa Cruz Mountains of the San Francisco Peninsula. The cabin is situated on the land that was historically occupied by the Ohlone peoples prior to Spanish and Mexican settlement. After Mexico gained independence from Spain in 1821, the land that encompasses present-day San Mateo County was parceled out in a number of land grants known as ranchos **(Figure 27)**. The Redwood Cabin is located in the former Rancho San Gregorio, which stretched from the coast of the Pacific Ocean up to the forested heights of the Santa Cruz Mountains.

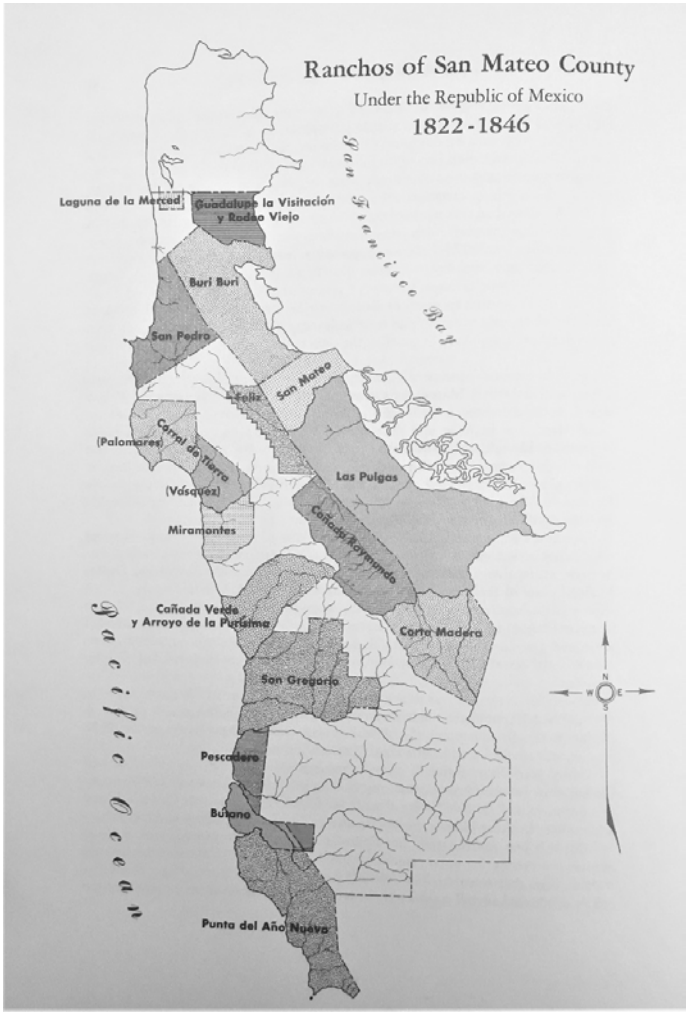


Figure 27. Map of ranchos, or land grants, in San Mateo County. Source: Frank M. Stanger, *South From San Francisco* (San Mateo, CA: San Mateo County Historical Association, 1963), 50.

The California Gold Rush and the rapid development of the city of San Francisco triggered a logging boom in the Santa Cruz Mountains. Home to old-growth redwoods and Douglas firs, lumber mills soon inundated the area and became the primary catalyst for the development of small towns in the hills along the peninsula, including nearby Woodside and La Honda that were established in the latter

half of the nineteenth century.[7] By 1853, 15 mills were operating on Kings Mountain, northwest of Woodside.[8]

EARLY RECREATION IN THE SANTA CRUZ MOUNTAINS

By the late 1800s and early 1900s, commercial timber logging in the Santa Cruz Mountains had subsided.[9] Meanwhile, beginning in the mid 1800s, the Santa Cruz Mountains were becoming a prime area for recreation, including camping, hunting, and fishing. The area's proximity to San Francisco and other Bay Area cities, paired with the rise of the personal automobile in the early twentieth century made the forests of the San Francisco Peninsula ideal locations for middle-class and wealthy families to vacation. Tourism became the livelihood of La Honda, a nearby former logging town located south of the subject Redwood Cabin. By the 1890s, several camps were located in the vicinity of La Honda, including the Cozy Nook Camp, the Bohemian Camp, Maplewood Camp, and Jonah Camp **(Figure 28)**.[10] Some camps had as many as 300 campers at a time. Lodges and hotels were also constructed during this period to accommodate non-campers and long-term visitors.

The area was accessed by several roads and logging trails that connected up through the San Francisco Peninsula. During the early 1920s, San Francisco, San Mateo, Santa Clara and Santa Cruz counties established a joint highway district in order to build Skyline Boulevard.[11] The route would become a major local route and would run along much of the spine of the San Francisco Peninsula.[12] By 1923, approximately 30 miles of the road had been completed between the city of San Francisco and La Honda Road, which formed a junction with Skyline Boulevard close to the Redwood Cabin.

Figure 28. Camp Boheme, ca. 1900, one of many camps located near La Honda. Photograph by Gus Zanoni. Source: Milton Cavalli Collection, San Mateo County Historical Association.

[7] Frank Stanger, *Sawmills in the Redwoods: Logging on the San Francisco Peninsula, 1849-1967,* (San Mateo: San Mateo County Historical Association, 1967), 77.
[8] Stacy Trevenon, *Kings Mountain* (Charleston, SC: Arcadia Publishing, 2008), 29.
[9] Bob Dougherty, *La Honda,* (Charleston, SC: Arcadia Publishing, 2007), 33.
[10] Ibid., 86.
[11] "Skyline: Santa Cruz Mountains Area Study," Department of Environmental Management, Planning and Development Division, San Mateo County, California, Hearing Draft July 1982, 1.2-1.4.
[12] Bob Dougherty, *La Honda*, 80.

One of the first subdivisions recorded along the Skyline Ridge was Redwood Park in 1908. Following the construction of Skyline Boulevard, the area was made more accessible to both visitors and year-round residents. The 1920s and 1930s brought the peak of residential development for the area, with new construction in unincorporated San Mateo County peaking in 1930.[13] Developments like Sky Londa (located directly east of the Redwood Cabin on Skyline Boulevard), Cuesta La Honda, the Middleton Tract, Sierra Morena Woods, Kings Mountain Park, and La Honda Park followed in the subsequent two decades, bringing hundreds of summer houses and cabins to the immediate area **(Figure 29 and Figure 30)**.[14] [15] A 1931 sales pamphlet describes the appeal of the area:

> La Honda Park, in the midst of miles of giant redwoods, a restful retreat for which you have been looking; not far from home, yet far enough to help you forget the troubles and cares of business. The most beautiful spot in San Mateo County. Pure spring water piped to camps and cabins. Picnicking, boating, camping, swimming. Parking fee 50 cents per car; camp tents $7.00 per week. Cabin lots, creek and woods, $400 up.[16]

Nestling Among Trees!

THIS COZY LITTLE summer home is typical of the cabins being built at Sky L'onda and Los Trancos Woods on the peninsula.

Sky-L'onda Cabins Are Designed to Fit Location

According to R. P. Watt, cabins at Sky-L'onda are being designed to artistically fit the location of the trees and view, and in this connection he announces that two are at present in the course of completion.

He added that they had always felt that the sameness of the cabins at the average tract are too monotonous, so they decided to build each cabin of a different and distinct design.

"Our experience," concluded Watt, "is proving our contention that many persons are interested in cabin life as an all year round abode, instead of only during the vacation period."

Figure 29. Advertisement for Sky Londa cabins, *San Francisco Examiner,* August 10, 1929.

[13]Historic Development Totals (Unincorporated San Mateo County), County of San Mateo Assessor's Standards Division records, page 88, on file at the San Mateo County Historical Association Archives.
[14] Bob Dougherty, *La Honda*, 33.
[15] "Skyline: Santa Cruz Mountains Area Study," 1.2-1.4.
[16] Bob Dougherty, *La Honda*, 99.

Despite their early popularity, most of the lodges and hotels along Skyline Ridge and in La Honda did not remain open past the Depression.[17] As other recreation areas became accessible, the popularity of La Honda and the Santa Cruz Mountains waned.[18] With the rise of the conservation movement in the 1970s, the remaining forests, coastal areas, and open spaces of the Santa Cruz Mountains were preserved. As a result, much of the surrounding area, including that of the subject property, has been incorporated into local and state parks and open space preserves. Today, the area serves yet again as a popular day recreation area and the occasional permanent residence or vacation home.

Figure 30. Sky Londa advertisement, *San Francisco Examiner,* September 14, 1929.

[17] Bob Dougherty, *La Honda*, 99.
[18] Ibid., 88.

