Initial Study / Mitigated Negative Declaration

1350 San Raymundo Road Project

Hillsborough, San Mateo County, California

Prepared for:

Town of Hillsborough, Planning Division
1600 Floribunda Avenue
Hillsborough, CA 94010

Attn: Linda Roberson
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April 2025

Prepared by:

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WRA#29273-6

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List of Acronyms and Abbreviations

ABAG	Association of Bay Area Governments
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
Basin Plan	San Francisco Bay Region Water Quality Control Plan
BMPs	Best Management Practices
BRTR	Biological Resources Technical Report
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
C&D	construction and demolition
dB	decibel
dBA	A-weighted sound level
EOC	Emergency Operations Plan
ESA	Endangered Species Act
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
IRWMP	Integrated Regional Water Management Plan
NAHC	Native American Heritage Commission
NPDES	National Pollution Discharge Elimination System
PCE	Peninsula Clean Energy
PG&E	Pacific Gas and Electric Company
Rank	California Rare Plant Rank
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SEMS	Standardized Emergency Management System
SF	square feet
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SRP	Stormwater Resource Plan
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
Town	Town of Hillsborough
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VHFHSZ	Very High Fire Hazard Severity Zone
WBWG	Western Bat Working Group
WSA	Water Supply Agreement
WRA	WRA, Inc.

1.0 INTRODUCTION AND PURPOSE

This Initial Study of environmental impacts is being prepared to conform to the requirements of the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations 15000 et. seq.), and the regulations and policies of the Town of Hillsborough (Town). This Initial Study evaluates the potential environmental impacts which might reasonably be anticipated to result from implementation of the 1350 San Raymundo Road Project (or the "project").

The Town of Hillsborough is the Lead Agency under CEQA and has prepared this Initial Study to address the impacts of implementing the proposed project. The purpose of the project is to subdivide an existing 1.67-acre lot located at 1350 Raymundo Road and containing an existing single-home into two separate lots. Upon review of the project, Town staff determined it was reasonably foreseeable that each lot would be developed with residential structures and other associated improvements that could potentially result in a significant effect on the environment.

As such, this Initial Study evaluates the potential environmental impacts which might reasonably be anticipated to result from implementation of the subdivision and the subsequent construction of residences at a detailed enough level to provide agencies and the public with information about the potential impacts of the proposed project on the local and regional environment.

2.0 PROJECT INFORMATION

2.1 Project Title

1350 San Raymundo Road Project

2.2 Lead Agency Name and Address

Town of Hillsborough, Planning Division
1600 Floribunda Avenue
Hillsborough, CA 94010

2.3 Contact Person and Phone Number

Linda Roberson
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1600 Floribunda Avenue
Hillsborough, CA 94010
650-375-3659
lroberson@hillsborough.net

2.4 Project Location

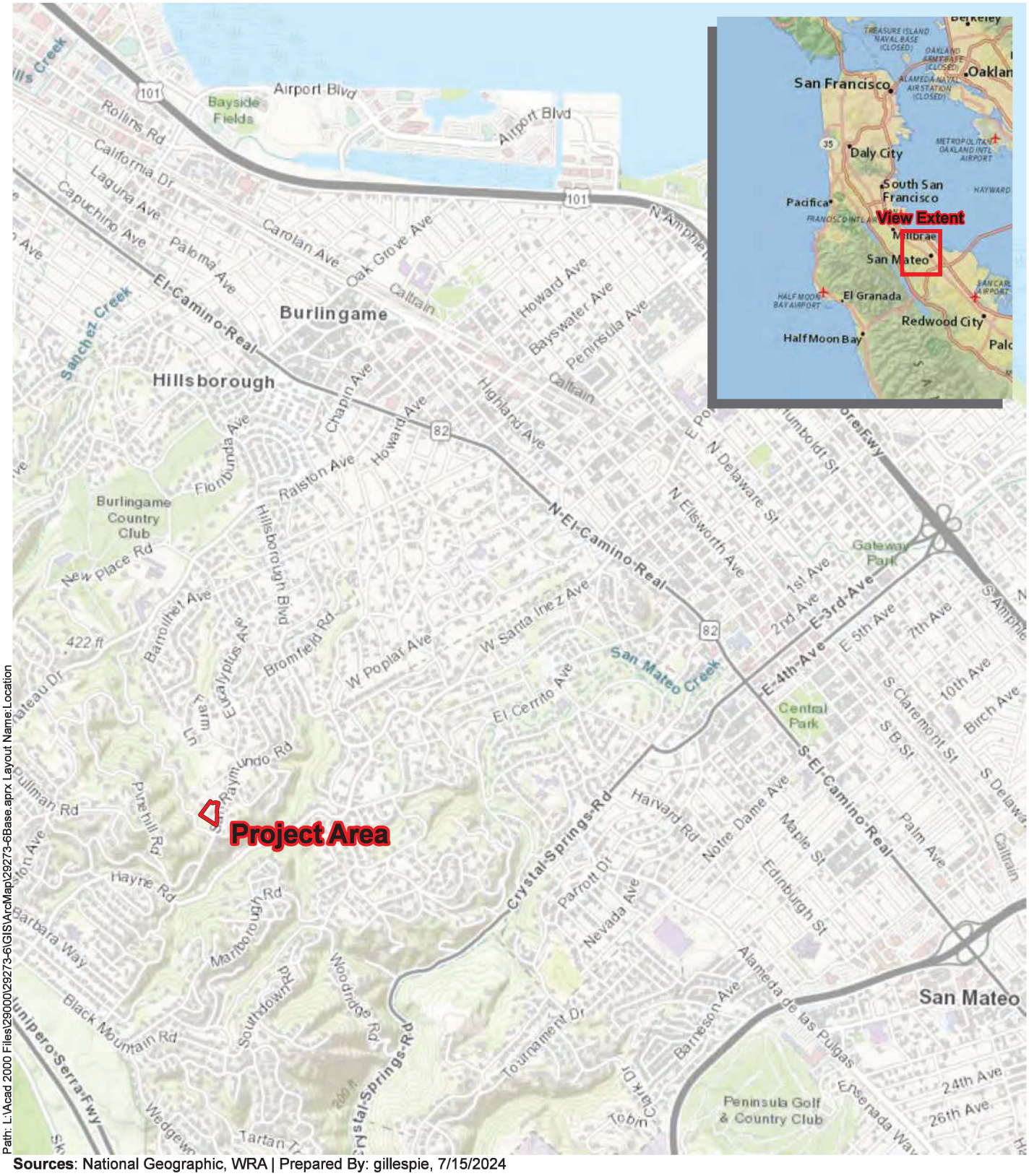
The project site is located at 1350 San Raymundo Road (Assessor's Parcel Number 030-091-030) between Robin Road and La Honda Road, east of Interstate 280 in Hillsborough, California (Figure 1).

2.5 General Plan Land Use Designation and Zoning District

The project site has a General Plan land use designation of Single-Family Residential and a zoning designation of Traditional Residential (RD-1).

2.6 Surrounding Land Uses and Setting

The project site is bordered by San Raymundo Road to the east and a residential property to the north. Surrounding land uses include low-density single-family residential lots to the south, east, north, and west of the project (Figure 2).



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Sources: National Geographic, WRA | Prepared By: gillespie, 7/15/2024

Figure 1. Project Area Vicinity Map

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 0.25 0.5 Miles

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Sources: USDA NAIP Imagery 2022, USDA NRCS SSURGO, WRA | Prepared By: gillespie, 7/15/2024

Figure 2. Project Area Site Map

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

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3.0 PROJECT DESCRIPTION

3.1 Existing Setting

The project site is located at 1350 San Raymundo Road in the Town of Hillsborough. The site is located on the west side of San Raymundo Road approximately 1.2 miles northeast of Interstate 280 via Hayne Road and Sandra Road. The majority of the project site is currently developed with one single-family residence. The existing residence was constructed in 1973 and has a tennis court, recreational swimming pool and an approximately 196-foot paved driveway that leads to San Raymundo Road. A second asphalt paved driveway is located southerly of the primary driveway and provides secondary access to the south side of the existing residence. Undeveloped areas consist of remnant stands of native trees (including coast redwoods, coast live oaks, madrone, Monterey cypress, Monterey pine, and Fremont cottonwood) and ruderal areas. The overall topography of the project site is flat with elevations ranging from approximately 300 to 350 feet above sea level. The project site is surrounded by similar large-lot single-family residential properties.

3.2 Detailed Description of the Proposed Project

The proposed project would subdivide the existing single parcel into two parcels: Parcel A and Parcel B (Figure 3). Although the project would not include any new development at this time, conceptual designs have been provided to help anticipate the potential environmental impacts that could occur when Parcel A and B are developed with new single-family residences in the future. Conceptual exhibits of the single-family residences are depicted in Figures 4-1 and 4-2.

Proposed Parcel A (Figure 4-1) would have an area of 0.89 ac (38,697 SF) and allow for a minimum covered floor area of at least 2,500 square feet. The existing maximum slope is 15%, which complies with the Town's standards for residential lots. The existing driveway for Parcel A is proposed to remain with some widening and narrowing as necessary to meet all development standards and life safety requirements. Most of the asphalt driveway would be a minimum of 20 feet wide, narrowing to 16 feet wide to match the existing condition at the entrance from San Raymundo Road. A bioretention filter outfall storm drain (with a minimum filter area of 360 square feet) with multiple emitters to create sheet-flow would be constructed within Parcel A. Approximately 20 trees, including coast live oak (*Quercus agrifolia*) and coast redwood (*Sequoia sempervirens*), would be removed based on the potential footprint of the house. The tennis courts and all other existing improvements are assumed to be demolished and removed prior to redevelopment of the parcel.

Proposed Parcel B (Figure 4-2) would have an area of 1.11 ac (48,561 SF) and allow for a minimum covered floor area of at least 2,500 square feet. The existing maximum slope is 15.5%, which complies with the Town's standards for residential lots. The existing driveway for Parcel B is proposed to remain with some widening near the house. Most of the driveway is a minimum of 16 feet wide, widening to 32 feet wide at the garage approach. The existing home and most of the other existing improvements on Parcel B, including the swimming pool, are to be demolished. The existing sewer and water service lines to the current residence would remain. Two flow-through planters with an approximate area of 100 square feet each would be constructed. Approximately ten birch (*Betula* spp.) trees would be removed based on the potential footprint of the new house.

As part of the process of separating the existing site infrastructure into that which is designed to serve two separate residences rather than one, all existing stairs and paths connecting proposed Parcels A and B would be removed. All existing minor irrigation lines or other utilities that cross the common line between the two parcels would be removed and capped. The irrigation systems would be reconfigured so that each parcel would have its own separate irrigation system and controllers.

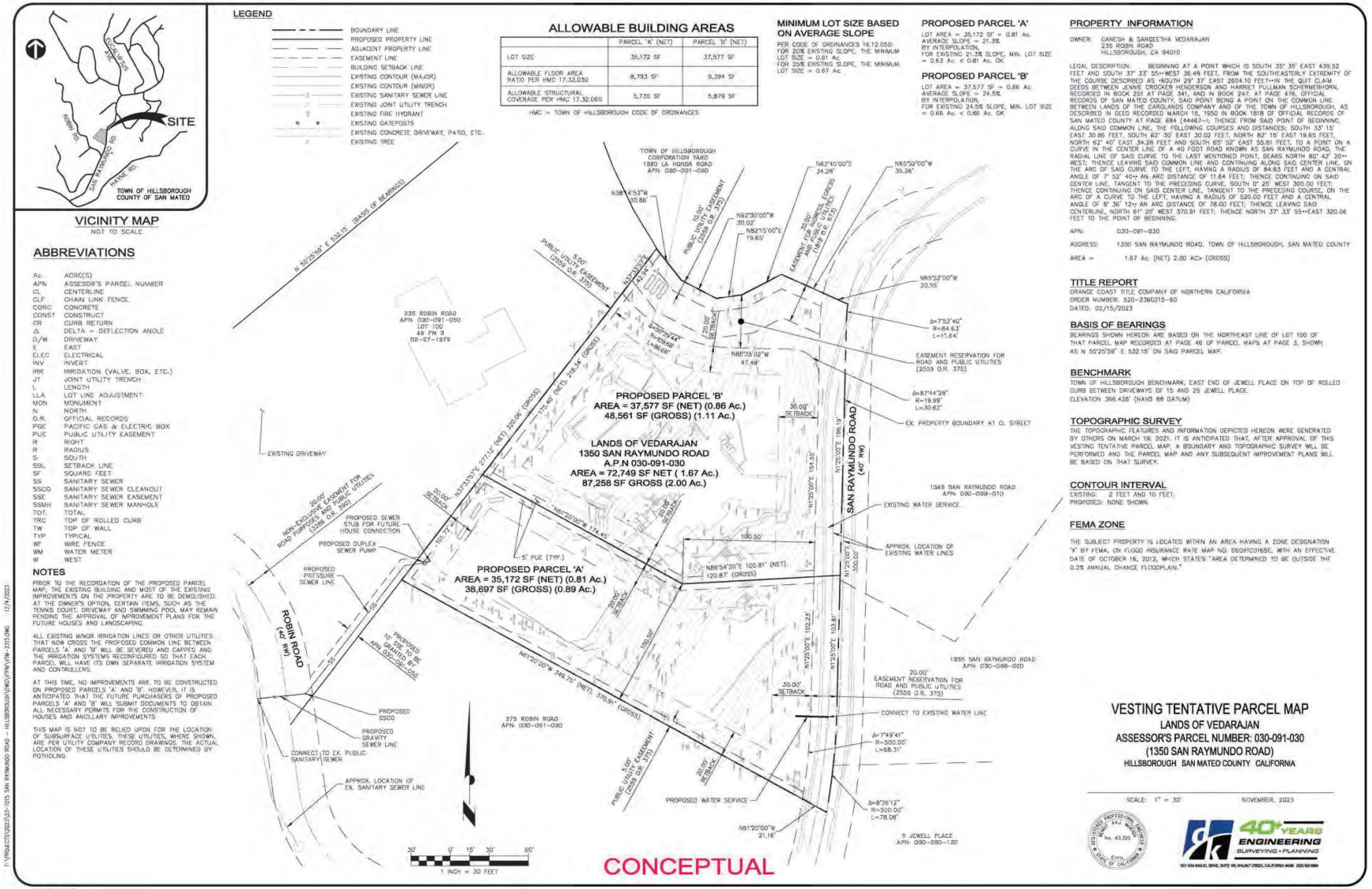

Figure 3. Tentative Parcel Map

1350 San Raymundo Road Project

Hillsborough, San Mateo County, California

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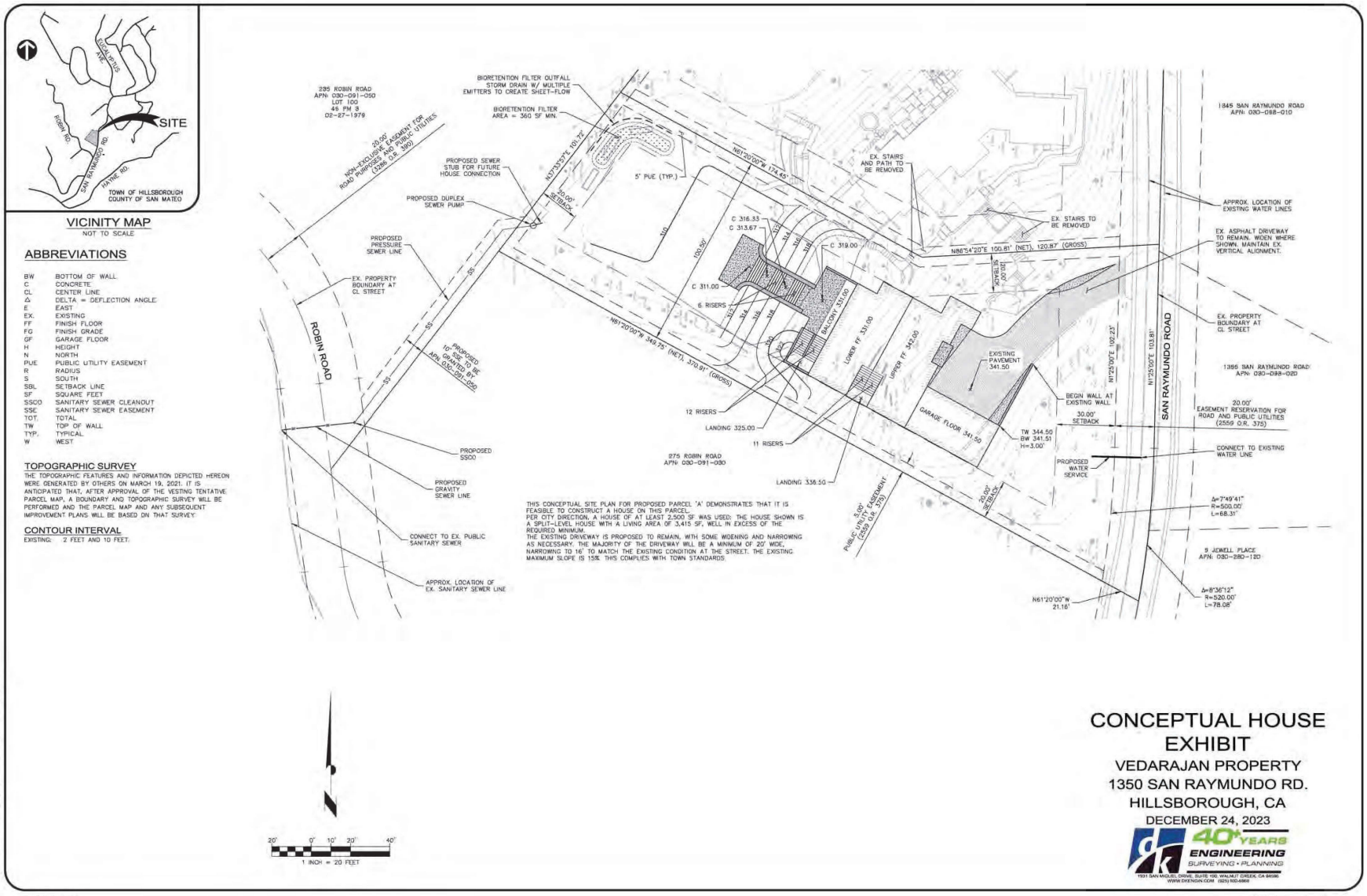

Figure 4-1. Conceptual House Exhibit

1350 San Raymundo Road Project

Hillsborough, San Mateo County, California

wra Environmental Consultants

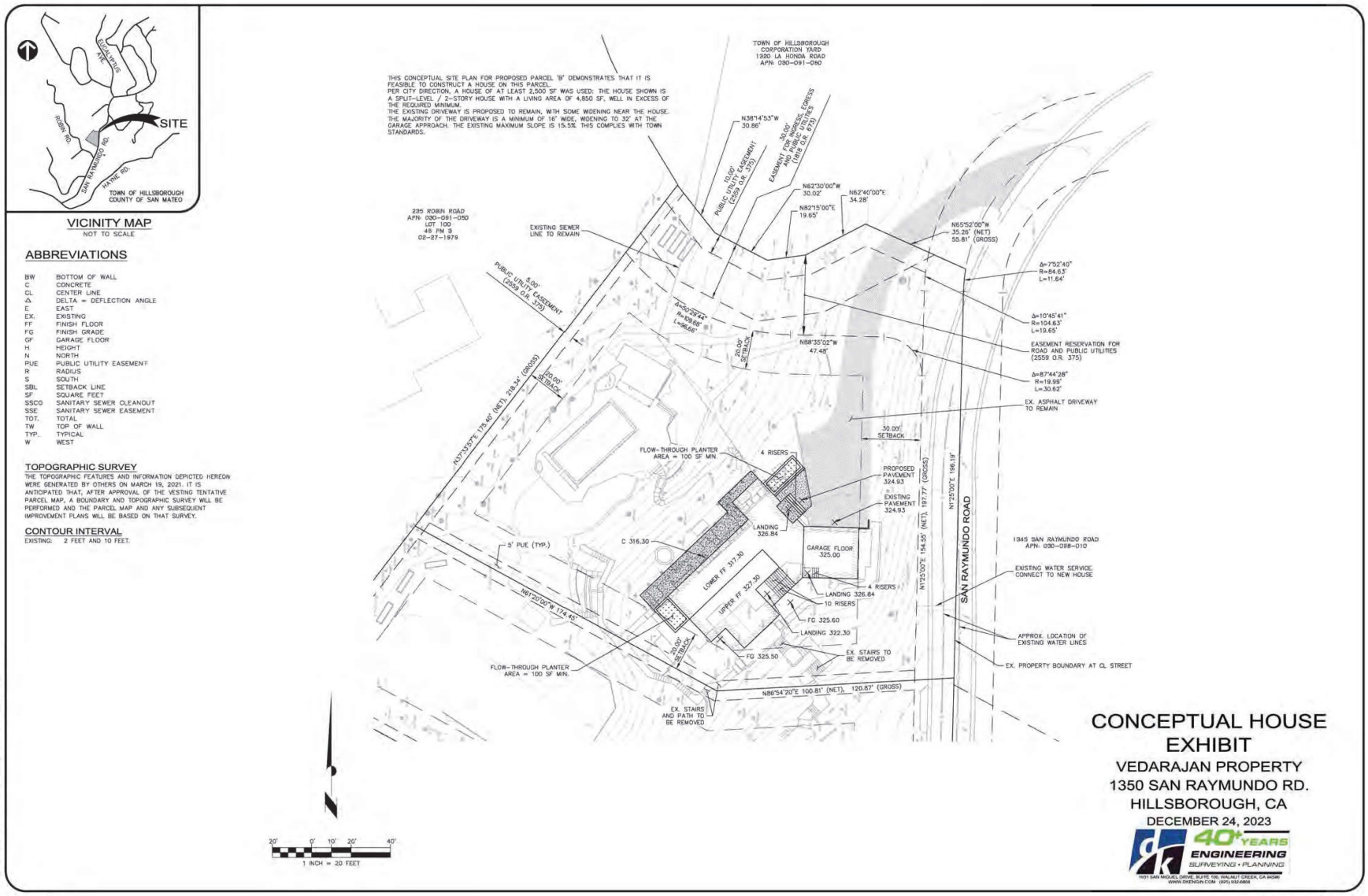

Figure 4-2. Conceptual House Exhibit

1350 San Raymundo Road Project

Hillsborough, San Mateo County, California

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3.3 Use of This Initial Study/Mitigated Negative Declaration

This IS/MND has been prepared by the Town to evaluate the proposed project, which consists of the subdivision of the subject parcel into two separate, legal parcels. To assess the likely environmental consequences of the project, this IS/MND evaluates the allowable redevelopment of the two proposed parcels. The Town's minimum development standards are assumed and the IS/MND presents a program-level analysis. No specific development proposals for either of the two proposed parcels have been presented to the Town for review at this time. Future development applications involving one or both parcels may be submitted to the Town. At this time, the Town will review each application and determine if additional CEQA analysis is necessary. If the proposed residential developments differ substantially from the assumptions included in this IS/MND, a supplemental CEQA analysis of the specific development proposals may be necessary. It is presumed that any such supplemental CEQA analysis would tier from this programmatic IS/MND for the proposed subdivision.

3.4 Project-Related Approvals, Agreements, and Permits

The information contained in this IS/MND will be used by the Town (the CEQA Lead Agency) as it considers the proposed subdivision. If approved by the City Council, the IS/MND would be used to as the basis for future CEQA review of any proposed development of the resulting parcels. For the proposed subdivision, these approvals include, but may not be limited to, the following:

- Subdivision Approval (including conceptual plan and tentative, vesting tentative, and final maps)
- Public Works reviews – may include utilities, water, sewer and storm drainage capacity
- Grading Permit
- Tree Removal Permit
- Demolition/Deconstruction Permit
- Design Review Permit
- Fire Access and Vegetation Management

Additional approvals by the Town and, potentially, other agencies, may be required for future development applications associated with one or both proposed parcels. Such approvals would include stormwater control plans and building permits (one for each residence). However, no application for residential construction has been filed at the present time.

3.5 Project Construction

To evaluate the potential environmental impacts resulting from residential development of the two proposed parcels, a series of assumptions have been made. These assumptions provide the basis for evaluating potential environmental impacts associated with the likely outcome of the proposed subdivision. Four potential construction scenarios could result from approval of the proposed project, described as follows:

3.5.1 Subdivision Only

Assuming the scope is limited to only the parcel subdivision, there is no required project construction. The process requires permits only with public reviews by City Council and the Architecture and Design Review Board. Further filing of tentative maps will be recorded by the County of San Mateo. The process is estimated to take approximately 6-9 months.

3.5.2 Subdivision and Development of One Parcel

Assuming the scope includes the parcel subdivision and development of one or both resulting parcels, the process requires permits as described above, the acquisition of development entitlements, which will add an additional 4-6 months of review time and finally construction, which will take approximately 1-3 years to complete.

3.5.3 Subdivision, Redevelopment of One Parcel and Sale of Remaining Parcel

Assuming the scope includes subdivision, redevelopment of one parcel and the sale of the remaining parcel, the process will be identical to the previously outlined process with one parcel remaining cleared and undeveloped. Site fencing may be required per neighbor outreach and feedback provided as part of the redevelopment process of parcel one.

3.5.4 Subdivision, Redevelopment of Both Parcels and Sale of Second Home

The final assumption would be the subdivision of land, redevelopment of one parcel and development of the second parcel to be sold. The process of development and construction would again be identical to the process outlined under subdivision and development however, the timeline may take up to 5 years to complete.

