

A P P E N D I X K

VEGETATION MANAGEMENT PLAN

.....

APPENDIX K1:
STANDARD UNIVERSITY NOTRE
DAME DE NAMUR UNIVERSITY
CAMPUS VEGETATION
MANAGEMENT PLAN
(PROMETHEUS FIRE CONSULTING
AND PANORAMA
ENVIRONMENTAL)



Stanford University Notre Dame De Namur University Campus Vegetation Management Plan

March 2023, revised December 2023

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PROMETHEUS
FIRE CONSULTING LLC



Stanford University Notre Dame De Namur University Campus Vegetation Management Plan

March 2023, Rev December 2023

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1 Introduction and Background Information

1.1 Project Summary and Purpose of Vegetation Management Plan

Stanford University (Stanford) has an option to purchase the 45.65-acre Notre Dame de Namur University (NDNU) campus, located on four parcels at 1500 Ralston Avenue in Belmont, California. Stanford is requesting approval for a Conceptual Development Plan (CDP) (per Belmont Zoning Ordinance Section 12.3.A) to renovate and revitalize the campus in a phased manner during a 30-year timeframe, keeping the campus's legacy as an academic institution intact. Stanford's intent is to develop a mutually agreed upon CDP with the City of Belmont that addresses the development and maintenance of the site. Stanford's redevelopment would revitalize existing building areas but would also maintain open spaces that border homes in the surrounding community. The CDP would be subject to environmental review under the California Environmental Quality Act (CEQA).

Stanford is committed to maintaining their lands for wildfire resiliency. One component of development and maintenance of the new campus is vegetation management to reduce wildfire risks. The purpose of the Vegetation Management Plan is to identify the regulatory requirements, to identify the wildfire risks relevant to the site, and to provide a plan for initial and on-going management of the vegetation on the campus.

1.2 Regulatory Requirements Pertaining to Wildfire Hazards at the NDNU Campus

The NDNU campus is within an area known as a *local responsibility area* (LRA), serviced by the Belmont Fire Protection District. LRAs in Belmont are mapped as either *very high fire hazard severity zone* (VHFHSZ) or non-VHFHSZ. Areas generally in the western part of the city are within the VHFHSZ. The NDNU campus, which is further east in the city, is designated a non-VHFHSZ (as shown in Figure 1 and Figure 2). The NDNU campus is not within the *wildland-urban interface* (WUI). Since the campus is not within a VHFHSZ, California Government Code section 51182 nor Chapter 49 of the Public Resources Code (PRC) would not apply to the site nor would the requirements under Chapter 7A of the California Building Code.¹

¹ California Government Code section 51182 requires that any person who owns, leases, controls, operates, or maintains an occupied structure covered with flammable material in a designated VHFHSZ must maintain 100 feet of defensible space.

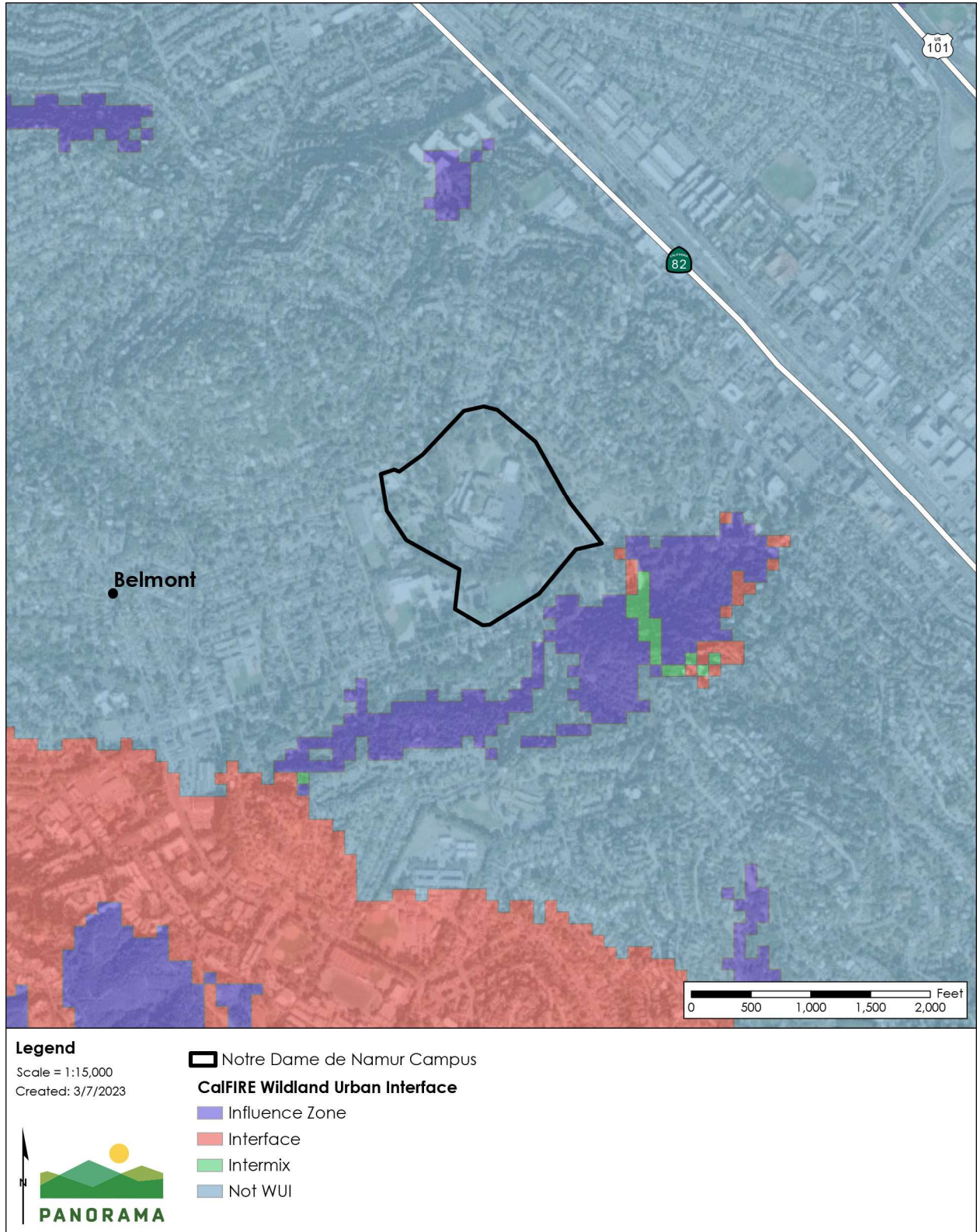
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Figure 1 Notre Dame De Namur University Campus Site, Fire Hazard Classifications



1 INTRODUCTION AND BACKGROUND INFORMATION

Figure 2 Notre Dame De Namur University Campus Site, WUI



1 INTRODUCTION AND BACKGROUND INFORMATION

Belmont's ordinance for properties within the VHFHSZ would not apply to the site. However, Belmont Municipal Code section 7-401(b) would apply. This code section defines as a public nuisance any property where "overgrown vegetation; dead, decayed, diseased, or hazardous trees, firewood; weeds and other vegetation is likely to harbor rats, vermin or nuisances or may be a fire hazard." The NDNU Campus is serviced by the Belmont Fire Protection District.

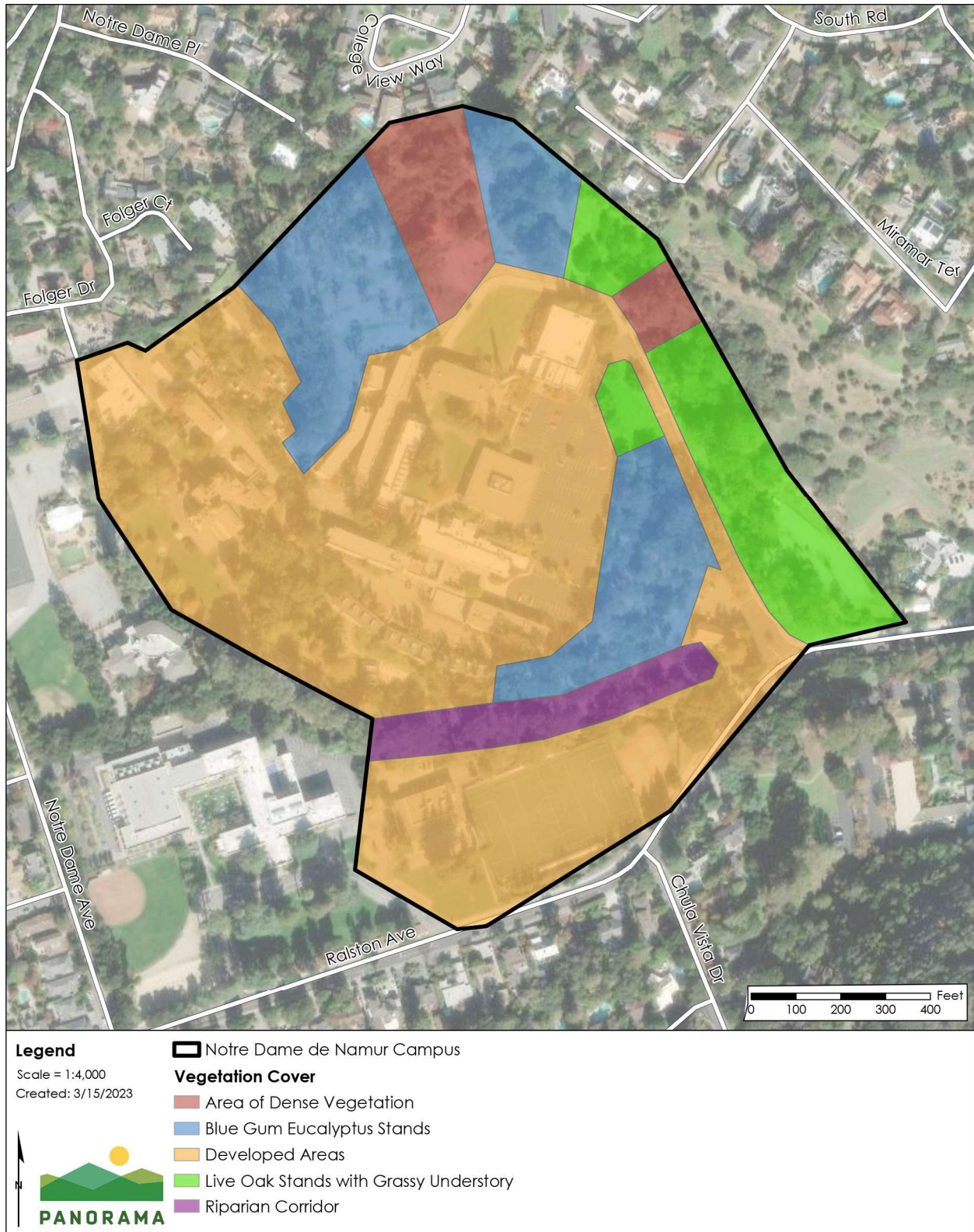
1.3 Existing Conditions of Site

The elevation ranges from 80 feet *above mean sea level* (amsl) in the south to 238 feet amsl in the north of the site. A little less than 1/4 of the site has slopes of greater than 10 percent. All other land on site has a slope of less than 10 percent. The NDNU campus contains a diversity of vegetation. Most of the vegetation in the campus core consists of plants that were installed as part of the landscaping of the campus as it was built over the years. In the remaining areas where natural vegetation still exists, several stands of blue gum eucalyptus (*Eucalyptus globulus*) are found with open understory. The east side of the campus includes stands of coast live oak (*Quercus agrifolia*) separated by open grassy areas or areas with minimal understory vegetation. An intermittent stream that feeds into Belmont Creek is located within the southern part of the site, between Laxague Drive and the tennis courts. The campus also has several areas of less than 1 acre of dense vegetation. Figure 3 shows the composition of the campus vegetation, and Figure 4 includes several photographs representative of the different vegetation types. Vegetation is considered dense when canopy bulk density is greater than 0.05 kg per cubic meter.

The campus has good access for fire suppression resources of all types, with roadways that meet local and state code requirements for emergency access. The perimeter of the property has a fuel break approximately 10 to 30 feet wide, and ongoing maintenance of this fuel break is important to delay fire spread on to or off of the property. There are numerous fire hydrants throughout the property capable of providing ample water, at the San Mateo County-mandated rate of one hydrant for each 1,000 gallons per minute (GPM) or fraction thereof (SMC ORD-2022-001). The NDNU campus is zoned *planned development* (PD). The surrounding zoning designations are all for single-family residential homes: R1E (lot size of one acre minimum) and R1A (lot size of 9,600 square foot minimum) to the east, R1B (lot size of 6,000 square foot minimum) to the north, and R1C (lot size of 5,000 square foot minimum) to the west, and R1H (lot size of 20,000 square foot minimum) south of Ralston Avenue, by which the campus is bounded on the south side.

1 INTRODUCTION AND BACKGROUND INFORMATION

Figure 3 **Vegetation Cover Types Across the NDNU Campus**



1 INTRODUCTION AND BACKGROUND INFORMATION

Figure 4 Photographs Representative of the Vegetation Cover Types Across the NDNU Campus



(above) Eucalyptus on the south end of the campus adjacent to Carroll Hall



(above) Eucalyptus near the highest point of the property on the north boundary

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(above) Eucalyptus above (east) of Gavin Hall



(above) Oak and grassy areas north of East Parking Lot

1 INTRODUCTION AND BACKGROUND INFORMATION



(above) Oak and understory east of Gleason Center



(above) Dense vegetation on east side of property

1 INTRODUCTION AND BACKGROUND INFORMATION



(above) Dense vegetation in intermittent drainage on north side of property

2 Methods

2.1 Field Visit

A field visit was conducted on January 17, 2023, to assess the site conditions. The field visit was performed by wildfire consultant Phil Dye of Prometheus Fire Consulting. Phil walked the 46-acre campus to understand the existing vegetation conditions and took several photographs of representative vegetation types, as shown in Figure 3, above. The campus had received at least 10 inches of rainfall since January 1 (over a 17-day period), which was an atypical amount for such a short period of time. The vegetation was well-watered, and no signs of drought stress were noted. The trees were noted as being well spaced, with minimal understory present.