V. PROJECT SITE HISTORY

SITE DEVELOPMENT

The Redwood Cabin is situated on land within the boundary of the former Rancho San Gregorio and is near the site of former lumber mills, including Harrington Mill **(Figure 28 and Figure 29)**. In 1894, the land in which the cabin would be built was owned by F.M.L. Peters and J. Kubler **(Figure 30)**. The land transferred hands, and in 1909 was owned by J.F. Peters, M.T. Maison, C.H. Souther, and J. Palmer with nearby lots owned by the Virginia Timber & Lumber Company **(Figure 31)**. In 1927, the land was owned by William O. Harabin and W.B. Allen and a portion of Skyline Boulevard had been constructed through said land **(Figure 32)**. According to District records, the Redwood Cabin was constructed by W.B. Allen from 1927-1928. By the early 1940s, Skyline Boulevard had been fully constructed along the Peninsula and a dirt road extended south, partially along the footprint of the road that now connects to the cabin **(Figure 33 and Figure 34)**. The development of the Sky Londa neighborhood, which had been underway for a decade, is also evident. Additionally, the road that connected the Redwood Cabin to Skyline Boulevard was named Allen Road at this time and wrapped south and then westward toward Bear Gulch Road, connecting to Allen Lookout and the former Dyer Ranch and White Barn **(Figure 35)**. It was not until 1961 that the subject building appeared on a USGS topographic map. During this time the Sky Londa development had grown and the section of Allen Road that connected the cabin to Dyer Ranch and the White Barn was converted to a "Jeep trail," or in other words, an unimproved dirt road **(Figure 36)**. A 1991 USGS topographic map shows the cabin on the access road to Skyline Boulevard and a re-configured Allen Road **(Figure 37)**.

An appraisal report from the San Mateo County Assessor's Office, dated June 10, 1953 and July 21, 1954, is currently the earliest and only known official record of the Redwood Cabin on file at the County of San Mateo. The record notes a 66'x30' rectangular building labeled "lodge" with a wraparound open plank deck and a larger rear deck **(Appendix B and Figure 38)**.[19] The lodge is described as a 6-room building with one bathroom and redwood log walls; light shake roof; exposed rustic along rake of rafters; mud sills and large rustic posts; pine floor; large natural stone fireplace; and deck pillars set on concrete piers.

The date of construction is listed as "est. 1920" on the appraisal report. Three other buildings accompany the lodge on the appraisal report and are noted as being "removed to parcel #075-330-010, dated 1/17/1966." The buildings appear to have been situated around the circular driveway and included two garages and a caretaker's cabin with an open deck at the front. Both garages are noted as being constructed in 1953. The caretaker's cabin and two garages are no longer extant on the site, and it is unknown whether they were demolished or relocated.

The following list details known dates and details on the site history of the La Honda Creek Redwood Cabin:

[19] San Mateo County Assessor's Office Property Appraisal Report for parcel number (APN) 075-330-220, a former parcel number that was previously consolidated into the current number.

Table 1. Site Development

Date(s)	Site History	Source
Ca. 1920s	The Redwood Cabin is constructed on former timber land near La Honda Creek, presumably as a recreation cabin for W.B. Allen and his family.	1953-1954 San Mateo County Assessor Appraisal Record
Ca. 1953	Redwood Cabin – Roof is replaced with composite shingles, new deck underpinning and pins. Garage 1 and Garage 2 – Constructed Caretaker's Cabin – Constructed at an unknown date. Two rooms added in 1953.	1953-1954 San Mateo County Assessor Appraisal Record
Ca. 1/17/1966	Garage 1, Garage 2, and the Caretaker's Cabin are "removed to parcel #075-330-010."	1953-1954 San Mateo County Assessor Appraisal Record
Unknown	Aluminum skylights are added. It is unclear whether or not they replaced original skylights or were additions.	

Figure 31. 1868 map of approximate future location of the Redwood Cabin, marked with orange arrow. Source: 1868 Official Map of the County of San Mateo, California, on file at the San Mateo County History Museum Archives. Edited by Page & Turnbull.

Figure 32. 1868 view of La Honda Creek area. Approximate future location of cabin marked with orange arrow. Source: 1868 Official Map of the County of San Mateo, California, on file at the San Mateo County History Museum Archives. Edited by Page & Turnbull.

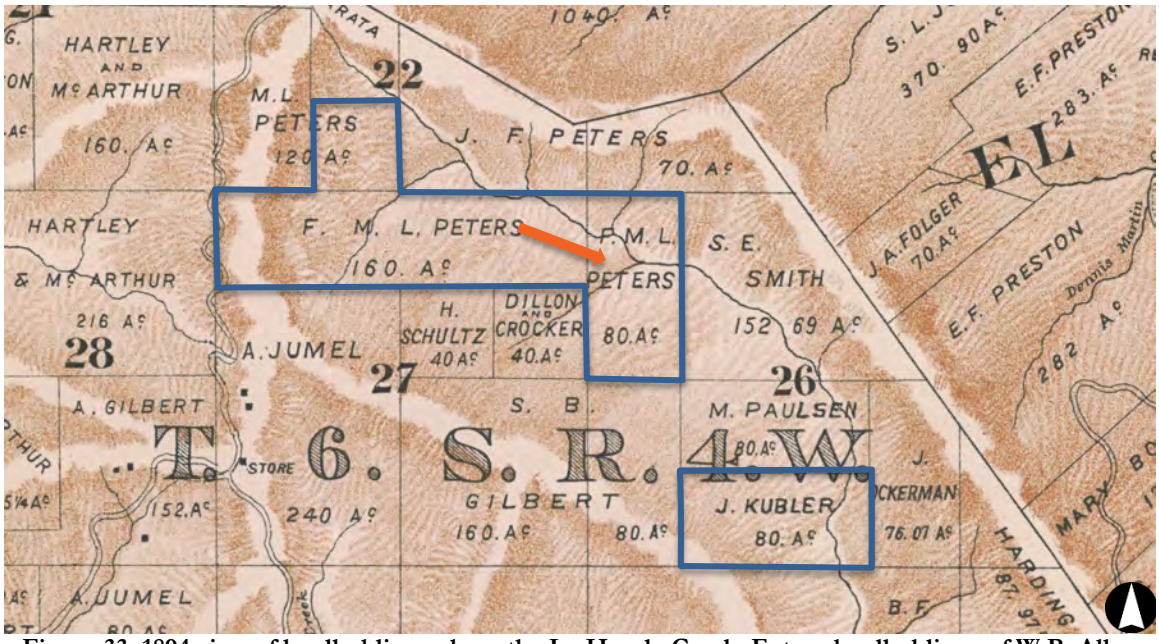


Figure 33. 1894 view of landholdings along the La Honda Creek. Future landholdings of W.B. Allen and William O. Horabin are outlined in blue. Approximate future location of cabin marked by orange arrow. Davenport Bromfield, County Surveyor, Official Map of San Mateo County, California, 1894. Source: Stanford Libraries. Edited by Page & Turnbull.

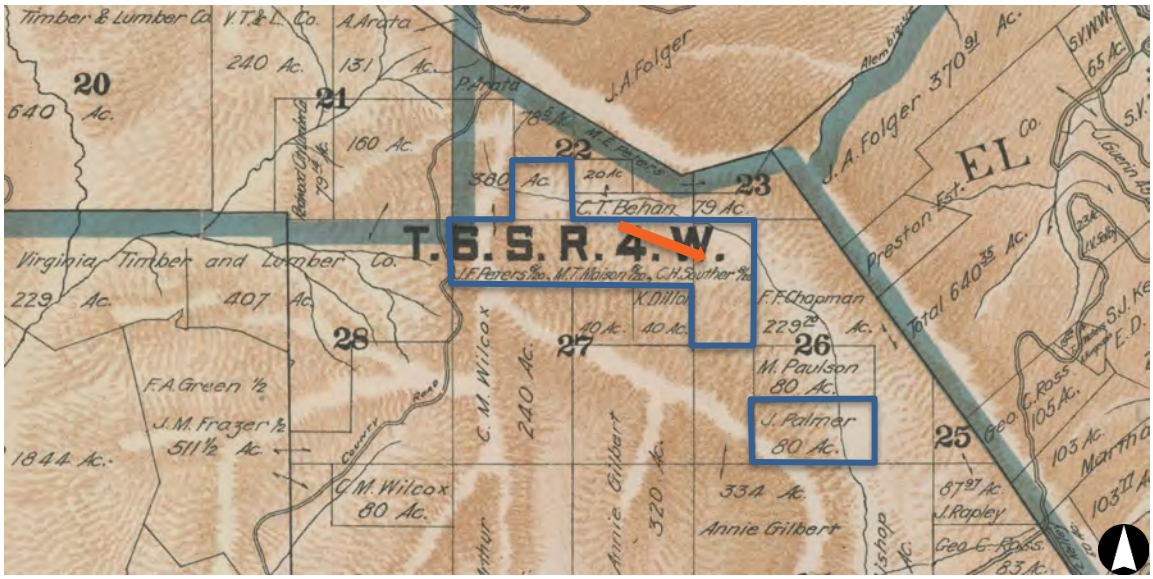


Figure 34. 1909 view of private and timber landholdings along the La Honda Creek. Future landholdings of W.B. Allen and William O. Horabin are outlined in blue. Approximate future location of cabin marked by orange arrow. J.V. Neumann, County Surveyor, Official Map of San Mateo County, California, 1909. Source: Stanford Libraries. Edited by Page & Turnbull.