3.5.5 Schedule and Equipment

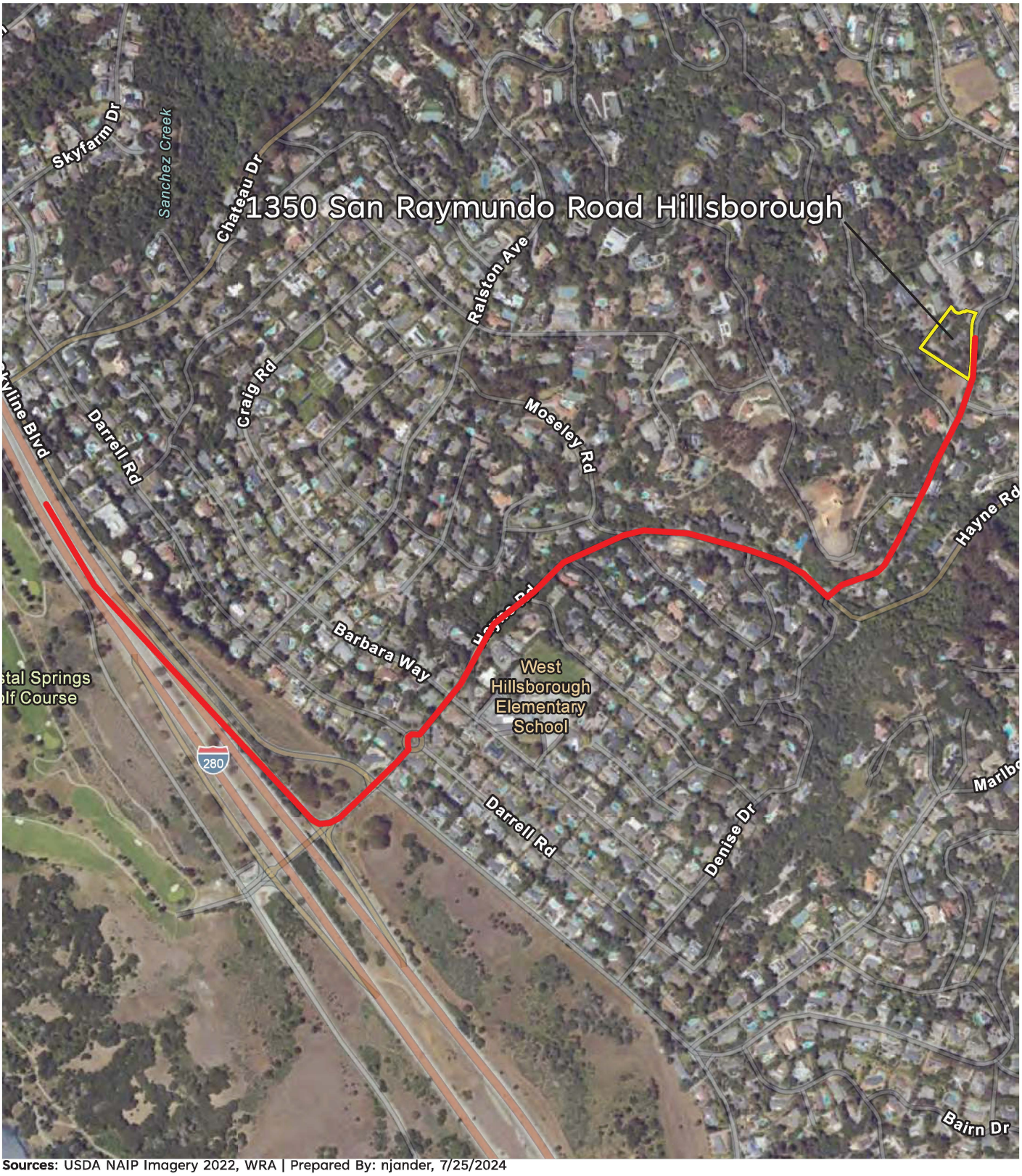
Demolition of the existing residence and other structures on the project site would be expected to occur in early 2025 and last for 12-36 months. It is unknown when development applications to construct one or both parcels might be submitted to the Town. However, once an application is submitted, it is anticipated that the Town's site and design review process would take approximately 4-6 months, with site work and construction requiring an additional 26 months. The following equipment would be required for the construction of residences on the site:

- Bulldozer
- Scraper
- Dump Truck
- Compactor
- Excavator
- Backhoe

3.5.6 Staging, Grading and Site Work

Construction staging would occur on-site in the existing parking areas at the end of the two driveways. It is assumed that all grading of the property necessary to construct the two residences would be balanced on the site and that no import or export of soil would be necessary. Debris from the demolition of the existing residence and associated structures on the

site, along with other miscellaneous debris generated during the future construction of new homes, would be removed from the site by truck. A haul route map is provided in Figure 5. Water necessary for demolition and construction work as well as for dust suppression would be sourced from the existing domestic water tap and meter located on-site. Power may be provided to the site with a valid permit and perimeter fencing may also be installed for aesthetic screening.



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Sources: USDA NAIP Imagery 2022, WRA | Prepared By: njander, 7/25/2024

Figure 5. Haul Route

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 500 1,000 Feet

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4.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is potentially significant unless mitigation is incorporated, as indicated by the checklist on the following pages.

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

4.1 Determination

On the basis of this initial evaluation:

☐ I find that the project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

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

☐ I find that the 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 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.

Linda Roberson

Signature

February 12, 2025

Date

Name and Title: Linda Roberson, Senior Planner

4.2 Initial Study Checklist

This section describes the existing environmental conditions in and near the project site and evaluates environmental impacts associated with the proposed project. The environmental checklist, as recommended in the CEQA Guidelines (Appendix G), was used to identify environmental impacts that could occur if the proposed project is implemented. The right-hand column in the checklist lists the source(s) for the answer to each question. The cited sources are identified at the end of this section.

Each of the environmental categories was fully evaluated, and one of the following four determinations was made for each checklist question:

- **"No Impact"** means that no impact to the resource would occur as a result of implementing the project.
- **"Less-than-Significant Impact"** means that implementation of the project would not result in a substantial and/or adverse change to the resource, and no mitigation measures are required.
- **"Less than Significant with Mitigation Incorporated"** means that the incorporation of one or more mitigation measures is necessary to reduce the impact from potentially significant to less than significant.
- **"Potentially Significant Impact"** means that there is either substantial evidence that a project-related effect may be significant, or, due to a lack of existing information, could have the potential to be significant.

4.2.1 Aesthetics

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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 point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located on 1350 San Raymundo Road, approximately 420 feet north of the intersection of San Raymundo Road and Robin Road (Figure 1). The site is developed with one existing single-family residence, driveway, and other accessory structures within the parcel. The remaining areas of the site are undeveloped and characterized by vegetation, including a variety of trees and shrubs. The project site is bordered by a Hillsborough Public Works facility to the north, San Raymundo Road to the east, Robin Road to the west, and an undeveloped residential property to the south.

DISCUSSION OF IMPACTS

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

No Impact

A scenic vista can be defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. However, the project site is not visible from any viewpoint in the area due to the local topography, trees, and vegetation. Thus, the project would have ***no impact*** related to effects on scenic vistas.

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

No Impact

The project site is not visible from any state scenic highways. The nearest officially designated state scenic highway is Interstate 280, which is approximately one mile west of the project site. However, the project site is not visible from this highway due to local topography, trees, and vegetation. ***No impact*** would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? 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

Visual character can be defined as the perceived contrast between the existing visual elements of an area and how the area will look after the project is implemented, as a measure of how compatible the project will be with the existing visual environment after it is implemented. The project site is located within a non-urbanized residential area in Hillsborough surrounded by vegetation and residential uses. Implementation of the project and future development on the two parcels would result in small-scale visual impacts during and after construction. The most prominent visual impact would be the removal of vegetation, including large trees, on the project site and the addition of two new single-family residences. The project would preserve vegetation to the extent feasible and the two residences would be constructed as required by local residential design guidelines, similar to other single-family residences in the neighborhood.

Furthermore, new development in Hillsborough requires Administrative Design Review to ensure neighborhood compatibility, including consistent setbacks, height, floor area ratio, and lot coverage. Therefore, any impact on visual character would be ***less than significant***.

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

Less-than-Significant Impact

The project site is located in a low-density residential area with large amounts of foliage. Daytime sources of light in the vicinity of the site include the reflection of sunlight from light-colored surfaces, windows, and metal details on cars travelling along San Raymundo Road and parked at the project site. Current light sources in the vicinity of the site include sparsely spaced streetlights, headlights of cars on streets, and outdoor and indoor lighting from nearby residential properties. However, the potential future construction of two new single-family residences would add additional residential outdoor and indoor lighting sources originating from the project site.

Furthermore, if the existing single-family residence is demolished and development on the project site occurs, changes to the visual environment may include construction equipment staged at the site, building materials being stored at the site, disturbed land, physical changes associated with temporary stormwater protection measures, artificial lighting, and other modifications associated with human disturbance. Subsequently, Town Ordinance No. 739 regarding nuisances and construction management practices would be implemented to minimize impacts related to changes in the visual character of the site. Specifically, Section 3 of Chapter 15.26.0308.24 of the Hillsborough Municipal Code requires construction materials to be stored in an orderly manner and screened from the public right-of-way to the maximum extent feasible. Furthermore, all construction vehicle parking must be on site and portable toilets must be screened from view from the public right-of-way and neighboring properties. Therefore, the impact of the potential future residential development with respect to generating light and glare would be ***less than significant***.

4.2.2 Agricultural and Forestry Resources

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) provides a classification system based on technical soil ratings and current land use. The FMMP is an informational service only and does not have regulatory authority over local land-use decisions. The minimum land use mapping unit is ten acres unless specified; the map incorporates smaller units of land into the surrounding map classifications. Pursuant to CEQA Guidelines Appendix G, the term "Farmland" refers to FMMP map categories Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (hereafter collectively referred to as "Farmland"). Generally, any conversion of land from one of these categories to a lesser quality category or a non-agricultural use would be an adverse impact. These map categories are as follows:

- **Prime Farmland:** Land which has the best combination of physical and chemical characteristics to produce crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods.

- **Unique Farmland:** Land of lesser quality soils used to produce specific high economic value crops. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high quality or high yields of a specific crop when treated and managed according to current farming methods. It is usually irrigated but may also include non-irrigated orchards or vineyards.
- **Farmland of Statewide Importance:** Land that is like Prime Farmland but with minor shortcomings, such as greater slopes or less ability to hold and store moisture.

The project site does not contain any prime, unique, or important farmland. The California Department of Conservation maps this area as "Other Land" (California Department of Conservation 2024).

DISCUSSION OF IMPACTS

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?

No Impact

The project site does not contain prime farmland, unique farmland, or farmland of statewide importance, nor does the project site contain any parcel that is under a Williamson Act contract. The project site is designated as Single-Family Residential per the Hillsborough General Plan and is currently zoned for single-family development. Therefore, ***no impact*** would occur from the project or potential future development regarding conversion of Farmland to non-agricultural uses or involving conflicts with an existing zoning designation 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 a 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?

No Impact

In accordance with the definition provided in California Public Resources Code Section 12220(g), "forest land" is land that can support, under natural conditions, ten percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources, such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits. "Timberland" means land, other than land owned by the federal government and land designated as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.

The project site is classified as Hillside Residential per the Hillsborough General Plan and is currently zoned for single-family development. For this reason, implementation of the project and all potential development activities on the project site would not result in any impact to lands zoned as forest land, timberland, or timberland production, or conversion of these lands to non-agricultural uses. ***No impact*** would occur.

4.2.3 Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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 in 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) affecting a substantial number of people?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which regulates stationary sources of air pollution in the nine counties that surround San Francisco Bay Area Basin (SFAAB): Alameda, Contra Costa, Santa Clara, San Francisco, San Mateo, Marin, and Napa Counties, and the southern portions of Solano and Sonoma Counties. The BAAQMD prepares and updates air quality plans to achieve state and national ambient air quality standards and comply with state and national air quality planning requirements. The air quality within the BAAQMD regional air basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

DISCUSSION OF IMPACTS

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

The BAAQMD's 2017 Clean Air Plan (CAP) is the applicable air quality plan for projects located in the SFBAAB. Consistency may be determined by evaluating whether the project supports the primary goals of the 2017 CAP, including applicable control measures contained within the 2017 CAP, and would not conflict with or obstruct implementation of any 2017 CAP control measures. The primary goals of the 2017 CAP are the attainment of ambient air quality standards and reduction of population exposure to air pollutants for the protection of public health in the Bay Area (BAAQMD 2017). As described further in Impact b), the project's air pollutant emissions would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is in nonattainment or expose the local community to substantial air pollutant concentrations.

The 2017 CAP includes control measures that aim to reduce air pollution and greenhouse gases (GHGs) from stationary, area, and mobile sources. The control measures are organized into nine categories: stationary sources, transportation, buildings, energy, agriculture, natural and working lands, waste, water, and super-GHG pollutants (e.g., methane, black carbon, and fluorinated gases). The consistency of the proposed project with control measures from the 2017 CAP is summarized in Table 1.

Table 1. Project Consistency with BAAQMD 2017 CAP

CONTROL MEASURES	PROPOSED PROJECT CONSISTENCY
Stationary Sources	**Not applicable**. The stationary source measures are enforced by the BAAQMD pursuant to its authority to control emissions from permitted facilities. Neither the project or potential development would create any permanent new stationary sources of emissions. Therefore, the control measures of the 2017 CAP are not applicable.
Transportation	**Not applicable**. The transportation control measures are designed to reduce vehicle trips, use, miles traveled, idling, or traffic congestion for the purpose of reducing vehicle emissions. Project operation and potential future construction would not substantially increase vehicle trips compared to existing conditions. Therefore, the transportation control measures of the 2017 CAP are not applicable.
Energy	**Not applicable**. The energy control measures are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Since these measures apply to electrical utility providers and local government agencies (and not individual projects), the energy control measures of the 2017 CAP are not applicable to either the project or future construction activities.
Buildings	**Consistent**. The BAAQMD has authority to regulate emissions from certain sources in buildings such as boilers and water heaters but has limited authority to regulate buildings themselves. Therefore, the building control measures focus on working with local governments that have authority over local building codes to facilitate adoption of best GHG control practices and policies. The project does not propose any new development at this time. However, all future construction activities would implement the applicable BAAQMD BMPs and local ordinances related to demolition and construction. Therefore, both the project and future construction activities would be consistent with the building control measures of the 2017 CAP.
Agriculture	**Not applicable**. The agriculture control measures are designed primarily to reduce emissions of methane. Since the project does not include any agricultural activities, the agriculture control measures of the 2017 CAP are not applicable to the Project.

CONTROL MEASURES	PROPOSED PROJECT CONSISTENCY
Natural and Working Lands	**Not applicable**. The control measures for the natural and working lands sector focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to adopt ordinances that promote urban tree plantings. The project is limited to a parcel split; future construction is possible but not proposed at this time and only conceptual plans have been provided. The natural and working lands control measures of the 2017 CAP are not applicable to the project or future development on the project site.
Waste Management	**Not applicable**. The waste management measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The project would generate minimal amounts of waste during construction; however, operation of the project would not substantially increase waste generation. Therefore, the waste management measures of the 2017 CAP are not applicable to the project.
Water	**Not applicable.** The water control measures to reduce emissions from the water sector are focused on minimizing emissions of GHGs, ROGs, and TACs from publicly owned treatment works (POTWs) and encouraging water conservation to reduce GHG emissions. The project consists of a parcel split into two lots and the demolition of the single-family residence currently on the parcel. Future development on the project site is possible. However, a single-family home is currently on the project site, and future construction would be limited to two new single-family homes. Thus, water distribution infrastructure is currently in place, and the net addition of one single-family home would minimally impact water supply and distribution infrastructure. Therefore, the project and potential future construction on the project site is in compliance with the water control measures of the 2017 CAP.
Super GHGs	**Not applicable**. The super-GHG control measures are designed to facilitate the adoption of best GHG control practices and policies through the BAAQMD and local government agencies. Since these measures do not apply to individual projects, the super-GHG control measures of the 2017 CAP are not applicable to the project.

Source: BAAQMD 2017

As shown above in Table 1, the project and potential future development would not conflict with control measures of the 2017 CAP. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality 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 Impact

The SFAAB is currently designated as a nonattainment area for state and national ozone standards and national particulate matter ambient air quality standards (BAAQMD 2022). In developing thresholds of significance and screening criteria for air pollutant emissions, the BAAQMD considered the emission levels for a project's individual emissions that would result in a cumulatively considerable net increase in criteria pollutants and thus result in significant adverse impacts to the region's existing air quality conditions. Projects that meet the screening criteria outlined by the BAAQMD are not considered to have a significant cumulative contribution to air quality emissions and therefore do not require further detailed air pollutant emissions analysis.

The BAAQMD CEQA Air Quality Guidelines set forth screening criteria for lead agencies and project applicants to determine whether a project requires a detailed air quality assessment to estimate air pollutant emissions (BAAQMD 2022). For operational-related impacts, if a project would be below BAAQMD's screening criteria for single-family residential development, which is 421 dwelling units (du) for criteria pollutants, the project would not result in the generation of operational-related criteria air pollutants and/or precursors that exceed the thresholds of significance. For construction-related impacts for this type of land development, a project would result in a less-than-significant impact related to criteria air pollutants and precursors if it would meet the following criteria:

- The project size is at or below the applicable screening threshold for operational-related impacts; and
- All best management practices (BMPs) listed in Table 5-2 in Chapter 5, "Project-Level Air Quality Impacts," of the BAAQMD CEQA Air Quality Guidelines would be included in project design and implemented during construction; and
- Construction-related activities would not overlap with operational activities.

The potential construction-related activities that could result from the proposed project would include demolition and possibly the simultaneous occurrence of two or more construction phases (e.g., paving and building would occur simultaneously), extensive site preparation (e.g., significant amounts of grading, cut and fill, earth movement), extensive material transport (e.g., soil import and export requiring a considerable amount of haul truck activity), or stationary air emission sources (e.g., backup generators) subject to Air District rules and regulations. Therefore, the project would be subject to BAAQMD 11-2-303 regulations regarding the emissions of asbestos-containing material, permitting, on-site monitoring, removal, and disposal if any asbestos removal is necessitated by the demolition of the existing single-family home on the parcel.

Furthermore, potential future development of the project site with two residences would be significantly below the applicable BAAQMD screening threshold of 421 du. However, because the project may include overlapping construction and operational activities in the event that one home would be constructed and occupied on either parcel before the second home is constructed, the project would not meet BAAQMD's screening criteria discussed above. However, BAAQMD considers implementation of dust control measures during construction sufficient to reduce air quality impacts from fugitive dust to a less-than-significant level. Thus, during construction, all BAAQMD-recommended BMPs for fugitive dust control would be implemented to ensure that construction activities are not generating significant PM emissions. Therefore, although the project may include overlapping construction and operational activities, because the two dwelling units proposed for that may be constructed would be below the District's threshold of 421 du, a detailed air quality assessment is not warranted.

However, the project may involve cut and fill and grading; however, all site preparation activities will utilize the existing soil on site, thus no significant quantities of soil removal would be required. Furthermore, the site is only two acres in size and all future construction would implement BAAQMD-recommended BMPs regarding dust control measures during construction. Therefore, the site preparation activities would not be considered extensive, and the project would meet the applicable screening requirements, and no detailed air quality analysis is required. Demolition of the existing improvements on the site would be subject to BAAQMD's asbestos removal regulations. Therefore, though the project does not fully meet the screening criteria for residential development, the number of dwelling units proposed for construction is far below BAAQMD's screening thresholds, and with the implementation of BAAQMD's BMPs, the potential construction of two single-family residences would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. The impact would be ***less than significant***.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less-than-Significant Impact

Children, the elderly, and people with illnesses or others who are especially sensitive to the effects of air pollutants may be considered sensitive receptors. Examples of uses and facilities that house or attract sensitive receptors are schools, hospitals, playgrounds, and residential areas. There are no hospitals or schools located within 0.25 mile of the project site. The project site is located in a low-density residential area and is not situated adjacent to any playgrounds or other public facilities. Furthermore, the potential construction of two new single-family residences is far below BAAQMD's screening threshold of 421 du, and with the implementation of BAAQMD's BMPs, would not create substantial pollutant concentrations within the area per the discussion above. Therefore, project related impacts 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 BAAQMD defines odor screening distances for projects that are typically associated with odor impacts, such as wastewater treatment plants, sanitary landfills, manufacturing plants, and food processing facilities. Residential land use types are typically not associated with nuisance odors and thus are not included in the screening criteria. The project could involve excavation and grading to prepare the site for the potential construction of two single-family residences. During construction, diesel equipment operating at the site may generate some nuisance odors; however, due to the location of the project in a low-density neighborhood and the temporary nature of construction activities, the project would not result in adverse impacts affecting a substantial number of people. The project would not include development of any source of nuisance odors; therefore, project operation would not result in adverse effects related to odors. Project impacts related to causing adverse impacts to a substantial number of people due to other emissions, such as those leading to odors, would be ***less than significant***.

4.2.4 Biological Resources

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

ENVIRONMENTAL SETTING

The project site is located in the central region of the Town of Hillsborough, San Mateo County. The majority of the project site is developed. Undeveloped areas on the project site consist of remnant stands of native trees and ruderal areas. Developed areas include the house, tennis

courts, sidewalks, a parking lot, driveway, pool, and porches. On March 7, 2024 WRA, Inc. (WRA) biologists conducted a survey within the project site to map vegetation and unvegetated land cover types, document plant and wildlife species present, and evaluate on-site habitat for the potential to support special-status species as defined by CEQA. The survey methodology and results of these surveys are summarized in the following sections. Information and conclusions in this section are based on the Biological Resources Technical Report (BRTR) prepared by WRA biologists in December 2024 (Appendix A) (WRA 2024).

Vegetation Communities and Other Land Cover

WRA observed one land cover type within the project site: developed. Land cover within the project site is illustrated in Appendix A – Figure 4. Developed land cover is considered non-sensitive.

Table 2. Vegetation Communities and Other Land Cover Types

COMMUNITY / LAND COVERS	SENSITIVE STATUS	RARITY RANKING	ACRES WITHIN STUDY AREA
TERRESTRIAL / COMMUNITY LAND COVER			
Developed	None	None	1.83

Developed/Landscaped (no vegetation alliance). California Department of Fish and Wildlife (CDFW) Rank: None

The project site is developed, including a house, pool, tennis courts, pathways, driveways, lawns, ornamental landscaping, a parking lot, and porches. Remnant native trees overhang throughout the developed area, including coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), madrone (*Arbutus menziesii*), Monterey cypress (*Hesperocyparis macrocarpa*), Monterey pine (*Pinus radiata*), and Fremont cottonwood (*Populus fremontii*). In areas that are not paved, ornamental vegetative understory includes greater periwinkle (*Vinca major*), English ivy (*Hedera helix*), and cleavers (*Galium aparine*). This land cover type is not considered sensitive by San Mateo County, CDFW, or any other regulatory entity.

Special-Status Species

Special-status Plants

97 special-status plant species have been documented in the vicinity of the project site. All of these species documented from the greater vicinity are unlikely or have no potential to occur as the project site's understory has been highly disturbed from development, leading to the absence of necessary habitats and associated natural communities, topographic conditions, or unique pH conditions. No special-status plants were identified during the site visit conducted by WRA biologists on March 7, 2024.

Special-status Wildlife

Of the 48 special-status wildlife species documented within in the San Mateo and eight surrounding USGS 7.5' quadrangles, 46 are excluded from the project site based on a lack

of habitat features. Features not found within the project site that are required to support special-status wildlife species include:

- Freshwater streams, rivers, or ponds are not present;
- Coastal habitats and beaches are not present;
- Vegetation communities (e.g., tidal or freshwater marsh, grassland, riparian forest, and old-growth coniferous forest) that provide nesting and/or foraging resources necessary to support special-status wildlife species are not present;
- Structures or vegetation (rocky cliffs, caves, abandoned buildings, small mammal burrows) necessary to provide nesting or cover habitat to support special-status wildlife species are not present;
- Host plants necessary to provide larval and nectar resources required for the completion of life cycles for specific special-status insects are not present; and
- The project site is outside of special-status wildlife species' documented range.

The absence of such habitat features eliminates components critical to the survival or movement of most special-status species found in the vicinity.

Two (2) special-status wildlife species were determined to have potential to occur within the project site: hoary bat (*Lasiurus* cinereus) and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*). These species are discussed in greater detail below.

San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*). CDFW Species of Special Concern. Present within the project site.

This subspecies of the dusky-footed woodrat occurs in the Coast Ranges between San Francisco Bay and the Salinas River (Matocq 2003). Occupied habitats are variable and include forest, woodland, riparian areas, and chaparral. Woodrats feed on woody plants, but will also consume fungi, grasses, flowers, and acorns. Foraging occurs on the ground and in bushes and trees. This species constructs robust stick houses/structures in areas with moderate cover and a well-developed understory containing woody debris. Breeding takes place from December to September. Individuals are active year-round and are generally nocturnal.

Woodrats are classified as a Species of Special Concern (SSC) by CDFW. An SSC is a species, subspecies, or distinct population of an animal native to California that currently meets the State definition of threatened or endangered but has not formally been listed; is experiencing, or formally experienced serious population declines or range retractions that, if continued, could qualify it for State-threatened or endangered status; and/or has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State-threatened or endangered status. Consequently, this species has been determined to be rare under the California public resources code (Cal. Code Regs. Tit. 14 § 15332).

Two woodrat middens were observed during the site visit beneath the ivy-covered concrete deck in the northeastern corner of the project site. It is unknown if this nest is currently inhabited. Woodrats could also construct nests within remnant stands of native trees in the northern portion of the project site, where tree cover is most dense.

Additionally, WRA biologists have observed that woodrats and their middens are locally abundant in the surrounding vicinity around the project site. Woodrat is therefore considered to be present within the project site.

Hoary bat (*Lasiurus cinereus*). Western Bat Working Group Medium Priority Species. Moderate potential to occur within the project site.

Hoary bats are highly associated with forested habitats in the western United States, particularly in the Pacific Northwest. They are a solitary species and roost primarily in foliage of both coniferous and deciduous trees, near the ends of branches, usually at the edge of a clearing. Roosts are typically 10 to 30 feet above the ground. Hoary bats have also been observed roosting in caves, beneath rock ledges, in woodpecker holes, in grey squirrel nests, under driftwood, and clinging to the sides of buildings, though this behavior is not typical. Hoary bats are thought to be migratory; however, wintering sites and migratory routes have not been well-documented. This species tolerates a wide range of temperatures and has been captured at air temperatures between 0 and 22 degrees Celsius. Hoary bats probably mate in the fall, with delayed implantation leading to birth in May through July. They usually emerge late in the evening to forage, typically from just over one hour after sunset to after midnight.

There will be a discretionary review by the USFWS for federal listing under the ESA for the hoary bat in FY27, as there have been recent and significant declines in population across its range. Consequently, this species should be considered rare under the California public resources code (Cal. Code Regs. Tit. 14 § 15332).

Hoary bats have the potential to roost in the project site. Large coast live oak trees with interstitial spaces, within the northern section and boundaries of the project site, could serve as suitable roost habitat for this species. The prevalence of edge habitat throughout the property would also create feeding opportunities for the species; therefore, the project site has potential to provide value as habitat for hoary bats.

Wildfire Corridors and Native Wildlife Native Sites

Wildlife movement between suitable habitat areas can occur via open space areas lacking substantial barriers. The terms “landscape linkage” and “wildlife corridor” are often used when referring to these areas. The key to a functioning corridor or linkage is that it connects two larger habitat blocks, also referred to as core habitat areas. It is useful to think of a “landscape linkage” as being valuable in a regional planning context, a broad scale mapping of natural habitat that functions to join two larger habitat blocks. The term “wildlife corridor” is useful in the context of smaller, local area planning, where wildlife movement may be facilitated by specific local biological habitats or passages and/or may be restricted by barriers to movement. Above all, wildlife corridors must link two areas of core habitat and should not direct wildlife to developed areas or areas that are otherwise void of core habitat.