Historical rainfall patterns have varied. While the vegetation experiences wet/dry cycles throughout the year, no indications that the fuels typically pose a significant threat to rapid wildfire spread were noted. Indicators of fuels that typically pose a significant threat to rapid wildfire spread include vegetation density, canopy base height, and continuity. Tree stands on campus have an open understory and probability of crown fire initiation low.

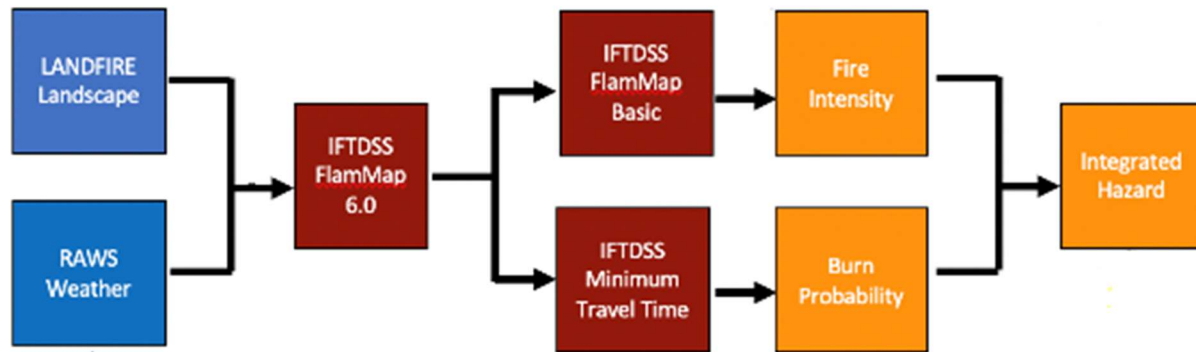
2.2 Fire Hazard Modeling

2.2.1 Overview of Fire Model

A fire behavior modeling effort was undertaken to determine if rapid or extreme fire behavior spread is likely to occur. The Interagency Fuel Treatment Decision Support System (IFTDSS) was used to model fire behavior. The IFTDSS utilizes two imbedded models: FlamMap and Minimum Travel Time. IFTDSS is a web-based application designed to make fuels treatment planning and analysis more efficient and effective.

The components of fire behavior modeling are as follows:

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2.2.2 Inputs using LANDFIRE

The Landscape Fire and Resource Management Planning Tools (LANDFIRE) was used for the inputs for landscape and fuels—that is, topography and vegetation cover types. LANDFIRE is a shared program between the wildland fire management programs of the U.S. Department of Agriculture's Forest Service (Forest Service) and the U.S. Department of the Interior. The datasets in LANDFIRE for topography and vegetation are based on remote sensing data, which have varied accuracies and must be assessed further. Therefore, field visits to the project parcel were conducted to verify and augment the LANDFIRE remotely sensed datasets through professional judgement and photo interpretation to ensure the existing conditions were being appropriately represented within the model inputs.

LANDFIRE Version LF 2020 was used to establish the fuel models. Fire behavior fuel models included the following:

- NB1 – urban/developed: 71 percent of area of interest
- GR1 – short, sparse, dry climate grass is short, naturally or heavy grazing, predicted rate of fire spread and flame length low: 1 percent of area of interest
- GS1 – low load dry climate grass-shrub about 1 foot high, grass load low, spread rate moderate and flame length low: 14 percent of area of interest
- TL3 – moderate load conifer litter: 14 percent of area of interest

Other parameters modeled to determine fire hazards are included in the IFTDSS report "Landscape Summary", which is provided in Appendix A.

The Remote Automatic Weather Stations (RAWS) system provided the inputs for weather. The RAWS system is a network of automated weather stations run by the Forest Service and Bureau of Land Management (BLM) and monitored by the National Interagency Fire Center (NIFC), mainly to observe potential wildfire conditions. The 97th-percentile weather conditions were utilized. Percentiles are based on a scale of 0 to 100 and are used to sort and rank a set of data collected over a period. For wildfire, when values at the upper end of the scale occur, complex fires are expected for which initial attack may often fail. The 97th percentile is often termed “the most likely worst-case scenario.” These are the days when weather conditions are greatest for

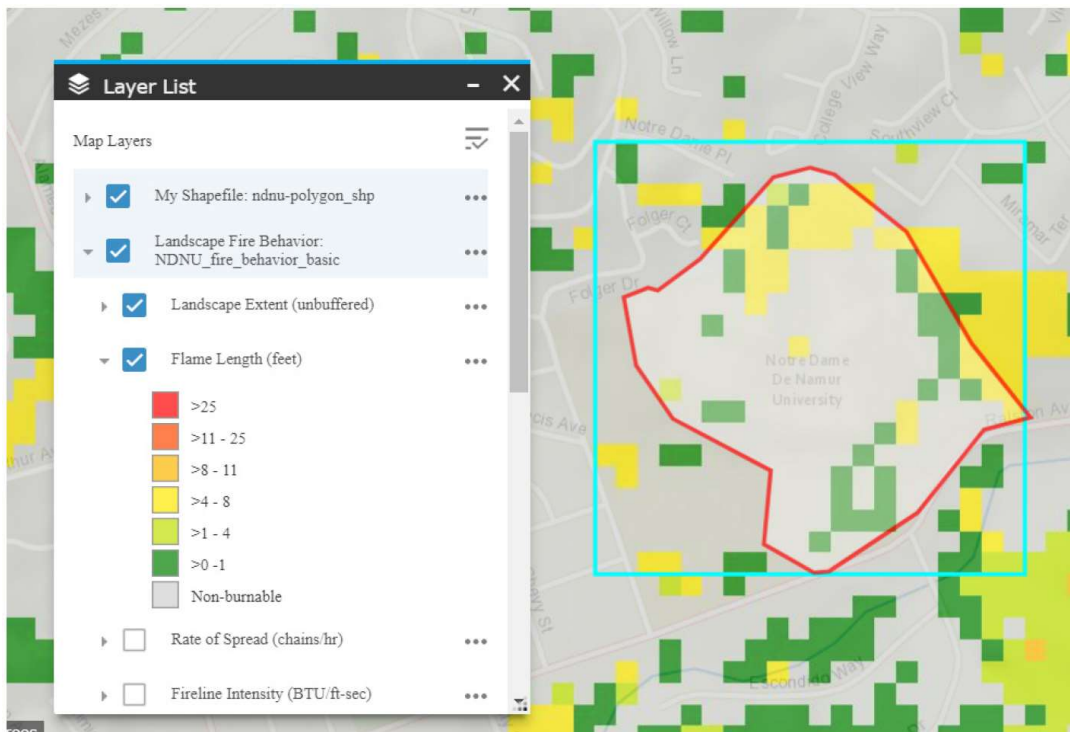
2 METHODS

wildfire ignition and spread, with high temperatures, low humidity and fuel moisture, increased wind speed, and wind direction that exacerbates fire spread.

2.2.3 Results

Figures 5, 6, and 7 represent predicted fire behavior under anticipated “extreme” fire weather conditions, as described above. As can be seen from this report, rapid and extreme fire behavior spread is unlikely to occur. The landscaped areas will not support rapid fire spread, and the areas of natural vegetation lack sufficient fuel density and volume to support rapid fire spread, as shown in Figures 5, 6, and 7. In addition, given the proximity of abundant fire suppression resources, large-area fire spread is unlikely to occur. As shown in Figure 6, the predicted rate of spread, even under extreme fire conditions, is predominantly in the lowest range of 0-2 chains/hour, with increased rate of spread aligning with areas of dense vegetation, eucalyptus, or with grassy understory, as shown in Figure 3. However, some thinning of vegetation in these areas would be helpful to avoid long flame residence time and areas of concentrated heat. Generally, flame lengths should be under 8 feet to allow for direct fire suppression, which is the modeled case under current conditions. The lack of significant understory vegetation is likely to result in a lack of crown fire initiation, and tree stand density is not sufficient to allow for crown fire propagation. The most likely scenario for fire spread would come from a structural ignition, but this is not modeled as no fire spread model exists for structure-to-structure ignitions.

Figure 5 Predicted Flame Lengths



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Figure 6 Predicted Rate of Spread

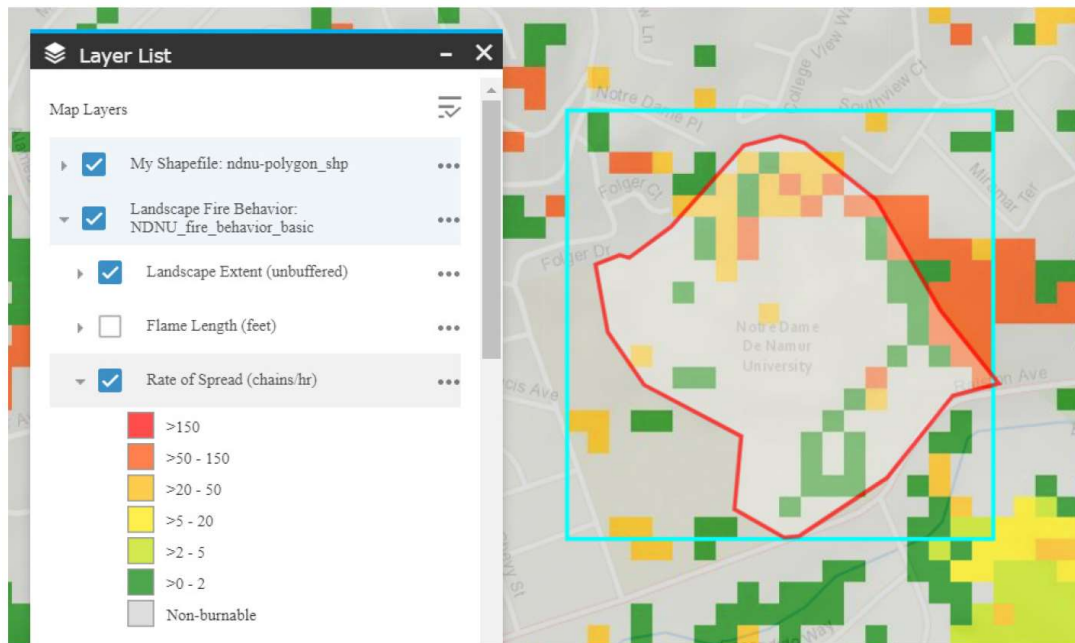
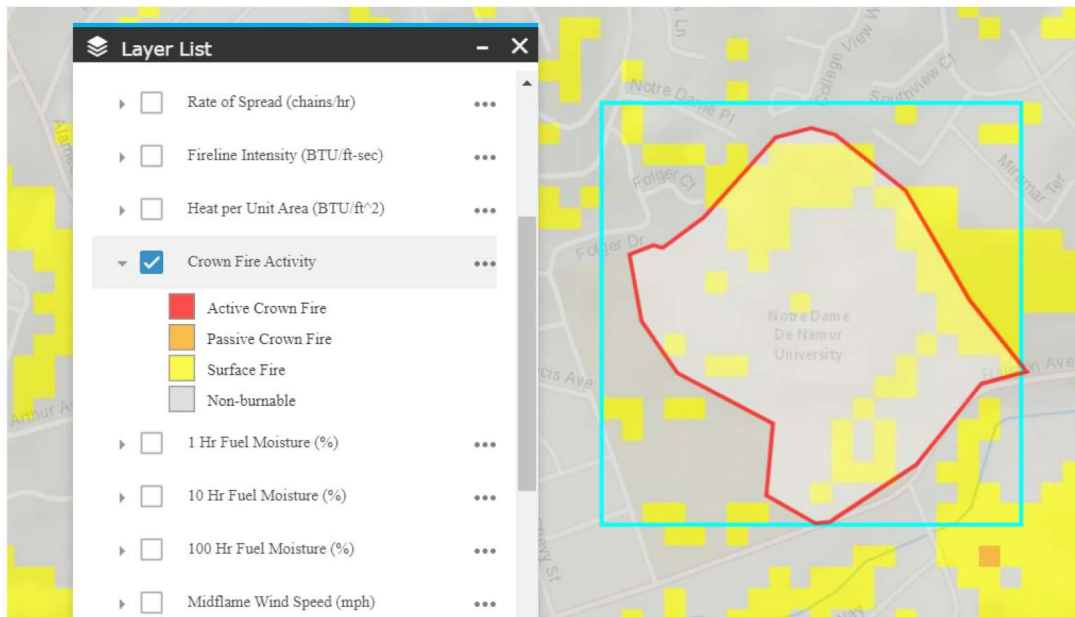


Figure 7 Predicted Crown Fire Initiation: Note, Figure Shows Zero Probability



3 Vegetation Management Recommendations

3.1 Treatment Methods

3.1.1 Treatment Activities

The type of treatment will depend primarily on the vegetation type, cover, and location. Treatment areas are discussed here as 1) areas of dense vegetation, 2) blue gum eucalyptus stands, 3) live oak stands with grassy understory, 4) riparian corridor, or 5) developed/landscaped areas. Since the NDNM campus is not within a WUI, defensible space requirements around structures are not applicable even as new buildings are constructed during phased development. However, best practices recommend creating defensible space around all structures, which are included below. The types of methods to be used are shown in Table 1, below. Section 3.2 discusses treatment activities for specific vegetation types.