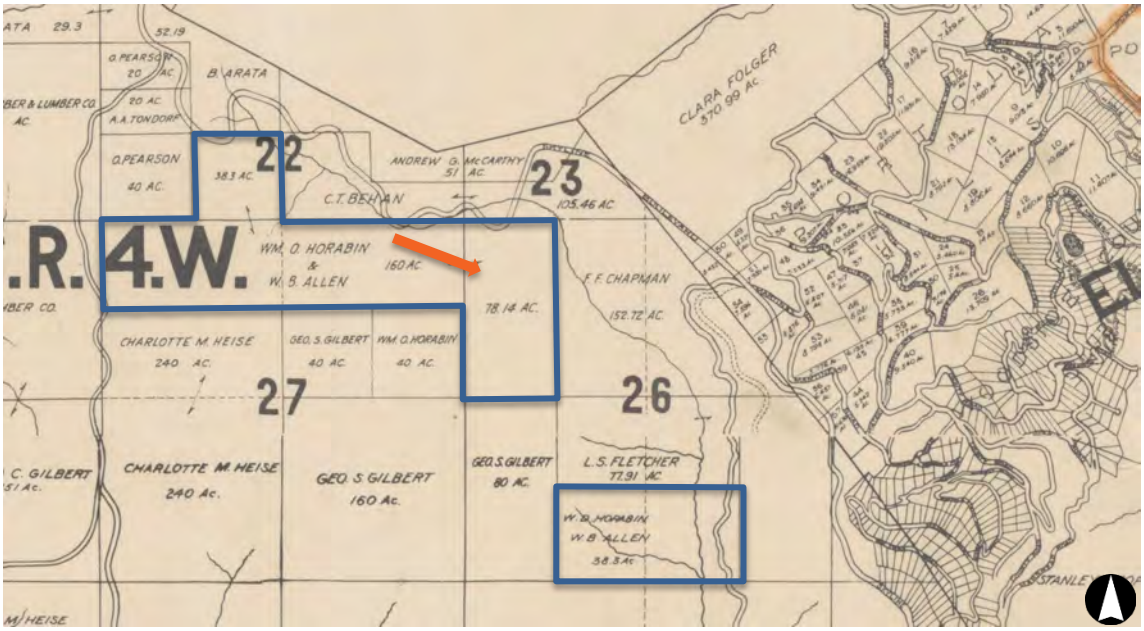


Figure 35. 1927 view of W.B. Allen and William O. Horabin's land holdings, outlined in blue. Approximate location of cabin is marked by orange arrow. Woodside Country and Portola Woods, two developments, can be seen to east. George A. Kneese, County Surveyor, Official Map of San Mateo County, California, 1927. Source: Stanford Libraries. Edited by Page & Turnbull.

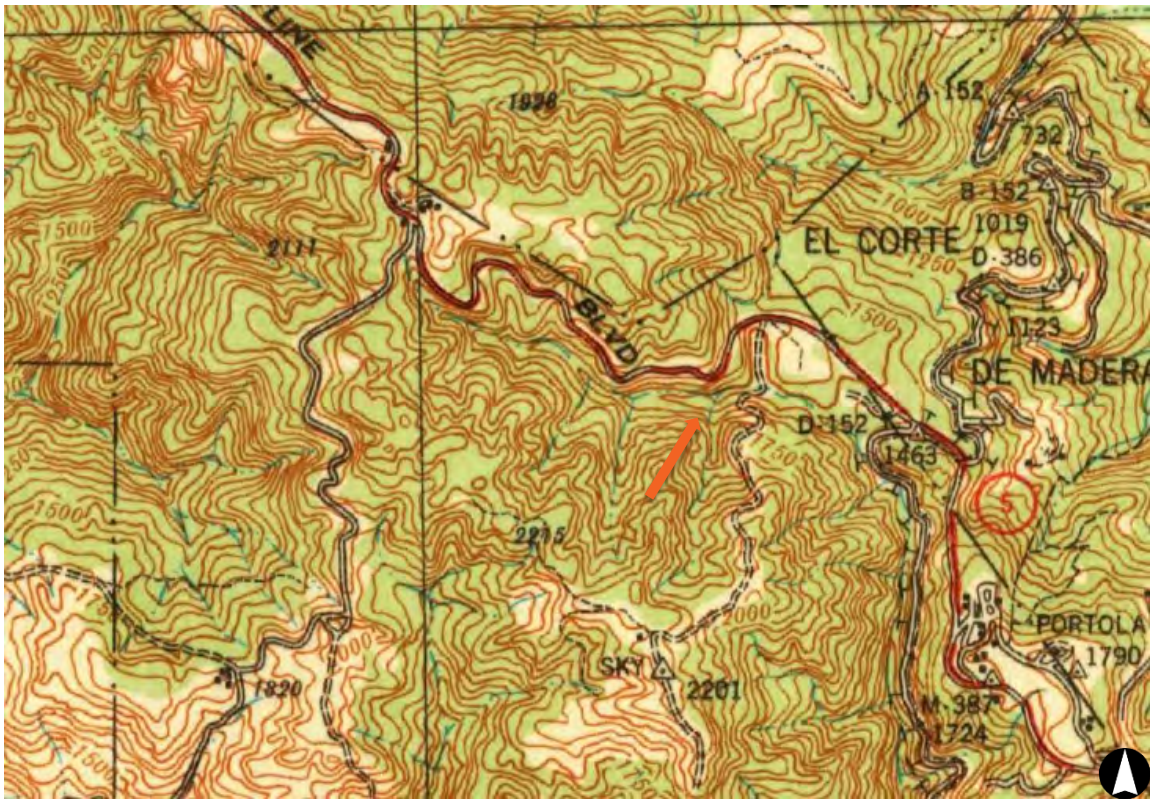


Figure 36. 1940 USGS Topographic Map of Half Moon Bay area. Approximate location of subject property marked by orange arrow. Source: USGS TopoView.

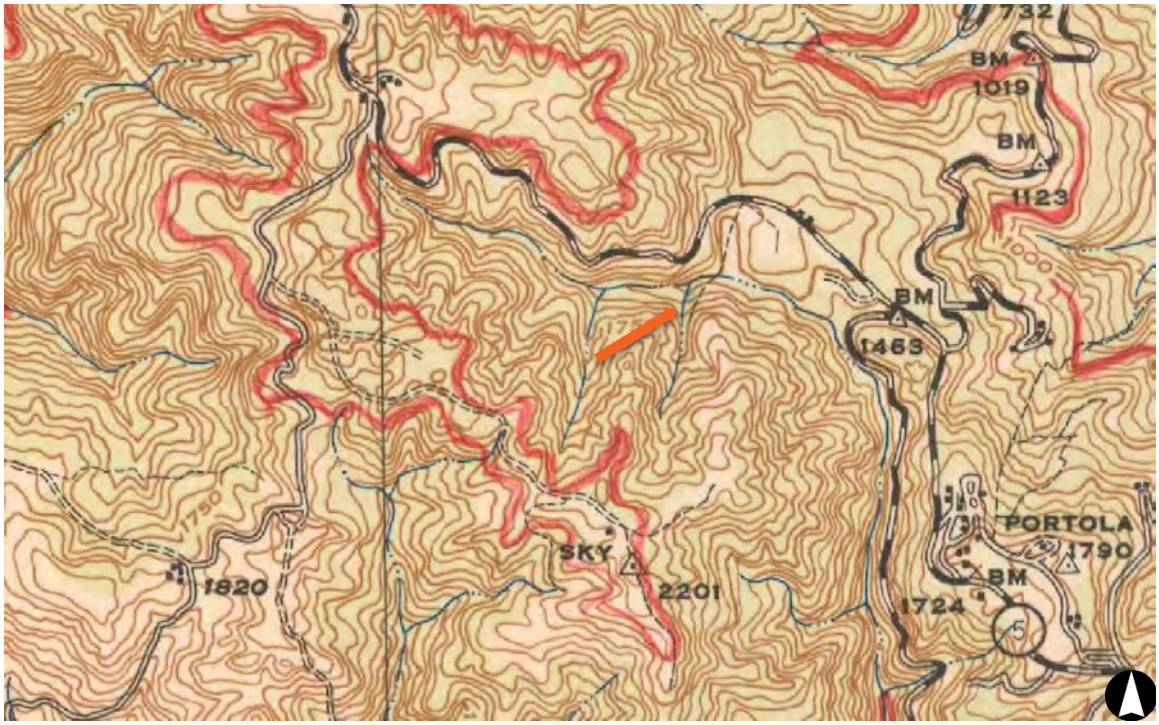


Figure 37. 1943 USGS Topographic Map of Half Moon Bay area. Approximate location of subject property marked by orange arrow. Source: USGS TopoView.