The project site is not within a designated wildlife corridor. The project site is located within a much larger tract of residential housing developments and lightly developed parcels of San Mateo County. The project site is less than one-mile east of Interstate 280, a multi-lane, auxiliary highway with high traffic flows and substantial physical barriers such as high curbs, concrete K-rails, chain-link fencing, and gated culverts. Interstate 280 acts as a complete barrier for all but the largest and most mobile species, and even then, represents an extremely risky crossing for

wildlife by drastically reducing successful movement between the highly developed landscape to the east from the relatively undeveloped landscape to the west including Crystal Springs Reservoir and surrounding protected lands. While common and resident wildlife species presumably utilize the project site to some degree for movement at a local scale, the project site itself does not provide corridor functions beyond connecting similar developed residential parcels in surrounding areas.

DISCUSSION OF IMPACTS

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 (CDFW) or United States Fish and Wildlife Service (USFWS)?

Less than Significant with Mitigation Incorporated

Special-status Plants

There is no potential for special-status plant species to occur within the project site. Therefore, the project would have no impact with respect to special-status plant species.

Special-status Species

San Francisco Dusky-Footed Woodrat

Potentially suitable habitat for two special-status wildlife species was identified within the project site. Potential impacts and mitigation for potentially significant impacts are discussed below.

Temporary and/or permanent loss of San Francisco dusky-footed woodrat (woodrat) habitat is anticipated due to the subdivision and potential construction of two single-family residences at 1350 San Raymundo Road. Additionally, there is a limited potential for direct impacts to occur to woodrat individuals within the project site. The locations and extent of potential impacts to woodrat habitat are depicted in Appendix A, Figure 6. Several woodrat middens were documented within the project site. Direct impacts may occur due to interactions with construction vehicles, vegetation removal, grubbing and grading of any future project footprints, landscaping, or entrapment in open trenches/holes, equipment, or materials. Redevelopment of the project site would remove known middens, potentially result in injury or mortality to adult and juvenile woodrats and potentially limit or preclude future habitation due to landscaping or development. This subspecies of woodrat, while having a limited range, are locally abundant in natural and low-density residential neighborhoods.

The temporary or permanent removal of approximately 0.83-acres of habitat in the regional context would not affect the viability of the regional population; however, injury or mortality of adults or impacts to occupied middens would be considered a ***potentially significant impact*** under CEQA. Mitigation Measures BIO-1a and BIO-1b, discussed below, would be required to reduce this impact to a less-than-significant level.

Hoary Bat and Other Roosting Bat Species

The Western Bat Working Group (WBWG) designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA. Future activities within the project site may affect hoary bats and other bat species during their maternity roosting season (typically between March 1 – August 31). Should development of either of the proposed parcels result in impacts to large oak trees, there is a potential to impact bats, their maternity roosts, or adversely affect foraging or roosting habitat. Impacts to hoary bat and other roosting bat species would be considered a ***potentially significant impact*** under CEQA. Mitigation Measures BIO-2a and BIO-2b, discussed below, would be required to reduce impacts to hoary bat and other roosting bat species to a less-than-significant level.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

No Impact

There are no sensitive natural communities within the project site. Therefore, the project would have ***no impact*** on sensitive natural communities.

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?

No Impact

There are no state or federally protected wetlands on the project site, and no impacts to wetlands outside of the project site are anticipated. Therefore, ***no impact*** to aquatic resources would occur as a result of the project.

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?

No Impact

No portions of the project site provide critical linkages, key corridors, or land cover or topographical features that provide connectivity between areas of suitable habitat in the vicinity. For terrestrial species, all portions of the project site are within a greater context of urban development, existing roads, and within a network of partial and complete barriers which will not be further degrades as a result of the project. Furthermore, there is no aquatic connectivity between the project site and upstream freshwater habitats. Therefore, the project will have ***no impact*** on migratory corridors for terrestrial and aquatic species.

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

Less than Significant with Mitigation Incorporated

The project may require removal of trees protected by the Town of Hillsborough Municipal Code (Tree Ordinance). Based on the project's conceptual plans, tree removal will consist primarily of coast live oak and coast redwood trees. According to the Tree Ordinance, projects that classify as subdivisions are required to obtain tree removal permits for all trees which have a trunk

diameter of 12 inches or more measured at 4.5 feet above natural grade (i.e., 'breast height') or "groves" (a group of at least five woody plants of the same type with a diameter of 6 inches or greater measured at breast height). Up to 30 trees may potentially be removed for eventual house construction and redevelopment. The potential for the project to conflict with the Town's Tree Ordinance would be considered a ***potentially significant impact*** under CEQA. Mitigation Measure BIO-3, discussed below, would be required to reduce this impact to a less-than-significant level.

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 the jurisdiction of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and therefore would not conflict with the provisions of any such adopted plan.

MITIGATION MEASURES

1. To reduce potential impacts to woodrat to a less-than-significant level, the following measures shall be implemented:
    - **Mitigation Measure BIO-1a:** Prior to vegetation removal and/or ground disturbance within suitable or occupied habitat, a pre-construction survey for woodrat structures/middens shall be conducted to identify any existing woodrat middens that may be impacted (i.e., those within the Survey Area). Any woodrat structures found during the survey shall be flagged and avoided to the fullest extent feasible.
    - **Mitigation Measure BIO-1b:** Woodrat nests that cannot be avoided by at least 10 feet should be dismantled by hand under the supervision of a biologist. If young are encountered during the dismantling process, the material should be placed back on the nest and the nest should then remain unmolested for three weeks in order to give the female enough time to move the young, or for the young to mature and leave the nest. After that time, the nest dismantling process may begin again.

    Implementation of these mitigation measures will reduce potential impacts to woodrat to a level that is ***less than significant***.
2. To reduce potential impacts to hoary bat to a less-than-significant level, the following measures shall be implemented:
    - **Mitigation Measure BIO-2a:** To avoid adverse effects to the active maternity roosts of special-status and other bat species; tree removal, vegetation removal, and initial ground disturbance should be prioritized to occur during the non-maternity roosting season, between September 1 through April 31.If potential bat habitat is present, and work is occurring between September 1 and April 31 (outside of the maternity season), a qualified biologist shall conduct an emergence survey no more than 7 days prior to tree removal to determine if the roost is occupied, or the tree should be assumed occupied. If the emergence survey confirms the roost is inactive, the tree may be felled with no further measures required to protect roosting bats. If the roost is confirmed active, or is assumed to be active, a two-phased cut shall be employed to remove the tree. The qualified biologist shall oversee removal of branches and small limbs not containing

potential bat roost habitat using hand tools such as chainsaws or handsaws. The following day, the rest of the tree may be removed.

- **Mitigation Measure BIO-2b:** If initial ground disturbance, including removal of trees and other vegetation, must occur during the maternity roosting season (May 1 – August 31), at least 30 days prior to the removal of any large tree (diameter at breast-height > 16 inches), a bat roost assessment shall be conducted by a qualified biologist to determine if potential roost habitat is present. If the tree has no potential to support roosting bats (e.g., no large basal cavities, exfoliating bark, interstitial spaces, or suitable foliage), the tree may be removed with no further measures required to protect roosting bats.

  If potential bat roosting habitat is present and work is occurring during the maternity season (May 1 through August 31), the qualified biologist may either conduct an emergence survey to determine if the roost is occupied; or assume the roost is occupied and a buffer shall be implemented. If the emergence survey does not detect bats, the tree may be removed with no further measures required to protect roosting bats. If roosting bats are detected, or the tree is assumed to be an active roost, the tree shall be given a 100-foot buffer and shall be avoided until after the maternity roosting season is complete. Once the maternal roosting season is complete, tree removal shall follow the approach outlined above for out-of-season tree removal.

As a WBWG Medium Priority species, there is no requirement to provide compensatory mitigation for impacts to the hoary bat under CEQA. Implementation of these mitigation measures will reduce potential impacts to the hoary bat to a level that is ***less than significant***.

3. To reduce potential impacts to protected trees to a less-than-significant level, the following measures shall be implemented:
   - **Mitigation Measure BIO-3a.** Should any tree removal be proposed, a tree survey conducted by a certified arborist shall be conducted within the area of proposed tree removal to determine which trees are protected by the Tree Ordinance.
   - **Mitigation Measure BIO-3b.** Prior to any tree trimming or removal, an arborist report prepared by the Town's Consulting Arborist, in compliance with Mitigation Measure BIO-3a, shall be prepared.

Implementation of this mitigation measure will reduce potential impacts to protected trees and groves to a level that is ***less than significant***.

4.2.5 Cultural Resources

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Hillsborough was incorporated in 1910, and previous environmental studies have identified prehistoric sites. During 1989 and 1990, the Town was comprehensively surveyed for historic buildings. The survey identified historically important structures, both privately and publicly owned, including the Early Subdivisions (1885-1915), the Great Estates (1900-1930) and the Later Subdivisions (1916-1940) (General Plan 2005). However, no historically important structures are within the immediate vicinity of the project site. The only structure on the project site is a single-family residence constructed in the 1970s, and the remainder of the site is primarily undisturbed land and vegetation. The project site has not been the subject of any previous archaeological investigation, and no archaeological resources are known to be present on the site. However, the Town has addressed this contingency with the inclusion of Town General Plan Action OSC-5.3, which requires construction projects to stop if archeological or paleontological resources are uncovered during grading or other on-site activities for assessment and mitigation as appropriate (General Plan 2005).

DISCUSSION OF IMPACTS

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

No Impact

A historical resource may be important if it meets any one of the following criteria, or if it is already listed on the California Register or a local register (Title 14 CCR, §4852):

1. Is 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; or
2. Is associated with the lives of persons important to local, California, or national history; or
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; or

4. Has yielded, or may be likely to yield, information important to the prehistory or history of the local area, California, or the nation.

The project site is not listed as a historic property. Furthermore, a portion of the parcel has been previously disturbed to construct a single-family home and accessory structures. Therefore, as no historical resources have been identified on the project site, there would ***no impact*** related to historical resources.

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

Less than Significant with Mitigation Incorporated

State of California Public Resources Code

PRC § 21083.2(g) defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that 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; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

No archaeological investigations have occurred on the project site and there are no known archaeological resources on the project site. However, if future development occurs on the project site, site preparation and associated construction activities may result in ground disturbance. General Plan Action OSC-5.3 would then apply to ensure that construction activities would stop if unknown archeological resources are discovered. Furthermore, mitigation measure CUL-1 would be implemented and impacts related to adverse changes to archeological resources would be ***less than significant***.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less-than-Significant Impact

No human remains are known to be buried on the project site. However, the possibility of future project construction activities has the potential to disturb human remains that may be interred outside of dedicated cemeteries. California Health and Safety Code section 7050.2 requires that, in the event that human remains are uncovered at the project site during construction activities, no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to Public Resources Code section 5097.998. The coroner then has 24 hours to notify the California Native American Heritage Commission (NAHC), pursuant to subdivision (c) of section 7050.5 of the California Health and Safety Code. The NAHC will then contact the most likely descendants, who may recommend how to proceed. Adherence to the applicable state Public Resources Code and Health and Safety Code regulations will ensure any potential impact to the disturbance of human remains is ***less than significant***.

MITIGATION MEASURES

1. To reduce potential impacts to archeological resources to a less-than-significant level, the following measures shall be implemented:

    - **Mitigation Measure CUL-1**: To comply with Section 21082 of the Public Resources Code, in the event that a suspected archaeological resource is accidentally discovered during construction activity at the site, work in the immediate vicinity of the discovery shall be halted and a qualified archaeologist shall be retained to examine the find. If the find is determined to be an historical or unique archaeological resource, a time allotment sufficient to allow for implementation of avoidance and/or recovery measures shall be established. Work could continue on other parts of the site while the unique archaeological resource mitigation takes place.

4.2.6 Energy

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Energy in Hillsborough is provided through Pacific Gas & Electric (PG&E) or Peninsula Clean Energy (PCE). In San Mateo County, PCE is the community-led electricity provider. In 2010, the Town approved a resolution authorizing a Sustainable Hillsborough Task Force to be established. Subsequently, the Town developed a Climate Action Plan in 2010, which established a framework for future actions the Town can implement to expand the use of renewable energy; some of which were included in a 2010 General Plan update, adding additional climate protection and sustainable goals and policies. Furthermore, new construction in California is required to comply with state Green Building Regulations, and the Town has adopted an ordinance to ensure continued compliance with the state building codes.

DISCUSSION OF IMPACTS

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

Less-than-Significant Impact

The project would not generate a substantial new demand for energy; it consists of a parcel split and the demolition of a residential structure currently on the project site. However, there is the potential for the future development of residential structures on each parcel. All construction activities on the project site would be required to comply with Town Ordinance 15.19: Green Building Regulations, which requires new development projects, as applicable, to comply with the requirements of the California Green Building Standards. Compliance with Green Building Requirements would ensure that the new single-family residences and accessory structures would not result in any potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. The 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 Impact

Any future construction on the project site would be subject to climate protection policies in the Town's General Plan. Specifically, Policy LU-6.1, which encourages the incorporation of minimum

green building measures into residential construction and new residential renovations; Policy LU-6.2, which provides educational and resource materials on green building practices for new development within the community; and Policy LU-6.4, which encourages and promotes solar or other renewable energy installations for residential structures. Through consistency with Policy LU-6.1, Policy LU-6.3, and Policy LU-6.4, and the local adoption of the State's Green Building code, all potential future development would comply with state and local plans for renewable energy and energy efficiency and therefore would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. The impact would be ***less than significant***.

4.2.7 Geology and Soils

Would the project:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☒	☐
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, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Hillsborough is characterized by areas of steep slopes, especially along its creeks and canyons. While the steeper slopes are at risks for erosion and slippage, the Town monitors several

historical landslide areas. Due to the amount of steep terrain within the Town, special development standards have been developed to meet current engineering standards meant to address potential slope failure. The Town also requires all new subdivisions on slopes over 10 percent to provide larger lots, reducing the concentration of homes on steeper slopes. Additionally, new development is subject to updated building codes and required to complete geotechnical studies prior to construction (General Plan 2005).

The existing maximum slope on each proposed parcel exceeds 15 percent. However, conceptual plans for future home development on each lot have been provided and both parcels would meet the Town's required minimum lot size for sites with slopes over 10 percent. Furthermore, there is minimal evidence of past landslides on the project site and surrounding area (General Plan 2005).

DISCUSSION OF IMPACTS

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

Less-than-Significant Impact

The project site does not lie within a State mandated Alquist-Priolo Earthquake Fault Zone, as identified by the most recent Alquist-Priolo Fault Zoning Map issued by the State Geologist (California Geological Survey 2024). Therefore, potential direct or indirect impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map would be ***less than significant***.

a-ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Less-than-Significant Impact

As the project site is located in the seismically active San Francisco Bay region, the occurrence of earthquakes due to rupture of a nearby earthquake fault cannot be precluded. The closest major faults are the San Andreas and Hayward Faults, which are mapped approximately 1.75 miles west and 20 miles east, respectively. These faults are capable of producing minor to major earthquakes, therefore there is potential for the project site to experience high intensity ground shaking. However, the likelihood of surface rupture occurring from active faulting at the site is small as no fault lines have been identified within Town limits (General Plan 2005). Implementation of the project would not exacerbate the potential for substantial adverse effects to occur as a result of strong seismic ground shaking. Therefore, project impacts related to strong seismic ground shaking would be ***less than significant***.

a-iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

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

Less-than-Significant Impact

Similar to the Alquist-Priolo Act, the Seismic Hazards Mapping Act has identified areas within the state that are at risk for other seismic related hazards, such as liquefaction and landslides. Liquefaction primarily occurs in relatively loose, saturated, cohesionless soils that lose their strength and become incapable of supporting the weight of overlying soils or structures when subject to earthquake stresses. According to the California Department of Conservation, the project site does not lie within a state-designated liquefaction zone (California Department of Conservation 2024). However, the site is within a designated landslide zone. In accordance with the Seismic Hazards Mapping Act, site-specific geotechnical reports must be conducted prior to permitting development projects (General Plan 2005). Thus, before any new construction can occur at the project site, the Town will require compliance with both the Seismic Hazards Mapping Act and the most recent Uniform Building Code (General Plan 2005). Standards for seismic design, foundations and drainage, and geotechnical engineering studies must be undertaken for all new buildings or earthworks (General Plan 2005), mitigating the risks related to landslides. Therefore, project impacts related to liquefaction and landslides would be ***less than significant***.

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

Less-than-Significant Impact

The majority of soils within Hillsborough have been previously disturbed or mechanically modified as a result of grade and fill (General Plan 2005). While there are soils that have a high potential for erosion within the Town, all are on slopes of 15 percent or more, most within protected open space areas. The project site is not on a slope nor is it in a designated open space area; it is located within a developed residential area and the subject parcel has been partially disturbed due to previous construction activities on the project site. Thus, potential impacts of the project relating to causing substantial erosion and/or loss of topsoil 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

The project site primarily consists of orthents, mechanically modified grading, cut, and fill associated with development and landscaping; other soils on the subject parcel comprise approximately six percent of the total area (USDA 2024). Similarly, the off-site area within the immediate vicinity of the project is developed with single-family homes with a similar soil profile. Furthermore, before beginning new construction, Hillsborough requires compliance with both the Seismic Hazards Mapping Act and the most recent Uniform Building Code (General Plan 2005). Standards for seismic design, foundations, drainage, and geotechnical engineering studies must be undertaken for all new buildings or earthworks (General Plan 2005). Future development proposed on the project site would require to be consistency with these standards and the requirement of site-specific geotechnical studies. Through compliance with these requirements, impacts related to geologic or soil instability would be ***less than significant***.

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

Less-than-Significant Impact

Expansive soils (clays) are those that contain minerals such as smectite clays that are capable of absorbing water. These soils are prone to expansion and shrinkage due to variation in water volume. The Town requires that geotechnical studies be performed prior to the submittal of detailed plans for construction and that the recommendations in these studies be incorporated into final project plans. These studies would identify the potential presence of clayey soils and would recommend mitigation if expansive soils are identified. In combination with Uniform Building Code compliance, this process would ensure that hazards associated with expansive soils would be ***less than significant***.

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

No Impact

The project does not include installation or use of septic tanks or alternative wastewater disposal systems. Therefore, implementation of the project would result in ***no impact*** associated with septic tanks and alternative wastewater disposal systems.

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

Less-than-Significant Impact

The project site has been partially developed and disturbed via mechanical grading, thus the likelihood of the discovery of paleontological resources and/or unique geologic features is low. However, future development activity at the project site may also extend into undeveloped and undisturbed land. The Town has addressed this contingency with the inclusion of Action OSC-5.3, included in the Town's General Plan, requiring construction projects to stop if archeological or paleontological resources are uncovered during grading or other on-site activities for assessment and mitigation as appropriate (General Plan 2005). With the implementation of Action OSC-5.3, impacts to unique paleontological resources and/or unique geologic features would be ***less than significant***.

4.2.8 Greenhouse Gas Emissions

Would the project:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The Hillsborough City Council established the Sustainable Hillsborough Task Force to expand Hillsborough's efforts to be a more sustainable community, endorsing measures for climate protection and the reduction of greenhouse gas emissions (Hillsborough Climate Action Plan 2007). As many structures in Hillsborough are single-family residences, residential energy consumption was identified as the largest emitter of greenhouse gas emissions. The Town's General Plan was also amended with a focus on climate protection and new sustainable programs and policies. These initiatives include the Civic Green Building Policy, the Residential Green Building Promotion and Education Program, the elimination of the solar permit fee, solar discount programs, and energy efficiency workshops. The Council's resolution also endorsed the preparation of a comprehensive Sustainable Hillsborough Plan, completed in 2010, which contains recommend sustainable policies and programs that will reduce greenhouse gas emissions (GHG), energy consumption energy costs, water consumption, other natural resource consumption while expanding renewable energy usage (Climate Action Plan 2010).

Currently, the existing single-family home is the sole source of GHG emissions from the project site. Residential uses that produce GHG emissions are typically associated with heating, cooling, ventilation, and appliance use. However, potential development on the project site upon completion of the parcel split and demolition of the single-family residence may result in the construction of two new single-family residences.

DISCUSSION OF IMPACTS

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

Less-than-Significant Impact

The project is limited to a parcel split and the demolition of the single-family residence currently on the project site. However, future development on the project site is possible, likely consisting of two new single-family residences. If there is development on the project site, General Plan policy LU-6.1 encourages the incorporation of minimum green building measures into residential construction, new residential renovations, and new municipal construction, while LU-6.2 promotes and supports efforts for increased energy efficiency in existing residential and

municipal structures. Additionally, Hillsborough's Climate Action Plan has a Construction and Demolition Debris Recycling Program, which employs staff to approve Waste Reduction Plans for building and demolition projects prior to permit issuance (Climate Action Plan 2010). With adherence to LU-6.1, LU-6.2, and the Climate Action Plan, project impacts related to greenhouse gas emissions would be ***less than significant***.

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

Less-than-Significant Impact

Construction activities are not proposed as part of the project. However, if there is development on the project site, General Plan policy LU-6.1 encourages the incorporation of minimum green building measures into residential construction, new residential renovations, and new municipal construction, while LU-6.2 promotes and supports efforts for increased energy efficiency in existing residential and municipal structures, and C-6.1 requires cooperation with regional agencies to promote air quality. Additionally, the Town has a Construction and Demolition Debris Recycling Program, which employs staff to approve Waste Reduction Plans for building and demolition projects prior to permit issuance (Climate Action Plan 2010). With adherence to LU-6.1, LU-6.2, C-6.1, and the Construction and Demolition Debris Recycling Program, project impacts and potential development on the project site related to greenhouse gas emissions would be ***less than significant***.

4.2.9 Hazards and Hazardous Materials

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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 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 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?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Hazardous substances are materials designated in government codes and regulations or that exhibit certain characteristics such as being toxic, corrosive, flammable, reactive, or explosive. A non-hazardous substance can become a hazardous waste if during its normal use it comes to meet the definition of a hazardous material or hazardous substance.

A search of the State Water Resources Control Board's Geotracker database and the Department of Toxic Substances Control's Envirostor database indicated that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control 2024; SWRCB 2024) vehicles that travel through the project site during construction would contain hazardous materials, including gasoline, lubricants, and other solutions. No hazardous materials are currently stored at the project site.

DISCUSSION OF IMPACTS

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-than-Significant Impact

During potential future construction activities at the project site, contractors would use small quantities of fuel, lubricants, and other similar construction materials that can be hazardous. There may be a potential for releases to occur during construction that could affect construction workers, recreational users, and the environment. However, compliance with Town Ordinances related to the use of and disposal of hazardous materials during construction and demolition activities would minimize impacts related to the transport or use of hazardous materials. As proposed, the project would not include the use, transport, or disposal of any hazardous materials during operation.

While the project consists of a parcel division and the demolition of an existing single-family home and no development is proposed at this time, any future construction activities on the project site would be subject to Town Code 15.26: Construction Management Activity, which requires the project applicant to ensure that BMPs are implemented by the contractor during construction to minimize potential impacts to groundwater, soils, and human health. Additionally, the contractors and field staff must adhere to existing laws and regulations that govern the transport, use, storage, handling, and disposal of hazardous materials to reduce the potential hazards associated with these activities. California Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards, including the handling and use of hazardous materials. The U.S. Department of Transportation and the California Department of Transportation (Caltrans) regulate the transportation of hazardous materials. Together, these federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. The transport, use, storage, handling, and disposal of hazardous materials for the project would be adequately controlled through existing regulatory requirements and the implementation of Code 15.26 which requires implementation of BMPs. Therefore, the project would result in ***less-than-significant*** impacts associated with creation of 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 accident conditions involving the release of hazardous materials into the environment?

Less-than-Significant Impact

As discussed above, during the demolition phase of the project, and potential future construction activities enabled by the project, contractors would use small quantities of fuel, lubricants, and other similar construction materials that can be hazardous. There may be a potential for releases to occur during construction that could affect construction workers, recreational users, and the environment. However, contractors and field staff would adhere to existing laws and regulations that govern the transport, use, storage, handling, and disposal of hazardous materials to reduce the potential hazards associated with these activities. California Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards, including the handling and use of hazardous materials. The U.S. Department of Transportation and Caltrans regulate the transportation of hazardous materials. Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. Furthermore, the project would not include the use, transport, or disposal of any hazardous waste during operation. Project impacts related to the release of hazardous materials would be ***less than significant***.

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

Less-than-Significant Impact

There are no existing or proposed schools located within 0.25 mile of the project site. The closest school is approximately one mile southwest of the project site. Although unlikely, implementation of the project could result in the release of hazardous materials from routine transportation or use of hazardous materials such as oils, lubricants and other fluids required for construction and/or operation equipment. Releases would be limited to fluids used for construction equipment, which would be on-site in small quantities, and because the project is located a mile from the school, there is a very low potential for a spill to affect the school. In addition, construction and demolition activities associated with project implementation would be subject to federal, state, and local laws and regulations governing hazardous materials. For these reasons, implementation of the project and potential construction activities on the project site would result in a ***less-than-significant impact*** associated with the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 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?

No Impact

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by state agencies, local agencies, and developers to provide information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to update Cortese List annually. No hazardous waste and substances sites are located within one mile of the project site based on a search of the current Cortese List (CalEPA 2024). Therefore, implementation of the project and all potential construction activities would have ***no impact*** associated with creation of a significant hazard to the public or the environment due to its location on a site which is not included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5.

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 for people residing or working in the project area?

No Impact

No airports or airfields are located within two miles of the project site. The nearest airport to the project site is San Francisco International Airport, located approximately four miles north of the project site. No aviation hazards would result from implementing the project. Therefore, implementation of the project would result in ***no impact*** associated with creation of 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?

Less-than-Significant Impact

The project would be required to comply with Town Ordinance No. 739 if construction commences on the project site. Ordinance No. 739 requires construction vehicle parking on-site unless otherwise authorized by building officials. Additionally, construction materials and vehicles must be stored outside of the public right of way to the maximum extent feasible, and the applicant must provide a minimum 72-hour advance notice to adjacent neighbors of the commencement of construction. With the implementation of Ordinance No. 739, appropriate measures would be implemented to ensure that residents and emergency response vehicles can utilize San Raymundo Road in an unimpeded manner.