Table 1 Treatment Activities

Treatment activity	description	Method of application	Initial or maintenance?
Mechanical treatment	Use of motorized equipment to cut, uproot, crush/compact, or chop existing vegetation	Mastication, chipping, brush raking, tilling, mowing, roller chopping, chaining, skidding and removal	Initial and maintenance
Manual treatment	Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species	Hand pull and grub, thin, prune, hand pile	Initial and maintenance
Prescribed herbivory	Use of domestic livestock to reduce a target plant population thereby reducing fire fuels or competition with desired plant species	Grazing or browsing goats	Maintenance

3.1.2 Access, Material Collection, and Removal

The entire campus appears to be very accessible, with all areas of vegetation within 440 feet of a roadway. The campus includes many parking areas that can be used to stage equipment for easy removal. Staging areas should be approximately 25 feet by 25 feet in size for daily off-

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hauling of material during initial treatments and during on-going property maintenance. One haul vehicle can usually hold approximately 10 cubic yards of material. Although sudden oak death (SOD) did not seem to be present in the parcel during field inspections, if any material potentially infected with the pathogen *Phytophthora ramorum*, which causes sudden oak death, is present, it will likely have to remain on site. Chipped material can also be left on site, with chipped material spread to depths typically not more than 6 inches, which can also aid in erosion prevention.

3.2 Treatments

3.2.1 Overview

This section describes both the initial treatments and the on-going maintenance plan for each cover type within the project parcel. Given the generally low wildfire-hazard risks, only the areas of dense vegetation need initial treatments. Other areas will have a maintenance schedule.

3.2.2 Areas of Dense Vegetation

Overview

Areas of dense vegetation should be initially treated to thin the vegetation understory immediately after Stanford takes ownership of the property. Annual monitoring and maintenance of vegetation in these areas should be undertaken to ensure they stay thinned.

Initial Treatment

Responsible Party: Stanford

Treatment Method: The majority of this area will utilize manual and mechanical cutting and removal.

1. Thin out with manual cutting or mastication brush or brush islands up to 10 feet tall to a spacing of twice the height, on center.
2. Raise (trim up) the crowns by 1/3 the height.
3. Remove deadwood subcanopies.
4. Masticate and/or mow all grass, cured herbs, and flammable debris from under the shrub canopies.
5. Cut and remove or rearrange (masticate) dead shrubs.
6. Remove structurally unstable trees.
7. Clean up down and dead debris.

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Maintenance Plan

Responsible Party: Stanford

Treatment Method: The majority of this area will utilize manual cutting.

1. Annually, ensure all grass, cured herbs, and flammable debris does not accumulate under the shrub canopies.
2. Periodically (every 5 years) manually remove dead and diseased trees or branches and foliage.
3. Annually, monitor conditions to ensure the above maintenance plan is maintaining treatment area objectives, listed under “Initial Treatments” above.

3.2.3 Blue Gum Eucalyptus Stands

Overview

Blue gum stands are generally healthy, with little understory. Removal of these trees is not necessary; however, Stanford should develop an annual assessment program to identify the health of the trees and to remove any trees deemed a hazard. Shed material can be thinned and removed periodically to reduce fire potential.

Initial Treatment

None.

Maintenance Plan

Responsible Party: Stanford

Treatment Method: The majority of this area will utilize manual cutting.

1. Conduct routine inspections and an annual assessment of eucalyptus trees on campus.
2. Plan to remove any hazard, dead, and dying trees identified in the annual assessment.
3. Verify minimal understory and remove sprouting eucalyptus, if any.
4. Remove excessive down limbs, leaves, and other slash (woody debris) from beneath the trees every 5 years. Chip material in place or haul off site.

3.2.4 Live Oak Stands with Grassy Understory

Overview

Areas of live oak stands with grassy understory should be maintained with low understory, and any weeds or shrubs that grow in should be removed. This condition can be established through annual mowing or grazing and removal of weeds.

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Initial Treatment

None.

Maintenance Plan

Responsible Party: Stanford

Treatment Method: The majority of this area will utilize manual cutting (mowing) and grazing.

1. Annually mow or, alternatively, graze areas of grassy understory in late spring/early summer (May–June) to keep grass heights low while minimizing shrub sprouting and regeneration.
2. Remove any sprouting weeds annually.
3. Periodically (every 5 years), manually remove or lop and scatter dead and diseased trees or branches and foliage.
4. Annually, monitor conditions to ensure the above maintenance plan is maintaining treatment area objectives.

3.2.5 Riparian Corridor

Overview

A drainage flows through the southern part of the campus, between Laxague Drive and the tennis courts. The area exhibits some limited riparian vegetation and trees are well spaced, with chip covering the surface. This area should be maintained in its current condition, but any work in the channel could require permits from the California Department of Fish and Wildlife (CDFW) since this drainage feeds into Belmont Creek.

Initial Treatment

None.

Maintenance Plan

Responsible Party: Stanford

Treatment Method: The majority of this area will utilize manual methods

1. Remove any sprouting weeds annually.
2. Every 2 years, trim/limb woody species as necessary to reduce ladder fuels and thin new growth to maintain the current low density of trees and shrubs. Trimming and limbing here will occur less frequently due to the sensitive nature of riparian corridors and associated drainages and generally lower risks in riparian areas.
3. Periodically (every 5 years), manually remove or lop and scatter dead and diseased trees or branches and foliage.
4. Annually, monitor conditions to ensure the above maintenance plan is maintaining treatment area objectives.

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3.2.6 Developed Areas

Overview

These areas comprise the landscaped areas of campus and areas around buildings and structures. As development progresses, this prescription would apply to any new areas of buildings or landscaping, as appropriate. The goal for these areas is also to maintain low flammability vegetation.

Initial Treatments

The campus is not within an SRA nor a VHFHSZ in the LRA, therefore, PRC 2490 and 2491 do not apply. However, initial treatment of developed areas will include defensible space maintenance within 100 feet of each side of a structure. An ember-resistant zone will be applied within five feet of a structure, and more intense fuel reduction is required between five and 30 feet of a structure.

Maintenance Treatments

Responsible Party: Stanford

Treatment Method: The majority of this area will utilize manual planting, cutting, and removal.

1. Annually, remove dead wood from trees and any trees within 5 feet of structures.
2. Select low-growing native or, if necessary, non-native shrubs and ground covers with low flammability as replacement plants.
3. Annually, remove/reduce lofty, loosely compacted litter accumulations, especially large debris such as branches, and replace with compact, small particle mulch to prevent invasion of noxious weeds and elevate live fuel moisture.
4. Mow/trim all grass each year to below 10 inches when it is 50-percent cured (typically by June 1 but may vary with amount and timing of winter precipitation).
5. Annually, remove sick, dying and dead shrubs and trees.
6. Annually, monitor and remove/reduce, if necessary, “ladder” fuels (grass to brush to trees).
7. Annually, ensure no shrubs establish beneath and around existing and emerging trees.
8. For landscaping, select native tree, shrub, or grass species or, if necessary, non-native, non-invasive species with low flammability.

3.3 Hazard Reduction and Regulatory Compliance

Post-treatment fire modeling was not conducted for the Vegetation Management Plan since the risks of wildfire are low and fire behavior is anticipated to be manageable under existing conditions. The treatments provided in the Vegetation Management Plan, however, would

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further reduce fire hazards and ensure compliance with Belmont Municipal Code section 7-401 regarding nuisance vegetation and fire risks.

3.4 Environmental Protection Measures

3.4.1 Overview

Environmental resources are not currently known; however, certain resources are typical and can be avoided during the implementation of vegetation management activities. These resources include nesting birds, woodrats, and heritage trees.

3.4.2 Nesting Birds

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 shall 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. 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 migratory birds native to the United States.

Section 3503 of the California 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 specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., hawks, owls, eagles, and falcons), including their nests or eggs. Section 3513 of the California Fish and Game Code codifies the federal Migratory Bird Treaty Act.

Nesting birds are likely common on the project site. For all activities that could result in potential noise and other land disturbances that could affect nesting birds (e.g., tree removal, mowing during nesting season, mastication, chipping), treatment sites should be surveyed to evaluate the potential for nesting birds. Trees should be removed outside the nesting season of March 15 to August 30 for smaller bird species such as passerines and February 15 to August 30 for raptors. If activities that could disturb nesting birds are performed during the nesting season (generally if work is performed from February 15 to August 30), then preconstruction nesting surveys would be performed and any active nests and a buffer area around the nest avoided until the young have fledged.

3.4.3 San Francisco Dusky Footed Woodrat

Woodrats build fortress-style “stick houses” around hollow trees, logs, rock piles, and the like. The structures have a central nest chamber, ladders for vegetation and nut storage, and multiple tunnels, entrances, exits, and latrines. Houses protect them from weather and predators and maintain a consistent habitat for living and long-term food storage. Woodrats sometimes maintain multiple houses and move among them to forage more broadly. Great climbers, they

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also occasionally build houses up in trees. The presence of woodrats on the campus is unknown at this time.

The species of woodrat in Belmont is likely the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*). This species is a California *species of special concern* with a limited range in the Santa Cruz Mountains and foothills. The species is not federally or state listed as threatened, endangered, or candidate and, accordingly, no federal or state Endangered Species Act permitting is required for impacts to the species. Houses would be avoided with a 5-foot buffer, where feasible. Material from dismantled houses would be left in place for woodrat reconstruction after work is completed, as specified, or required per the biological resources analysis in the EIR.

3.4.4 Significant Trees

Belmont has a Tree Ordinance (#2017-1120). Protected trees require a permit for removal. These trees include the following:

- **Principal native trees:** coast live oak, valley oak, redwood, madrone, bay laurel, or buckeye having a single main stem or trunk of 10 inches or more diameter at 4.5 feet *diameter at breast height* (DBH) or with up to three of the largest secondary stems totaling 10 inches or more DBH.
- **Large diameter tree:** A woody, perennial plant characterized by having a single main stem or trunk of 14 inches or more DBH or with up to three of the largest secondary stems totaling 18 inches or more DBH.
- **Replacement tree:** Any tree, regardless of size, that has been planted as required mitigation for the previous removal of another tree at the same site or elsewhere in the city.
- **Right-of-way tree:** A tree located in a public street right-of-way. NOTE: The adjacent property owner is responsible for trees, curbs, gutters, and sidewalks in the right-of-way; a fence does not determine the property line. The City's responsibility ends at the edge of roadway.

Generally, these types of trees can be avoided, but if they need to be removed, an arborist report and permit would be required.

3.4.5 Riparian Areas and Drainages

A tributary to Belmont Creek flows through the site. This drainage is intermittent but exhibits riparian vegetation in and around its banks. In this riparian area, treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to main the current low density of trees. Allowable activities include hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. Mature, healthy trees will not be removed from a riparian corridor. Any activities conducted within a

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riparian corridor will be conducted so as to avoid alteration to a bed, channel, or bank of a waterway and all debris, including sawdust, chips, or other vegetative material, will be prevented from entering the bed, channel, or bank of a waterway, unless a permit from the California Department of Fish and Game under Section 1600 is obtained.

Appendix A: IFTDSS Landscape Summary Report



Report: Landscape Summary

Landfire Version: LF 2020

Landscape Name:

NDNU_FM40_LF2020_unedited_20230127

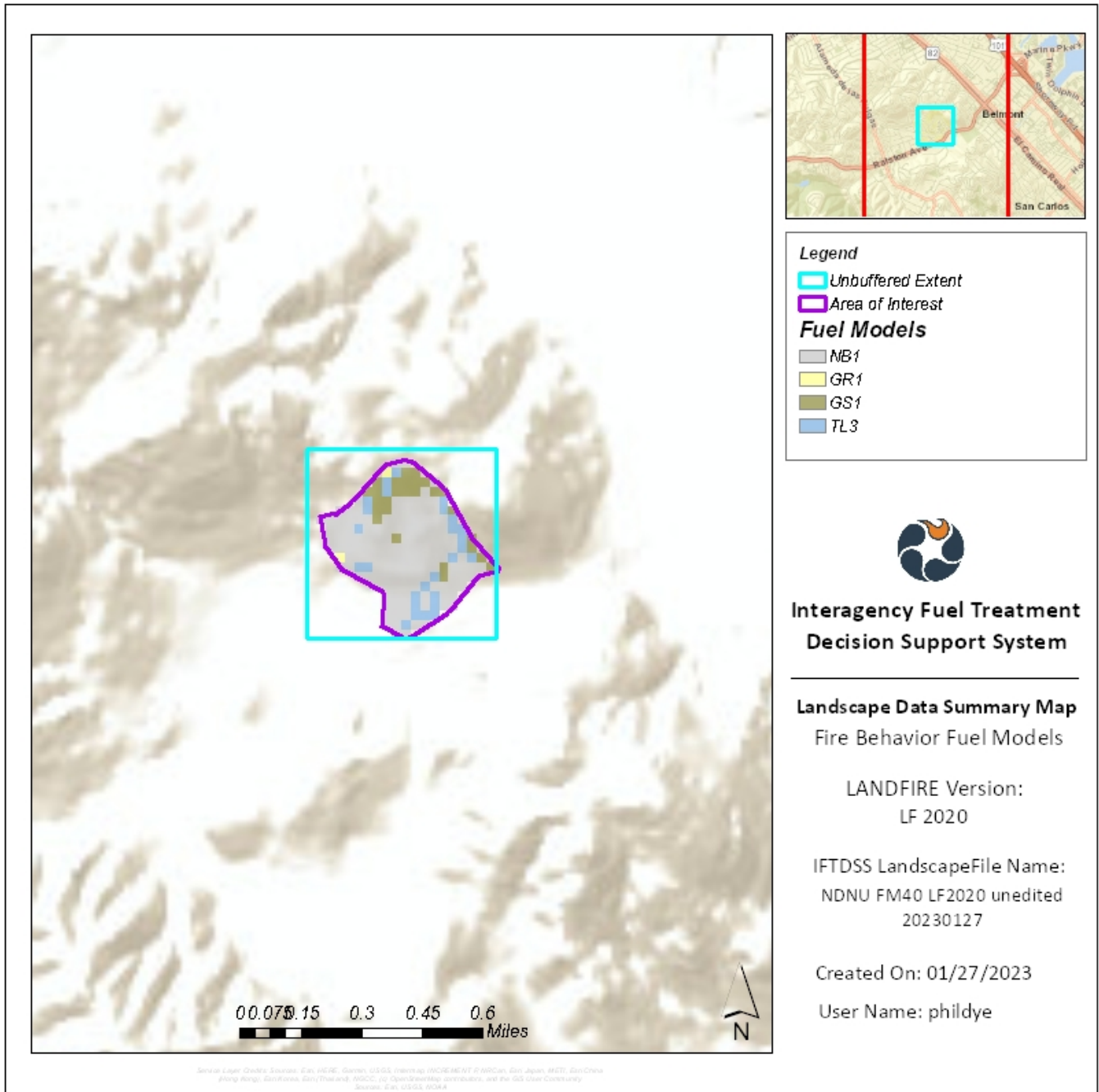
Landscape Acres: 89

Area of Interest: ndnu-polygon_shp

Prepared for: Phillip Dye

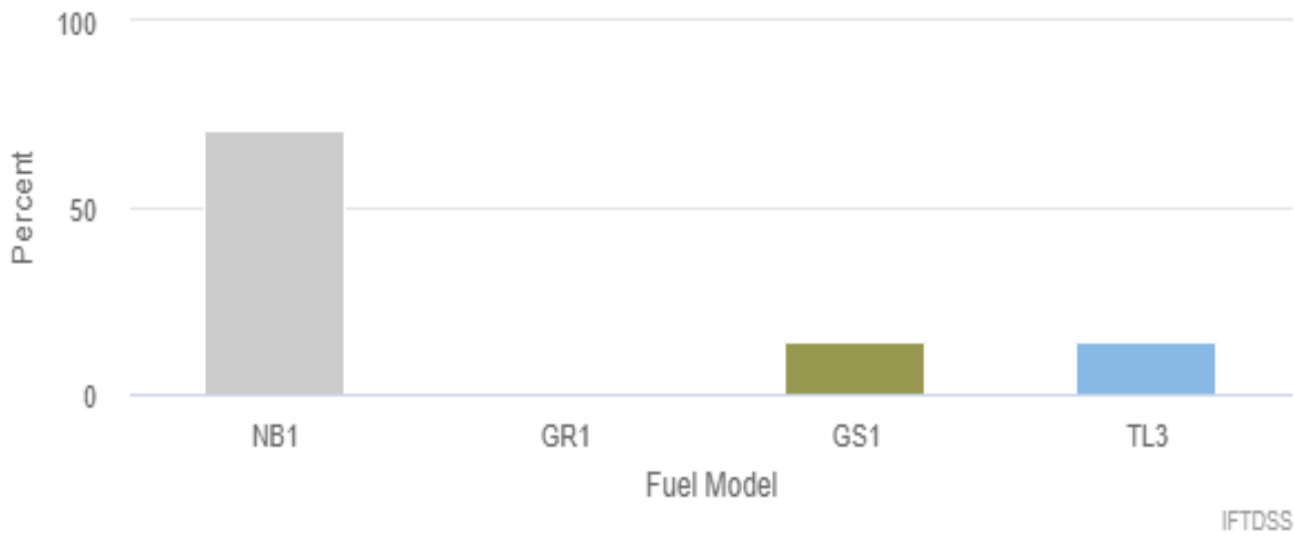
1/27/2023, 11:41:59 AM

Fuel Model (FBFM)



**Fuel Model Data Summary for Area of Interest
"ndnu-polygon_shp" within
"NDNU_FM40_LF2020_unedited_20230127"
Landscape**

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43
Distribution under 1% not shown



Fuel Model (FBFM)

Fuel Model Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

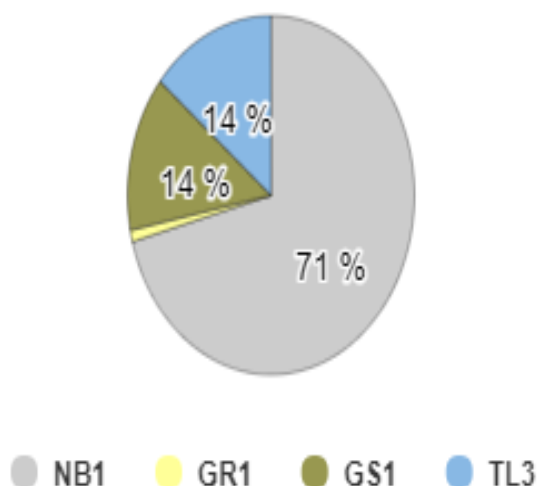
Landscape Name: NDNU_FM40_LF2020_unedited_20230127

Landfire Version: LF 2020

Landscape Acres (unbuffered): 89

Area of Interest Name: ndnu-polygon_shp

Area of Interest Acres: 43

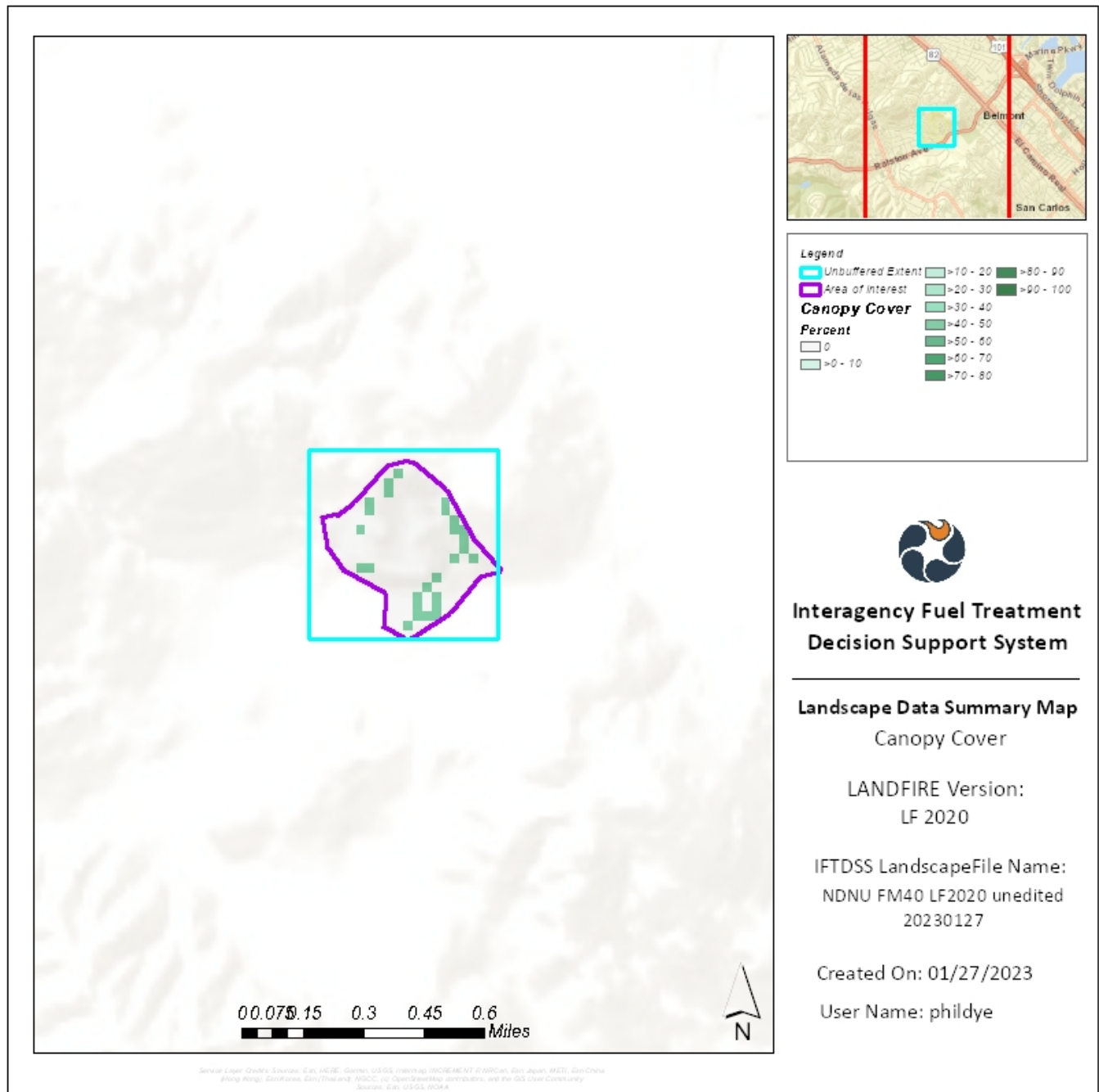


IFTDSS

Fuel Model (FBFM)

Fuel Model	Pixel Count (freq)	Acres In AOI	Percent In AOI
NB1 (91)	136	30	71
GR1 (101)	2	0	1
GS1 (121)	27	6	14
TL3 (183)	27	6	14

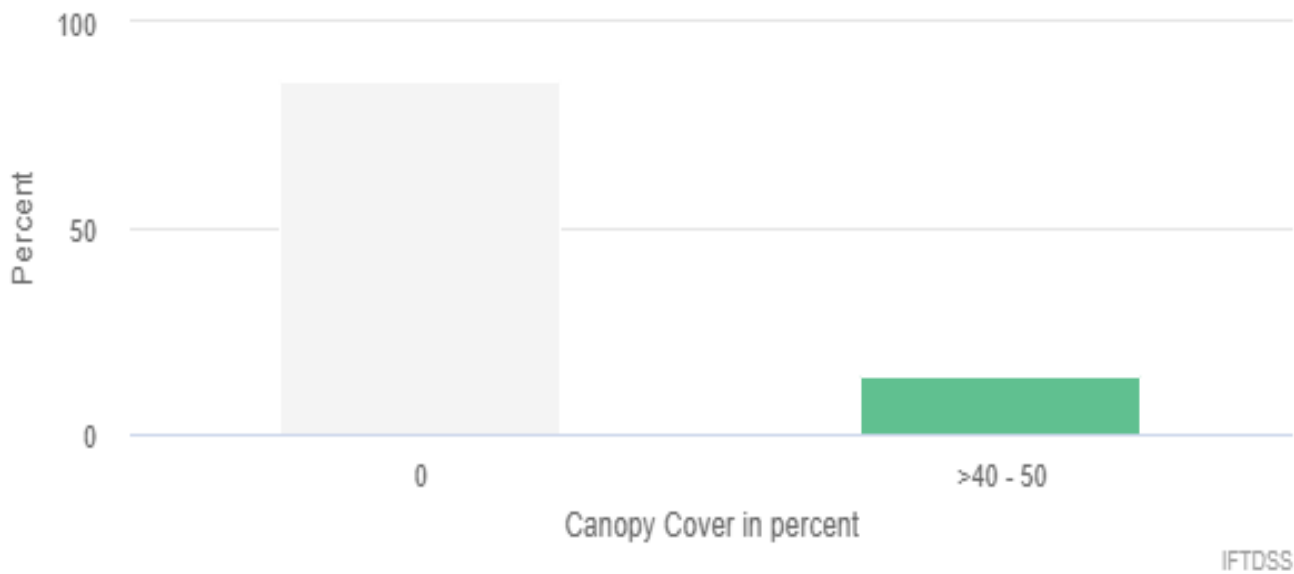
Canopy Cover



Canopy Cover

Canopy Cover (percent) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



IFTDSS

Canopy Cover

Canopy Cover (percent) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

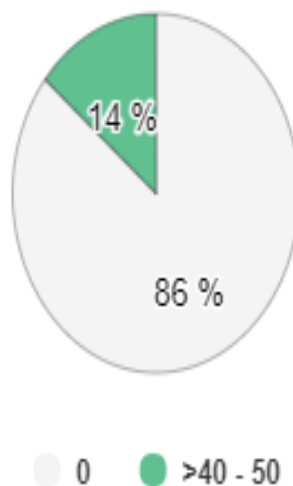
Landscape Name: NDNU_FM40_LF2020_unedited_20230127