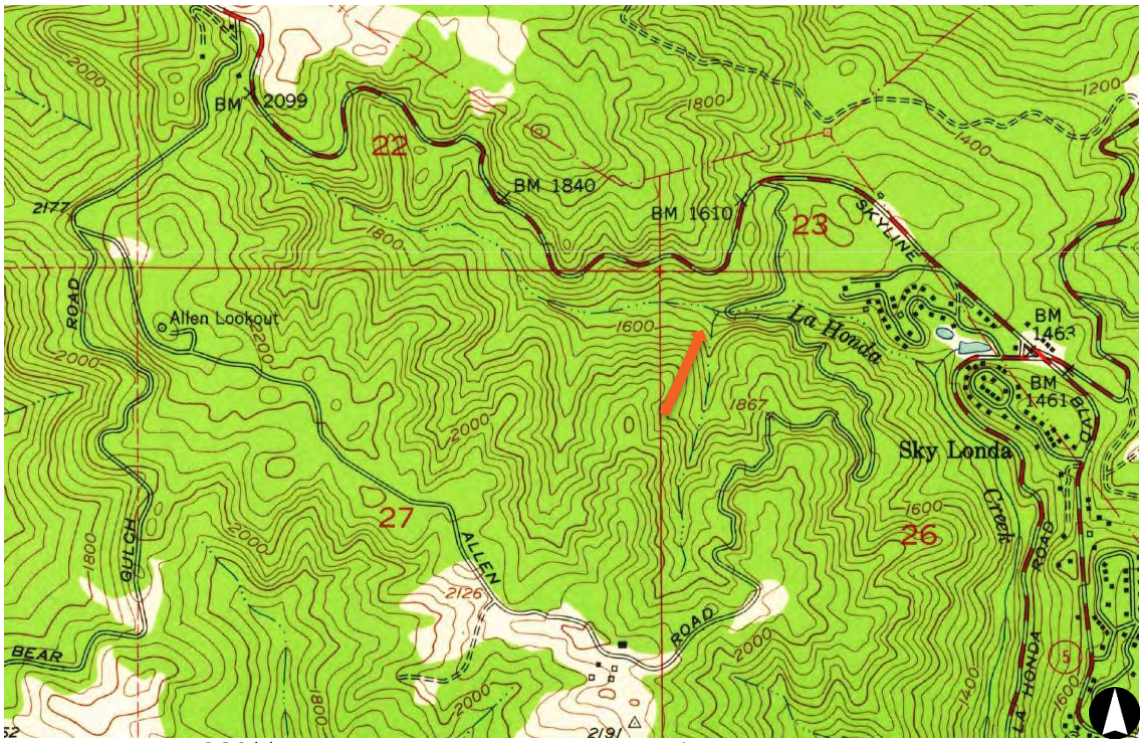


Figure 38. 1953 USGS Topographic Map of Woodside area. Approximate location of subject property marked by orange arrow. Source: USGS TopoView.

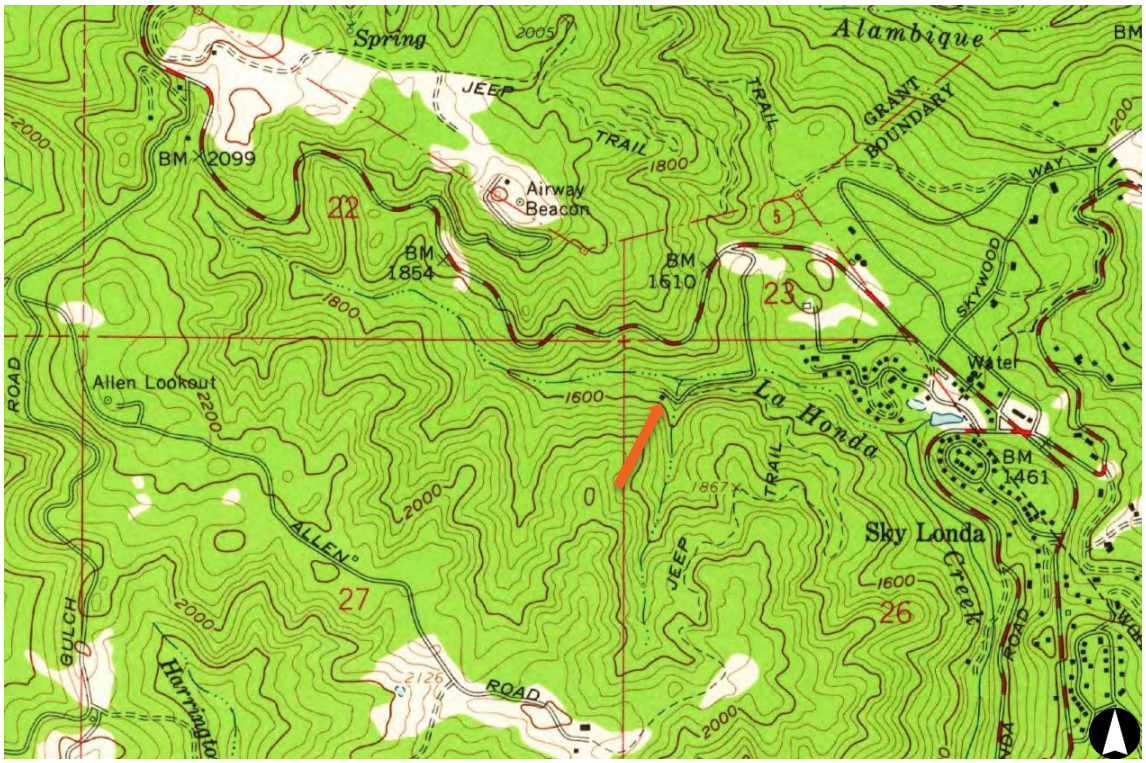


Figure 39. 1961 USGS Topographic Map of Woodside area. Location of subject property marked by orange arrow. Source: USGS TopoView.

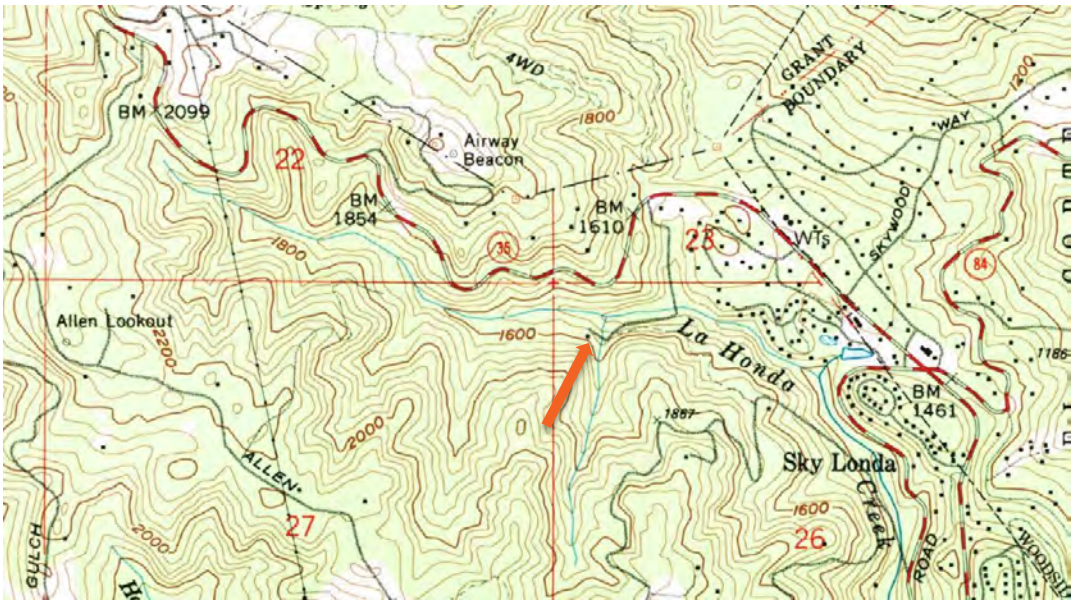


Figure 40. 1991 USGS Topographic Map of Woodside area. Location of subject property marked by orange arrow. Source: USGS TopoView.

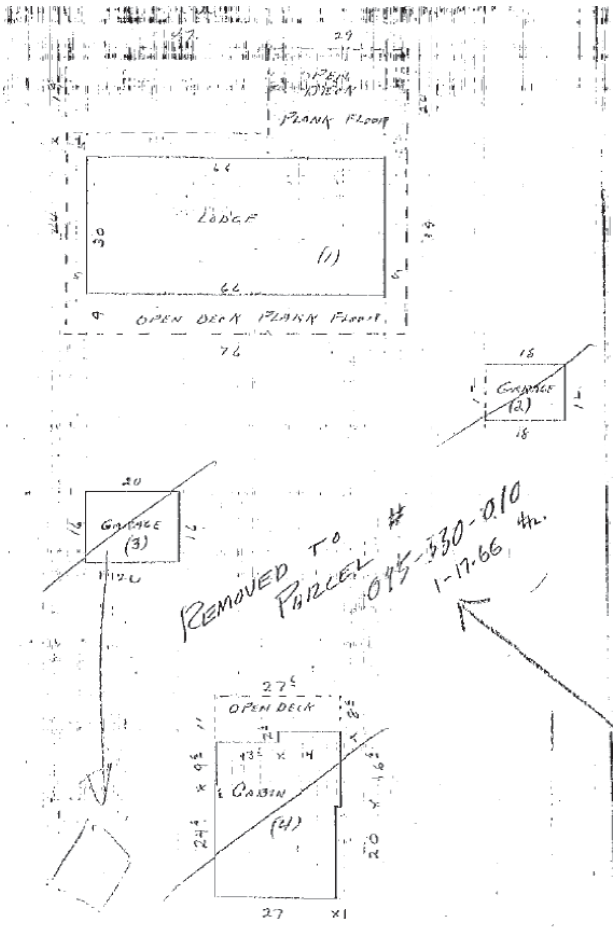


Figure 41. 1953-1954 site drawing from appraisal report of the La Honda Creek Redwood Cabin. Source: San Mateo County Assessor's Office.