As the project involves the demolition of one single-family residence and the potential construction of two new single-family residences, project operation would not result in the addition of a substantial number of new residents or structures that would impede existing residents from evacuating or emergency vehicles from accessing properties. The Town has an emergency plan based on the Standardized Emergency Management System (SEMS), enabling the effective flow of information and resource tracking. Hillsborough has established emergency preparedness procedures to respond to both natural and man-made disasters that could potentially occur. Furthermore, the Town is included in the San Mateo County Operational Area Emergency Operations Plan (EOC) which establishes the Standardized Emergency Management System (SEMS) as required by state law, and includes information on mutual aid agreements, hierarchies of command and different levels of response in emergency situations. Therefore, project impacts related to impairment of an adopted emergency response plan or emergency evacuation plan 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

The project site and the adjacent area are in a Very High Fire Hazard Severity Zone (VHFHSZ) (ABAG 2024), and the risk of loss, injury, or death involving wildland fires could be exacerbated during project construction. In part, this is due to Hillsborough's mix of vegetation, open space, and single-family residences. However, the implementation of Town Ordinance 17.56.030 - Landscaping would be required. Ordinance 17.56.030 requires a Landscaping Plan to be submitted prior to the issuance of building permits. Specifically, the ordinance states that all developed property shall be landscaped. If all or part of a lot has never been graded or planted,

that portion of the lot may be retained in its natural state, if appropriately maintained. Appropriate maintenance of the natural state shall include, but not necessarily be limited to, removing dead, dying, or other hazardous trees or other vegetation, and otherwise pruning, thinning, and maintaining the natural vegetation to ensure fire safety. The requirements of 17.56.030 as they relate to the project would ensure that vegetation is utilized during and after construction to minimize the risk of wildfires.

Future construction activities may occur on the project site. However, development would be limited to a net increase of one single-family residence, which would not significantly increase the exposure of people or structures to wildland fires after project construction with implementation of landscaping management requirements under Ordinance 17.56.030. Through compliance with the approved Landscaping Plan, which would minimize operational fire hazards impacts related to exposing people or structures to a significant risk of loss, injury, or death involving wildfires resulting from the future redevelopment of the project site would be ***less than significant***.

4.2.10 Hydrology and Water Quality

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
	iii) create or contribute runoff water that would exceed the capacity of existing or planned storm water 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?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is located within San Mateo County, which is designated as "Region 2" under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay RWQCB). The San Francisco Bay Region Water Quality Control Plan (Basin Plan) indicates that the project site is within the San Mateo Coastal hydrologic planning area (San Francisco Bay RWQCB 2017). The project site is located in the Sanchez Creek watershed per the County Association of Governments of San Mateo County (www.flowstobay.org) interactive map. The

Sanchez Creek watershed drains 1.8 square miles, relatively unmodified for about 3.3 miles until it is culverted downstream to Burlingame Lagoon eventually draining into San Francisco Estuary. The project site also falls within the planning jurisdiction of the San Mateo Countywide Water Pollution Prevention Program. The San Mateo Countywide Water Pollution Prevention Program covers stormwater discharges pursuant to the NPDES program under the Clean Water Act. The NPDES permit requires construction and post-construction storm water control, including erosion control, run-on and run-off control, sediment control, and active treatment systems. The project site drains to the municipal storm drainage system via the storm drain located beneath San Raymundo Road.

DISCUSSION OF IMPACTS

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

Less-than-Significant Impact

The SFRQCB's Basin Plan sets narrative and numerical water quality objectives for the San Francisco Bay Region. Numerical objectives typically describe pollutant concentration, physical and chemical conditions of water, and the toxicity of water to aquatic organisms. Furthermore, per Hillsborough Town Ordinance 13.5- Stormwater Management and Discharge Control, future construction activities at the project site that involve the disturbance of one acre or more would be subject to the conditions of the National Pollutant Discharge Elimination System (NPDES) general construction activity permit. Upon commencement of construction work at the site, the Town's inspection process and general NPDES permit would ensure that the project will comply with all applicable stormwater management and discharge requirements. Following the conclusion of construction, stormwater runoff from the two new residential parcels would continue to flow to the municipal storm drain system and would not be expected to significantly differ from existing conditions. Because the project would be subject to compliance with the aforementioned regulations, impacts related to water discharge and ground water quality from the project 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?

Less-than-Significant Impact

The project would not rely on groundwater for water use on site during demolition, potential future construction activities, or operation. Water would be supplied to the site by the Town operated water distribution system. Groundwater is recharged naturally as precipitation infiltrates into soils and moves through soil pore spaces down to the water table. Flat areas enhance groundwater recharge because more time is provided for precipitation to infiltrate the soils. Recharge can be obstructed by human activities such as paving, development, and logging.

The project proposes the division of one lot into two lots to facilitate the development of two single-family residences. The site is currently developed with one single-family residence along with ancillary structures including tennis courts and a swimming pool. Due to the relatively flat nature of the project site, existing groundwater recharge rates at the site are generally not impeded by the existing paved surface areas associated with the existing residence. The project would demolish and remove the existing residence and divide the site into two legal parcels that

could be developed at some future time with two single-family residences. Such development would involve some paving for driveways and home construction but would not be likely to substantially interfere with groundwater recharge as significant portions of each parcel would be devoted to landscaping and non-paved surfaces. Impacts associated with decreasing groundwater supplies or interfering with groundwater recharge such that the project may impede sustainable groundwater management of the basin 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 erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (iii) create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?

Less-than-Significant Impact

Though the project site would be located completely within a relatively flat parcel, drainage patterns may need to be altered to redirect runoff to storm drainage facilities. However, if there is future development on the project site, site alterations that may impact drainage patterns, erosion, or runoff water, or could redirect flood flows are subject to Chapter 15.24 of the Hillsborough Municipal Code – Grading and Drainage Plans. Chapter 15.24 includes stormwater BMPs for new construction projects. Sediment controls would be installed and maintained to provide rapid removal of surface water runoff away from the project site. Storm drain inlets will be covered during construction activities and additional surface drainage requirements constructed by the builder would be maintained during landscaping. In particular, seeding and vegetation for erosion control on slopes or where construction is not immediately planned would be required. Construction materials are required to be covered if rain is forecast or if the material stockpiles are not actively being used within 14 days.

The Town's municipal code includes measures to reduce runoff from vehicles, hazardous materials, and waste during construction activities, including an approved erosion plan. Potential construction activities would not cause a substantial increase in the amount or rates of runoff which would result in flooding on- or off-site or exceed the capacity of existing storm drainage systems.

Future development that may be facilitated by the project could include the addition of impervious surfaces necessitated by the development of one additional single-family home at the project site. However, the amount of existing permeable surfaces that would be transformed to impervious surfaces would not be great enough as compared to existing conditions to cause a substantial increase in erosion or surface runoff from the site.

The project site is not located within any designated flood zones; thus, the project would not impede or redirect flood flows during demolition or the potential addition of two single-family residences, during both construction or operation. Additionally, as described above, potential future construction activities would be required to implement Chapter 15.24 of the Town's Municipal Code and construction BMPs, which would control on- and off-site erosion and stormwater runoff.

With the incorporation of recommended design features into the design of the potential future residences, as required by Chapter 15.24, the impacts of the project regarding altering existing drainage patterns would be ***less than significant***.

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

No Impact

The project site is not located within any flood hazard, tsunami, or seiche zones. ***No impact*** would occur.

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

Less-than-Significant Impact

The project falls within the jurisdiction of the Basin Plan, which sets narrative and numerical water quality objectives for the San Francisco Bay Region. As described in Impact (a) above, the project would implement Ordinance 13.5- Stormwater Management and Discharge Control and be subject to the requirements of the general construction NPDES permit to ensure project-related construction activities would not violate any water quality standards established in the Basin Plan. Additionally, The San Mateo County Stormwater Resource Plan (SRP), San Mateo Stormwater Pollution Prevention Program (SWPPP), and the Bay Area Integrated Regional Water Management Plan (IRWMP) are codified and enforced through the Town's implementation of the Countywide Water Pollution Prevention Program. Lastly, the subject parcel is not located in an area that requires a groundwater management plan. Therefore, the project, nor any possible future development within the project area, would not conflict with or obstruct any of the goals outlined in a water quality control plan or sustainable groundwater management plan. Project impacts would be ***less than significant***.

4.2.11 Land Use and Planning

Would the project:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is zoned as Traditional Residential (RD-1). The General Plan land use designation for the project site is Single-Family Residential. The project site is currently developed with one single-family residence, consistent with the site's zoning and land use designation.

DISCUSSION OF IMPACTS

a) Physically divide an established community?

No Impact

The project site is located in an area that predominantly consists of vegetation and low-density residential development. Surrounding land uses adjacent to the project include single-family residences, open space, and a public services facility. The project proposes a lot subdivision and no development is proposed at this time. However, as a logical outgrowth of the project, it is possible that the two new parcels could each be developed with a new single-family residence. Currently, a portion of the parcel is undeveloped, enabling the construction of an additional single-family residence in compliance with Town standards. Therefore, the project would not physically divide an established community; ***no impact*** would occur.

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 proposed project would subdivide an existing 2-acre lot into two separate lots. This subdivision would create two new vacant lots which would currently allow for development of one (1) single-family residence on each lot per the existing Zoning. These conceptual project plans are consistent with the project sites currently permitted residential land use activity, single-family facility type, General Plan land use designation, and design standards. Specifically, the applicant has submitted a site plan demonstrating the feasibility of the construction of a single-family home on each of the two newly created parcels. Per Town direction, the residences have approximately 3,415 square-feet of living area, above the minimum of 2,500 square-feet. Additionally, the existing driveways are proposed to remain, though some widening and narrowing may be necessary to match the existing condition on the street, however, the

maximum slope would be 15%, in compliance with Town standards. Thus, ***no impact*** would occur due to conflicts with any land use plan, policy, or regulation.

4.2.12 Mineral Resources

Would the project:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is located on a flat parcel within a residential area in Hillsborough. According to the California Department of Conservation's Mineral Lands Classification map, the Town is located in a State designated production area. However, there are no focused study areas or active mineral extraction operations on or near the project site (California Geological Survey 2024. Furthermore, the Town does not contain any State protected mineral resources (General Plan 2005).

DISCUSSION OF IMPACTS

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?

No Impact

There are no known mineral resources located on or near the project site. The project site is located within the RD-1 zoning district, which does not include mineral resource collection or production as a permitted use. Therefore, neither the project or potential future construction activities would not 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, or a locally important mineral resource recovery site delineated on any local general plan, specific plan, or other land use plan. ***No impact*** would occur.

4.2.13 Noise

Would the project result in:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located in a low-density residential area, with sparse vegetation and open space areas. As the primary sources of noise around the project site are vehicles travelling along San Raymundo Road, wildlife, and residential neighborhood activity adjacent to the project site, noise levels are relatively low.

DISCUSSION OF IMPACTS

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less-than-Significant Impact

The project proposes a parcel subdivision and the removal of the current single-family residence on the project site. However, it is possible that the two new parcels could each be developed with a new single-family residence. No additional development is proposed. Construction activities required to develop two single-family homes on the project site would be consistent with expected construction activities for this land use designation and zoning district. The project would generate a temporary increase in ambient noise levels during construction, which would not be permitted to exceed applicable standards established in a local plan or noise ordinance or by other agencies as required by Chapter 8.32.040 of the Hillsborough Municipal Code. Construction, demolition, and alteration activities would be restricted to Monday through Friday, 8 a.m. to 5 p.m. Additionally, noise levels within twenty-five feet of the property line from all

sources combined are restricted to 100 dBa; on Saturdays, the total combined noise level is limited to 70 dBa, subject to the conditions of the building or other applicable permit issued by the Town. Upon the completion of demolition and construction related activities, the two new single-family residences would not generate a substantial permanent operational increase in noise inconsistent with the Town's zoning, land use designations, or current surrounding uses. With the implementation of Chapter 8.32 of the Hillsborough Municipal code, the temporary impacts of the project regarding increases in ambient noise levels in the vicinity of the project would be ***less than significant.***

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?

Less-than-Significant Impact

The project site is located approximately four miles south of San Francisco International Airport (SFO) and six miles northwest of San Carlos Airport. However, neither the Town of Hillsborough nor the project site is within the noise contour of either airport. SFO monitors and publishes aircraft noise contours for a monitoring site in Hillsborough to ensure it remains in compliance with federal standards. Therefore, due to the monitoring process currently in place and distance from the airport, neither the project or potential future development on the project site would expose people to excessive noise levels. The impact would be ***less than significant***.

4.2.14 Population and Housing

Would the project:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is located in a low-density residential neighborhood in the Town of Hillsborough, CA with an estimated population of 11,116 (California Department of Finance 2024). The site is developed with one existing single-family residence, driveway, and other accessory structures.

DISCUSSION OF IMPACTS

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)?

Less-than-Significant Impact

The project would consist of the subdivision of an existing 2-acre lot into two separate lots and the demolition of the single-family residence currently on the parcel. Even though the creation of two new vacant lots would allow for two new single-family residences to be built, one on each lot, no development is proposed at this time. However, the potential future development of two new single-family residences on the project site is consistent with the currently permitted Single-Family (RD-1) residential activity and Traditional Residential General Plan land use designations of the Town of Hillsborough. Potential construction activities would not require the extension of roads or other infrastructure. Thus, impacts resulting from the project or replacement of the existing single-family residence with two new residential units would not induce substantial unplanned population growth in the area, either directly or indirectly and would be considered ***less than significant***.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact

The proposed project would subdivide the existing single parcel into two parcels. Although the project does not include any new development at this time, it is possible the structure currently

on the project site would be demolished and two new single-family residences may be constructed upon the division of the parcel. However, no people would be displaced due to the project or future construction activities would. ***No impact*** would occur.

4.2.15 Public Services

Would the project:	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located in a low-density residential area in Hillsborough. Fire services in the Town are provided by Central County Fire Department Hillsborough Station 33, located approximately one mile west of the project site. Public schools in the Town are administered by the Hillsborough City School District. One school and two parks are located within one mile of the project site, the closest being West Hillsborough Elementary and Preschool, approximately 0.6 miles from the project site. The San Mateo Public Library is the closest library, it is located approximately two miles of the project site.

DISCUSSION OF IMPACTS

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- Fire Protection?
- Police Protection?
- Schools?
- Parks?
- Other Public Facilities?

Less-than-Significant Impact

The project proposes the subdivision of a single parcel into two residential parcels and the demolition of the single-family residence currently on the parcel. No new development is proposed at this time, but the potential construction of two single-family residences on the proposed parcels would not generate the growth expected to require new or physically altered government facilities including fire or police protection, schools, parks, libraries, or other public facilities. Future construction at the project site could impact response times for fire or police protection due to possible road closures along San Raymundo Road. However, Hillsborough Municipal Code 15.30 requires that all construction vehicles be contained within the project site to ensure that emergency access will be maintained at all times. Additionally, the Town's Planning Division would assess each project and apply the appropriate fees to offset public service impacts to each development prior to issuance of a building permit. The project impacts associated with the provision of or need for new or physically altered governmental facilities would be ***less than significant***.

4.2.16 Recreation

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
a)	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b)	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is located in a low-density residential neighborhood. There are two neighborhood parks within one mile of the project site. These neighborhood parks offer a variety of activities including picnic areas, basketball courts, and playground equipment for children.

DISCUSSION OF IMPACTS

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?

Less-than-Significant Impact

The project proposes to divide a single residential parcel into two residential parcels and the demolition of the single-family residence currently on the parcel, no development is proposed at this time. It is possible that the two new parcels could each be developed with a new single-family residence. However, as there is currently a single-family residence on the project site, the potential net addition of one new residential development would not substantially increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, thus impacts resulting from the project are considered to be ***less than significant***.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact

The project does not include the development of recreational facilities or require the construction or expansion of recreational facilities, it is limited to the division of a single residential parcel into two residential parcels and the demolition of the single-family residence currently on the parcel. Future development is possible, but the net addition of one single-family residence would not require any additional recreational facilities. ***No impact*** would occur.

4.2.17 Transportation

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Hillsborough is mainly comprised of small, curvilinear residential streets, with few direct cross-town connections or connections to the external regional roadway system (General Plan 2005). Regional access to Hillsborough is provided by three major freeways: State Route 92, U.S. Highway 101, and Interstate 280 (General Plan 2005). The Town has no public transportation system and bike facilities are limited due to the narrow local roadways and hilly terrain (General Plan 2005).

DISCUSSION OF IMPACTS

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less-than-Significant Impact

The project would not conflict with any program, plan, ordinance, or policy addressing transit, roadway, bicycle, and pedestrian facilities. The project is limited to the subdivision of an existing parcel into two parcels and demolition of the single-family residence currently on the project site. No new development is proposed, though the project would enable the construction of two new single-family residences. If there is future development on the project site, the net addition of one single-family residence would not necessitate any modifications to the existing roadways, sidewalks, or bicycle lanes as any change to circulation patterns in the vicinity of the project area would be minimal. However, potential temporary construction activities on the project site may require temporary obstruction of the public right-of-way along San Raymundo Road with construction equipment or building materials. If deemed necessary by the contractor, Hillsborough Municipal Code 15.26: Construction Management Activity is applicable. During the demolition and construction phases of the project, all construction vehicle parking must occur on-site unless otherwise authorized by the building official. Via the implementation of

Hillsborough Municipal Code 15.26, the project would be compliant with all programs, plans, ordinances, and policies addressing the circulation system and impacts related to the circulation system would be ***less than significant***.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less-than-Significant Impact

CEQA Guidelines Section 15064.3 requires lead agencies to utilize the vehicle miles traveled (VMT) methodology to analyze transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Section 15064.3 subdivision (b) states that for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. The project itself and potential construction of two single-family residences would not generate VMT that would significantly increase the existing regional household VMT. The 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

The project proposes a parcel split and the demolition of the single-family residence currently on the project site; the construction of two new single-family homes is possible, though no development is proposed at this time. However, if the parcels are developed, the addition of two single-family homes and associated structures, within an existing residential neighborhood, would only require the construction to access each parcel. No modifications to the Town's existing local roads are necessary to accommodate the project or potential future development. Furthermore, there would be no impact to the local circulation system as no incompatible uses are proposed by the project. ***No impact*** would occur.

d) Result in inadequate emergency access?

Less-than-Significant Impact

The parcel subdivision and demolition activities are limited to an existing parcel. If future development occurs, all construction will be limited to the project site. The parcel is currently zoned for residential use. With the implementation of Hillsborough Municipal Code 15.26: Construction Management Activity, impacts to emergency access would be ***less than significant***.

4.2.18 Tribal Cultural Resources

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

ENVIRONMENTAL SETTING

The area of potential of effect (APE) of the project would be limited to a single parcel which currently contains one single-family residence and accessory structures and thus has previously been disturbed. On September 13, 2024, a record search of the Native American Heritage Commission's Sacred Lands File was completed, and the results were negative. However, it remains possible that future construction activities on the project site may uncover tribal cultural resources. Therefore, Native American tribes who may also have knowledge of cultural resources in the project area were consulted by the Town. Notification letters were issued to the Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Tribe of the San Francisco Bay Area, the Ohlone Indian Tribe, and the Wuksachi Indian Tribe/Eshom Valley Band. None of these tribal organizations requested formal consultation with the Town regarding the project.

REGULATORY SETTING

Tribal Cultural Resources Assembly Bill 52 (AB 52)

AB 52 (Chapter 532, Statutes 2014) required an update of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. AB 52 establishes a consultation process with all California Native American Tribes on the Native American Heritage Commission List, Federal and Non-Federal Recognized Tribes. AB 52 also establishes a new class of resources: Tribal Cultural Resources. Key components of AB 52 include consideration of Tribal Cultural

Values in determination of project impacts and mitigation and required Tribal notice and meaningful consultation.

PRC Section 21080.3.2(b) states that consultation ends when either 1) parties agree to mitigation measures or avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort concludes that mutual agreement cannot be reached.

State of California Public Resources Code

Section 21074 of the PRC defines historical resources related to tribal cultural resources.

a) "Tribal cultural resources" are either of the following:
    a. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
        A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
        B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
    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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Section 5020.1(k) defines "Local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

Section 5024.1 is the establishment of the California Register of Historical Resources (California Register).

DISCUSSION OF IMPACTS

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less than Significant with Mitigation Incorporated

The potential exists for unknown tribal cultural resources to be discovered during earth-disturbing demolition and construction activities, such as excavation and grading, that could occur in the future as an outgrowth of the project. Thus, the project would have a ***potentially significant impact***.

MITIGATION MEASURES

Implementation of Mitigation Measure CUL-1 (see Section 4.2.5, Cultural Resources) would ensure that any accidentally discovered tribal cultural resources would be treated with proper care during future ground-disturbing construction activity at the project site. With implementation of Mitigation Measure CUL-1, the project's potential impact would be reduced to a ***less-than-significant*** level.

4.2.19 Utilities and Service Systems

Would the project:		*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the 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?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Water at the project site is supplied by the Town. Hillsborough's water supply comes the San Francisco Public Utilities Commission (SFPUC). SFPUC's water supply comes from the Hetch Hetchy Reservoir in the Sierra Nevada Mountains and local watersheds in Alameda County and the San Francisco Peninsula. Hetch Hetchy Reservoir provides approximately 85% of the total water supply, with the remaining 15% coming from Alameda County and Peninsula watersheds. Per the Town's Urban Water Management Plan (UWMP), water demand is projected to decrease by 2045 due to minimal projected growth in population and a continued projected improvement in water conservation and the plumbing code (Town of Hillsborough 2021). As part of the UWMP, the Town was required to adopt a Water Shortage Contingency Plan (WSCP; Town of Hillsborough 2020) intended to maintain a reliable water supply. The Town operates a sanitary sewer collection system, but the Town's wastewater is conveyed to and treated by facilities in the Cities of San Mateo and Burlingame. Recycling and trash collection services in Hillsborough are

provided by Recology of San Mateo County. Power is provided in Hillsborough through Peninsula Clean Energy and Pacific Gas and Electric (PG&E).

DISCUSSION OF IMPACTS

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less-than-Significant Impact

The project is limited to a parcel division and the demolition of one single-family home and the demolition of the single-family residence currently on the parcel; future development on the parcels is possible but not proposed at this time. Given the size and location of the project, future development on the project site would generate minimal new demand for utilities and would tie into existing utilities in the neighborhood. The project would not result in the relocation or construction of new water, wastewater, and stormwater drainage, electric power, natural gas, or telecommunications facilities which could cause significant environmental effects. The impact would be ***less than significant***.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less-than-Significant Impact

Water at the project site is supplied by the Town. The Town's Urban Water Management Plan (UWMP) and Water Supply Agreement (WSA) assess water supplies against expected water demands and establish protocols to address future water shortages that may occur during various dry-year scenarios. The UWMP has a planning horizon of 2050 and includes diverse and resilient strategies including recycled water and conservation programs to prepare for uncertainties in the future. The WSCP outlines strategies to help address water shortages that may occur in drought years and especially multi-year drought periods. Neither the project nor potential development on the project site would generate a substantial new demand for water. Regional water supply planning is thoroughly addressed in the UWMP; neither the project or any future development would with either the UWMP or WSCP.

Potential project impacts related to the sufficiency of water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be ***less than significant***.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less-than-Significant Impact

The project and potential addition of one new single-family residence to the existing neighborhood would not generate a substantial increase in wastewater generation, and therefore not exceed the capacity of existing wastewater treatment facilities. This impact would be less than significant.

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?

Less-than-Significant Impact

The parcel division and demolition of the existing structure on the project site, in addition to the potential development of two single-family residences on the project site would generate waste during the construction & demolition (C&D) waste. However, all waste generated will be properly disposed of and C&D waste will be taken to an appropriate waste facility.

In the event of future construction activities, Chapter 15.26.0308.24 of the Town's Municipal Code would be applicable. Chapter 15 requires that the project applicant comply with the Town's construction management BMPs. Although the project may result in the future construction of two single-family residences, it is not expected that such construction would generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure. The project will generate demolition waste and may generate construction waste if there is development on the project site; however, implementation of the required Chapter 15 BMPs would ensure adequate waste reduction and recycling. Thus, potential impacts regarding waste generation and compliance with federal, state, and local management reduction regulations for solid waste would be less than significant.

Furthermore, if redevelopment does occur, operational waste production would not substantially increase and exceed state or local standards or be in excess of the capacity of local infrastructure. Waste services to the potential two new single-family residences would be provided by Recology of San Mateo County. Impacts related to solid waste generation would be ***less than significant***.

4.2.20 Wildfire

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

ENVIRONMENTAL SETTING

Hillsborough contains a mixture of undeveloped land, rural canyons, and preserved open space in addition to housing and other development. However, the proximity of housing and other development to these areas carries a high risk of wildland fires and is an ever-present concern (General Plan 2005). The project site is within the jurisdiction of the Central County Fire Department Hillsborough Station 33, located approximately one mile to the west. The project site is located within the Locally Responsible Area and is within a Very High Fire Hazard Severity Zone (VHFHSZ) (ABAG 2024). The Town's vegetation management programs and associated ordinances are applied and implemented by the Town and Fire Department (General Plan 2005). In 2018, the Town adopted Ordinance No. 755, known as the Wildland-Urban Interface Code, applicable to parcels within a Very High Fire Hazard Severity Zone. The code requires the maintenance of defensible space around property and enables Town inspectors to conduct inspections to ensure compliance with the ordinance.

The Town's General Plan also has policies related to wildfires. Policy PS-1.1 requires safe building practices and fire-safe building materials in all new developments and substantial redevelopments. Policy PS-1.3 encourages the maintenance of ground cover and fire breaks on all open space lands. Policy PS-1.4 encourages the support of fire service through the maintenance of fire equipment and the training of fire personnel.

Furthermore, The Town has an emergency plan based on the Standardized Emergency Management System (SEMS), enabling the effective flow of information and resource tracking.

Hillsborough has established emergency preparedness procedures to respond to both natural and man-made disasters that could potentially occur. Furthermore, the Town is included in the San Mateo County Operational Area EOC. The Emergency Plan establishes the SEMS as required by state law, and includes information on mutual aid agreements, hierarchies of command and different levels of response in emergency situations.

DISCUSSION OF IMPACTS

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-Significant Impact

The designated location for the coordination of emergency response in Hillsborough is Town Hall, located at 1600 Floribunda Ave. In the event of emergency evacuation due to wildfires, the general direction of traffic would be dispersed throughout the Town as the local schools are designated as emergency evacuation shelters. In this event, residents within Hillsborough may travel past the project site due to the central location of San Raymundo Road with respect to the nearest evacuation center. As San Raymundo Road is relatively narrow, the presence of construction equipment could limit access of vehicles on the road near the project site.

The project consists of the subdivision of one parcel and the demolition of one single-family residence; future development on the parcels is possible but not proposed at this time. If construction activities were to occur on the project site, compliance with Town Ordinance No. 739 would be required. Ordinance No. 739 requires the parking of construction vehicles and equipment on-site unless otherwise authorized by building officials, the storage of construction materials outside of the public right of way to the maximum extent feasible, and the provision of a minimum 72-hour advance notice to adjacent neighbors prior to the start of construction. With the implementation of Ordinance No. 739, construction vehicles associated with development of the project site would not present an obstruction to the use of San Raymundo Road as an evacuation route in case of wildfire.