Landfire Version: LF 2020

Landscape Acres (unbuffered): 89

Area of Interest Name: ndnu-polygon_shp

Area of Interest Acres: 43

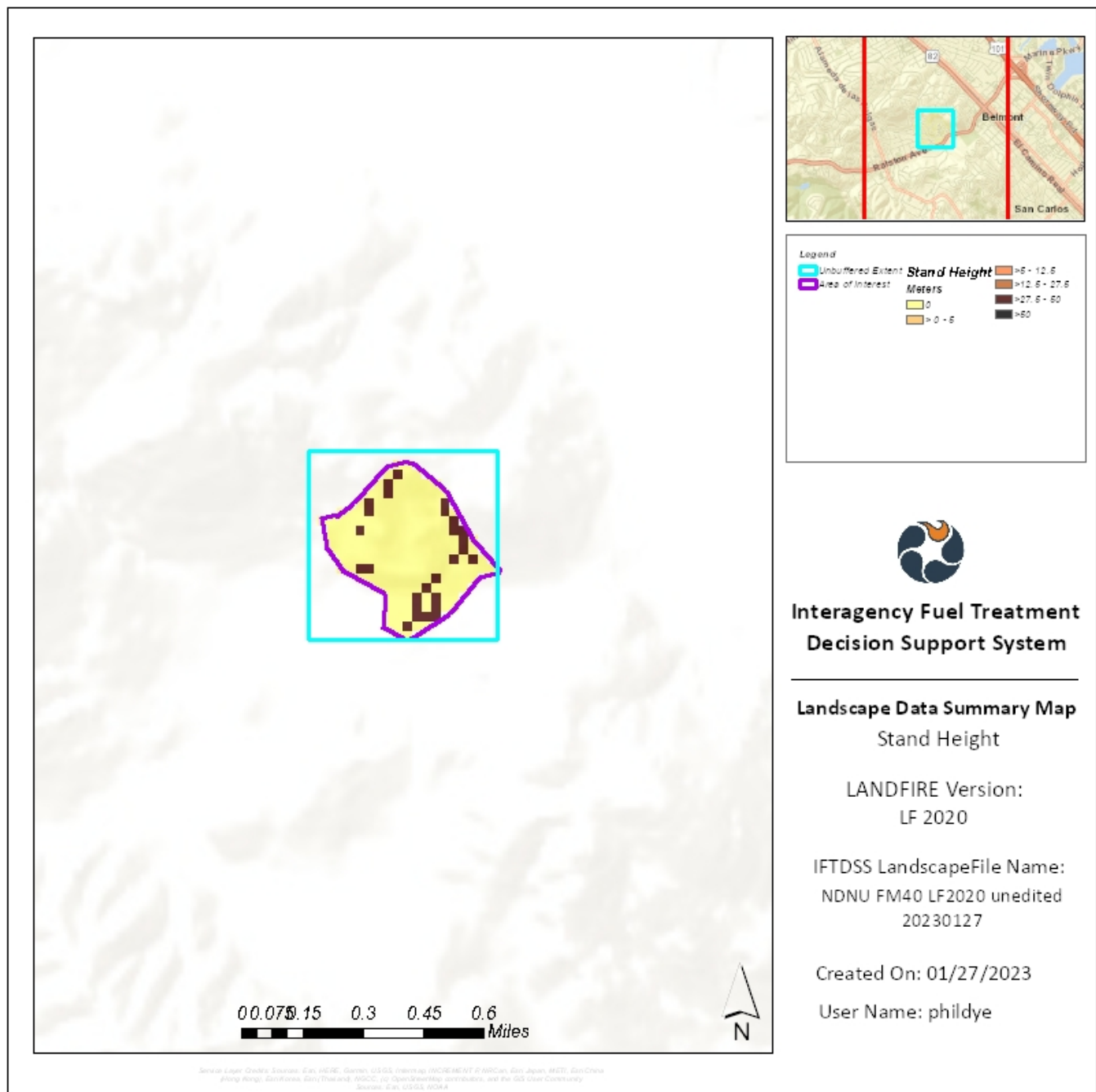


IFTDSS

Canopy Cover

Canopy Cover (percent)	Pixel Count (freq)	Acres In AOI	Percent In AOI
0 (non-forested)	165	37	86
>40 - 50	27	6	14

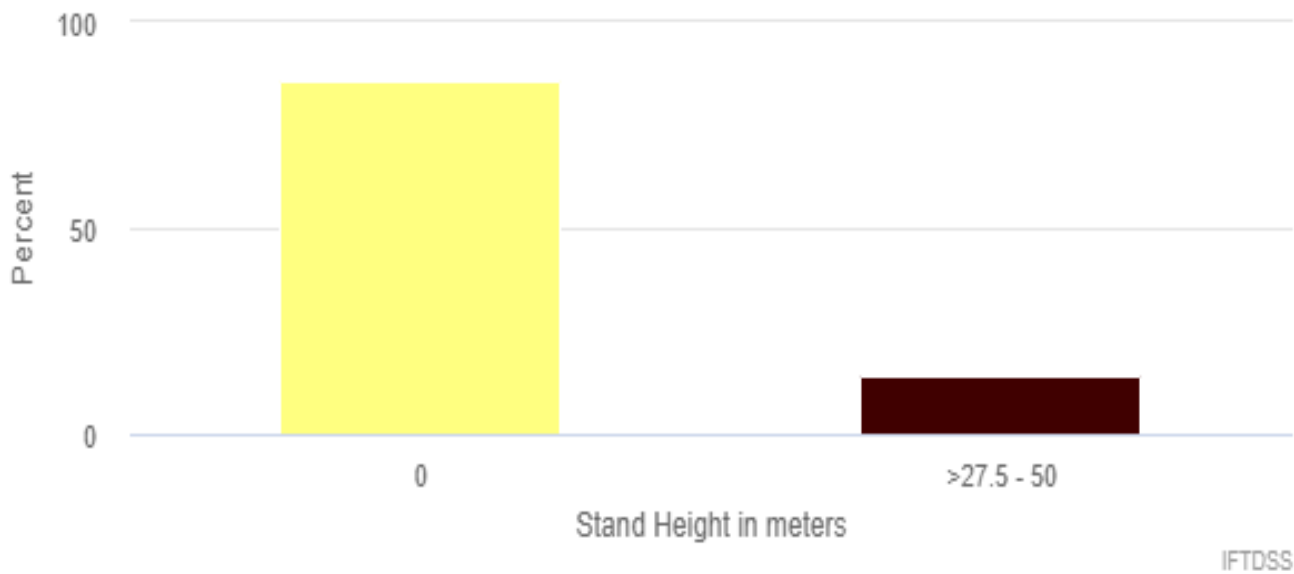
Stand Height



Stand Height

Stand Height (meters) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



IFTDSS

Stand Height

Stand Height (meters) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

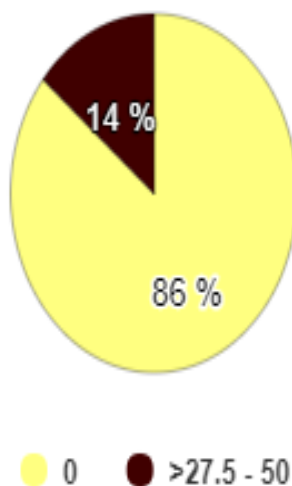
Landscape Name: NDNU_FM40_LF2020_unedited_20230127

Landfire Version: LF 2020

Landscape Acres (unbuffered): 89

Area of Interest Name: ndnu-polygon_shp

Area of Interest Acres: 43



IFTDSS

Stand Height

Stand Height (meters)	Pixel Count (freq)	Acres In AOI	Percent In AOI
0 (non-forested)	165	37	86
>27.5 - 50	27	6	14

Canopy Base Height



**Interagency Fuel Treatment
Decision Support System**

Landscape Data Summary Map
Canopy Base Height

LANDFIRE Version:
LF 2020

IFTDSS LandscapeFile Name:
NDNU FM40 LF2020 unedited
20230127

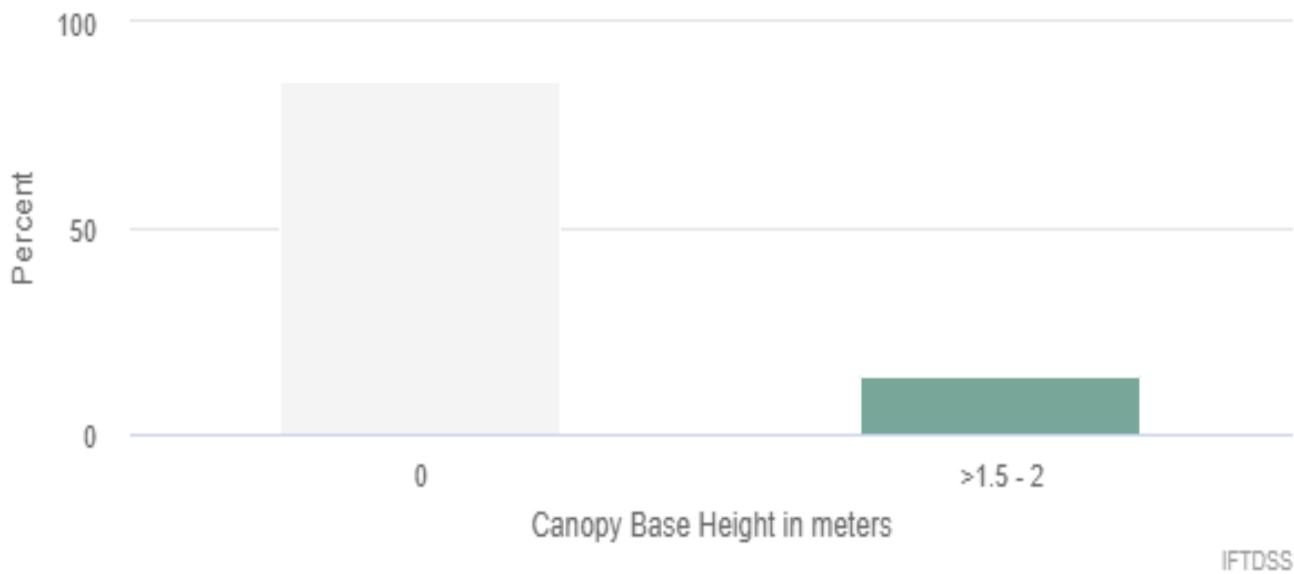
Created On: 01/27/2023
User Name: phildye

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Beijing), Esri Korea, Esri (Thailand), Swisstopo, IGN, Esri, Mapbox, OpenStreetMap contributors, and the GIS User Community
Sources: Esri, USGS, NOAA

Canopy Base Height

Canopy Base Height (meters) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

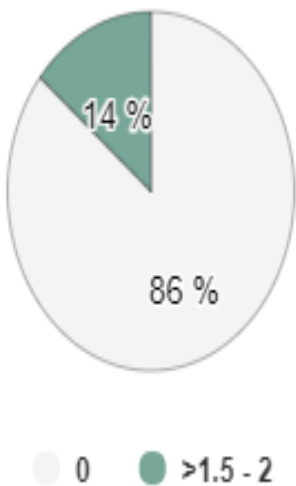
Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



Canopy Base Height

Canopy Base Height (meters) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43

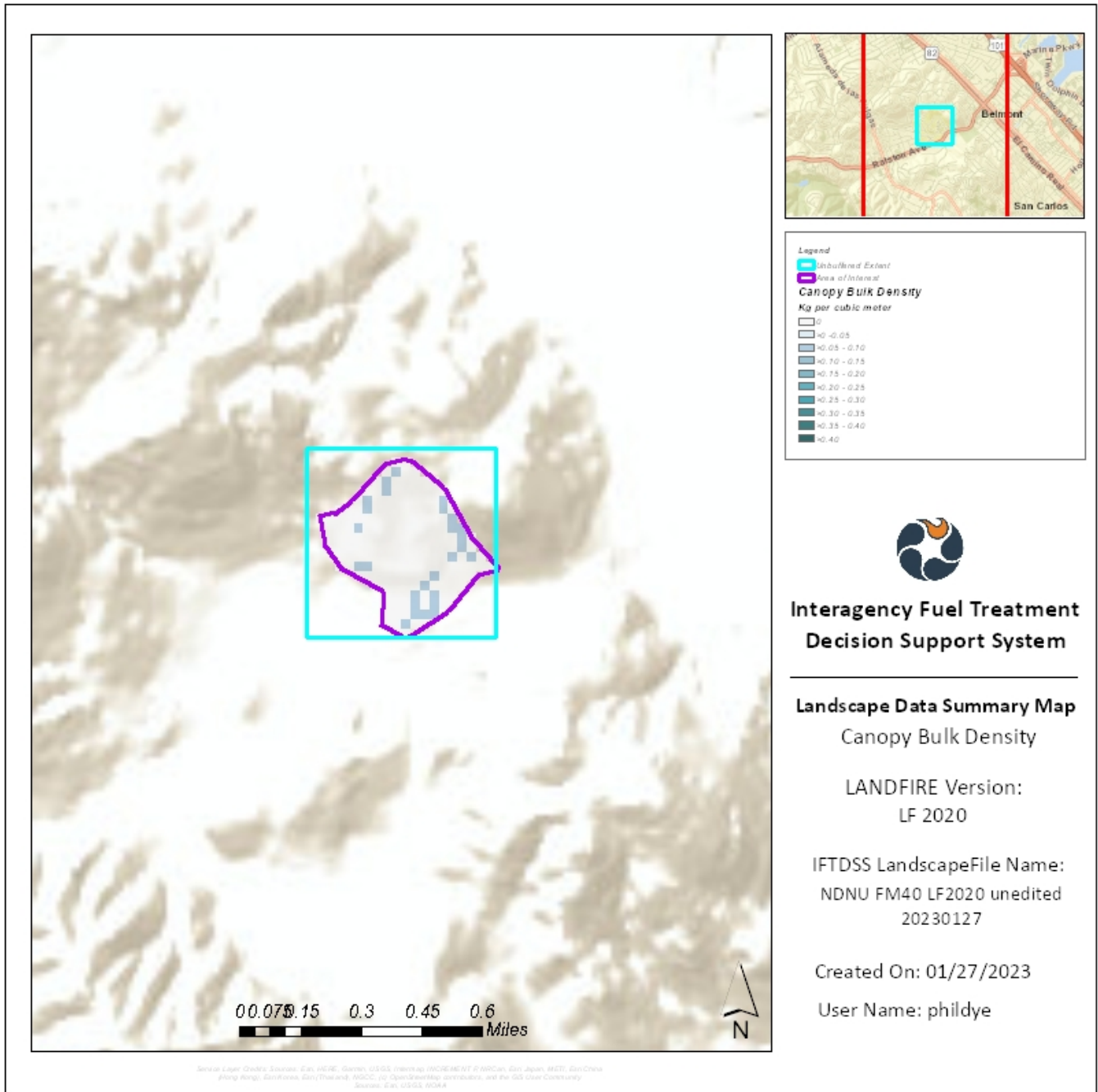


IFTDSS

Canopy Base Height

Canopy Base Height (meters)	Pixel Count (freq)	Acres In AOI	Percent In AOI
0 (non-forested)	165	37	86
>1.5 - 2	27	6	14