SELECT BUILDER, OWNER, AND OCCUPANT HISTORY

The Redwood Cabin was constructed by W. B. Allen in 1927-28 as a family retreat:

> Allen settled in Palo Alto in 1903 and owned and operated Palo Alto Hardware. By 1918, he purchased 400 acres in La Honda including the subject parcel. With the assistance of two Norwegian laborers, Allen constructed the lodge on a bedrock foundation using local timber pieced together without nails.[20] In addition to the lodge, Allen imported stones from the coast to construct walls, stairs, and numerous stone-lined hiking trails throughout the property. In the 1930s, the California Conservation Corps assisted with the improvement of some roads near the property. The Allen family as well as local groups, including the YMCA and the rotary club, used the lodge as a summer retreat for decades. The property remained in the Allen (Paulin) family until 1988 when the MROSD purchased it.[21]

It is unclear who designed the building or definitively aided W.B. Allen with the construction of the cabin. Lee Erickson, a Finnish immigrant, and his sons were known local builders of rustic log cabins and could be responsible for the construction of the cabin. Furthermore, a cabin constructed by Erickson in the 1920s with substantial similarities is extant. According to George Bordi, a lifelong La Honda farmer and resident, Lee Erickson and his two sons helped his grandfather, Antone Bordi, construct a rectangular log cabin on the Bordi Farm near La Honda in the 1920s.[22] It is constructed of barked redwood set in a saddle notch configuration with angled corners on a minimal foundation, similar to the Redwood Cabin **(Figure 39 and Figure 40)**. The cabin is front gabled with a small porch and multi-paned casement windows. The front door was broad-axed out of an old redwood burl, in similar fashion to the unique front door of the Redwood Cabin. The Bordi Cabin measures approximately 66 feet long by 30 feet wide, the same dimensions of the subject building.[23] Both men are discussed in detail in the following biography sections.

Table 2. Owner and Occupancy of the Redwood Cabin

Date	Owner(s)	Occupant(s)
Ca. 1927-1964	W.B. Allen, Winifred Allen	Allen Family
Ca. 1964-1988	Allen & Paulin Family	Allen & Paulin Family
1988-present	Midpeninsula Regional Open Space District	n/a

[20] The quoted context is based on oral histories; some details, such as that of specifically Norwegian laborers, may be incorrect.
[21] Jones & Stokes, "Final Biological and Cultural Resources Technical Memo and Opportunities and Constraints Analysis," 2004, 45; Midpeninsula Regional Open Space District. 2002. Meeting Notes, June 26, 2002, R-02-79; Joan Paulin, personal communication, October 4, 2004; La Honda Creek Open Space Preserve Master Plan, Midpeninsula Regional Open Space District, August 2012.
[22] The Bordi Farm is currently located at 1355 Portola State Park Road in La Honda, California.
[23] Google Earth, 2020.

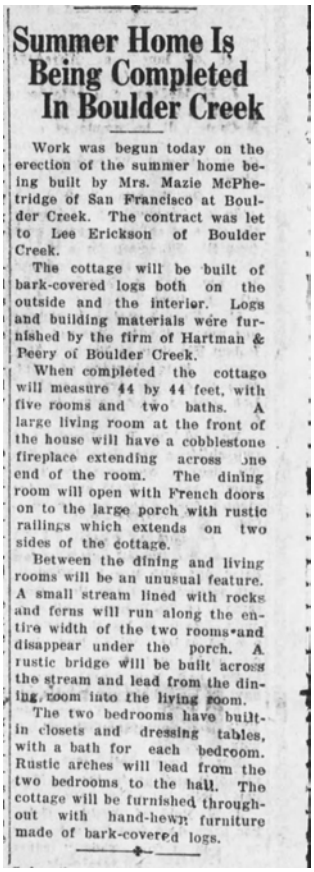
Figure 42. The Bordi Cabin, ca. 2011. The Bordi Cabin has many similar attributes to the Redwood Cabin. Source: George and Mary Bordi, "Meet George and Mary Bordi," *The La Honda Voice*, January 29, 2011.

Figure 43. Antone Bordi, Lee Erickson and sons constructing the Bordi Cabin, ca. 1920s. Source: George and Mary Bordi, "Meet George and Mary Bordi," *The La Honda Voice*, January 29, 2011.

Builder Biography: Lee Erickson and Sons

Leander "Lee" Erickson (1864-1938) was a Finnish carpenter and the presumptive builder of the Redwood Cabin. Erickson arrived in the U.S. circa 1882. After marrying Ida Sofia Hendrikson (1865-1948) in Michigan, the couple moved to the Santa Cruz area where they would remain for the rest of their lives. The two settled on Big Basin Road in the rural community of Boulder Creek and had four children, Lydia (1894-1955), Robert (1895-1962), Jennie (1897 – ca. 1907), and Rugner (1903-1969).

Erickson was a skilled axe-ma, working at nearby lumber camps, and was a carpenter and stonemason.[24] In later years, sons Robert ("Rupert") and Rugner would join their father on projects in La Honda and Boulder Creek.[25] A 1931 *Santa Cruz Evening News* article details a summer home built by Erickson with similar components to the Redwood Cabin, such as "bark-covered logs on the outside and the interior," "a cobblestone fireplace," and "large porch with rustic railings" **(Figure 41)**. According to George Bordi, a lifelong La Honda farmer and resident, this similar log cabin was constructed in the 1920s by his grandfather, Antone Bordi, with the help of Lee Erickson and his two sons. The front door was broad-axed out of an old redwood burl, in similar fashion to the unique front door of the Redwood Cabin. Bordi claims that Erickson went on to build several cabins in the Middleton Tract, an early development of year-round and summer cabins and residences located southwest of the town of La Honda.[26]



Summer Home Is Being Completed In Boulder Creek

Work was begun today on the erection of the summer home being built by Mrs. Mazie McPhetridge of San Francisco at Boulder Creek. The contract was let to Lee Erickson of Boulder Creek.

The cottage will be built of bark-covered logs both on the outside and the interior. Logs and building materials were furnished by the firm of Hartman & Peery of Boulder Creek.

When completed the cottage will measure 44 by 44 feet, with five rooms and two baths. A large living room at the front of the house will have a cobblestone fireplace extending across one end of the room. The dining room will open with French doors on to the large porch with rustic railings which extends on two sides of the cottage.

Between the dining and living rooms will be an unusual feature. A small stream lined with rocks and ferns will run along the entire width of the two rooms and disappear under the porch. A rustic bridge will be built across the stream and lead from the dining room into the living room.

The two bedrooms have built-in closets and dressing tables, with a bath for each bedroom. Rustic arches will lead from the two bedrooms to the hall. The cottage will be furnished throughout with hand-hewn furniture made of bark-covered logs.

Figure 44. *Santa Cruz Evening News,* June 20, 1931. Newspaper clipping detailing summer home constructed by Lee Erickson in nearby Boulder Creek.

[24] 1910 and 1920 U.S. Federal Census Records accessed via Ancestry.com; "Boulder Creek," *Santa Cruz Sentinel*, March 1, 1911; "Leander Erickson Funeral Services Set For Monday," *Santa Cruz Evening News*, May 14, 1938.
[25] *Santa Cruz Evening News*, October 8, 1927; *Santa Cruz Evening News*, October 13, 1927.
[26] *County of San Mateo, Master Index Map, Revision 2, June 1985*, (Redwood City, California: County of San Mateo Assessor), 40-41.

Owner Biography: W.B. Allen

William Benjamin Allen (1878-1964) was born to a prominent Palo Alto pioneer family **(Figure 42)**. In 1903 he opened the Palo Alto Hardware Company at the corner of University Avenue and Bryant Street in Palo Alto. Allen would own the store until his retirement in 1951, and over the course of 48 years would operate one of Palo Alto's most prominent businesses.[27]

W. B. Allen married Winifred Alecia Jeffreys (1878-1976) in 1901, and they had two children, Lloyd (1902-1979) and Edith (1906-1995). W. B. and Lloyd were both known outdoorsmen, skilled in hunting and fishing, and traveled throughout the state and the Santa Cruz Mountains in their outdoor pursuits **(Figure 43)**. Lloyd would later go on to own and operate a sporting goods store in Sacramento.[28] An excerpt from the 1952 *Palo Alto Community Book* mentions W. B. Allen's cabin, presumed to be the subject La Honda Redwood Cabin, following Allen's retirement: "Ben Allen has always been an ardent hunter and fisherman an in later years his main hobby has been work about his cabin in the redwoods."[29]

Figure 45. W.B. Allen, ca. 1920s. Photograph by Newton Studios, Palo Alto, California. Source: Palo Alto Historical Association.

[27] "New apostle called to serve LDS Church," *Ukiah Daily Journal*, January 27, 1976.
[28] Guy C. Miller and Hugh Enochs, eds. *Palo Alto Community Book* (Palo Alto: Arthur H. Cawston, 1952), 219.
[29] Ibid., 220.

Lloyd Allen Boasts of a Very Successful Record With Fishing Rod and Gun

Lloyd Allen of Palo Alto.

This is the forty-seventh of a series of articles on outdoor sportsmen of Northern California who rate high as anglers and hunters. Others will follow shortly.