Thus, though the project would not result in the addition of a substantial number of new residents, if two single-family residential or structures are constructed on the project site, there would be no impediment to residents evacuating or emergency vehicles accessing properties. Therefore, project impacts related to impairment of an adopted emergency response plan or emergency evacuation plan would be ***less than significant***.

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

Though no development is proposed at this time, the risk of loss, injury, or death involving wildland fires could be exacerbated by future construction activity at the project site. However, as discussed above, the Town has taken a number of proactive steps to reduce risks related to wildfire as. If there is future development on the project site, Ordinance No. 755, PS-1.1, PS 1.3, and PS-1.4 would reduce risks related to wildfire. Therefore, if future construction on the project site were to occur, Ordinance No. 755, PS-1.1, PS 1.3, and PS-1.4 would be implemented and

reduce the risks associated with wildfires and the uncontrolled spread of wildfire. Therefore, the impact of the proposed project would be ***less than significant.***

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?

No Impact

The project would not require the installation or maintenance of additional infrastructure that may exacerbate fire risk or result in environmental impacts. The project would divide an existing residential parcel into two new residential parcels, permitting the potential development of the site with two single-family residences. Existing infrastructure is sufficient to support the net addition of one single-family home to the project site. ***No impact*** would occur.

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?

Less-than-Significant Impact

As discussed in 3.2.7, the Town requires compliance with both the Seismic Hazards Mapping Act and most recent Uniform Building Code (General Plan 2005). Though the project is limited to a parcel division and the demolition of a single-family residence, the project site may be redeveloped. All future construction on the project site would be subject to the standards for seismic design, foundations, drainage, and geotechnical engineering studies must be undertaken for all new buildings or earthworks (General Plan 2005), thus impacts related to runoff, post-fire instability, and drainage changes would be ***less than significant***.

4.2.21 Mandatory Findings of Significance

		Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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 a rare or endangered plant or animal 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?	☐	☐	☒	☐

DISCUSSION OF IMPACTS

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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less-than-Significant with Mitigation Incorporated

As discussed in Section 4.2.4, Biological Resources, future redevelopment of the project site that would be permitted by the project has the potential to impact special-status species and sensitive natural communities. The project may reduce the number of woodrats, Hoary bats, and other roosting bat species found on the project site, or which roost and/or nest in trees on the project site. However, per Mitigation Measure BIO-1a, wildlife surveys will be conducted prior to vegetation removal. If a nest is found, it must be avoided with a 10-foot buffer. If project activities necessitate the removal of a nest, it must be done under the supervision of a qualified biologist. Potential future construction activities on the project site would also result in a loss of coast live oak and coast redwood trees, however, a tree permit would be required before any trees are removed. With the implementation of project mitigation measures, potential impacts resulting from the project would not substantially degrade the quality of the environment, substantially reduce the habitat or population of a special-status species, or cause a wildlife

population to drop below self-sustaining levels. The impacts would be less than significant with mitigation incorporated.

Furthermore, neither the project nor future redevelopment of the project site would impact known cultural or tribal cultural resources. As discussed in Section 4.2.5, Cultural Resources, and Section 4.2.18, Tribal Cultural Resources, there are no known historical or cultural resources located within the project site. Mitigation Measure CUL-1 would ensure that any accidentally discovered cultural resources would be treated with proper care if there is future ground-disturbing construction activity at the project site. Therefore, the impacts would be ***less than significant with mitigation incorporated.***

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)?

Less-than-Significant Impact

The project is limited to a parcel split and the demolition of a residential structure currently on the project site; future development on the project site is possible but not proposed at this time. The project is not connected to any past projects or anticipated future projects with which its incremental effects would be deemed cumulatively considerable. The project would tie into the existing neighborhood facilities and would thus not encourage further growth or development within the project area. The project's cumulative impacts would be ***less than significant***.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less-than-Significant Impact

Based upon the impact evaluations in Sections 4.2.1, Aesthetics, through 4.2.20, Wildfire, the project does not have the potential to result in environmental effects that will cause substantial adverse effects on human beings. Three environmental effects may be caused by the project; all are related to biological resources, cultural resources, and tribal cultural resources. However, the project would implement mitigation measures Bio-1a through Bio-3b and Cul-1, reducing project related impacts and potential future construction activities that may impact biological resources, cultural resources, and tribal cultural resources to a ***less-than-significant*** level. Therefore, neither the project nor the possible construction of two single-family homes has the potential to cause substantial adverse effects on human beings.

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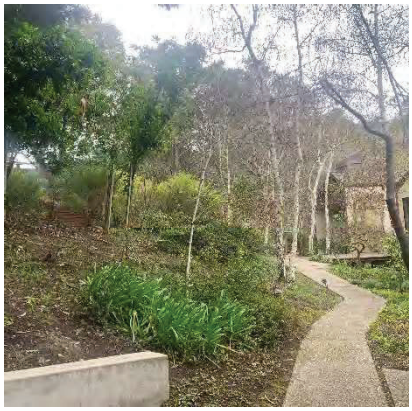
APPENDIX A. BIOLOGICAL RESOURCES TECHNICAL REPORT (WRA 2024)

Biological Resources Technical Report

1350 San Raymundo Road Project

Hillsborough, San Mateo, California



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List of Acronyms

Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFP	California Fully Protected Species
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
Corps	U.S. Army Corps of Engineers
CPRC	California Public Resources Code
CRLF	California Red Legged Frog
CSRL	California Soils Resource Lab
CWA	Clean Water Act
EFH	Essential Fish Habitat
ESA	Federal Endangered Species Act
Inventory	California Native Plant Society Rare Plant Inventory
MM	Mitigation Measure
NCCP	Natural Community Conservation Plan
NETR	National Environmental Title Research
NOAA	National Oceanic and Atmospheric Administration
NMFS	National Marine Fisheries Service
NPPA	California Native Plant Protection Act
OHWM	Ordinary High-Water Mark
Rank	California Rare Plant Ranks
RHA	Rivers and Harbors Act
RMP	Restoration Management Permit
RWQCB	Regional Water Quality Control Board
SC	State Candidate
SSC	Species of Special Concern
SWRCB	State Water Resource Control Board
TOB	Top of Bank
Town	Town of Hillsborough
USC	U.S. Code
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WBWG	Western Bat Working Group
WRA	WRA, Inc.

1.0 INTRODUCTION

WRA, Inc. (WRA) has prepared this Biological Resources Technical Report to evaluate existing biological resources, potential impacts, and mitigation measures for proposed redevelopment of 1350 San Raymundo Road in the Town of Hillsborough (Town), San Mateo County, California (Project Area; Assessor's Parcel Number 030-091-030; Appendix A – Figure 1). The proposed Project (Project) involves the subdivision of an approximately 1.83-acre parcel into two parcels. The existing parcel is developed with a residential home, tennis court, and recreational pool.

1.1 Overview and Purpose

This Biological Resources Technical Report provides an assessment of biological resources within the Project Area and immediate vicinity. The purpose of the assessment was to develop and gather information on sensitive land cover types and special-status plant and wildlife species to support an evaluation of the proposed Project under the California Environmental Quality Act (CEQA). This report describes the results of the site visit, which assessed the Project Area for (1) the presence of sensitive land cover types, special-status plant species, and special-status wildlife species, (2) the potential for the site to support special-status plant and wildlife species. Based on the results of the site assessment, potential impacts to sensitive land cover types and special-status species resulting from the proposed Project were evaluated. If the proposed Project has the potential to result in significant impacts to these biological resources, measures to avoid, minimize, or mitigate for those significant impacts are described.

A biological resources assessment provides general information on the presence, or potential presence, of sensitive species and habitats. Additional focused studies (such as protocol level species surveys or a wetland delineation) may be required to support regulatory permit applications or to implement mitigation measures included in this report. This assessment is based on information available at the time of the study and on-site conditions that were observed on the dates the site was visited. Conclusions are based on currently available information used in combination with the professional judgement of the biologists completing this study.

1.2 Project Description

1.2.1 Detailed Description of the Proposed Project

The proposed Project would subdivide the existing single parcel into two parcels: Parcel A and Parcel B (Figure 3). Although the proposed Project would not include any new development at this time, conceptual designs have been provided to help anticipate the potential environmental impacts that could occur when Parcel A and B are developed with new single-family residences in the future.

Proposed Parcel A would have an area of 0.89 acre (38,697 square feet) and allow for a minimum covered floor area of at least 2,500 square feet. The existing maximum slope is 15%, which complies with the Town's standards for residential lots. The existing driveway for Parcel A is proposed to remain with some widening and narrowing as necessary to meet all development standards and life safety requirements. Most of the asphalt driveway would be a minimum of 20 feet wide, narrowing to 16 feet wide to match the existing condition at the entrance from San Raymundo Road. A bioretention filter outfall storm drain (with a minimum filter area of

360 square feet) with multiple emitters to create sheet-flow would be constructed within Parcel A. Approximately 20 trees, including coast live oak (*Quercus agrifolia*) and coast redwood (*Sequoia sempervirens*), would be removed based on the proposed footprint of the house. The tennis courts and all other existing improvements are assumed to be demolished and removed prior to redevelopment of the parcel.

Proposed Parcel B would have an area of 1.11 acres (48,561 square feet) and allow for a minimum covered floor area of at least 2,500 square feet. The existing maximum slope is 15.5%, which complies with the Town's standards for residential lots. The existing driveway for Parcel B is proposed to remain with some widening near the house. Most of the driveway is a minimum of 16 feet wide, widening to 32 feet wide at the garage approach. The existing home and most of the other existing improvements on Parcel B, including the swimming pool, are to be demolished. The existing sewer and water service lines to the current residence would remain. Two flow-through planters with an approximate area of 100 square feet each would be constructed. Approximately ten birch (*Betula* spp.) trees would be removed.

As part of the process of separating the existing site infrastructure into that which is designed to serve two separate residences rather than one, all existing stairs and paths connecting proposed Parcels A and B would be removed. All existing minor irrigation lines or other utilities that cross the common line between the two parcels would be removed and capped. The irrigation systems would be reconfigured so that each parcel would have its own separate irrigation system and controllers.

1.2.2 Project Construction

For the purpose of analyzing the residential development of the two proposed parcels, a series of assumptions have been made. These assumptions provide the basis for evaluating potential environmental impacts associated with the likely outcome of the proposed subdivision.

Subdivision Only

Assuming the scope is limited to only the parcel subdivision, there is no required project construction. The process requires permits only with public reviews by the Town and the Architecture and Design Review Board. Further filing of tentative maps will be recorded by the County of San Mateo. The process is estimated to take approximately 6-9 months.

Subdivision and Development of One Parcel

Assuming the scope includes the parcel subdivision and development of one or both resulting parcels, the process requires permits as described above, the acquisition of development entitlements, which will add an additional 4-6 months of review time and finally construction, which will take approximately 1-3 years to complete.

Subdivision, Redevelopment of One Parcel and Sale of Remaining Parcel

Assuming the scope includes subdivision, redevelopment of one parcel and the sale of the remaining parcel, the process will be identical to the previously outlined process with one parcel remaining cleared and undeveloped. Site fencing may be required per neighbor outreach and feedback provided as part of the redevelopment process of parcel one.

The final assumption would be the subdivision of land, redevelopment of one parcel and development of the second parcel to be sold. The process of development and construction

would again be identical to the process outlined under subdivision and development however, the timeline may take up to 5 years to complete.

SCHEDULE AND EQUIPMENT

Demolition of the existing residence and other structures within the Project Area would be expected to occur in early 2025 and last for 12-36 months. It is unknown when development applications to construct one or both parcels might be submitted to the Town. However, once an application is submitted, it is anticipated that the Town's site and design review process would take approximately 4-6 months, with site work and construction requiring an additional 26 months. The following equipment would be required for project construction:

- Bulldozer
- Scraper
- Dump Truck
- Compactor
- Excavator
- Backhoe

STAGING, GRADING, AND SITE WORK

Construction staging would occur on site in the existing parking areas at the end of the two driveways. It is assumed that all grading of the property necessary to construct the two residences would be balanced on the site and that no import or export of soil would be necessary. Debris from the demolition of the existing residence and associated structures on the site, along with other miscellaneous debris generated during the future construction of new homes, would be removed from the site by truck. Water necessary for demolition and construction work as well as for dust suppression would be sourced from the existing domestic water tap and meter located on-site. Power may be provided to the site with a valid permit and perimeter fencing may also be installed for aesthetic screening.

Table 1. Summary of Biological Resources Evaluation

CEQA Assessment Category[1] IV – Biological Resources	Biological Resources Considered	Relevant Laws & Regulations	Responsible Regulatory Agency	Summary of Findings & Report Section[2]
Question A. **Special-status Species**	Special-status Plants Special-status Wildlife Designated Critical Habitat	Federal Endangered Species Act CA Endangered Species Act CA Native Plant Protection Act Migratory Bird Treaty Act Bald & Golden Eagle Protection Act	U.S. Fish & Wildlife Service National Marine Fisheries Service CA Department of Fish & Wildlife	Potentially significant impacts were identified, and mitigation measures are included that reduce those impacts to a level that is less than significant. **See Section 5.2 for more information.**
Question B. **Sensitive natural communities & riparian habitat**	Sensitive Natural Communities Streams, Lakes & Riparian Habitat	CA Fish & Game Code Oak Woodland Conservation Act Porter-Cologne Act Clean Water Act	CA Department of Fish & Wildlife U.S. Army Corps of Engineers U.S. Environmental Protection Agency State Water Resources Control Board Regional Water Quality Control Board	Potentially significant impacts were not identified. **See Section 5.1 for more information.**
Question C. **State and federally protected wetlands**	Wetlands Unvegetated surface waters	Clean Water Act: Sections 404/401 Rivers & Harbors Act: Section 10 Porter-Cologne Act	U.S. Army Corps of Engineers U.S. Environmental Protection Agency State Water Resources Control Board Regional Water Quality Control Board	Potentially significant impacts were not identified. **See Section 5.1 for more information**

[1] *CEQA Questions have been summarized here, see Section 6.2 for details.*
[2] *As given in this report, see Section 5.0 subheadings.*

Question D. **Fish & Wildlife corridors**	Essential Fish Habitat Wildlife Corridors	CA Fish & Game Code Magnuson-Stevens Fishery Conservation & Management Act	CA Department of Fish and Wildlife National Marine Fisheries Service	Potentially significant impacts were not identified. **See Section 5.1 for more information**
Question E. **Local policies**	Protected Trees Coastal zone resources Other biological protections	Local Tree Ordinance General Plan (e.g., Stream & Wetland Setbacks) Local ordinances	Local and regional agencies CA Coastal Commission San Francisco Bay Conservation and Development Commission	Potentially significant impacts were identified, and mitigation measures are included that reduce those impacts to a level that is less than significant. **See Section 5.2 for more information.**
Question F. **Local, state, federal conservation plans**	Habitat Conservation Plans Natural Community Conservation Plans	Federal Endangered Species Act Natural Community Conservation Planning Act	U.S. Fish and Wildlife Service CA Department of Fish and Wildlife	Potentially significant impacts were not identified. **See Section 5.2 for more information**

2.0 REGULATORY BACKGROUND

The following sections explain the regulatory context of the biological assessment, including applicable laws and regulations that were applied to field investigations and analysis of potential project impacts. Table 1 shows the correlation between these regulations and each Biological Resources question in the Environmental Checklist Form (Appendix G) of the CEQA guidelines.

2.1 Federal and State Regulatory Setting

2.1.1 Vegetation and Aquatic Communities

CEQA provides protections for particular vegetation types defined as sensitive by the California Department of Fish and Wildlife (CDFW) and aquatic features protected by laws and regulations administered by the U.S Army Corps of Engineers (Corps), State Water Resources Control Board (SWRCB), and Regional Water Quality Control Boards (RWQCB). The laws and regulations that provide protection for these resources are summarized below.

Sensitive Natural Communities: Sensitive natural communities include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. CDFW ranks sensitive communities as "threatened" or "very threatened" (CDFW 2024a) and keeps records of their occurrences in its California Natural Diversity Database (CNDDB; CDFW 2024b). Natural communities are ranked 1 through 5 in the CNDDB based on NatureServe's (2020) methodology, with those communities ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW or U.S. Fish and Wildlife Service (USFWS) must be considered and evaluated under CEQA (California Code of Regulations [CCR] Title 14, Div. 6, Chap. 3, Appendix G). In addition, this general class includes oak woodlands that are protected by local ordinances under the Oak Woodlands Protection Act and Section 21083.4 of California Public Resources Code (CPRC).

Waters of the United States, Including Wetlands: The Corps regulates “Waters of the United States” under Section 404 of the Clean Water Act (CWA). Waters of the United States are defined in the Code of Federal Regulations (CFR) as including the territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, such as tributaries, lakes and ponds, impoundments of waters of the U.S., and wetlands that are hydrologically connected with these navigable features (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *U.S. Army Corps of Engineers Wetlands Delineation Manual* (Corps Manual; Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Unvegetated waters including lakes, rivers, and streams may also be subject to Section 404 jurisdiction and are characterized by an ordinary high water mark (OHWM) identified based on field indicators such as the lack of vegetation, sorting of sediments, and other indicators of flowing or standing water. The placement of fill material into Waters of the United States generally requires a permit from the Corps under Section 404 of the CWA.

The Corps also regulates construction in navigable waterways of the U.S. through Section 10 of the Rivers and Harbors Act (RHA) of 1899 (33 U.S. Code [USC] 403). Section 10 of the RHA

requires Corps approval and a permit for excavation or fill, or alteration or modification of the course, location, condition, or capacity of, any port, roadstead, haven, harbor, canal, lake, harbor or refuge, or enclosure within the limits of any breakwater, or of the channel of any navigable water of the United States. Section 10 requirements apply only to navigable waters themselves, and are not applicable to tributaries, adjacent wetlands, and similar aquatic features not capable of supporting interstate commerce.

Waters of the State, Including Wetlands: The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The SWRCB and nine RWQCB protect waters within this broad regulatory scope through many different regulatory programs. Waters of the State in the context of a CEQA Biological Resources evaluation include wetlands and other surface waters protected by the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (SWRCB 2019). The SWRCB and RWQCB issue permits for the discharge of fill material into surface waters through the State Water Quality Certification Program, which fulfills requirements of Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Clean Water Act permit are also required to obtain a Water Quality Certification. If a project does not require a federal permit but does involve discharge of dredge or fill material into surface waters of the State, the SWRCB and RWQCB may issue a permit in the form of Waste Discharge Requirements.

Sections 1600-1616 of California Fish and Game Code: Streams and lakes, as habitat for fish and wildlife species, are regulated by CDFW under Sections 1600-1616 of California Fish and Game Code (CFGC). Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream," which includes creeks and rivers, is defined in the CCR as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). The term "stream" can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFG 1994). Riparian vegetation has been defined as "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself" (CDFG 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

2.1.2 Special-status Species

Endangered and Threatened Plants, Fish, and Wildlife. Specific species of plants, fish, and wildlife species may be designated as threatened or endangered by the Federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA). Specific protections and permitting mechanisms for these species differ under each of these acts, and a species' designation under one law does not automatically provide protection under the other.

The ESA (16 USC 1531 et seq.) is implemented by the USFWS and the National Marine Fisheries Service (NMFS). The USFWS and NMFS maintain lists of endangered and threatened plant and animal species (referred to as "listed species"). "Proposed" or "candidate" species are those that are being considered for listing and are not protected until they are formally listed as threatened or endangered. Under the ESA, authorization must be obtained from the USFWS or NMFS prior to

take of any listed species. “Take” under the ESA is defined as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Take under the ESA includes direct injury or mortality to individuals, disruptions in normal behavioral patterns resulting from factors such as noise and visual disturbance and impacts to habitat for listed species. Actions that may result in take of an ESA-listed species may obtain a permit under ESA Section 10, or via the interagency consultation described in ESA Section 7. Federal-listed plant species are only protected when removal or destruction occurs on federal land; however, if a federal agency authorizes, funds, or carries out an action, that agency must insure through Section 7 consultation that the action is not likely to jeopardize the continued existence of the species.

The ESA also provides for designation of critical habitat, which are specific geographic areas containing physical or biological features “essential to the conservation of the species.” Protections afforded to designated critical habitat apply only to actions that are funded, permitted, or carried out by federal agencies. Critical habitat designations do not affect activities by private landowners if there is no other federal agency involvement.

The CESA (CFGC 2050 et seq.) prohibits the take of any plant and animal species that the CFGC determines to be an endangered or threatened species in California. CESA regulations include take protection for threatened and endangered plants on private lands, as well as extending this protection to candidate species that are proposed for listing as threatened or endangered under CESA. The definition of a "take" under CESA ("hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") only applies to direct impact to individuals, and does not extend to habitat impacts or harassment. CDFW may issue an Incidental Take Permit under CESA to authorize take if it is incidental to otherwise lawful activity and if specific criteria are met. Take of these species is also authorized if the geographic area is covered by a Natural Community Conservation Plan (NCCP), as long as the NCCP covers that activity. CDFW may also authorize take for voluntary restoration projects through the Restoration Management Permit (RMP).

Fully Protected Species and Designated Rare Plant Species. This category includes specific plant and wildlife species that are designated in the CFGC as protected even if not listed under CESA or ESA. Fully Protected Species includes specific lists of birds, mammals, reptiles, amphibians, and fish designated in CFGC. Fully protected species may not be taken or possessed at any time. No licenses or permits may be issued for take of fully protected species, except for necessary scientific research and conservation purposes. The definition of "take" is the same under the California Fish and Game Code and the CESA. By law, CDFW may not issue an Incidental Take Permit for Fully Protected Species. Under the California Native Plant Protection Act (NPPA), CDFW has listed 64 “rare” or “endangered” plant species, and prevents “take,” with few exceptions, of these species. CDFW may authorize take of species protected by the NPPA through the Incidental Take Permit process, or under a NCCP. CDFW may also authorize take for voluntary restoration projects through the Restoration Management Permit (RMP).

Special Protections for Nesting Birds and Bats. The federal Bald and Golden Eagle Protection Act provides relatively broad protections to both of North America’s eagle species (bald eagle [*Haliaeetus leucocephalus*] and golden eagle [*Aquila chrysaetos*]) that in some regards are similar to those provided by the ESA. In addition to regulations for special-status species, most native birds in the United States, including non-status species, have baseline legal protections under the Migratory Bird Treaty Act of 1918 and CFGC, i.e., sections 3503, 3503.5 and 3513.

Under these laws/codes, the intentional harm or collection of adult birds as well as the intentional collection or destruction of active nests, eggs, and young is illegal. For bat species, the Western Bat Working Group (WBWG) designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA.

Essential Fish Habitat. The Magnuson-Stevens Fishery Conservation and Management Act provides for conservation and management of fishery resources in the U.S., administered by NMFS. This Act establishes a national program intended to prevent overfishing, rebuild overfished stocks, ensure conservation, and facilitate long-term protection through the establishment of Essential Fish Habitat (EFH). EFH consists of aquatic areas that contain habitat essential to the long-term survival and health of fisheries, which may include the water column, certain bottom types, vegetation (e.g., eelgrass [*Zostera* spp.]), or complex structures such as oyster beds. Any federal agency that authorizes, funds, or undertakes action that may adversely affect EFH is required to consult with NMFS.

Species of Special Concern, Movement Corridors, and Other Special-status Species under CEQA. A Species of Special Concern (SSC) is a species formally designated by the CDFW which meets one or more criteria related to a Federal ESA status (if it is not listed under CESA), including extirpation from California, documented population declines, or small population size within California and risk of declines. In addition, CDFW has developed a special animals list as "a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status." This list includes lists developed by other organizations, including for example, the Audubon Watch List Species, the Bureau of Land Management Sensitive Species, and USFWS Birds of Conservation Concern. Plant species on the California Native Plant Society (CNPS) Rare Plant Inventory (Inventory; CNPS 2024a) with California Rare Plant Ranks (Rank) of 1 and 2, as well as some with a Rank of 3 or 4, are also considered special-status plant species and must be considered under CEQA. Some Rank 3 and Rank 4 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare. Additionally, any species listed as sensitive within local plans, policies and ordinances are likewise considered sensitive. Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

2.2 Local Plans and Policies

Town of Hillsborough General Plan. The Town of Hillsborough General Plan contains policies pertaining to the following biological resources categories:

- Rare wildlife, plants, and natural habitats (Policy OSC-2.1, 2.2, 3.3, 3.11, 3.12)
- Creeks and riparian habitat (Policy OSC-3.1, 3.2, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, Action OSC-4.1)

The Town of Hillsborough Tree Removal Guidelines. The Town of Hillsborough Municipal Code states that all tree removals related to the construction of property improvements, along with property improvement plans, require design review and approval from the Planning Department. For projects that classify as subdivisions, all subdivision maps or divisions of land filed for tentative approval shall designate all "trees" (woody plants which have a trunk diameter of 12 inches or more measured at 4.5 feet above natural grade, i.e., 'breast height') or "groves" (group of at least five woody plants of the same type with a diameter of 6 inches or greater

measured at breast height) proposed to be removed, and those to be retained. Once approved, a permit must be obtained from the building department. Final approval of a map by the Town shall constitute a permit to remove any trees and/or groves designated on the tentative map as approved. An arborist report may be required for projects that propose removal of trees or groves.

Town of Hillsborough Stream Setback Policy. The Town has two regulations governing stream setbacks: (1) development is prohibited within 20 feet of the top of bank (TOB) of any stream, and (2) if any development is to occur between 20 and 50 feet from the TOB, a biologist must assess the project plans to ensure that no damage to the riparian area will occur.

3.0 ASSESSMENT METHODOLOGY

On March 7, 2024, WRA biologist Maya Avendano visited the Project Area to map vegetation, aquatic features, and other land cover types; document plant and wildlife species present; and evaluate on-site habitat for the potential to support special-status species as defined by CEQA. Prior to the site visit, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive land cover types and special-status species, including:

- Web Soil Survey (CSRL 2024)
- San Mateo 7.5-minute U.S. Geological Survey (USGS) quadrangle (USGS 2021)
- Contemporary aerial photographs (Google Earth 2024)
- Historical aerial photographs (NETR 2024)
- National Wetlands Inventory (USFWS 2024a)
- California Aquatic Resources Inventory (SFEI 2024)
- CNDDB (CDFW 2024b)
- CNPS Inventory (CNPS 2024a)
- Consortium of California Herbaria (CCH1 2024, CCH2 2024)
- USFWS Information for Planning and Consultation (USFWS 2024b)
- eBird Online Database (Cornell Lab of Ornithology 2024)
- California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- A Manual of California Vegetation, Online Edition (CNPS 2024b)
- Preliminary Descriptions of the Terrestrial Natural Communities (Holland 1986)
- California Natural Community List (CDFW 2024a)
- Database searches (i.e., CNDDB, CNPS) for special-status species focused on the San Mateo, Montara Mountain, San Francisco South, Hunter's Point, San Leandro, Redwood Point, Palo Alto, Woodside, and Half Moon Bay USGS 7.5-minute quadrangles.