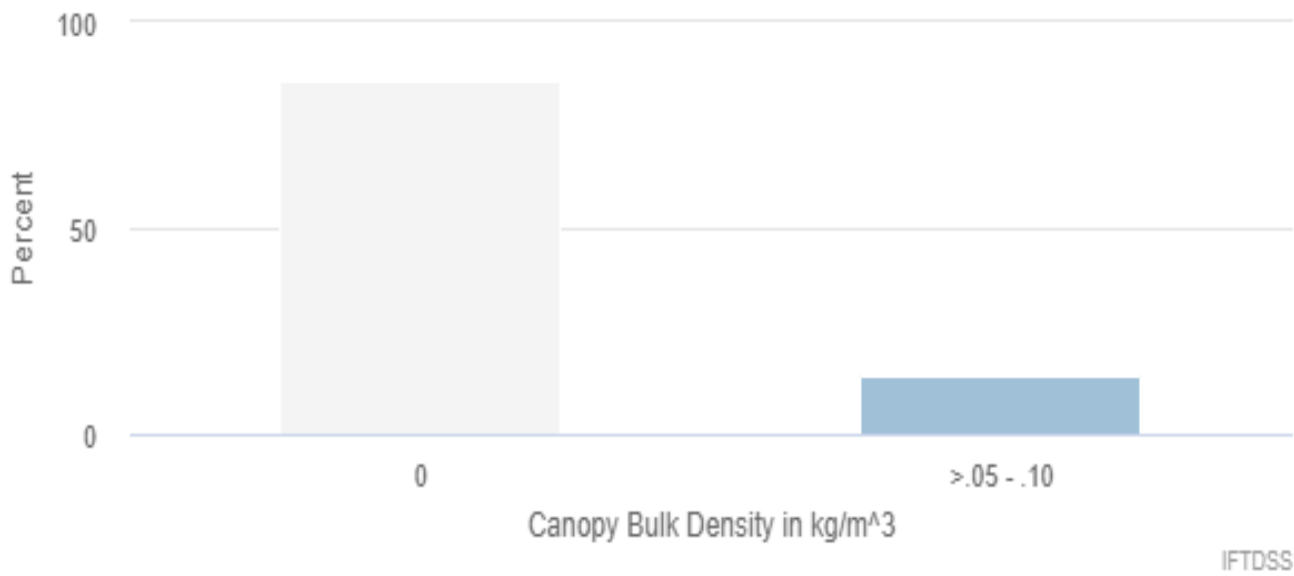
Canopy Bulk Density



Canopy Bulk Density

Canopy Bulk Density (kg/m^3) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

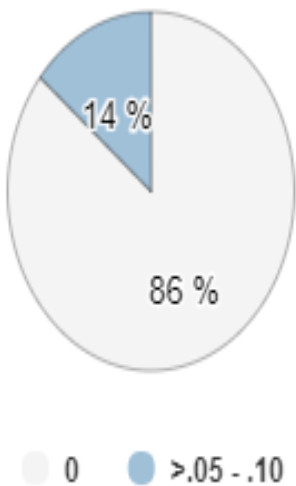
Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



Canopy Bulk Density

Canopy Bulk Density (kg/m^3) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43

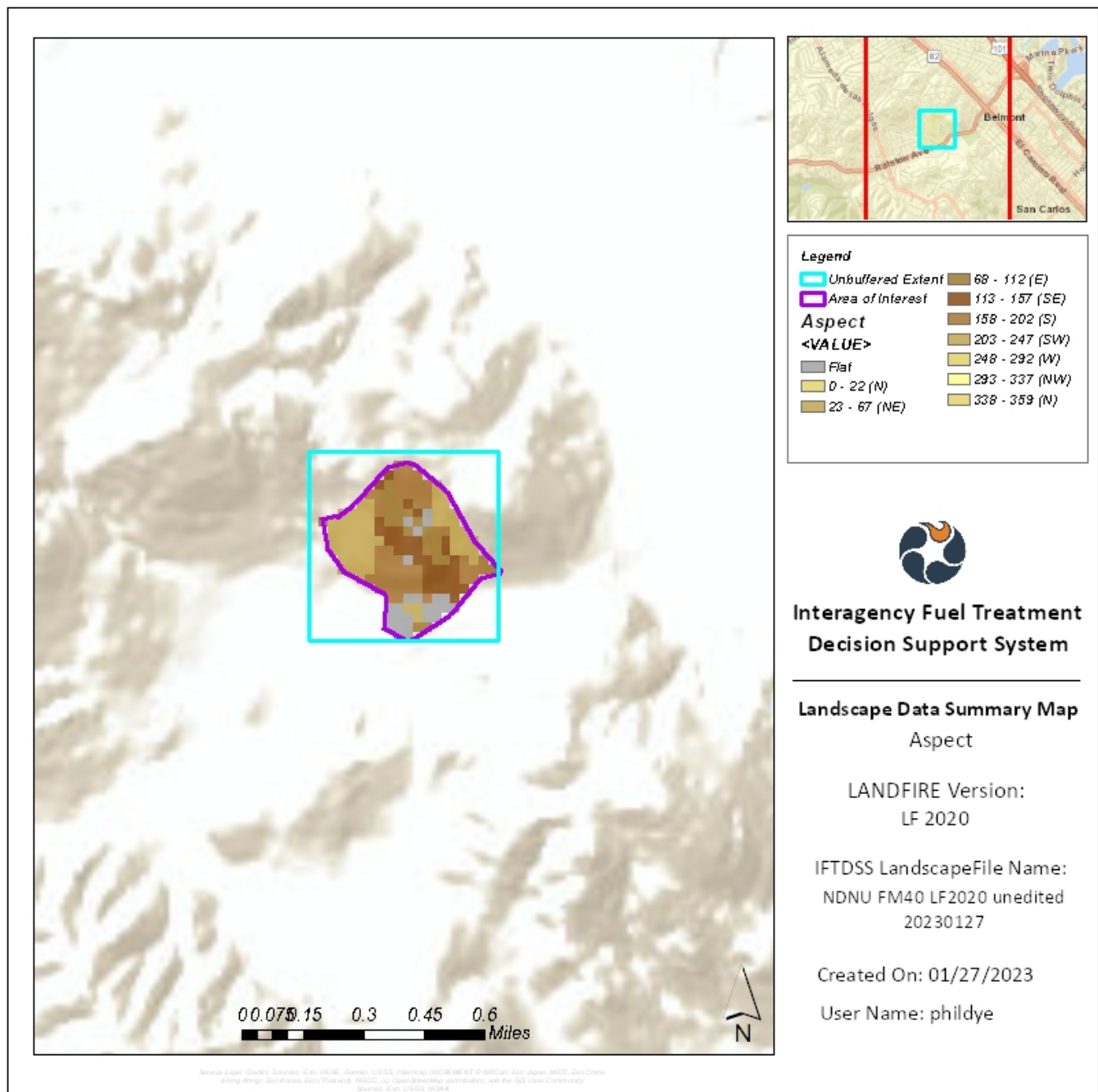


IFTDSS

Canopy Bulk Density

Canopy Bulk Density (kg/m^3)	Pixel Count (freq)	Acres In AOI	Percent In AOI
0 (non-forested)	165	37	86
>.05 - .10	27	6	14

Aspect



Aspect (degrees) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

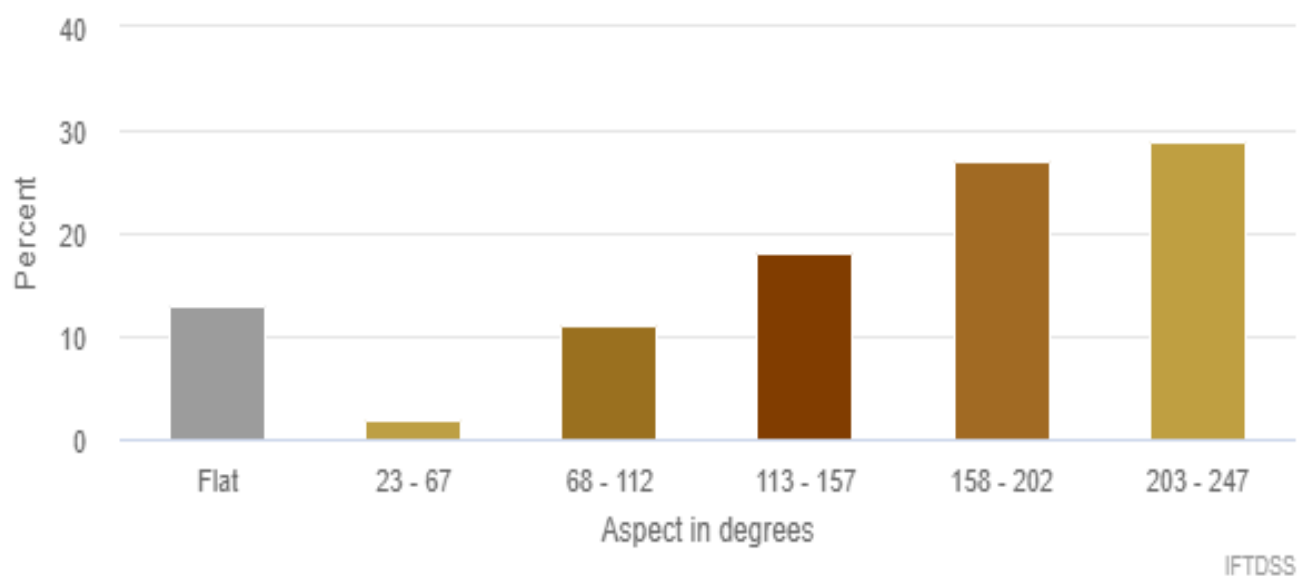
Landscape Name: NDNU_FM40_LF2020_unedited_20230127

Landfire Version: LF 2020

Landscape Acres (unbuffered): 89

Area of Interest Name: ndnu-polygon_shp

Area of Interest Acres: 43



Aspect (degrees) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

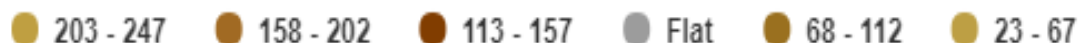
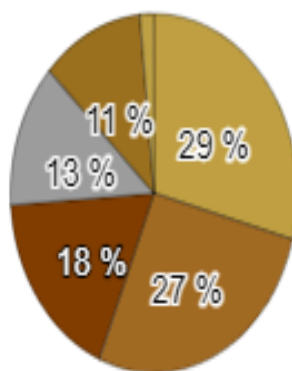
Landscape Name: NDNU_FM40_LF2020_unedited_20230127

Landfire Version: LF 2020

Landscape Acres (unbuffered): 89

Area of Interest Name: ndnu-polygon_shp

Area of Interest Acres: 43

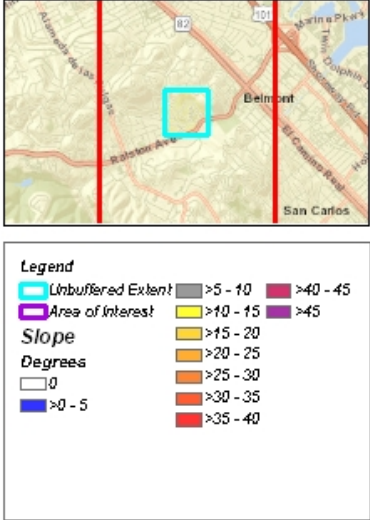
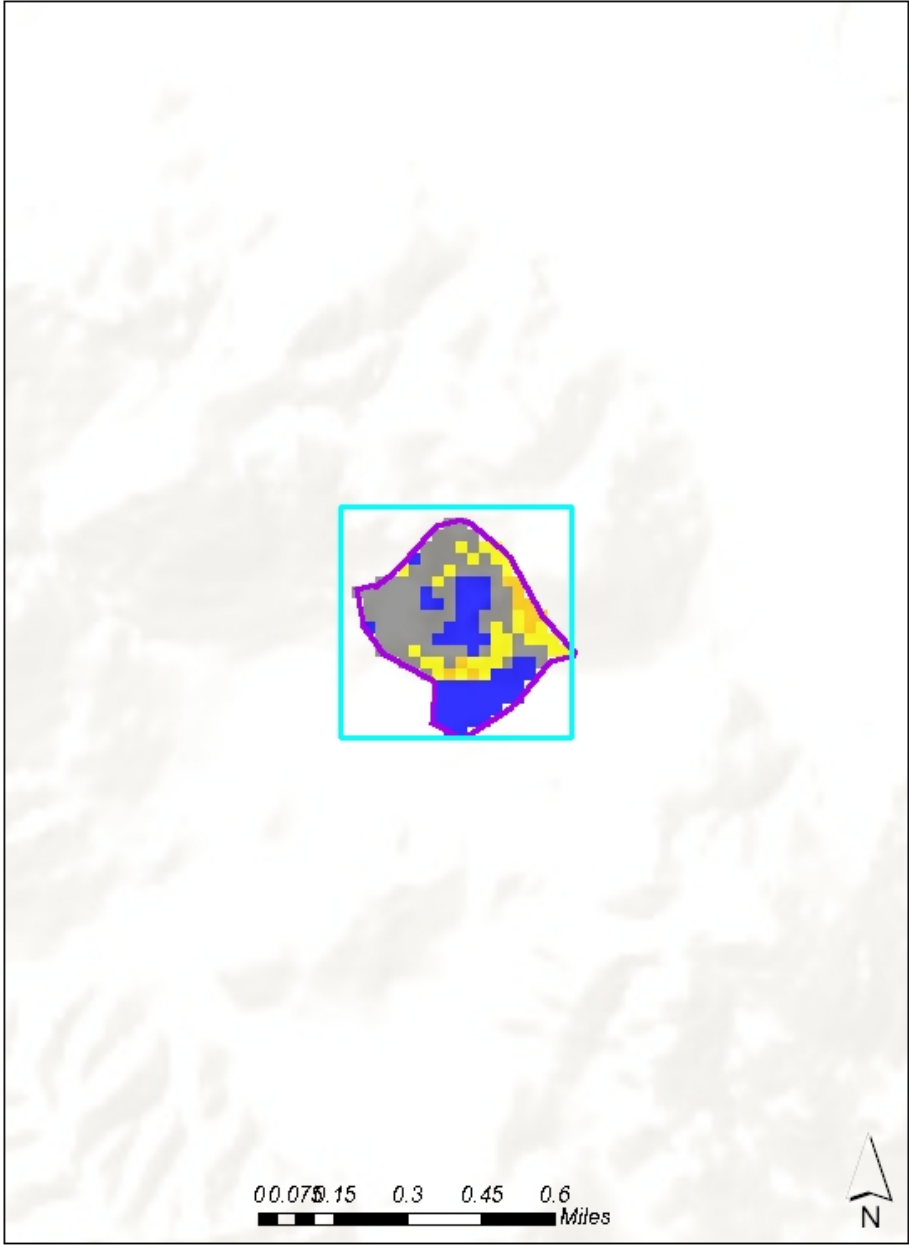