PALO ALTO, Jan. 13.—Few veteran California sportsmen can boast of as excellent a record of success with rod and gun as that of Lloyd Allen, son of W. B. Allen, Palo Alto hardware dealer, himself an expert in all things pertaining to the outdoors.

To young Allen has fallen the honor of bringing down one of the largest muletail deer shot in the State this season—a giant eight-point buck, weighing 350 pounds dressed. Allen got this deer in Modoc county.

Ever since he was 15 years old—and he is 21 now—Allen has bagged the limit of deer. He has hunted all over the Mount Hamilton country, the Santa Cruz mountains and has spent much of his time on vacations in the seldom-visited regions of the Yosemite back country.

This summer he toured over 2700 miles up and down the State, hunting and fishing as he went. On this trip, while in Modoc county, he bagged the big muletail.

Allen attributes his unusual success in hunting and fishing to an inherited love of the outdoors. Each year the older Allen and his son have gone off hunting together, and the larder of the Allen home in Palo Alto is always being replenished with fish and game.

Figure 46. Lloyd Allen featured in the *San Francisco Chronicle*, January 14, 1923.

VI. EVALUATION

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

In order for a property to be eligible for listing in the California Register, it must be found significant under one or more of the following criteria.

- *Criterion 1 (Events)*: Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

- *Criterion 2 (Persons)*: Resources that are associated with the lives of persons important to local, California, or national history.

- *Criterion 3 (Architecture)*: Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.

- *Criterion 4 (Information Potential)*: Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

The following section examines the eligibility of the La Honda Creek Redwood Cabin for individual listing in the California Register.

Criterion 1 (Events)

The La Honda Creek Redwood Cabin does appear to be significant under Criterion 1 (Events) as a property associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States. According to various accounts, the Redwood Cabin was constructed in the 1927-1928 by Palo Alto businessman W. B. Allen with the aid of labormen. The cabin was constructed at a peak of outdoor recreation in the Santa Cruz Mountains. The Redwood Cabin's construction appears representative of a broader pattern of recreational development in the Santa Cruz Mountains following the San Francisco Peninsula's logging boom, specifically at a time when recreation shifted from camps to cabins and early subdivisions. While the cabin does not appear to be one of the earliest recreational cabins (from the late 1800s and early 1900s), it appears to be one of the last remaining ones intact from the transition era to permanent structures. Most of the original lodges and hotels appear nonextant. Due to the rural nature of the area, not all nearby properties were surveyed; however, those that were appeared not age eligible or altered. The Redwood Cabin appears to be a rare building typology and retains its original rural setting. Therefore, the property does appear to be individually eligible for listing under Criterion 1 with its period of significance, 1927-1928, the years of its construction.

Criterion 2 (Persons)

The La Honda Creek Redwood Cabin does not appear to be significant under Criterion 2 (Persons) for its association with the lives of persons important to local, state, or national history. W. B. Allen, original and longtime owner of the cabin, was a well-known Palo Alto businessman. From 1903 to 1951, Allen owned and operated the Palo Alto Hardware Company, a prominent business within Palo Alto and San Mateo County. Allen also came from a renowned local pioneer family, and he and his wife Winifred were active in the Palo Alto community. While W.B. Allen appears to be significant locally in Palo Alto, the Redwood Cabin was not the most significant property tied to Allen and instead, served as a secondary residence. While no longer extant, the Palo Alto Hardware Company formerly located at the corner of University Avenue and Bryant Street in Palo Alto was more directly connected to W. B. Allen and his achievements. His longtime residence, 909 Hamilton Avenue in Palo Alto, is extant and would be a more ideal candidate. Therefore, the La Honda Creek Redwood Cabin does not appear to be individually eligible for listing under Criterion 2.

Criterion 3 (Architecture)

The La Honda Creek Redwood Cabin does appear to be individually eligible for listing in the California Register under Criterion 3 (Architecture) as a building that embodies the distinctive characteristics of a type, period, region, or method of construction, or that represents the work of a master or possesses high artistic values. The Redwood Cabin is a large, one-story side-gabled rectangular log cabin with an open wraparound plank deck. It is constructed of barked redwood logs of various sizes, with saddle notches that are set unconventionally and upside down. The cabin and deck are supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The cabin features a large centered stone chimney that connects to an expansive interior fireplace, its foundation visible from beneath the cabin. Its openings consist of what appear to be original wood sash multi-lite windows, a large, handmade redwood door with iron details, and paneled one-lite wood doors and wood multi-lite French doors throughout. It is unclear who designed the cabin, and if it was the result of an architect or kit plan. According to district records, it was constructed in 1927-1928 by businessman W.B. Allen with the help of two laborers. Research suggests that the building could have been constructed by Finnish builder Lee Erickson, a local builder of similar cabins. W.B. Allen and Lee Erickson do not appear to be master architects or builders. Much of the cabin appears to be original. The building clearly utilizes local materials, and while its construction method appears slightly "primitive," it appears indicative of the rural, woodsy character of the area and the period in which the region was transitioning to more permanent recreational structures. As such, the Redwood Cabin does appear to be a unique property type or architectural style such that it would rise to the level of individual significance within a local context. In conclusion, the La Honda Creek Redwood Cabin does appear to be individually eligible for listing under Criterion 3.

Criterion 4 (Information Potential)

The "potential to yield information important to the prehistory or history of California" typically relates to archeological resources, rather than built resources. When California Register Criterion 4 (Information Potential) does relate to built resources, it is relevant for cases when the building itself is the principal source of important construction-related information. The analysis of the Redwood Cabin for eligibility under Criterion 4 is beyond the scope of this report.

INTEGRITY

In order to qualify for listing in any local, state, or national historic register, a property or landscape must possess significance under at least one evaluative criterion as described above and retain integrity. Integrity is defined by the California Office of Historic Preservation as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed

during the resource's period of significance," or more simply defined by the National Park Service as "the ability of a property to convey its significance."[30]

Page & Turnbull uses established integrity standards outlined by the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. Seven variables, or aspects, that define integrity are used to evaluate a resource's integrity—location, setting, design, materials, workmanship, feeling, and association. A property must possess most or all of these aspects in order to retain overall integrity. If a property does not retain integrity, it can no longer convey its significance and is therefore not eligible for listing in local, state, or national registers.

The seven aspects that define integrity are defined as follows:

> Location is the place where the historic property was constructed or the place where the historic event occurred;
>
> Setting addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building(s);
>
> Design is the combination of elements that create the form, plan, space, structure, and style of the property;
>
> Materials refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the historic property;
>
> Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
>
> Feeling is the property's expression of the aesthetic or historic sense of a particular period of time; and
>
> Association is the direct link between an important historic event or person and the historic property.

Location

The La Honda Creek Redwood Cabin retains integrity of location as it has remained in its original location since construction.

Setting

The La Honda Creek Redwood Cabin retains integrity of setting. The cabin remains in a rural setting, set within a heavily forested area. The immediate area remains remarkably undeveloped, even with a more heavily trafficked Skyline Boulevard nearby. The cabin retains its subtle landscaping features including the stone walls and circular dirt driveway. It is also still accessed by a semi-rural dirt road. The general area also retains similar use, functioning as a day-use recreational area and year-round home.

[30] California Office of Historic Preservation, *Technical Assistance Series No. 7: How to Nominate a Resource to the California Register of Historical Resources* (Sacramento: California Office of State Publishing, September 4, 2001) 11; and U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: National Park Service, 1995) 44.

Design

The La Honda Creek Redwood Cabin retains integrity of design. It does not appear to have any major design alterations or additions. The building retains its large, rectangular footprint, rustic log construction, doors and casement windows, stone and wood staircase, stone site features, side-gable roof, and log fascia. The aluminum skylights are likely alterations; however, the original design remains legible. The wraparound porch appears predominantly intact, although the rear porch projection is no longer standing, and the building is still able to convey its rustic style.

Materials

The La Honda Creek Redwood Cabin retains integrity of materials. It does not appear to have any major alterations and many original elements remain, including the barked redwood logs, plank decking, rustic deck posts and railing, stone staircase and site elements, stone chimney, wood doors and windows. The wraparound porch is mostly intact, except for the northern porch and northwest projecting deck. The porch at the primary façade remains intact, as does the entry staircase. Most material components appear to remain from the building's initial construction.

Workmanship

The La Honda Creek Redwood Cabin retains integrity of workmanship. The building remains representative of workmanship common to rural recreation cabins constructed in the early twentieth century. The construction and design of the cabin reflect the workmanship of a local builder, such as the rustic log construction, saddle notches, vertically set log posts, and stone chimney. The building's retention of such features is evidence of remaining workmanship.

Feeling

The La Honda Creek Redwood Cabin retains integrity of feeling as a recreational cabin constructed in a rural setting in the 1920s, during the rise of the automobile era and recreation boom in the country. The subject building continues to express its historic aesthetic character, as evidenced by its retention of a rural setting away from development and within a heavily forested area, and its historic materials and rustic workmanship associated with its era of construction.