Following the remote assessment, WRA biologists completed a field review to document: (1) land cover types (e.g., vegetation communities, aquatic resources), (2) existing conditions and to determine if such provide suitable habitat for any special-status plant or wildlife species, (3) if and what type of aquatic land cover types (e.g., wetlands) are present, and (4) if special-status species are present[3].

3.1 Vegetation Communities and Other Land Cover Types

During the site visit, WRA evaluated the species composition and area occupied by distinct vegetation communities, aquatic communities, and other land cover types. Mapping of these classifications utilized a combination of aerial imagery and ground surveys. In most instances, communities are characterized and mapped based on distinct shifts in plant assemblage (vegetation) and follow the California Natural Community List (CDFW 2024a) and A Manual of California Vegetation, Online Edition (CNPS 2024b). These resources cannot anticipate every component of every potential vegetation assemblage in California, and so in some cases, it is necessary to identify other appropriate vegetative classifications based on best professional judgment of WRA biologists. When undescribed variants are used, it is noted in the description. Vegetation alliances (natural communities) with a CDFW Rank of 1 through 3 (globally critically imperiled [S1/G1], imperiled [S2/G2], or vulnerable [S3/G3]) (CDFW 2024a), were evaluated as sensitive as part of this evaluation.

The site was reviewed for the presence of wetlands and other aquatic resources according to the methods described in the Corps Manual (Environmental Laboratory 1987), the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West* (Corps 2008), and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (Lichvar and McColley 2008). Areas meeting these indicators were mapped as aquatic resources and categorized using the vegetation community classification methods described above. The presence of riparian habitat was evaluated based on woody plant species meeting the definition of riparian provided in *A Field Guide to Lake and Streambed Alteration Agreements, Section 1600-1607, California Fish and Game Code* (CDFG 1994) and based on best professional judgement of biologists completing the field surveys.

3.2 Special-status Species

3.2.1 General Assessment

Potential occurrence of special-status species in the Project Area was evaluated by first determining which special-status species occur in the vicinity of the Project Area through a literature and database review as described above. Presence of suitable habitat for special-status species was evaluated during the site visit based on physical and biological conditions of the site as well as the professional expertise of the investigating biologists. The potential for each special-status species to occur in the Project Area was then determined according to the following criteria:

[3] *Due to the timing of the assessment, it may or may not constitute protocol-level species surveys; see Section 5.2 if the site assessment would constitute a formal or protocol-level species survey.*

- **No Potential.** Habitat on and adjacent to the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Unlikely.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** Species is observed on the site or has been recorded (i.e., CNDDB, other reports) on the site in the recent past.

If a more thorough assessment was deemed necessary, a targeted or protocol-level assessment or survey was conducted or recommended as a future study. If a special-status species was observed during the site visit, its presence was recorded and discussed below in Section 5.2. If designated critical habitat is present for a species, the extent of critical habitat present and an evaluation of critical habitat elements is provided as part of the species discussions below.

3.3 Wildlife Corridors and Native Wildlife Nursery Sites

To account for potential impacts to wildlife movement/migratory corridors, biologists reviewed maps from the California Essential Connectivity Project (CalTrans 2010), and habitat connectivity data available through the CDFW Biogeographic Information and Observation System (CDFW 2024c). Additionally, aerial imagery (Google Earth 2024) for the local area was referenced to assess if local core habitat areas were present within, or connected to the Project Area. This assessment was refined based on observations of on-site physical and/or biological conditions, including topographic and vegetative factors that can facilitate wildlife movement, as well as on-site and off-site barriers to connectivity.

The potential presence of native wildlife nursery sites is evaluated as part of the site visit and discussion of individual wildlife species below. Examples of native wildlife nursery sites include nesting sites for native bird species (particularly colonial nesting sites), marine mammal pupping sites, and colonial roosting sites for other species (such as heron rookeries or monarch butterfly [*Danaus plexippus*]).

4.0 ECOLOGICAL SETTING

The approximately 2-acre Project Area is located in the Town of Hillsborough, at 1350 San Raymundo Road, between Robin Road and La Honda Road east of Highway 280. The Project Area includes all areas affected by the proposed Project. Additional details of the local setting are below.

4.1 Soils and Topography

The overall topography of the Project Area is flat with elevations ranging from approximately 300 to 350 feet above sea level. According to SoilWeb (CSRL 2024) and Web Soil Survey (CSRL 2024), the Project Area is underlain by one soil mapping unit: Orthents, cut and fill-Urban land complex, 5 to 75 percent slopes. Soils within the Project Area are shown in Appendix A – Figure 3. The parent soil series of the Project Area's mapping unit is summarized below.

Orthents: This series consists of variable depth and variable soil textures, and is formed from residuum, at elevations of 0 to 700 feet. This soil series is well drained, is not rated as hydric, and is typically found in loamy mountains.

Urban Land: Urban fill can consist of gravel, sand, clay, and other non-native soils. This soil series is not rated as hydric.

4.2 Climate and Hydrology

The Project Area is located in the central region of the Town of Hillsborough, San Mateo County. The average monthly maximum temperature in the area is 68.7 degrees Fahrenheit, while the average monthly minimum temperature is 48.5 degrees Fahrenheit. Predominantly, precipitation falls as rainfall between November and March with an annual average precipitation of 19.09 inches.

The local watershed is Colma Creek-Frontal San Francisco Bay Estuaries (HUC 12: 180500040903) and the regional watershed is San Francisco Bay (HUC 8: 18050004). The Project Area is located in the upper portion of the Colma-Creek Frontal San Francisco Bay Estuaries watershed. There are no blue-line streams in the Project Area (USGS 2021, CARI; SFEI 2024). Detailed descriptions of aquatic resources are provided in Section 5.1 below.

4.3 Land Use

The majority of the Project Area is developed. Undeveloped areas consist of remnant stands of native trees and ruderal areas. Developed areas include the house, tennis courts, sidewalks, a parking lot, driveway, pool, and porches. Detailed land cover type descriptions are included in Section 5.1 below, and all observed plant species are included in Appendix B. Surrounding land uses include similarly developed residential areas (Google Earth 2024). Historically, the Project Area has been developed for residential purposes as far back as at least the 1980s, and was previously undeveloped open space (NETR 2024).

5.0 ASSESSMENT RESULTS

5.1 Vegetation Communities and Other Land Cover

WRA observed one land cover type within the Project Area: developed. Land cover within the Project Area are illustrated in Appendix A – Figure 4. Developed land cover would be considered non-sensitive.

Table 2. Vegetation Communities and Other Land Cover Types

COMMUNITY / LAND COVERS	SENSITIVE STATUS	RARITY RANKING	ACRES WITHIN PROJECT AREA
TERRESTRIAL / COMMUNITY LAND COVER			
Developed	None	None	1.83

5.1.1 Terrestrial Land Cover

Developed/Landscaped (no vegetation alliance). CDFW Rank: None. The Project Area is developed, including a house, pool, tennis courts, pathways, driveways, lawns, ornamental landscaping, a parking lot, and porches. Remnant native trees overhang throughout the developed area, including coast redwood, coast live oak, madrone (*Arbutus menziesii*), Monterey cypress (*Hesperocyparis macrocarpa*), Monterey pine (*Pinus radiata*), and Fremont cottonwood (*Populus fremontii*). In areas that are not paved, ornamental vegetative understory includes greater periwinkle (*Vinca major*), English ivy (*Hedera helix*), and cleavers (*Galium aparine*). This land cover type is not considered sensitive by San Mateo County, CDFW, or any other regulatory entity.

5.2 Special-status Species

5.2.1 Special-status Plants

Based upon a review of the resource databases listed in Section 3.0, 97 special-status plant species have been documented in the vicinity of the Project Area. All of these species documented from the greater vicinity are unlikely or have no potential to occur for one or more of the following:

- Hydrologic conditions (e.g., tidal, riverine) necessary to support the special-status plant species are not present in the Project Area;
- Edaphic (soil) conditions (e.g., volcanic tuff, serpentine) necessary to support the special-status plant species are not present in the Project Area;
- Topographic conditions (e.g., north-facing slope, montane) necessary to support the special-status plant species are not present in the Project Area;
- Unique pH conditions (e.g., alkali scalds, acidic bogs) necessary to support the special-status plant species are not present in the Project Area;
- Associated natural communities (e.g., interior chaparral, tidal marsh) necessary to support the special-status plant species are not present in the Project Area;
- The Project Area is geographically isolated (e.g., below elevation, coastal environ) from the documented range of the special-status plant species;
- The historical landscape and/or habitat(s) of the Project Area were not suitable habitat prior to land/type conversion (e.g., reclaimed shoreline) to support the special-status plant species;
- Land use history and contemporary management (e.g., grading, intensive grazing) has degraded the localized habitat necessary to support the special-status plant species.

The Project Area understory has been highly disturbed from development, leading to no potential for any special-status rare plant species to occur.

5.2.2 Special-status Wildlife

Of the 48 special-status wildlife species documented within in the San Mateo and eight surrounding USGS 7.5' quadrangles, 46 are excluded from the Project Area based on a lack of habitat features. Features not found within the Project Area that are required to support special-status wildlife species include:

- Freshwater streams, rivers, or ponds are not present;
- Coastal habitats and beaches are not present;
- Vegetation communities (e.g., tidal or freshwater marsh, grassland, riparian forest, and old-growth coniferous forest) that provide nesting and/or foraging resources necessary to support special-status wildlife species are not present;
- Structures or vegetation (rocky cliffs, caves, abandoned buildings, small mammal burrows) necessary to provide nesting or cover habitat to support special-status wildlife species are not present;
- Host plants necessary to provide larval and nectar resources required for the completion of life cycles for specific special-status insects are not present; and
- The Project Area is outside of special-status wildlife species' documented range.

The absence of such habitat features eliminates components critical to the survival or movement of most special-status species found in the vicinity. For instance, California red-legged frog (CRLF; *Rana draytonii;* Federal Threatened, CDFW Species of Special Concern) is known to occur in the open spaces in the vicinity. However, suitable aquatic habitat and movement corridors connecting the Project Area to source populations are absent, precluding this species from inhabiting the Project Area. Given the Project Area's relative proximity to sensitive habitats on the San Francisco Bay, many species documented nearby are additionally obligates to marine or tidal marsh habitats which are not present on or in the immediate vicinity of the Project Area.

Two (2) special-status wildlife species were determined to have potential to occur within the Project Area: hoary bat (*Lasiurus cinereus*, Western Bat Working Group [WBWG] Medium Priority) and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*, hereafter woodrat; CDFW Species of Special Concern [SSC]). These species are discussed in greater detail below. Although unlikely to occur, CRLF is also discussed given its regional prevalence, and known occupied habitats proximal to the Project Area.

Table 3. Potential Special-status Wildlife

SCIENTIFIC NAME	COMMON NAME	CONSERVATION STATUS	POTENTIAL HABITAT IN THE PROJECT AREA
OTHER SPECIAL-STATUS WILDLIFE (CEQA, OTHER)			
Lasiurus cinereus	Hoary bat	WBWG Medium Priority	Oak trees within the Project Area may provide suitable roosting habitat for this species. This species has been observed in the area.
Neotoma fuscipes annectens	San Francisco dusky-footed woodrat	CDFW SCC	Woodrat middens were documented within the Project Area. This species is locally abundant in the surrounding area.

San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*). CDFW Species of Special Concern. Present within the Project Area.

This subspecies of the dusky-footed woodrat occurs in the Coast Ranges between San Francisco Bay and the Salinas River (Matocq 2003). Occupied habitats are variable and include forest, woodland, riparian areas, and chaparral. Woodrats feed on woody plants, but will also consume fungi, grasses, flowers, and acorns. Foraging occurs on the ground and in bushes and trees. This species constructs robust stick houses/structures in areas with moderate cover and a well-developed understory containing woody debris. Breeding takes place from December to September. Individuals are active year-round and are generally nocturnal.

Woodrats are classified as a Species of Special Concern (SSC) by CDFW. An SSC is a species, subspecies, or distinct population of an animal native to California that currently meets the State definition of threatened or endangered but has not formally been listed; is experiencing, or formally experienced serious population declines or range retractions that, if continued, could qualify it for State-threatened or endangered status; and/or has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State-threatened or endangered status. Consequently, this species has been determined to be rare under the California public resources code (Cal. Code Regs. Tit. 14 § 15332).

Two woodrat middens were observed during the site visit beneath the ivy-covered concrete deck in the northeastern corner of the Project Area. It is unknown if this nest is currently inhabited. Woodrats could also construct nests within remnant stands of native trees in the northern portion of the Project Area, where tree cover is most dense. Additionally, WRA biologists have observed that woodrats and their middens are locally abundant in the surrounding vicinity around the Project Area. Woodrat is therefore considered to be present within the Project Area.

Hoary bat (*Lasiurus cinereus*). Western Bat Working Group Medium Priority Species. Moderate potential to occur within the Project Area.

Hoary bats are highly associated with forested habitats in the western United States, particularly in the Pacific Northwest. They are a solitary species and roost primarily in foliage of both

coniferous and deciduous trees, near the ends of branches, usually at the edge of a clearing. Roosts are typically 10 to 30 feet above the ground. Hoary bats have also been observed roosting in caves, beneath rock ledges, in woodpecker holes, in grey squirrel nests, under driftwood, and clinging to the sides of buildings, though this behavior is not typical. Hoary bats are thought to be migratory; however, wintering sites and migratory routes have not been well-documented. This species tolerates a wide range of temperatures and has been captured at air temperatures between 0 and 22 degrees Celsius. Hoary bats probably mate in the fall, with delayed implantation leading to birth in May through July. They usually emerge late in the evening to forage, typically from just over one hour after sunset to after midnight.

There will be a discretionary review by the U.S. Fish and Wildlife Service for federal listing under the Endangered Species Act (ESA) for the hoary bat in FY27, as there have been recent and significant declines in population across its range. Consequently, this species should be considered rare under the California public resources code (Cal. Code Regs. Tit. 14 § 15332).

Hoary bats have the potential to roost in the Project Area. Large coast live oak trees with interstitial spaces, within the northern section and boundaries of the Project Area, could serve as suitable roost habitat for this species. The prevalence of edge habitat throughout the property would also create feeding opportunities for the species; therefore, the Project Area has potential to provide value as habitat for hoary bats.

California red-legged frog (*Rana draytonii*). Federal Threatened, CDFW Species of Special Concern. Unlikely to occur within the Project Area.

CRLF is the only native "pond frog" found throughout much of California. Suitable aquatic breeding habitat is characterized by deep and still or slow-moving water associated with emergent marsh and/or riparian vegetation, typically with at least 20 weeks of continuous inundation (USFWS 2010). Suitable features include ponds (perennial and non-perennial), streams/creeks, seasonal wetlands, springs, seeps, man-made features (e.g., stock ponds, roadside ditches), marshes, dune ponds, and lagoons. Dependent upon local conditions, CRLF may complete its entire life cycle in a particular habitat patch (e.g., a perennial pond suitable for all life stages), or utilize multiple habitat types. In aquatic features that dry down seasonally, CRLF often undergo aestivation (a period of inactivity) during the dry months, retreating to small mammal burrows or other substrates that provide suitable refugia (Thomson et al. 2016). Adults and sub-adults (newly metamorphosed individuals) may disperse from breeding habitats to nearby riparian and/or aestivation areas in the summer. Conversely, during the rainy season CRLF may migrate from aestivation sites to waters suitable for breeding. During such dispersals, frogs can travel over one mile over a variety of topographic and habitat types (Bulger et al. 2003). Upland dispersal habitats are variable and typically include riparian corridors, grasslands, and oak savannas.

Despite documented occurrences in the vicinity, CRLF are unlikely to occur due to the lack of aquatic resources, significant development in the area, and presence of multiple partial and complete barriers that are present that would prevent CRLF from inhabiting or dispersing though the Project Area. CRLF are known to occur regionally and in the vicinity of the Project Area. There are several documented recent occurrences of CRLF within approximately one mile west of Interstate 280 (CDFW 2024b). WRA staff also observed an occurrence of CRLF approximately one mile north of the Project Area, in February 2024 (Sean MacDonald, personal observation). However, the Project Area does not support suitable breeding or non-breeding aquatic habitats

for CRLF and, moreover, no documented aquatic habitats are hydrologically connected to the Project Area. Additionally, there is no viable connectivity between the Project Area and occupied habitats to the west. Interstate 280 and the extent of interspersed residential development constitutes a complete barrier to dispersal for this species into the Project Area; therefore, it is unlikely that CRLF would occur within the Project Area.

5.3 Wildlife Corridors and Native Wildlife Nursery Sites

No native wildlife nursery sites are present in the Project Area.

Wildlife movement between suitable habitat areas can occur via open space areas lacking substantial barriers. The terms "landscape linkage" and "wildlife corridor" are often used when referring to these areas. The key to a functioning corridor or linkage is that it connects two larger habitat blocks, also referred to as core habitat areas (Beier and Loe 1992; Soulé and Terbough 1999). It is useful to think of a "landscape linkage" as being valuable in a regional planning context, a broad scale mapping of natural habitat that functions to join two larger habitat blocks. The term "wildlife corridor" is useful in the context of smaller, local area planning, where wildlife movement may be facilitated by specific local biological habitats or passages and/or may be restricted by barriers to movement. Above all, wildlife corridors must link two areas of core habitat and should not direct wildlife to developed areas or areas that are otherwise void of core habitat (Hilty et al. 2019).

The Project Area is not within a designated wildlife corridor (CalTrans 2010). The Project Area is located within a much larger tract of residential housing developments and lightly developed parcels of San Mateo County. The Project Area is less than one-mile east of Interstate 280, a multi-lane, auxiliary highway with high traffic flows and substantial physical barriers such as high curbs, concrete K-rails, chain-link fencing, and gated culverts. Interstate 280 acts as a complete barrier for all but the largest and most mobile species, and even then, represents an extremely risky crossing for wildlife by drastically reducing successful movement between the highly developed landscape to the east from the relatively undeveloped landscape to the west including Crystal Springs Reservoir and surrounding protected lands. While common and resident wildlife species presumably utilize the Project Area to some degree for movement at a local scale, the Project Area itself does not provide corridor functions beyond connecting similar developed residential parcels in surrounding areas.

6.0 ANALYTICAL METHODOLOGY AND SIGNIFICANCE THRESHOLD CRITERIA

Pursuant to Appendix G, Section IV of the State CEQA Guidelines, a project would have a significant impact on biological resources if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or U.S. Fish and Wildlife Service;

3. 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
4. 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;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or,
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

These thresholds were utilized in completing the analysis of potential Project impacts for CEQA purposes. For the purposes of this analysis, a "substantial adverse effect" is generally interpreted to mean that a potential impact could directly or indirectly affect the resiliency or presence of a local biological community or species population. Potential impacts to natural processes that support biological communities and special-status species populations that can produce similar effects are also considered potentially significant. Impacts to individuals of a species or small areas of existing biological communities may be considered less than significant if those impacts are speculative, beneficial, de minimis, and/or would not affect the resiliency of a local population.

7.0 IMPACTS AND MITIGATION EVALUATION

Using the CEQA analysis methodology outlined in Section 6.2 above, the following section describes potential significant impacts to sensitive resources within the Project Area as well as suggested mitigation measures which are expected to reduce impacts to less than significant.

7.1 Special-status Species

This section analyzes the proposed Project's potential impacts and mitigation for special-status species in reference to the significance threshold outlined in CEQA Appendix G, Part IV (a):

> *Does the project have the potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service?*

There is no potential for special-status plant species to occur within the Project Area. However, potentially suitable habitat for two special-status wildlife species was identified within the Project Area. Potential impacts and mitigation for potentially significant impacts are discussed below.

<u>San Francisco Dusky-Footed Woodrat</u>

Woodrats are classified as a SSC by CDFW. Consequently, this species has been determined to be rare under the California public resources code (Cal. Code Regs. Tit. 14 § 15332).

Temporary and/or permanent loss of woodrat habitat is anticipated due to the proposed subdivision of 1350 San Raymundo Road and project construction. Additionally, there is a limited potential for direct impacts to occur to woodrat individuals within the Project Area. The locations and extent of potential impacts to woodrat habitat are depicted in Appendix A – Figure 6. Several woodrat middens were documented within the Project Area during the March 7, 2024 site visit. Direct impacts may occur due to interactions with construction vehicles, vegetation removal, grubbing and grading of any future project footprints, landscaping, or entrapment in open trenches/holes, equipment, or materials. Redevelopment of the Project Area would remove known middens, potentially result in injury or mortality to adult and juvenile woodrats, and potentially limit or preclude future habitation due to landscaping or development. However, this subspecies of woodrat, while having a limited range, are locally abundant in natural areas and low-density residential neighborhoods.

The temporary or permanent removal of approximately 0.83 acre of habitat in the regional context will not affect the viability of the regional population; however, injury or mortality of adults or impacts to occupied middens would be considered a ***potentially significant impact*** under CEQA.

> **Potential Impact BIO-1:** The Proposed Project, including up to complete development of the Project Area, could result in direct or indirect injury of mortality woodrat individuals, removal of their middens, and potential land cover changes that could preclude future habitation of woodrat within the Project Area. This would be considered a significant impact.

To reduce potential impacts to woodrat to a less-than-significant level, the following measures shall be implemented year-round:

> **Mitigation Measure BIO-1a:** Prior to vegetation removal and/or ground disturbance within suitable or occupied habitat, a pre-construction survey for woodrat structures/middens shall be conducted to identify any existing woodrat middens that may be impacted (i.e., those within the Project Area). Any woodrat structures found during the survey shall be flagged and avoided to the fullest extent feasible.
>
> **Mitigation Measure BIO-1b:** Woodrat nests that cannot be avoided by at least 10 feet should be dismantled by hand under the supervision of a biologist. If young of the species are encountered during the dismantling process, the material should be placed back on the nest and the nest should then remain unmolested for three weeks in order to give the female enough time to move the young, or for the young to mature and leave the nest. After that time, the nest dismantling process may begin again.

Implementation of these mitigation measures will reduce potential impacts to woodrat to a level that is ***less than significant***.

Hoary Bat and Other Roosting Bat Species

The WBWG designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA. Future activities within the Project Area may affect hoary bats and other bat species during their maternity roosting season (typically between March 1 – August 31). Should a future project result in impacts to large oak trees, there is a potential to impact bats, their maternity roosts, or to adversely affect foraging

or roosting habitat. Impacts to hoary bat and other roosting bat species would be considered a **potentially significant impact** under CEQA.

> **Potential Impact BIO-2:** Proposed activities within the Project Area could result in direct injury and mortality and/or harassment of hoary bat adults, their pups and the removal of maternity roosts. Impacts hoary bat and other roosting bat species could occur during the removal of trees, vegetation, or other ground-disturbing activities. These activities could result in the direct removal or destruction of active roosts, as well as generate audible, vibratory and/or visual disturbances that might indirectly result in roost abandonment.

To reduce potential impacts to hoary bat and other roosting bat species to a less-than-significant level, the following measures shall be implemented:

> **Mitigation Measure BIO-2a:** To avoid adverse effects to the active maternity roosts of special-status and other bat species; tree removal, vegetation removal, and initial ground disturbance shall be prioritized to occur during the non-maternity roosting season, between September 1 through April 31, if possible.
>
> If work is occurring between September 1 and April 31 (outside of the maternity season), a qualified biologist shall conduct an emergence survey of potential bat habitat within the Project Area no more than 7 days prior to tree removal to determine if the roost is occupied, or the tree should be assumed occupied. If the emergence survey confirms the roost is inactive, the tree may be felled with no further measures required to protect roosting bats. If the roost is confirmed active, or is assumed to be active, a two-phased cut shall be employed to remove the tree. The qualified biologist shall oversee removal of branches and small limbs not containing potential bat roost habitat using hand tools such as chainsaws or handsaws. The following day, the rest of the tree may be removed.
>
> **Mitigation Measure BIO-2b:** If initial ground disturbance, including removal of trees and other vegetation must occur during the maternity roosting season (May 1 – August 31), At least 30 days prior to the removal of any large tree (DBH > 16 inches) a bat roost assessment shall be conducted by a qualified biologist to determine if potential roost habitat is present. If the tree has no potential to support roosting bats (e.g., no large basal cavities, exfoliating bark, interstitial spaces, or suitable foliage), the tree may be removed with no further measures required to protect roosting bats.
>
> If potential bat roosting habitat is present and work is occurring during the maternity season (May 1 through August 31), either a qualified biologist shall conduct an emergence survey to determine if the roost is occupied, or the roost shall be assumed to be occupied and a no-disturbance buffer around the roost shall be implemented. If the emergence survey does not detect bats, the tree may be removed with no further measures required to protect roosting bats. If roosting bats are detected, or the tree is assumed to be an active roost, a 100-foot buffer shall be established around the tree and the area shall be avoided until after the maternity roosting season is complete. Once the maternal roosting season is complete, tree removal shall follow the approach outlined above for out-of-maternity-season tree removal.

As a WBWG Medium Priority species, there is no requirement to provide compensatory mitigation for impacts to the hoary bat under CEQA. Implementation of these mitigation measures will reduce potential impacts to the hoary bat and other roosting bat species to a level that is ***less than significant***.

7.2 Sensitive Natural Communities and Land Cover Types

This section addresses the question:

> *b) Does the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or U.S. Fish and Wildlife Service;*

There are no sensitive natural communities within the Project Area. Therefore, there will be ***no impact*** on sensitive natural communities.

7.3 Aquatic Resources

This section analyzes the Project's potential impacts and mitigation for wetlands and other areas presumed or determined to be within the jurisdiction of the Corps or BCDC in reference to the significance threshold outlined in CEQA Appendix G, Part IV (c):

> *c) Does the Project have the potential to have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*

There are no aquatic resources within the Project Area. Therefore, there will be ***no impact*** on aquatic resources.

7.4 Wildlife Corridors and Native Wildlife Nursery Sites

This section analyzes the Project's potential impacts and mitigation for habitat corridors and linkages in reference to the significance threshold outlined in CEQA Appendix G, Part IV (d):

> *d) Does the Project have the potential to 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;*

As noted in Section 3.2.6, no portions of the Project Area provide critical linkages, key corridors, or land cover or topographical features that provide connectivity between areas of suitable habitat in the vicinity. For terrestrial species, all portions of the Project Area are within a greater context of urban development, existing roads, and within a network of partial and complete barriers which will not be further degrades as a result of the proposed Project. Furthermore, there is no aquatic connectivity between the Project Area and upstream freshwater habitats. The proposed Project will have ***no impact*** on migratory corridors for terrestrial and aquatic species.