IFTDSS

Aspect

Aspect (degrees)	Pixel Count (freq)	Acres In AOI	Percent In AOI
Flat	25	6	13
23 - 67 (NE)	3	1	2
68 - 112 (E)	22	5	11
113 - 157 (SE)	34	8	18
158 - 202 (S)	52	12	27
203 - 247 (SW)	56	12	29

Slope




**Interagency Fuel Treatment
Decision Support System**

Landscape Data Summary Map
Slope

LANDFIRE Version:
LF 2020

IFTDSS LandscapeFile Name:
NDNU FM40 LF2020 unedited
20230127

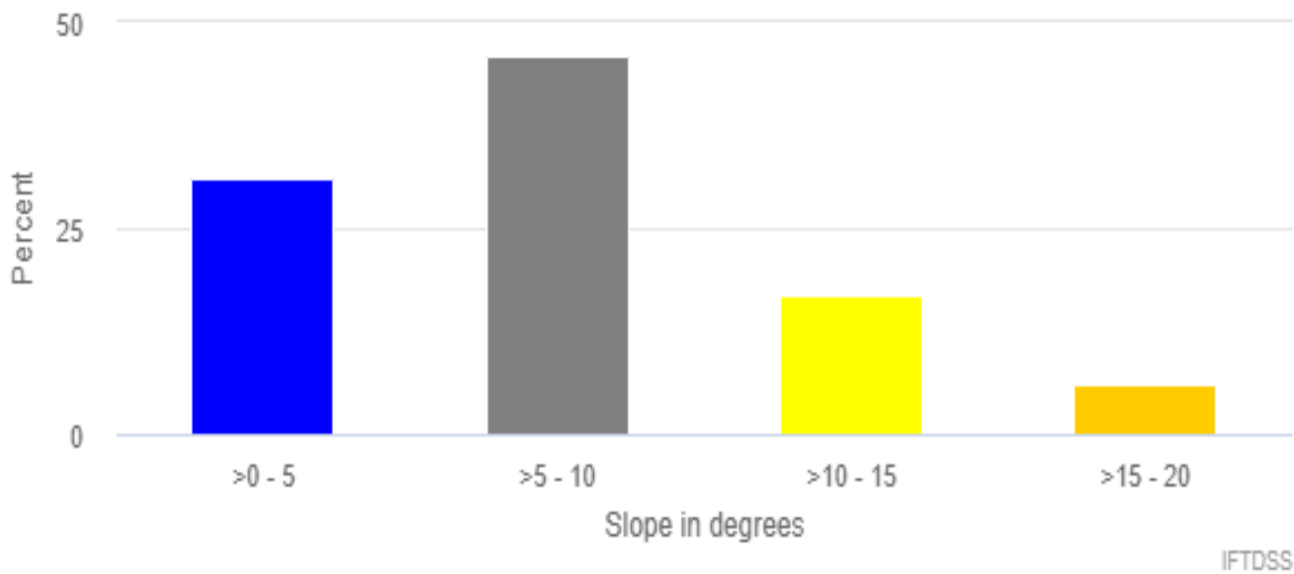
Created On: 01/27/2023
User Name: phildye

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Beijing), Esri Korea, Esri (Thailand), NGCC, et al. OpenStreetMap contributors, and the GIS User Community
Sources: Esri, USGS, NOAA

Slope

Slope (degrees) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

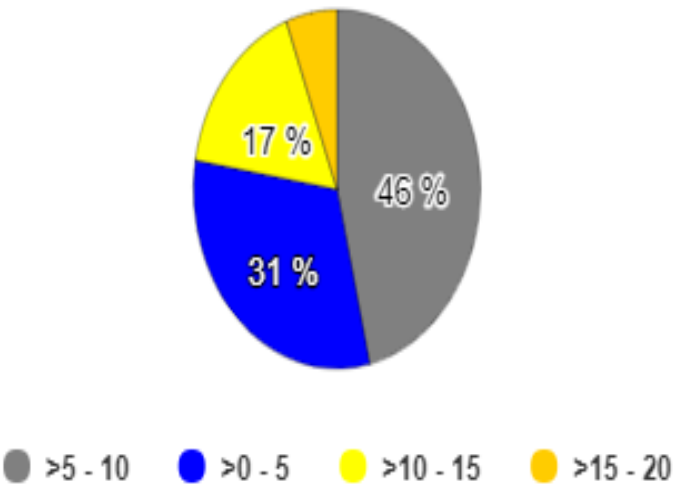
Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



Slope

Slope (degrees) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43

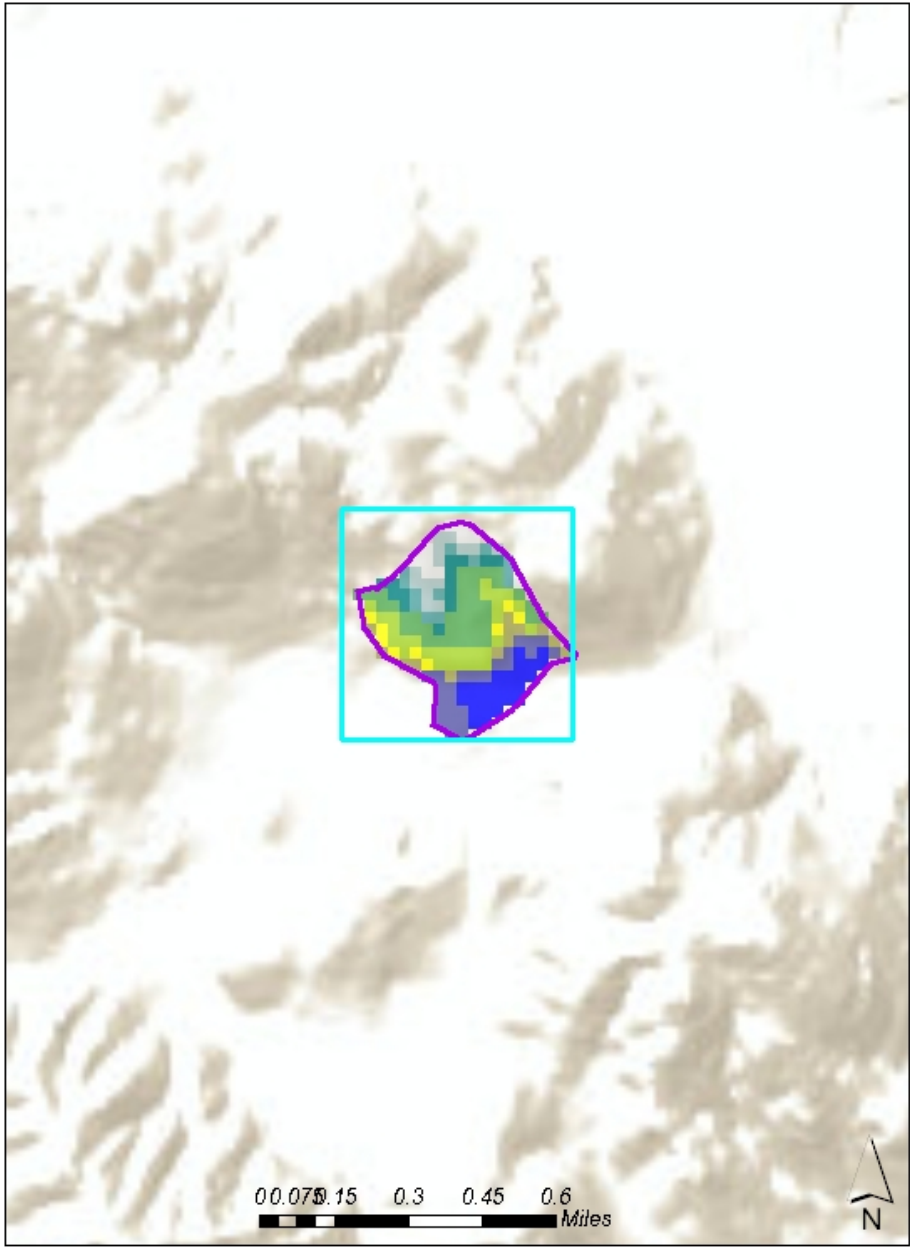


IFTDSS

Slope

Slope (degrees)	Pixel Count (freq)	Acres In AOI	Percent In AOI
>0 - 5	60	13	31
>5 - 10	89	20	46
>10 - 15	32	7	17
>15 - 20	11	2	6

Elevation



Legend

Unbuffered Extent	145 - 159
Area of Interest	160 - 175
Elevation	
82 - 97	176 - 190
98 - 113	191 - 205
114 - 128	206 - 221
129 - 144	222 - 236

**Interagency Fuel Treatment
Decision Support System**

Landscape Data Summary Map
Elevation

LANDFIRE Version:
LF 2020

IFTDSS LandscapeFile Name:
NDNU FM40 LF2020 unedited
20230127

Created On: 01/27/2023

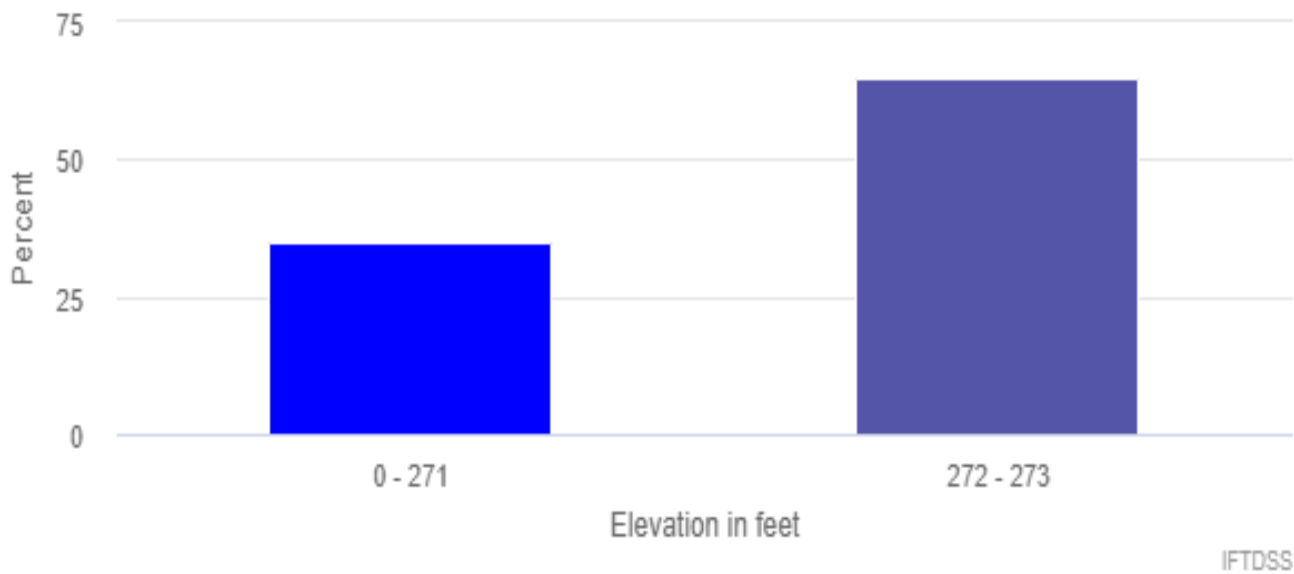
User Name: phildye

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Beijing), Esri Korea, Esri (Thailand), NGCC, et al. OpenStreetMap contributors, and the GIS User Community
Sources: Esri, USGS, NOAA

Elevation

Elevation (feet) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

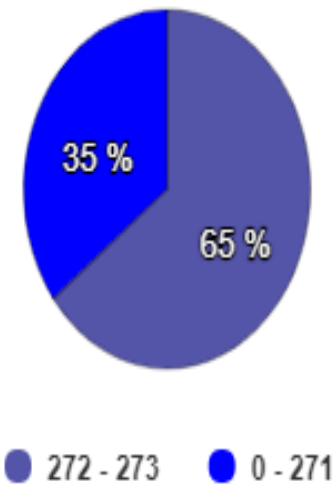
Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



Elevation

Elevation (feet) Data Summary for Area of Interest "ndnu-polygon_shp" within "NDNU_FM40_LF2020_unedited_20230127" Landscape

Landscape Name: NDNU_FM40_LF2020_unedited_20230127
Landfire Version: LF 2020
Landscape Acres (unbuffered): 89
Area of Interest Name: ndnu-polygon_shp
Area of Interest Acres: 43



IFTDSS

Elevation

Elevation (feet)	Pixel Count (freq)	Acres In AOI	Percent In AOI
0 - 271	68	15	35
272 - 273	124	28	65

APPENDIX K2:
ADDENDUM TO THE NOTRE DAME
DE NAMUR UNIVERSITY CAMPUS,
VEGETATION MANAGEMENT PLAN
(PANORAMA ENVIRONMENTAL)



Addendum to the Notre Dame De Namur University Campus, Vegetation Management Plan

Prepared by Panorama Environmental, Inc.