Association

The La Honda Creek Redwood Cabin retains integrity of association. Originally constructed as a recreational cabin for W. B. Allen and his family in the 1920s, the cabin no longer operates as such and is currently vacant. While the cabin no longer serves as a retreat for the Allen family, it does remain in a recreational setting. Acquired by the Midpeninsula Regional Open Space District, the property continues to be surrounded by a recreational area and away from any development. The property continues to communicate its rural setting. Overall, the cabin retains sufficient enough integrity of association.

Overall Integrity

The La Honda Creek Redwood Cabin retains sufficient historic integrity to be eligible for listing in the California Register for Historical Resources as an individual resource.

CHARACTER-DEFINING FEATURES OF THE LA HONDA CREEK REDWOOD CABIN

For a property to be eligible for national, state or local designation under one of the significance criteria, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. To be eligible, a property must clearly retain enough of those characteristics, and these features must also retain a sufficient degree of integrity. Character-

defining features can be expressed in terms of form, proportion, structure, plan, style, materials, and ornamentation.

The following character-defining features have been identified for the La Honda Creek Redwood Cabin and relate to the building's period of significance, its date of construction, 1927-1928:[31]

- Siting on steep topography in a grove of redwood trees
- One-story, rectangular massing and open character under the building
- Side-gable roof with exposed rafter tails and barked log fascia
- Barked log construction with saddle notched log corners and chinking
- Large rustic wood support posts
- Massive central stone chimney
- Wraparound porch with rustic log railing
- Generally symmetrical door and window placement on the east and west façades
- Paired wood casement windows with divided lites and unornamented wood surrounds
- Wide, solid wood entrance door with decorative iron hardware
- Two-panel redwood stile and rail wood doors at secondary entrances, each with an undivided glazed top panel.

[31] Page & Turnbull, Inc., "Basis of Design and Alternative Evaluation: Redwood Cabin," San Francisco, November 22, 2019.

VII. CONCLUSION

The La Honda Creek Redwood Cabin was constructed circa 1927-1928 by W.B. Allen with the help of laborers, presumably including local builder Lee Erickson. The subject property appears to be one of few remaining examples of a permanent recreational cabin from the 1920s with a high degree of integrity, and which is individually representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century. The cabin does not appear to be significant for an association with the lives of persons important to local, state, or national history. The cabin's longtime owner, W. B. Allen, was a prominent businessman in Palo Alto; however, the cabin was a secondary residence and does not reflect his business achievements nor his association with the Palo Alto community. Neither Allen, nor Lee Erickson, appear to be master architects or builders. The building retains much of its original components and fully articulates its rustic style and is a unique example of a rustic recreational cabin in the surrounding area. Overall, the La Honda Creek Redwood Cabin does appear to be locally significant and individually eligible for listing in the California Register of Historical Resources.

In conclusion, the La Honda Creek Redwood Cabin does appear to be an historic resource for the purposes of CEQA review.

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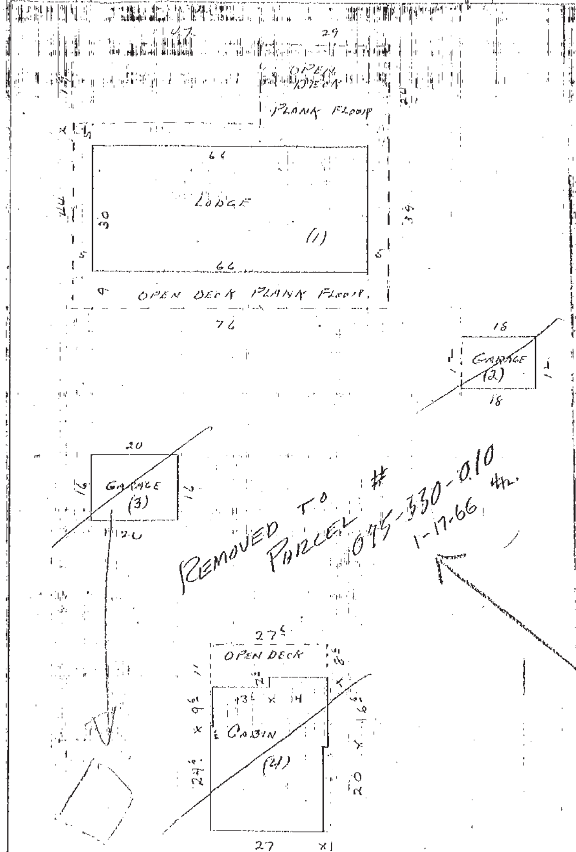
APPENDIX

APPENDIX A – PREPARER QUALIFICATIONS

This Historic Resource Evaluation was prepared by Page & Turnbull of San Francisco, California. Page & Turnbull staff responsible for this report include Peter Birkholz, AIA, LEED AP, Principal-in-charge; Sarah Brummett, Associate AIA, Project Manager; and Alicia Sanhueza, Cultural Resources Planner and primary author. All professional staff working on this report meet or exceed the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, Architectural History, or History.

APPENDIX B – APPRAISAL REPORT, SAN MATEO COUNTY ASSESSOR'S OFFICE



6 ROOMS & BATH - STEG'D LOG INT. PARTITIONING

(1) LODGE EST. 1920 — REDWOOD LOG WALLS - LIGHT SHAKE ROOF (APP.) MUD SILLS & LARGE REDWOOD POSTS - PINE FLOOR - LOG PARTS. EXPOSED RUSTIC ALONG RAKE OF RAFTERS - BATH & 6/PLBS. NO HEAT - STORAGE - LARGE NATURAL STONE FIREPLACE. MINIMUM BUILTINS - ($50 ARB. VALUE) NEW ROOF - 1953 UNDERPINING & PTNS OF DECKS NEW 1953 - FAIR COND. DECK PILLARS REST ON CONC. PIERS.

~~(2) GARAGE — 12x16 - B&B WALLS - MALTHOID ROOF - CONCRETE PIERS~~ DIRT FLOOR - NO DOORS. NEW 1953

~~(3) GARAGE — 16x20 - B&B WALLS - MALTHOID ROOF - CONCRETE PIERS~~ NEW 1953 ~~2 SWING DOORS - DIRT FLOOR - 1/4 PLANK FLOOR.~~

~~(4) CABIN — B&B WALLS - MALTHOID ROOF - WOOD & CONCRETE PIERS.~~ PINE FLOOR - SHEET ROCK & PLYWOOD WALLS & CEILINGS BATH - STORAGE - 2 ROOMS ADDED 1953 - COULD NOT CHECK (6-1953) GOOD CONDITION

INTERIOR DESCRIPTION OBTAINED 7-21-54 PER
FACTOR DECREASED FROM $3.00 ARB. TO $2.95

UNIT	AREA	FACTOR	EST COST	% GOOD	DEP COST
(1) LODGE	1980	2.85	5643	70%	3950
~~(2) GARAGE~~	~~192~~	~~1.10~~	~~211~~	~~100%~~	~~211~~
~~(3) GARAGE~~	~~320~~	~~1.40~~	~~448~~	~~100%~~	~~448~~
~~(4) CABIN~~	~~962~~	~~2.95~~	~~2838~~	~~75%~~	~~2129~~
			~~18280~~	~~65~~	~~11882~~
			~~9140~~	~~TOTAL~~	~~6738~~
				73.7%	

LODGE FACTOR:
(CLASS OF CONSTRUCTION IS AT LEAST EQUAL TO THAT OF A DOUBLE-WALL CABIN)
BASIC SHELL FACTOR = $2.20/□' x 1980□' = $4356
ADDITIVES:
PLBG. 6 x $65 = 390
FIREPLACE 300
BUILT-INS 50
OPEN DECK @ 25¢ 545
ADDITIVE FACTOR = $.65 $1285
TOTAL = $2.85 PER SQ. FT. = 5641

CABIN FACTOR:
BASIC SHELL @ $2.50
962□' x 2.50 PER □' = 2405
ADDITIVES:
PLBG. 220
SHWR. 25
WTR. HTR. 60
BUILT-INS 50
OPEN DECK 67
ADD. FACTOR = $.44 PER □' = 422
TOTAL = $2.94 PER SQ. FT. = 2827

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PAGE&TURNBULL

MEMORANDUM

DATE	September 8, 2021	PROJECT NUMBER	20230
TO	Alta Cunningham Ascent Environmental	PROJECT	OSP White Barn and Redwood Cabin CEQA Consultation
OF	455 Capitol Mall, Suite 300 Sacramento, CA 95814 916.306.2635 Alta.cunningham@ascentenvironmental.com	FROM	Christina Dikas, Associate Principal, Page & Turnbull; Clare Flynn, Cultural Resources Planner, Page & Turnbull

REGARDING La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum

INTRODUCTION

This Landscape Evaluation Commentary Memorandum has been prepared for Ascent Environmental and the Midpeninsula Regional Open Space District to evaluate the need for a historic evaluation of the landscape components at the La Honda Creek Redwood Cabin property. The property is located in the La Honda Creek Open Space Preserve in an unincorporated area of San Mateo County, just west of the town of Woodside, California.