7.5 Local Policies and Ordinances

This section analyzes the Project's potential impacts and mitigation based on conflicts with local policies and ordinances in reference to the significance threshold outlined in CEQA Appendix G, Part IV (e):

> *e) Does the Project have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;*

Construction of the proposed Project may necessitate removal of trees protected by Town of Hillsborough Municipal Code (Tree Ordinance). Based on the Project's conceptual plans, tree removal would consist primarily of coast live oak and coast redwood trees. According to the Tree Ordinance, projects that classify as subdivisions are required to obtain tree removal permits for all trees which have a trunk diameter of 12 inches or more measured at 4.5 feet above natural grade (i.e., 'breast height') or "groves" (groups of at least five woody plants of the same type with a diameter of 6 inches or greater measured at breast height). Up to 30 trees are anticipated to be removed to accommodate the house construction and redevelopment. Trimming or removal of trees or groves protected by the Tree Ordinance would be a ***potentially significant impact*** under CEQA.

> **Potential Impact BIO-3:** The Project may need to remove up to 30 trees for the house construction and redevelopment.

To reduce potential impacts to protected trees to a less-than-significant level, the following measures shall be implemented:

> **Mitigation Measure BIO-3a**. Should any tree removal be proposed, a tree survey conducted by a certified arborist shall be conducted within the area of proposed tree removal to determine which trees are protected by the Tree Ordinance.

> **Mitigation Measure BIO-3b.** Prior to any tree trimming or removal, an arborist report prepared by the Town's Consulting Arborist, in compliance with Mitigation Measure BIO-3a, is required.

Implementation of these mitigation measures will reduce potential impacts to protected trees and groves to a level that is ***less than significant***.

7.6 Habitat Conservation Plans

This section analyzes the Project's potential impacts and mitigation based on conflicts with any adopted local, regional, and state habitat conservation plans in reference to the significance threshold outlined in CEQA Appendix G, Part IV (f):

> *f) Does the Project have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

The proposed Project does not occur within the jurisdiction of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and therefore **no potential conflict** with the provisions of such.

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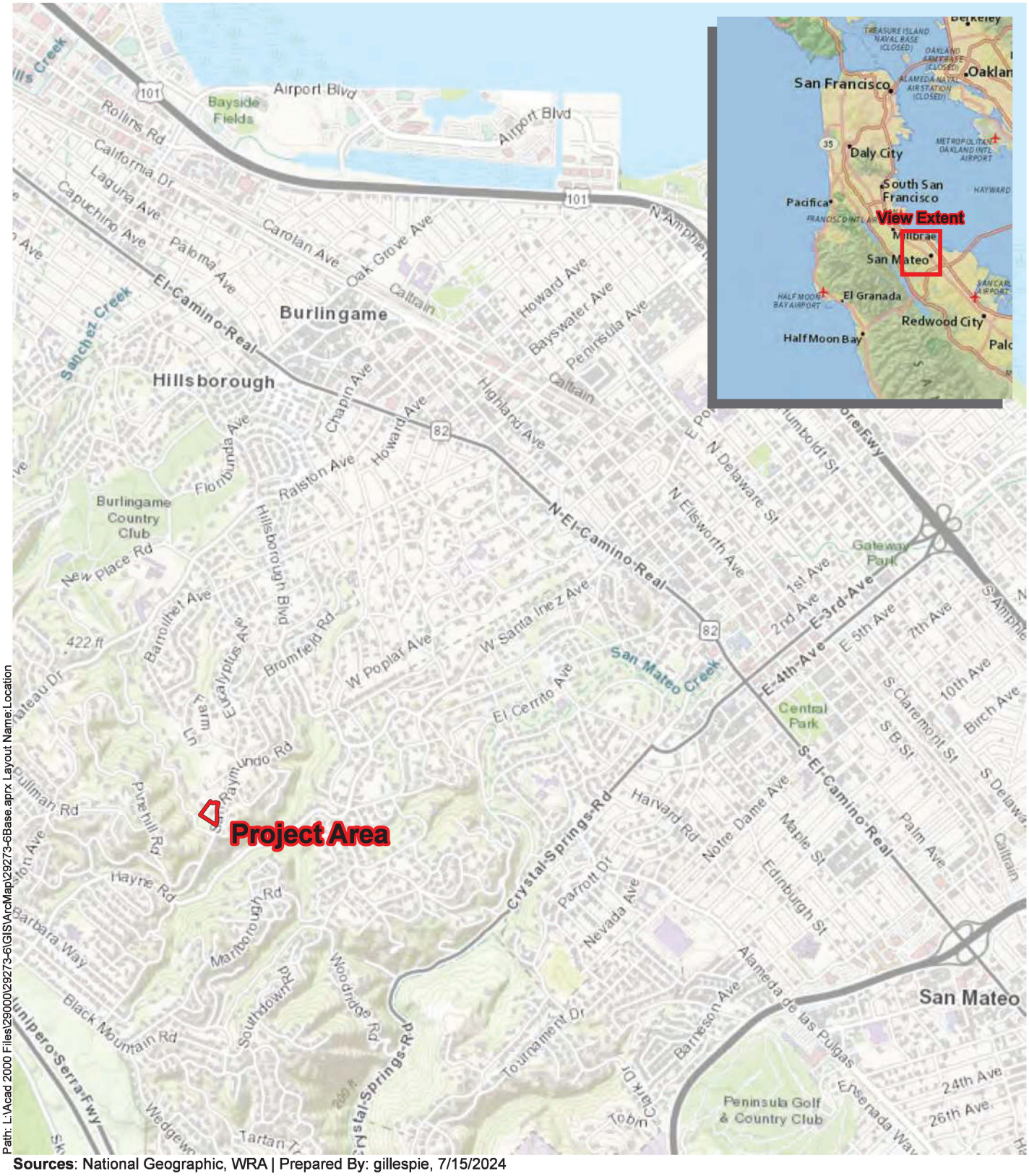
APPENDIX A. FIGURES



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Sources: National Geographic, WRA | Prepared By: gillespie, 7/15/2024

Figure 1. Project Area Vicinity Map

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 0.25 0.5 Miles

N

wra Environmental Consultants

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Sources: USDA NAIP Imagery 2022, USDA NRCS SSURGO, WRA | Prepared By: gillespie, 7/15/2024

Figure 2. Project Area Site Map

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

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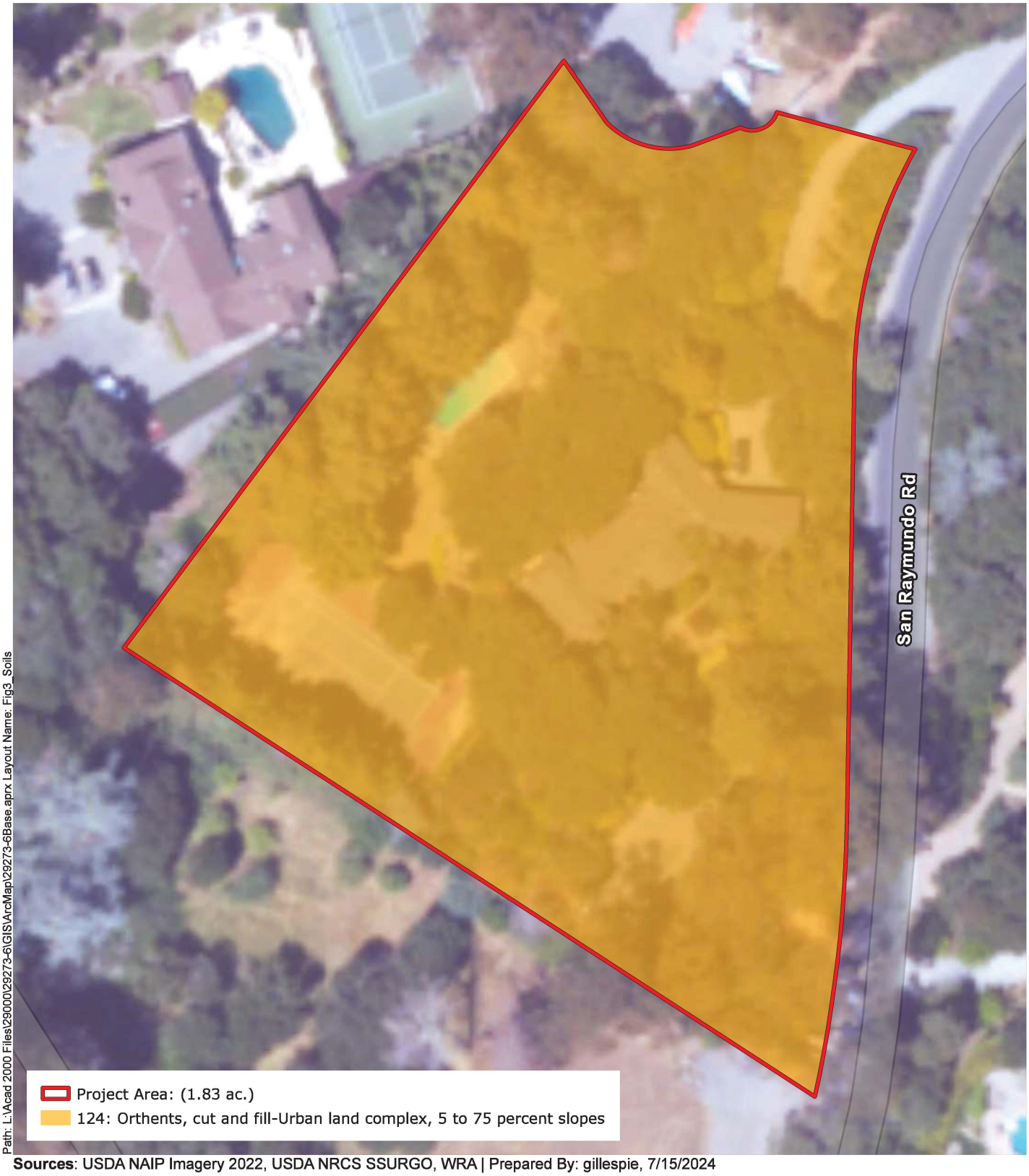
wra Environmental Consultants



Sources: USDA NAIP Imagery 2022, USDA NRCS SSURGO, WRA | Prepared By: gillespie, 7/15/2024

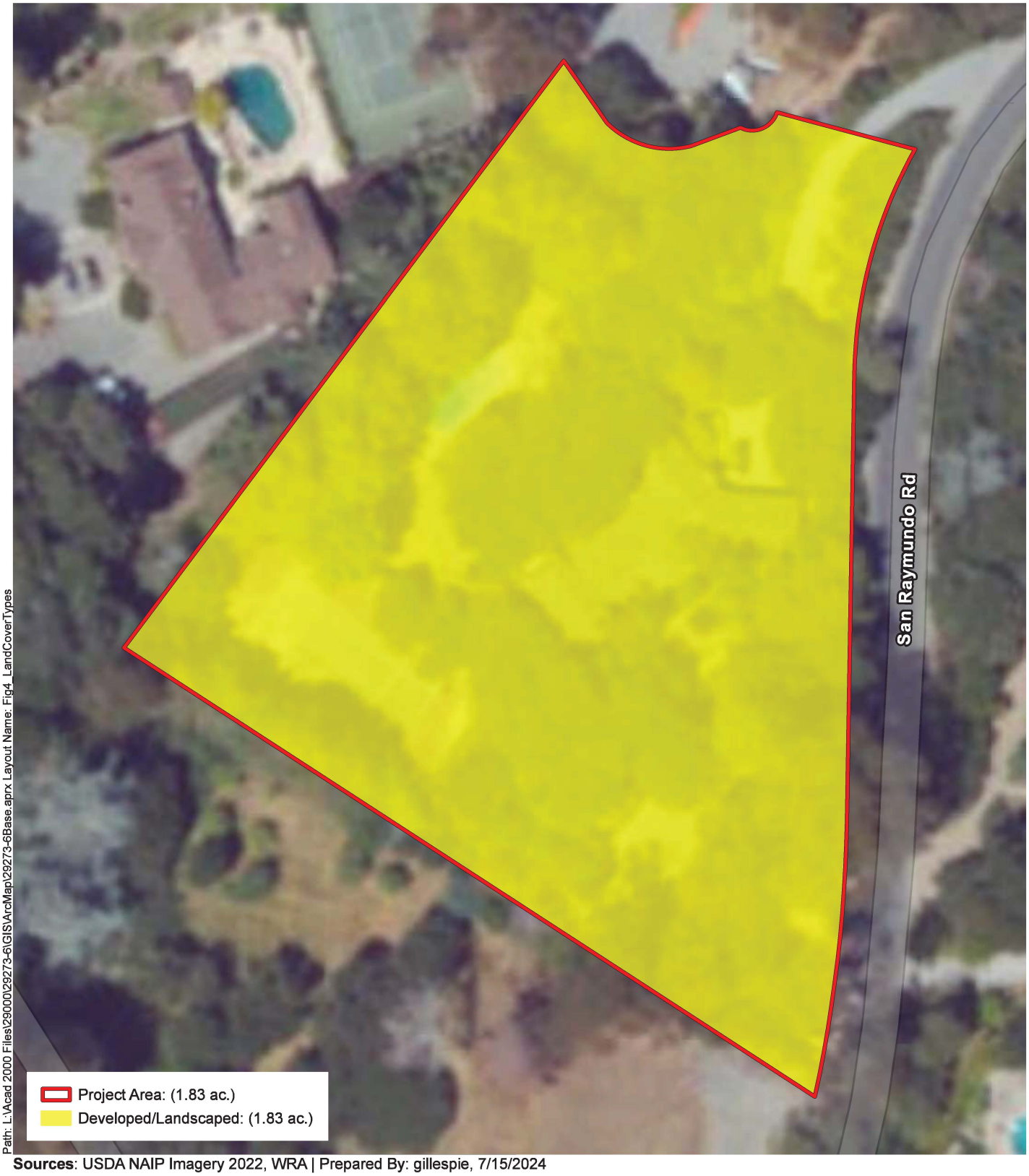
Figure 3. Soil Types within the Project Area

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

N

wra Environmental Consultants



Sources: USDA NAIP Imagery 2022, WRA | Prepared By: gillespie, 7/15/2024

Figure 4. Land Cover Types within the Project Area

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

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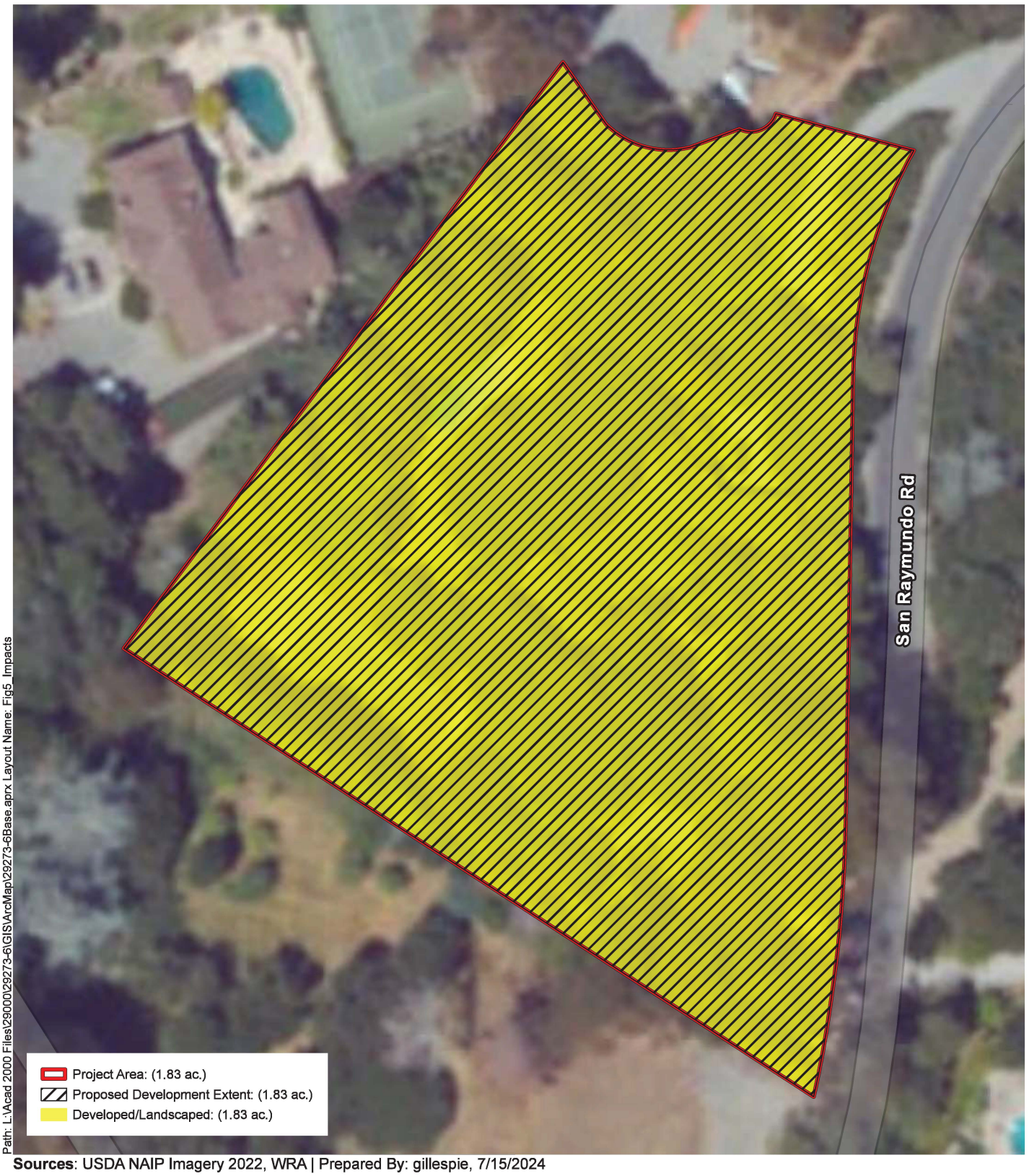
wra Environmental Consultants



Sources: USDA NAIP Imagery 2022, WRA | Prepared By: gillespie, 7/15/2024

Figure 5. Proposed Impacts within the Project Area

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

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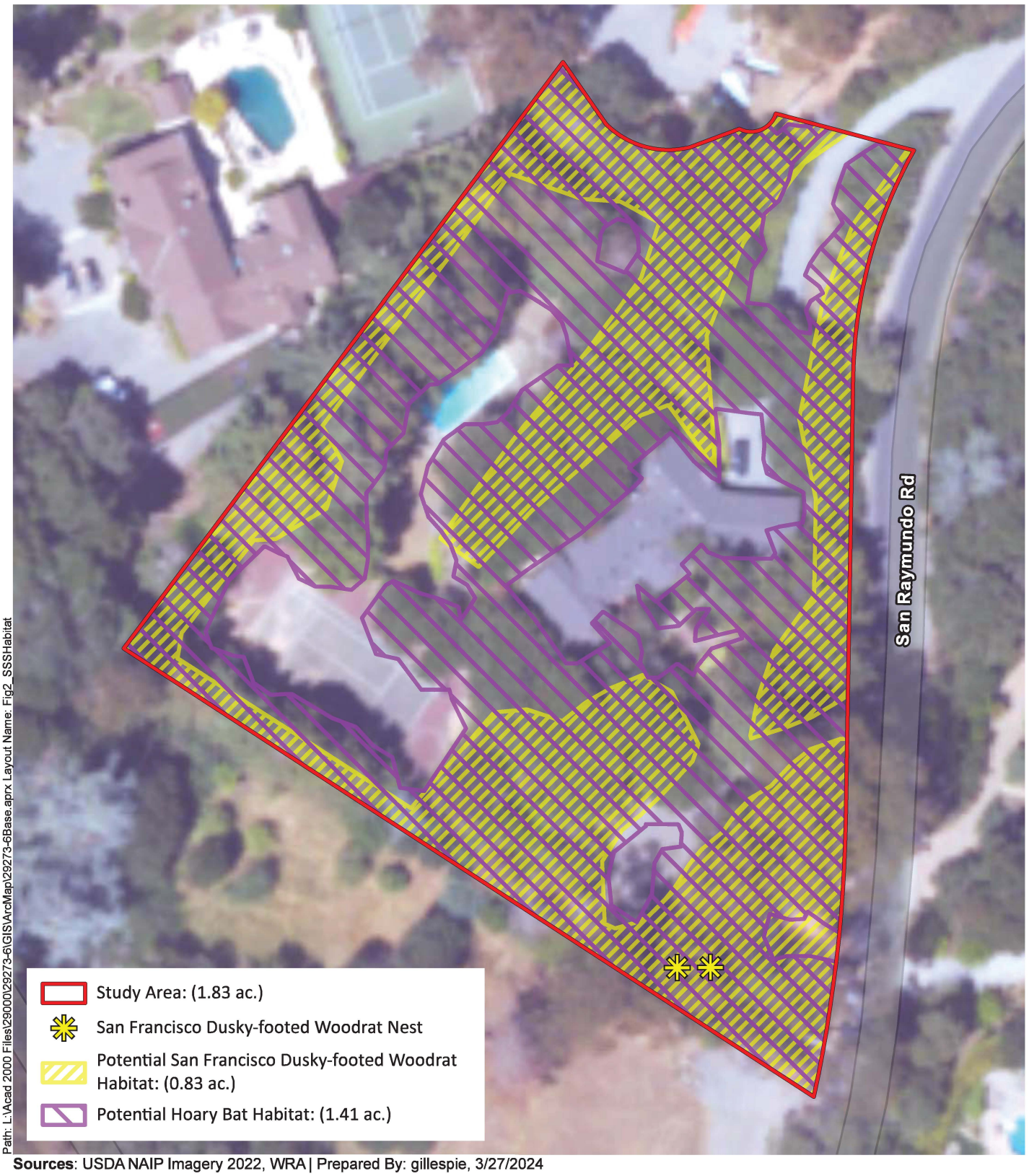

Sources: USDA NAIP Imagery 2022, WRA | Prepared By: gillespie, 3/27/2024

Figure 6. Potential Impacts to Special-Status Species

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

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wra Environmental Consultants

Sources: USDA NAIP Imagery 2022, WRA | Prepared By: gillespie, 7/25/2024

Figure 6. Potential Impacts to Special Status Species

1350 San Raymundo Road
Town of Hillsborough,
San Mateo County, California

0 50 100 Feet

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APPENDIX B.
SPECIES OBSERVED IN AND AROUND THE PROJECT AREA

Appendix B. Species Observed within the Project Area during the March 7, 2024 Site Visit.

SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
***Acacia* sp.**	-	-	-	-	-	-
Alnus rubra	Red alder	native	tree, shrub	-	-	FACW
Arbutus menziesii	Madrone	native	tree	-	-	-
Arbutus unedo	Strawberry tree	non-native	tree	-	-	-
***Betula* sp.**	Birch tree	non-native	Tree	-	-	-
***Ceanothus* sp.**	-	-	-	-	-	-
Claytonia perfoliata	Miner's lettuce	native	annual herb	-	-	FAC
Conium maculatum	Poison hemlock	non-native (invasive)	perennial herb	-	Moderate	FACW
Delairea odorata	Cape ivy	non-native (invasive)	perennial herb	-	High	FAC
Eucalyptus globulus	Blue gum	non-native (invasive)	tree	-	Limited	-
Galium aparine	Cleavers	native	annual herb	-	-	FACU
Genista monspessulana	French broom	non-native (invasive)	shrub	-	High	-
Hedera helix	English ivy	non-native (invasive)	vine, shrub	-	High	FACU
Hesperocyparis macrocarpa	Monterey cypress	native	tree	Rank 1B.2*	-	-
Pinus radiata	Monterey pine	native	tree	Rank 1B.1*	-	-
Populus fremontii* ssp. *fremontii	Fremont cottonwood	native	tree	-	-	FACW
Quercus agrifolia	Coast live oak	native	tree	-	-	-
Rosmarinus officinalis	Rosemary	non-native	shrub	-	-	-
Sanicula crassicaulis	Pacific sanicle	native	perennial herb	-	-	-
Sequoia sempervirens	Coast redwood	native	tree	-	-	-
Vinca major	Greater periwinkle	non-native (invasive)	perennial herb	-	Moderate	FACU

WILDLIFE		
BIRDS		
SCIENTIFIC NAME	**COMMON NAME**	**STATUS**
Baeolophus inornatus	Oak titmouse	None
Buteo lineatus	Red-shouldered hawk	None
Calypte anna	Anna's hummingbird	None
Corvus brachyrhynchos	American crow	None
Corvus corax	Common raven	None
Junco hyemalis	Dark-eyed junco	None
Poecile rufescens	Chestnut-backed chickadee	None
Setophaga coronata	Yellow-rumped warbler	None
Thryomanes bewickii	Bewick's wren	None
MAMMALS		
SCIENTIFIC NAME	**COMMON NAME**	**STATUS**
Neotoma fuscipes annectens	San Francisco dusky-footed woodrat	CDFW Species of Special Concern

Note: All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2024]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2024] or Rare Plant Inventory (CNPS 2024). Sp.: "species", intended to indicate that the observer was confident in the identity of the genus but uncertain which species.

*Special status only at native occurrences. The Project Area does not contain a native occurrence of this species.