California Environmental Quality Act Analysis

CEQA and Relevant Criteria

Stanford University (Stanford) has applied to the City of Belmont for a “Conceptual Development Plan” or CDP, and for a Development Agreement. The City of Belmont is preparing an Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA) to address the potential impacts of the project and to avoid or minimize those impacts, where feasible.

Panorama prepared a Vegetation Management Plan for the project in March of 2023. The Vegetation Management Plan identified the existing conditions of vegetation and fuels on-site, as well as the regulatory requirements related to wildfire, and presented a plan to further reduce wildfire hazards on site through vegetation thinning and maintenance. The campus is not within the wildland urban interface (WUI) and is within a Local Responsibility Area (LRA) serviced by the Belmont Fire Protection District. Within the LRA, the campus is not within an area mapped as a *very high fire hazard severity zone* (VHFHSZ). It is within a non-VHFHSZ.

This Addendum to the Vegetation Management Plan addresses the environmental factors related to wildfire that are potentially affected by implementation of the project, including the Vegetation Management Plan, as identified in the CEQA Guidelines Appendix G: Environmental Checklist Form. Note that the Vegetation Management Plan is part of the proposed project subject to CEQA review. The implementation of the Vegetation Management Plan could affect other CEQA analyses besides wildfire, as well. Any such impacts of the Vegetation Management Plan should be addressed, as appropriate, in the individual CEQA sections of the EIR pertaining to those resources and are not addressed here.

ADDENDUM TO THE VEGETATION MANAGEMENT PLAN FOR THE NOTRE DAME DE NAMUR UNIVERSITY CAMPUS

CEQA Regulatory Environment

State Regulations, Policies and Standards

California Emergency Plan

Pursuant to the Emergency Services Act (California Government Code Section 8550 et seq). California has developed an Emergency Plan to coordinate emergency services provided by federal, State, and local government agencies and private individuals. Response to wildfires is one part of the Emergency Plan. The Emergency Plan is administered by the State's Office of Emergency Services (OES). The OES coordinates the response of other agencies, including the U.S. Environmental Protection Agency, California Highway Patrol, California Department of Fish and Wildlife, the Regional Water Quality Control Boards (in this case, the San Francisco Bay Regional Water Quality Control Board), the local air districts, and other local agencies. The Emergency Plan defines the policies, concepts, and general protocols for the proper implementation of California's Standardized Emergency Management Systems (SEMS). The SEMS is an emergency management protocol that agencies in California must follow during multiagency response efforts, whenever State agencies are involved (CAL OES 2017). Belmont Fire Protection District responds to disasters in accordance with the SEMS in the project area.

California Fire Code

The California Fire Code is Part 9 of the California Code of Regulations under Title 24, also referred to as the California Building Standards Code. The purpose of the California Fire Code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosions, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. This code establishes regulations affecting or relating to buildings, structures, processes, premises, and a reasonable degree of life and property safeguards regarding fire hazards, fire suppression, or alarm systems, and conditions affecting the safety of emergency responders (UpCodes 2022). The California Fire Code applies to existing and new campus buildings and structures.

California Public Resources Code

Sections 4290 and 4291 of the California Public Resources Code (PRC) pertain to minimum fire safety standards related to defensible space that are applicable to State Responsibility Area (SRA) lands under the authority of CAL FIRE, and to lands classified and designated as VHFHSZs in the LRAs. The PRC requires maintenance of a 100-foot defensible space, with space from each side and from the front and rear of a structure, but not beyond the property line. Other defensible space requirements include vegetation management of trees and shrubs, and maintenance of roofs by removing vegetative materials (California Legislative Information n.d.; n.d.). These requirements would not apply to the project since it is not within the SRA nor within a VHFHSZ within the LRA.

ADDENDUM TO THE VEGETATION MANAGEMENT PLAN FOR THE NOTRE DAME DE NAMUR UNIVERSITY CAMPUS

California State Hazard Mitigation Plan

The 2018 California Hazard Mitigation Plan represents the State's primary hazard mitigation guidance document and is composed of comprehensive and valuable input provided by State Hazard Mitigation Team members and stakeholders. The State Hazard Mitigation Plan continues to build on the State's commitment to reduce or eliminate potential risks and impacts of natural and human-caused disasters, to help communities and their mitigation and disaster resiliency efforts. The State Hazard Mitigation Plan includes an updated statewide risk assessment, disaster history, and statistics; recent mitigation progress, success stories, and best practices; updated State hazard mitigation goals, objectives, and strategies; and updated climate mitigation progress and adaptation strategies (Cal OES 2023). Recommendations and risk assessment updates could apply to the project.

Belmont Municipal Code Section 7-401(b)

This code section defines as a public nuisance any property where "overgrown vegetation; dead, decayed, diseased, or hazardous trees, firewood; weeds and other vegetation is likely to harbor rats, vermin or nuisances or may be a fire hazard." The NDNU Campus is serviced by the Belmont Fire Protection District. This code would apply to the project.

CEQA Wildfire Factors

This Addendum addresses the Appendix G Environmental Checklist Form factors under Section 20, Wildfire. The CEQA checklist questions are shown below, followed by the analysis for the project. The campus is not within an SRA, nor in an area classified as a VHFHSZ within an LRA, therefore, the questions under Section 20 Wildfire do not technically apply and thus the project could be deemed to have no impact on that basis. However, to ensure that any potential effects of the project on wildfire (or wildfire on the project) are analyzed, the questions also are addressed substantively, without regard for the limitations stated in the CEQA checklist form.

Environmental impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
20. WILDFIRE. 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?	☐	☐	☒	☐

ADDENDUM TO THE VEGETATION MANAGEMENT PLAN FOR THE NOTRE DAME DE NAMUR UNIVERSITY CAMPUS

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

☐☐☐☒

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

☐☐☐☒

Responses

A) Less than Significant Impact with Mitigation. Note that impacts to emergency response plans that are not related to wildfire are addressed under the EIR's Hazards and Hazardous Materials and Traffic analyses. This analysis pertains only to impacts to emergency response and evacuation related to wildfires.

The Belmont Police Department, Office of Emergency Services (OES), provides planning, preparedness, public information, training, and federal/State intergovernmental emergency services coordination for the City of Belmont (City). The Belmont OES develops and maintains the Emergency Operations Plan (EOP) for the City and the Belmont Fire Protection District. Belmont Fire Protection District responds to disasters in accordance with the National Incident Management System (NIMS) at the federal level and the Standardized Emergency Management System (SEMS) at the State level. The City's EOP outlines policies and procedures during an emergency. San Mateo County uses Genasys (formerly Zonehaven) for evacuation across the County.

The campus is not in an area of high wildfire risk and thus the risk of needing to evacuate the campus for wildfire is substantially lower than the risk in the western portions of the City, which are within VHFHSZs. Egress from the NDDN Campus, however, would ultimately end up on Ralston Avenue in the event of evacuation for wildfire. The primary egress would be through Entry Drive onto Ralston. Should evacuation from the western part of Belmont for wildfire be needed, Ralston Avenue would also likely serve as a major evacuation route for residents in western Belmont traveling eastward towards El Camino Real or Highway 101.

In the rare event of a wildfire evacuation during construction activities, numerous vehicles could be required to evacuate to Ralston Avenue. During the peak operation of the campus, the evacuation of up to 1,350 vehicles (the number of parking spaces proposed) could result in congestion of Ralston Avenue, impeding evacuation. The City would likely require sheltering in place in the vicinity of the campus in order to evacuate the western portion of the City first, per the EOP. Given the size of the campus, evacuation could be impeded without clear planning, which would be a significant impact. Mitigation Measure WF-1 would be implemented to minimize impacts and ensure evacuation in accordance with the City's emergency planning

ADDENDUM TO THE VEGETATION MANAGEMENT PLAN FOR THE NOTRE DAME DE NAMUR UNIVERSITY CAMPUS

efforts. The measure would require a Wildfire Evacuation Plan be prepared for the campus in coordination with the Belmont OES and Belmont Fire Protection District. The plan would first address evacuation during the construction phase, and then would be updated as the campus is operational and grows. The plan would also identify evacuation routes off of the campus, which may also include secondary emergency vehicle access routes through neighboring properties via Notre Dame Avenue and/or Folger Drive to connect to Laxague Drive and the campus plateau. Stanford would develop access agreements with neighboring property owners as discussed in the Traffic Impact Assessment Report. These access agreements would also address evacuation needs. Implementation of the Evacuation Plans and following the City's EOP would minimize effects to less than significant levels.

Mitigation Measure WF-1: A Wildfire Evacuation Plan shall be prepared for the campus in coordination with the City of Belmont's OES and the Belmont Fire Protection District. The Wildfire Evacuation Plan shall identify key contacts between Stanford University and the City in the event of a wildfire emergency per the City's EOP, protocols to follow to manage the campus' evacuation process, and evacuation route options based on agreements with neighbors. The Wildfire Evacuation Plan shall be developed first for construction, then updated as the campus is operational and grows for each major phase of development. The plan shall be reviewed and agreed upon with the City OES.

Vegetation management activities identified under the Vegetation Management Plan would not impair an adopted emergency response or emergency evacuation plan. Vegetation management would be carried out immediately upon acquisition of the parcels, as well as over the life of the project. The work may include the staging of equipment on-campus, but it would not be anticipated to impact Ralston Avenue or other major routes that could be used for emergency response or evacuation. In the unlikely event roads were to be impacted during vegetation management activities, the appropriate permits would be obtained from Belmont Public Works Department, which would specify the necessary emergency response and evacuation provisions. Project impacts on an adopted emergency response plan or emergency evacuation plan from vegetation treatment activities, therefore, would be less than significant.

B) Less than Significant Impact. The Vegetation Management Plan (included in the Project Description) presented fire behavior modeling of existing conditions and found that rapid and extreme fire behavior spread on the campus is unlikely to occur. The landscaped areas would not support rapid fire spread, and the areas of natural vegetation lack sufficient fuel density and volume to support rapid fire spread. Given the proximity of abundant fire suppression resources, large-area fire spread is unlikely to occur. Therefore, the development of the campus under the current proposal would not substantially increase wildfire risks or occupants' exposure to wildfire.

Residents of the entire Bay Area can be subject to increased pollutant concentrations from wildfire; however, the project would have low risks of causing or exacerbating wildfire. Newer buildings also typically have better ventilation systems than older, existing buildings, thus

ADDENDUM TO THE VEGETATION MANAGEMENT PLAN FOR THE NOTRE DAME DE NAMUR UNIVERSITY CAMPUS

potentially further reducing impacts of exposure to pollutants from wildfire as compared to the existing conditions on campus. These improved ventilation systems would minimize the impact of smoke on residents. Additionally, future development must comply with the CA building Code and Fire Code regulations, along with Public Resources Code 4291, which requires defensible space around new buildings, thereby minimizing wildfire risks and associated pollutant concentrations.

Should a wildfire occur on campus, implementation of the Vegetation Management Plan would further reduce impacts, reducing the potential for the sparking of wildfire on campus. The potential for long flame residence time (>50 chains/hour) and areas of concentrated heat from wildfire would be minimized through thinning and on-going maintenance, reducing intensity of any potential fire and the amount of time to extinguish the fire, and thus reducing pollutants emitted from burning structures.

C) Less than Significant. No new infrastructure beyond that dictated by code (e.g., fire hydrants) would be required to address wildfire risks, since the risks are expected to be low. While new stormwater drainage, sewer systems, and roads are included in the project, these utilities are not needed to address wildfire risk. For the environmental impacts associated with installation of these utilities, refer to the Utilities and Service System section of the EIR.

New, off-site overhead power lines are not anticipated to be needed for the project. New connections to buildings would be made from existing utilities to the campus, most of which would be underground, although some may be overhead. All utility installations would comply with relevant building codes and the California Fire Code to minimize potential for fire. Impacts would be less than significant.

D) Less than Significant Impact. The potential risk of wildfire on the campus site is low and would be further reduced through the implementation of the Vegetation Management Plan, which would require thinning in areas of denser vegetation and ongoing maintenance. The campus has low slopes of less than 10 percent on over $\frac{3}{4}$ of the campus. The elevation ranges from 80 feet above mean sea level (amsl) in the south to 238 feet amsl in the north of the site. Slightly less than $\frac{1}{4}$ of the site has slopes of greater than 10 percent but these slopes are less than 50 percent (which is the typical slope where landslides are a risk). Given the minimal risks of rapid and intense wildfire on-campus and generally lower slopes, the project would not expose people or structures to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes from wildfire on-site.

Wildfire could occur off-site, particularly in the wildland areas in the western portion of the City. Should a wildfire occur in these areas, the campus could be subject to some degree of downslope increased stormwater runoff; however, few drainages pass through the campus and stormwater in the City's downtown is largely maintained through underground drainage and sewer systems. Flooding impacts on the NDDN Campus from off-site wildfire are not expected

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to be substantial. Other impacts associated with geology and soils and hydrology and water quality that are not related to wildfire are addressed in those sections of the EIR.

Post-fire slope instabilities in off-site areas are not likely to impact the campus due to the limited slopes in the off-site areas, intervening infrastructure (such as Crystal Springs Reservoir and Highway 280), and hilly topography between the wildland areas and the campus (e.g., the topography undulates up and down over a series of hills). Landslides that occur in Belmont tend to have localized impacts, given slopes over 50 percent generally do not occur except in very localized areas.

Since the campus is existing, the risks of off-site wildfire impacts on the campus would also be similar to the baseline conditions. Build-out of the campus would potentially result in 52 additional people on the campus over baseline conditions, and thus would not result in a substantially increased risks to life or property over baseline conditions.