HISTORIC SIGNIFICANCE OF LA HONDA CREEK REDWOOD CABIN

In March 2020, Page & Turnbull prepared a Historic Resource Evaluation Report (HRE) for the La Honda Creek Redwood Cabin and found the property to be eligible for listing on the California Register of Historical Resources (California Register) under Criterion 1 (Events) and Criterion 3 (Architecture). The significance evaluation for the property under these criteria are excerpted below:

> ### Criterion 1 (Events)
>
> The La Honda Creek Redwood Cabin does appear to be significant under Criterion 1 (Events) as a property associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States. According to various accounts, the Redwood Cabin was constructed in the 1927-1928 by Palo Alto businessman W. B. Allen with the aid of labormen. The cabin was constructed at a peak of outdoor recreation in the Santa Cruz Mountains. The Redwood Cabin's construction appears

representative of a broader pattern of recreational development in the Santa Cruz Mountains following the San Francisco Peninsula's logging boom, specifically at a time when recreation shifted from camps to cabins and early subdivisions. While the cabin does not appear to be one of the earliest recreational cabins (from the late 1800s and early 1900s), it appears to be one of the last remaining ones intact from the transition era to permanent structures. Most of the original lodges and hotels appear nonextant. Due to the rural nature of the area, not all nearby properties were surveyed; however, those that were appeared not age eligible or altered. The Redwood Cabin appears to be a rare building typology and retains its original rural setting. Therefore, the property does appear to be individually eligible for listing under Criterion 1 with its period of significance, 1927-1928, the years of its construction.

Criterion 3 (Architecture)

The La Honda Creek Redwood Cabin does appear to be individually eligible for listing in the California Register under Criterion 3 (Architecture) as a building that embodies the distinctive characteristics of a type, period, region, or method of construction, or that represents the work of a master or possesses high artistic values. The Redwood Cabin is a large, one-story side-gabled rectangular log cabin with an open wraparound plank deck. It is constructed of barked redwood logs of various sizes, with saddle notches that are set unconventionally and upside down. The cabin and deck are supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The cabin features a large centered stone chimney that connects to an expansive interior fireplace, its foundation visible from beneath the cabin. Its openings consist of what appear to be original wood sash multi-lite windows, a large, handmade redwood door with iron details, and paneled one-lite wood doors and wood multi-lite French doors throughout. It is unclear who designed the cabin, and if it was the result of an architect or kit plan. According to district records, it was constructed in 1927-1928 by businessman W.B. Allen with the help of two laborers. Research suggests that the building could have been constructed by Finnish builder Lee Erickson, a local builder of similar cabins. W.B. Allen and Lee Erickson do not appear to be master architects or builders. Much of the cabin appears to be original. The building clearly utilizes local materials, and while its construction method appears slightly "primitive," it appears indicative of the rural, woodsy character of the area and the period in which the region was transitioning to more permanent recreational structures. As such, the Redwood Cabin does appear to be a unique property type or architectural style such that it would rise to the level of individual significance within a local context. In conclusion, the La Honda Creek Redwood Cabin does appear to be individually eligible for listing under Criterion 3.[1]

[1] Page & Turnbull, "La Honda Creek Redwood Cabin Historic Resource Evaluation Report," 2020, 31-32.

Based on this evaluation, the property appears to be a historic resource under CEQA.

EXISTING LANDSCAPE FEATURES

The significance evaluation contained in the 2020 HRE by Page & Turnbull focused primarily on the Redwood Cabin building. The La Honda Creek Redwood Cabin property also includes several landscape and site features. Existing landscape features described in the 2020 HRE include the following:

- Heavily wooded, rural surroundings
- Sloping terrain
- Narrow dirt access road that leads to the site from Skyline Boulevard
- Circular dirt driveway that surrounds a small grove of redwoods
- Stone walls that partially delineate the driveway's outer edges
- Stone stairs leading to the cabin
- Horseshoe pit
- Stone barbeque pit
- Brick planter or pit

Other site features, including two garages and a caretaker's cabin that were formerly located around the circular driveway, were relocated in 1966. The garages were constructed in 1953; research has not revealed the date of construction of the caretaker's cabin. The current location and status of these features is unknown.

LANDSCAPE EVALUATION COMMENTARY

The 2020 HRE by Page & Turnbull included a brief physical description of site features at the La Honda Creek Redwood Cabin property but focused primarily on evaluating the cabin itself. The following discussion provides a brief summary of known information about the existing landscape features on the site and assesses the need for further historic evaluation of these features.

While the Redwood Cabin, itself, was constructed around 1927 to 1928 for owner W.B. Allen, research has not definitively revealed the original date of construction, builder, use, and any other historic associations of the individual landscape features on the site. Without this information, it is not known whether these features contribute to the property's overall significance under Criteria 1 and 3 for listing on the California Register. The features are clustered around the cabin and most likely served a support function for the cabin and its occupants. Due to their ancillary nature, the historic significance of these landscape features is likely to be dependent upon and inextricably connected to the cabin. Thus, removing the cabin but retaining the surrounding contributing landscape features would result in a loss of any associative historic significance that the landscape features may possess, as well.

Furthermore, the landscape features at the La Honda Creek Redwood Cabin property do not appear to be individually historically significant as separate entities from the Redwood Cabin. The stone walls along the circular driveway, as well as the stairs leading up to the cabin and various hiking trails throughout the site, were reportedly constructed by W.B. Allen, using stones imported from the California coast. There is speculation that the Civilian Conservation Corps (CCC) may have assisted with the construction of these walls and helped improve other roads in the surrounding area in the 1930s.[2] However, no clear documentary evidence has been uncovered to date that confirms that the CCC did, in fact, construct the walls or any other features at the La Honda Creek Redwood Cabin property. The CCC's involvement with a project on privately owned land seems unlikely, given that the program's primary focus was to employ young men in conservation work on public land, most of which consisted of National Forests, throughout the United States. The CCC, originally known as the Emergency Conservation Work (ECW) program, was established in 1933 as a New Deal era program during the Great Depression. In 1937, the program was formally renamed the Civilian Conservation Corps.[3] The ECW/CCC's primary focus on completing projects on public land is spelled out in the act that established the ECW program, which authorized:

> [...] employing citizens in the construction, maintenance and carrying on of works of a public nature in connection with the forestation of lands belonging to the United States or to the several States which are suitable for timber production, the prevention of forest fires, floods and soil erosion, plant pest and disease control, the construction, maintenance or repair of paths, trails and fire-lanes in the national parks and national forest, and such other work on the public domain, national and State, and Government reservations incidental to or necessary in connection with any projects of the character enumerated, as the President may determine to be desirable: Provided, that the President may in his discretion extend the provisions of this Act to lands owned by counties and municipalities and lands in private ownership, but only for the purpose of doing thereon such kinds of cooperative work as are not provided for by Acts of Congress in preventing and controlling forest fires and the attacks of forest tree pests and diseases and such work as is necessary in the public interest to control floods.[4]

[2] The 2012 La Honda Creek Open Space Preserve Master Plan states that it was the California Conservation Corps that assisted with the construction of these walls. As the California Conservation Corps was created in the 1970s under Governor Jerry Brown, this appears to refer to California's branch of the New Deal-era Civilian Conservation Corps, which was active from 1933 to 1942.
[3] John C. Paige, "The Civilian Conservation Corps and The National Park Service, 1933-1942, An Administrative History, (Washington, DC: National Park Service, U.S. Department of the Interior, 1985), 24.
[4] "An act for the relief of unemployment through the performance of useful public work, and for other purposes," March 31, 1933, Public No. 5, 73d Congress.

Although this act indicates that some ECW/CCC projects may have occurred on private lands, such projects seem to have been relatively rare. Typically, such cases occurred when it was necessary to expand projects that had started on public land onto immediately adjacent private properties in order to fully and adequately complete the planned work. In such instances, each case was evaluated and granted permission by the Office of the Director of the Emergency Conservation Work.[5] The construction of stone walls along a private road does not appear to fall under the requirement that work by the CCC on private lands was intended to prevent or control forest fires, pests, or floods. Furthermore, as there are no National Parks, National Forests, or State Parks in the immediate vicinity of the La Honda Creek Redwood Cabin site, such an exemption for ECW/CCC work to occur on private land appears unlikely. It is possible that the stone walls and stairs at the La Honda Creek Redwood Cabin property were constructed with the assistance of individuals who had at some point been involved with the CCC; however, there is currently no evidence to support this. Even if evidence proved that the CCC did construct walls or other features on the property, every landscape feature, piece of infrastructure, or other improvement constructed by the CCC across the country is not automatically considered historic or individually significant. A relatively small and discrete expanse of stone wall and stair located on a private property is not likely to rise to the level of an individually significant example of the CCC's work.

Similar arguments can be made with regard to the individual significance of the horseshoe pit, barbeque pit, brick planter or pit, circular driveway, and narrow dirt access road. The features do not appear to have historic significance apart from their association with the Redwood Cabin. Demolishing the Redwood Cabin, which serves as the primary focal point for the property, but retaining these features would impair the setting, design, association, and feeling that characterize the integrity of these features.

CONCLUSION

Based on this review, Page & Turnbull finds that a separate historic evaluation of the landscape features at the La Honda Creek Redwood Cabin property is unnecessary. The features do not appear to possess individual historic significance apart from the Redwood Cabin. The landscape features were likely built as auxiliary features that served the Redwood Cabin and its occupants; therefore, any potential historic significance they may possess is likely to be as site features associated with the cabin itself.

[5] Paige, 19-20.