[1] **California Native Plant Society. 2024. Rare Plant Inventory (online edition, v9.5). Sacramento, California. Online at: http://rareplants.cnps.org/; most recently accessed: July 2024.**

FE:	Federal Endangered
FT:	Federal Threatened
SE:	State Endangered
ST:	State Threatened
SR:	State Rare
Rank 1A:	Plants presumed extinct in California
Rank 1B:	Plants rare, threatened, or endangered in California and elsewhere
Rank 2:	Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3:	Plants about which we need more information – a review list
Rank 4:	Plants of limited distribution – a watch list

[2] **California Invasive Plant Council. 2024. California Invasive Plant Inventory Database. California Invasive Plant Council, Berkeley, CA. Online at: http://www.cal-ipc.org/paf/; most recently accessed: July 2024.**

High:	Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate:	Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited:	Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed:	Assessed by Cal-IPC and determined to not be an existing current threat

[3] **U.S. Army Corps of Engineers. 2024. National Wetland Plant List, version 3.6. Engineer Research and Development Center. Cold Regions Research and Engineering Laboratory, Hanover, NH. Online at: http://wetland-plants.sec.usace.army.mil/**

OBL:	Almost always found in wetlands
FACW:	Usually found in wetlands
FAC:	Equally found in wetlands and uplands
FACU:	Usually not found in wetlands
UPL:	Almost never found in wetlands
NL:	Not listed, assumed almost never found in wetlands
NI:	No information; not factored during wetland delineation

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APPENDIX C. SPECIAL-STATUS SPECIES POTENTIAL TABLE

Appendix C. Potential for Special-status Plant and Wildlife Species to Occur within the Project Area

List Compiled from the California Department of Fish and Wildlife California Natural Diversity Database (CDFW 2024), U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) Report (USFWS 2024), and California Native Plant Society Rare Plant Inventory (CNPS 2024) search of the San Mateo, Montara Mountain, San Francisco South, Hunter's Point, San Leandro, Redwood Point, Palo Alto, Woodside, and Half Moon Bay USGS 7.5' quadrangles.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
San Mateo thorn-mint ***Acanthomintha duttonii***	FE, SE, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 165 to 985 feet (50 to 300 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Blasdale's bent grass ***Agrostis blasdalei***	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie. Elevation ranges from 0 to 490 feet (0 to 150 meters). Blooms May-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Franciscan onion ***Allium peninsulare* var. *franciscanum***	Rank 1B.2	Cismontane woodland, valley and foothill grassland. Elevation ranges from 170 to 1000 feet (52 to 305 meters). Blooms (Apr)May-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
bent-flowered fiddleneck ***Amsinckia lunaris***	Rank 1B.2	Cismontane woodland, coastal bluff scrub, valley and foothill grassland. Elevation ranges from 10 to 1640 feet (3 to 500 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
California androsace ***Androsace elongata* ssp. *acuta***	Rank 4.2	Chaparral, cismontane woodland, coastal scrub, meadows and seeps, pinyon and juniper woodland, valley and foothill grassland. Elevation ranges from 490 to 4280 feet (150 to 1305 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Robbins' broomrape ***Aphyllon robbinsii***	Rank 1B.1	Coastal bluff scrub. Elevation ranges from 0 to 330 feet (0 to 100 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
coast rockcress ***Arabis blepharophylla***	Rank 4.3	Broadleafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 10 to 3610 feet (3 to 1100 meters). Blooms Feb-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Anderson's manzanita ***Arctostaphylos andersonii***	Rank 1B.2	Broadleafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 195 to 2495 feet (60 to 760 meters). Blooms Nov-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Franciscan manzanita ***Arctostaphylos franciscana***	FE, Rank 1B.1	Coastal scrub (serpentine). Elevation ranges from 195 to 985 feet (60 to 300 meters). Blooms Feb-Apr.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
San Bruno Mountain manzanita ***Arctostaphylos imbricata***	SE, Rank 1B.1	Chaparral, coastal scrub. Elevation ranges from 900 to 1215 feet (275 to 370 meters). Blooms Feb-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Presidio manzanita ***Arctostaphylos montana ssp. ravenii***	FE, SE, Rank 1B.1	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 150 to 705 feet (45 to 215 meters). Blooms Feb-Mar.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Montara manzanita ***Arctostaphylos montaraensis***	Rank 1B.2	Chaparral (maritime), coastal scrub. Elevation ranges from 260 to 1640 feet (80 to 500 meters). Blooms Jan-Mar.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Pacific manzanita ***Arctostaphylos pacifica***	SE, Rank 1B.1	Chaparral, coastal scrub. Elevation ranges from 1085 to 1085 feet (330 to 330 meters). Blooms Feb-Apr.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Kings Mountain manzanita ***Arctostaphylos regismontana***	Rank 1B.2	Broadleafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 1000 to 2395 feet (305 to 730 meters). Blooms Dec-Apr.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
ocean bluff milk-vetch ***Astragalus nuttallii* var. *nuttallii***	Rank 4.2	Coastal bluff scrub, coastal dunes. Elevation ranges from 10 to 395 feet (3 to 120 meters). Blooms Jan-Nov.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
coastal marsh milk-vetch ***Astragalus pycnostachyus* var. *pycnostachyus***	Rank 1B.2	Coastal dunes (mesic), coastal scrub, marshes and swamps (coastal salt, streamsides). Elevation ranges from 0 to 180 feet (0 to 55 meters). Blooms (Apr)Jun-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
alkali milk-vetch ***Astragalus tener* var. *tener***	Rank 1B.2	Playas, valley and foothill grassland (adobe clay), vernal pools. Elevation ranges from 5 to 195 feet (1 to 60 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Brewer's calandrinia ***Calandrinia breweri***	Rank 4.2	Chaparral, coastal scrub. Elevation ranges from 35 to 4005 feet (10 to 1220 meters). Blooms (Jan)Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Oakland star-tulip ***Calochortus umbellatus***	Rank 4.2	Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland. Elevation ranges from 330 to 2295 feet (100 to 700 meters). Blooms Mar-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
pink star-tulip ***Calochortus uniflorus***	Rank 4.2	Coastal prairie, coastal scrub, meadows and seeps, north coast coniferous forest. Elevation ranges from 35 to 3510 feet (10 to 1070 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
bristly sedge ***Carex comosa***	Rank 2B.1	Coastal prairie, marshes and swamps (lake margins), valley and foothill grassland. Elevation ranges from 0 to 2050 feet (0 to 625 meters). Blooms May-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
johnny-nip ***Castilleja ambigua* var. *ambigua***	Rank 4.2	Coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, valley and foothill grassland, vernal pools (margins). Elevation ranges from 0 to 1425 feet (0 to 435 meters). Blooms Mar-Aug.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Congdon's tarplant ***Centromadia parryi* ssp. *congdonii***	Rank 1B.1	Valley and foothill grassland (alkaline). Elevation ranges from 0 to 755 feet (0 to 230 meters). Blooms May-Oct(Nov).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
pappose tarplant ***Centromadia parryi* ssp. *parryi***	Rank 1B.2	Chaparral, coastal prairie, marshes and swamps (coastal salt), meadows and seeps, valley and foothill grassland (vernally mesic). Elevation ranges from 0 to 1380 feet (0 to 420 meters). Blooms May-Nov.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Point Reyes salty bird's-beak ***Chloropyron maritimum* ssp. *palustre***	Rank 1B.2	Marshes and swamps (coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms Jun-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco Bay spineflower ***Chorizanthe cuspidata* var. *cuspidata***	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 10 to 705 feet (3 to 215 meters). Blooms Apr-Jul(Aug).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
robust spineflower ***Chorizanthe robusta* var. *robusta***	FE, Rank 1B.1	Chaparral (maritime), cismontane woodland (openings), coastal dunes, coastal scrub. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Franciscan thistle ***Cirsium andrewsii***	Rank 1B.2	Broadleafed upland forest, coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 0 to 490 feet (0 to 150 meters). Blooms Mar-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
fountain thistle ***Cirsium fontinale* var. *fontinale***	FE, SE, Rank 1B.1	Chaparral (openings), cismontane woodland, meadows and seeps, valley and foothill grassland. Elevation ranges from 150 to 575 feet (45 to 175 meters). Blooms (Apr)May-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
compact cobwebby thistle ***Cirsium occidentale* var. *compactum***	Rank 1B.2	Chaparral, coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 15 to 490 feet (5 to 150 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
lost thistle ***Cirsium praeteriens***	Rank 1A		**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
round-headed collinsia ***Collinsia corymbosa***	Rank 1B.2	Coastal dunes. Elevation ranges from 0 to 65 feet (0 to 20 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco collinsia ***Collinsia multicolor***	Rank 1B.2	Closed-cone coniferous forest, coastal scrub. Elevation ranges from 100 to 900 feet (30 to 275 meters). Blooms (Feb)Mar-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
clustered lady's-slipper ***Cypripedium fasciculatum***	Rank 4.2	Lower montane coniferous forest, north coast coniferous forest. Elevation ranges from 330 to 7990 feet (100 to 2435 meters). Blooms Mar-Aug.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
western leatherwood ***Dirca occidentalis***	Rank 1B.2	Broadleafed upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, north coast coniferous forest, riparian forest, riparian woodland. Elevation ranges from 80 to 1395 feet (25 to 425 meters). Blooms Jan-Mar(Apr).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
California bottle-brush grass ***Elymus californicus***	Rank 4.3	Broadleafed upland forest, cismontane woodland, north coast coniferous forest, riparian woodland. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms May-Aug(Nov).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Mateo woolly sunflower ***Eriophyllum latilobum***	FE, SE, Rank 1B.1	Cismontane woodland (often serpentine, roadcuts), coastal scrub, lower montane coniferous forest. Elevation ranges from 150 to 1085 feet (45 to 330 meters). Blooms May-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Hoover's button-celery ***Eryngium aristulatum* var. *hooveri***	Rank 1B.1	Vernal pools. Elevation ranges from 10 to 150 feet (3 to 45 meters). Blooms (Jun)Jul(Aug).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Jepson's coyote-thistle ***Eryngium jepsonii***	Rank 1B.2	Valley and foothill grassland, vernal pools. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr-Aug.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco wallflower ***Erysimum franciscanum***	Rank 4.2	Chaparral, coastal dunes, coastal scrub, valley and foothill grassland. Elevation ranges from 0 to 1805 feet (0 to 550 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Hillsborough chocolate lily ***Fritillaria biflora* var. *ineziana***	Rank 1B.1	Cismontane woodland, valley and foothill grassland. Elevation ranges from 490 to 490 feet (150 to 150 meters). Blooms Mar-Apr.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Marin checker lily ***Fritillaria lanceolata* var. *tristulis***	Rank 1B.1	Coastal bluff scrub, coastal prairie, coastal scrub. Elevation ranges from 50 to 490 feet (15 to 150 meters). Blooms Feb-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
fragrant fritillary ***Fritillaria liliacea***	Rank 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 10 to 1345 feet (3 to 410 meters). Blooms Feb-Apr.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
blue coast gilia ***Gilia capitata* ssp. *chamissonis***	Rank 1B.1	Coastal dunes, coastal scrub. Elevation ranges from 5 to 655 feet (2 to 200 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
dark-eyed gilia ***Gilia millefoliata***	Rank 1B.2	Coastal dunes. Elevation ranges from 5 to 100 feet (2 to 30 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco gumplant ***Grindelia hirsutula* var. *maritima***	Rank 3.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Elevation ranges from 50 to 1310 feet (15 to 400 meters). Blooms Jun-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Diablo helianthella ***Helianthella castanea***	Rank 1B.2	Broadleafed upland forest, chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland. Elevation ranges from 195 to 4265 feet (60 to 1300 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
congested-headed hayfield tarplant ***Hemizonia congesta* ssp. *congesta***	Rank 1B.2	Valley and foothill grassland. Elevation ranges from 65 to 1835 feet (20 to 560 meters). Blooms Apr-Nov.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
short-leaved evax ***Hesperevax sparsiflora* var. *brevifolia***	Rank 1B.2	Coastal bluff scrub (sandy), coastal dunes, coastal prairie. Elevation ranges from 0 to 705 feet (0 to 215 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Marin western flax ***Hesperolinon congestum***	FT, ST, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 15 to 1215 feet (5 to 370 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
water star-grass ***Heteranthera dubia***	Rank 2B.2	Marshes and swamps (alkaline, still, slow-moving water). Elevation ranges from 100 to 4905 feet (30 to 1495 meters). Blooms Jul-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Loma Prieta hoita ***Hoita strobilina***	Rank 1B.1	Chaparral, cismontane woodland, riparian woodland. Elevation ranges from 100 to 2820 feet (30 to 860 meters). Blooms May-Jul(Aug-Oct).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Kellogg's horkelia ***Horkelia cuneata* var. *sericea***	Rank 1B.1	Chaparral (maritime), closed-cone coniferous forest, coastal dunes, coastal scrub. Elevation ranges from 35 to 655 feet (10 to 200 meters). Blooms Apr-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Point Reyes horkelia ***Horkelia marinensis***	Rank 1B.2	Coastal dunes, coastal prairie, coastal scrub. Elevation ranges from 15 to 2475 feet (5 to 755 meters). Blooms May-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
harlequin lotus ***Hosackia gracilis***	Rank 4.2	Broadleafed upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, north coast coniferous forest, valley and foothill grassland. Elevation ranges from 0 to 2295 feet (0 to 700 meters). Blooms Mar-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
island tube lichen ***Hypogymnia schizidiata***	Rank 1B.3	Chaparral, closed-cone coniferous forest. Elevation ranges from 1180 to 1330 feet (360 to 405 meters).	**No potential**. The Project Area does not include chaparral or closed-cone coniferous forest habitat to support this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
coast iris ***Iris longipetala***	Rank 4.2	Coastal prairie, lower montane coniferous forest, meadows and seeps. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms Mar-May(Jun).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
perennial goldfields ***Lasthenia californica* ssp. *macrantha***	Rank 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. Elevation ranges from 15 to 1705 feet (5 to 520 meters). Blooms Jan-Nov.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Contra Costa goldfields ***Lasthenia conjugens***	FE, Rank 1B.1	Cismontane woodland, playas (alkaline), valley and foothill grassland, vernal pools. Elevation ranges from 0 to 1540 feet (0 to 470 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
beach layia ***Layia carnosa***	FT, SE, Rank 1B.1	Coastal dunes, coastal scrub (sandy). Elevation ranges from 0 to 195 feet (0 to 60 meters). Blooms Mar-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
serpentine leptosiphon ***Leptosiphon ambiguus***	Rank 4.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 395 to 3710 feet (120 to 1130 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
bristly leptosiphon ***Leptosiphon aureus***	Rank 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland. Elevation ranges from 180 to 4920 feet (55 to 1500 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
coast yellow leptosiphon ***Leptosiphon croceus***	SE, Rank 1B.1	Coastal bluff scrub, coastal prairie. Elevation ranges from 35 to 490 feet (10 to 150 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
large-flowered leptosiphon ***Leptosiphon grandiflorus***	Rank 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 15 to 4005 feet (5 to 1220 meters). Blooms Apr-Aug.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
broad-lobed leptosiphon ***Leptosiphon latisectus***	Rank 4.3	Broadleafed upland forest, cismontane woodland. Elevation ranges from 560 to 4920 feet (170 to 1500 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
rose leptosiphon ***Leptosiphon rosaceus***	Rank 1B.1	Coastal bluff scrub. Elevation ranges from 0 to 330 feet (0 to 100 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Crystal Springs lessingia ***Lessingia arachnoidea***	Rank 1B.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 195 to 655 feet (60 to 200 meters). Blooms Jul-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco lessingia ***Lessingia germanorum***	FE, SE, Rank 1B.1	Coastal scrub (remnant dunes). Elevation ranges from 80 to 360 feet (25 to 110 meters). Blooms (Jun)Jul-Nov.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
woolly-headed lessingia ***Lessingia hololeuca***	Rank 3	Broadleafed upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Elevation ranges from 50 to 1000 feet (15 to 305 meters). Blooms Jun-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
spring lessingia ***Lessingia tenuis***	Rank 4.3	Chaparral, cismontane woodland, lower montane coniferous forest. Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Ornduff's meadowfoam ***Limnanthes douglasii* ssp. *ornduffii***	Rank 1B.1	Meadows and seeps. Elevation ranges from 35 to 65 feet (10 to 20 meters). Blooms Nov-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
San Mateo tree lupine ***Lupinus arboreus* var. *eximius***	Rank 3.2	Chaparral, coastal scrub. Elevation ranges from 295 to 1805 feet (90 to 550 meters). Blooms Apr-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
arcuate bush-mallow ***Malacothamnus arcuatus* var. *arcuatus***	Rank 1B.2	Chaparral, cismontane woodland. Elevation ranges from 50 to 1165 feet (15 to 355 meters). Blooms Apr-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
northern curly-leaved monardella ***Monardella sinuata ssp. nigrescens***	Rank 1B.2	Chaparral (scr co.), coastal dunes, coastal scrub, lower montane coniferous forest (scr co., ponderosa pine sandhills). Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms (Apr)May-Jul(Aug-Sep).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
woodland woollythreads ***Monolopia gracilens***	Rank 1B.2	Broadleafed upland forest (openings), chaparral (openings), cismontane woodland, north coast coniferous forest (openings), valley and foothill grassland. Elevation ranges from 330 to 3935 feet (100 to 1200 meters). Blooms (Feb)Mar-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
white-rayed pentachaeta ***Pentachaeta bellidiflora***	FE, SE, Rank 1B.1	Cismontane woodland, valley and foothill grassland (often serpentine). Elevation ranges from 115 to 2035 feet (35 to 620 meters). Blooms Mar-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Michael's rein orchid ***Piperia michaelii***	Rank 4.2	Chaparral, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal scrub, lower montane coniferous forest. Elevation ranges from 10 to 3000 feet (3 to 915 meters). Blooms Apr-Aug.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Choris' popcornflower ***Plagiobothrys chorisianus*** **var. *chorisianus***	Rank 1B.2	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 10 to 525 feet (3 to 160 meters). Blooms Mar-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Hickman's popcornflower ***Plagiobothrys chorisianus*** **var. *hickmanii***	Rank 4.2	Chaparral, closed-cone coniferous forest, coastal scrub, marshes and swamps, vernal pools. Elevation ranges from 50 to 1280 feet (15 to 390 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Oregon polemonium ***Polemonium carneum***	Rank 2B.2	Coastal prairie, coastal scrub, lower montane coniferous forest. Elevation ranges from 0 to 6005 feet (0 to 1830 meters). Blooms Apr-Sep.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Marin knotweed ***Polygonum marinense***	Rank 3.1	Marshes and swamps (brackish, coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms (Apr)May-Aug(Oct).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Hickman's cinquefoil ***Potentilla hickmanii***	FE, SE, Rank 1B.1	Closed-cone coniferous forest, coastal bluff scrub, marshes and swamps (freshwater), meadows and seeps (vernally mesic). Elevation ranges from 35 to 490 feet (10 to 149 meters). Blooms Apr-Aug.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Lobb's aquatic buttercup ***Ranunculus lobbii***	Rank 4.2	Cismontane woodland, north coast coniferous forest, valley and foothill grassland, vernal pools. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms Feb-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Sanford's arrowhead ***Sagittaria sanfordii***	Rank 1B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 0 to 2135 feet (0 to 650 meters). Blooms May-Oct(Nov).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
adobe sanicle ***Sanicula maritima***	SR, Rank 1B.1	Chaparral, coastal prairie, meadows and seeps, valley and foothill grassland. Elevation ranges from 100 to 785 feet (30 to 240 meters). Blooms Feb-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
chaparral ragwort ***Senecio aphanactis***	Rank 2B.2	Chaparral, cismontane woodland, coastal scrub. Elevation ranges from 50 to 2625 feet (15 to 800 meters). Blooms Jan-Apr(May).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Scouler's catchfly ***Silene scouleri* ssp. *scouleri***	Rank 2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms (Mar-May)Jun-Aug(Sep).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco campion ***Silene verecunda* ssp. *verecunda***	Rank 1B.2	Chaparral, coastal bluff scrub, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 100 to 2115 feet (30 to 645 meters). Blooms (Feb)Mar-Jul(Aug).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
long-styled sand-spurrey ***Spergularia macrotheca* var. *longistyla***	Rank 1B.2	Marshes and swamps, meadows and seeps. Elevation ranges from 0 to 835 feet (0 to 255 meters). Blooms Feb-May.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
most beautiful jewelflower ***Streptanthus albidus* ssp. *peramoenus***	Rank 1B.2	Chaparral, cismontane woodland, valley and foothill grassland. Elevation ranges from 310 to 3280 feet (95 to 1000 meters). Blooms (Mar)Apr-Sep(Oct).	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
northern slender pondweed ***Stuckenia filiformis* ssp. *alpina***	Rank 2B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May-Jul.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
California seablite ***Suaeda californica***	FE, Rank 1B.1	Marshes and swamps (coastal salt). Elevation ranges from 0 to 50 feet (0 to 15 meters). Blooms Jul-Oct.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
two-fork clover ***Trifolium amoenum***	FE, Rank 1B.1	Coastal bluff scrub, valley and foothill grassland (sometimes serpentine). Elevation ranges from 15 to 1360 feet (5 to 415 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
saline clover ***Trifolium hydrophilum***	Rank 1B.2	Marshes and swamps, valley and foothill grassland (mesic, alkaline), vernal pools. Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
San Francisco owl's-clover ***Triphysaria floribunda***	Rank 1B.2	Coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 35 to 525 feet (10 to 160 meters). Blooms Apr-Jun.	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
coastal triquetrella ***Triquetrella californica***	Rank 1B.2	Coastal bluff scrub, coastal scrub. Elevation ranges from 35 to 330 feet (10 to 100 meters). Blooms .	**No potential**. The Project Area is developed with remnant native trees, but a highly disturbed understory. The Project Area does not support suitable habitat for this species.	No further recommendations for this species.
Methuselah's beard lichen ***Usnea longissima***	Rank 4.2	Broadleafed upland forest, north coast coniferous forest. Elevation ranges from 165 to 4790 feet (50 to 1460 meters).	**Unlikely**. The Project Area includes remnant native coniferous trees, but this species typically occurs in forests closer to the coast and/or near bodies of water.	No further recommendations for this species.
WILDLIFE				
MAMMALS				
pallid bat ***Antrozous pallidus***	SSC, WBWG High	Found in a variety of habitats ranging from grasslands to mixed forests, favoring open and dry, rocky areas. Roost sites include crevices in rock outcrops and cliffs, caves, mines, and hollow trees and various manmade structures such as bridges, barns, and buildings (including occupied buildings). Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	**Unlikely.** This species favors open grasslands for foraging and dry, rocky areas for roosting, both of which are absent within the Project Area. Large oak trees that may contain large hollows or crevices do occur within the Project Area. However, these trees are exposed to human disturbances that limit their potential as suitable roosting habitat, as this bat species is very sensitive to roost disturbance.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Townsend's big-eared bat ***Corynorhinus townsendii***	SSC, WBWG High	Associated with a wide variety of habitats from deserts to higher elevation mixed and coniferous forests. Females form maternity colonies in buildings, caves and mines, and males roost singly or in small groups. Foraging typically occurs at edge habitats near wooded areas, e.g., along streams.	**Unlikely.** There is no suitable roosting habitat in the form of abandoned buildings, caves, or mines within the Project Area. Although trees occur within the Project Area, they are in locations that are exposed to anthropogenic disturbances, such as human presence and vehicular traffic, that limit their potential as suitable roosting habitat, as this species is highly sensitive to disturbance. This species is primarily found in coniferous forest which is not found in the Project Area or the immediate vicinity.	No further recommendations for this species.
Steller (=Northern) sea lion ***Eumetopias jubatus***	FD, MMC SSC	Breeds on Año Nuevo, San Miguel and Farallon islands, Point Saint 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.	**No Potential.** There are no bays, inlets, or other water features within the Project Area and therefore no suitable foraging habitat for this species.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
hoary bat ***Lasiurus cinereus***	WBWG Medium	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths.	**Moderate Potential.** There is suitable roosting habitat in the form of large oak trees within the Project Area. Although these trees are exposed to human disturbances that limit their potential as suitable roosting habitat, they may contain large hollows or crevices that can be used as maternity roosts. Additionally, surrounding forest tracts and aquatic features further increase maternity roost potential in the Project Area as they provide suitable foraging habitat. Lastly, nearby streetlamps may attract prey items for this species.	See **Section 7.1** for recommendations regarding this species.
fringed myotis ***Myotis thysanodes***	WBWG High	Associated with a wide variety of habitats including dry woodlands, desert scrub, mesic coniferous forest, grassland, and sage-grass steppes. Buildings, mines and large trees and snags are important day and night roosts.	**Unlikely.** This species favors dry habitats where open areas (e.g., grasslands and deserts) are interspersed with mature forests (usually ponderosa pine, pinyon-juniper, or oak), creating complex mosaics with ample edges and abundant snags, all of which are absent within the Project Area. Additionally, this species is mostly found at middle elevations between 3,900 and 6,900 feet, but the Project Area is at 350 feet in elevation.	No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
San Francisco dusky-footed woodrat ***Neotoma fuscipes annectens***	SSC	Forest habitats of moderate canopy and moderate to dense understory, also in chaparral habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.	**Present.** Several woodrat middens were documented within the Project Area during the March 7, 2024 site visit. The Project Area possesses a mixed forest of native and non-native trees with ample dead vegetation. Middens of this species are known to be locally abundant.	See **Section 7.1** for recommendations regarding this species.
big free-tailed bat ***Nyctinomops macrotis***	SSC, WBWG med-high	Occurs rarely in low-lying arid areas. Requires high cliffs or rocky outcrops for roosting sites.	**No Potential.** This species is rare within California having most records occur in urban areas within San Diego County (CDFW 2024). This species most likely does not breed in California (Zeiner et al 1990). Additionally, this species is found in rugged, rocky terrain and predominately roosts in buildings, caves, cliffs, rock outcrops, and occasionally trees.	No further recommendations for this species.
salt-marsh harvest mouse ***Reithrodontomys raviventris***	FE, SE, CFP	Endemic to emergent salt and brackish wetlands of the San Francisco Bay Estuary. Pickleweed marshes are primary habitat; also occurs in various other wetland communities with dense vegetation. Does not burrow, builds loosely organized nests. Requires higher areas for flood escape.	**No Potential.** There are no emergent salt or brackish wetlands within the Project Area. Therefore, there is no breeding or foraging habitat for this species.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Alameda island mole ***Scapanus latimanus parvus***	SSC	Known only from Alameda Island. Found in a variety of habitats, especially annual and perennial grasslands. Prefers moist, friable soils. Avoids flooded soils.	**No Potential.** The Project Area is outside the known range for this species.	**Not Present.** No further recommendations for this species.
Salt-marsh wandering shrew ***Sorex vagrans halicoetes***	SSC	Salt marshes of the south arm of San Francisco Bay. Medium high marsh 6 to 8 feet above sea level where abundant driftwood is scattered among Salicornia.	**No Potential.** There are no salt marshes or other aquatic features within the Project Area. Therefore, there is no breeding or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
American badger ***Taxidea taxus***	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Requires friable soils and open, uncultivated ground. Preys on burrowing rodents.	**No Potential.** There are no open shrub, forest, or herbaceous habitats with friable soils within the Project Area. Therefore, there is no denning or foraging habitat for this species.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
		BIRDS		
Short-eared owl ***Asio flammeus***	SSC	Occurs year-round, but primarily as a winter visitor, breeding very restricted in most of California. Found in open, treeless areas (e.g., marshes, grasslands) with elevated sites for foraging perches and dense herbaceous vegetation for roosting and nesting. Preys mostly on small mammals, particularly voles.	**Unlikely.** There are no open, treeless areas with elevated sites suitable for foraging within the Project Area. This species typically nests on the ground in herbaceous fields which the Project Area lacks.	**Not Present.** No further recommendations for this species.
burrowing owl ***Athene cunicularia***	SSC	Year-round resident and winter visitor. Occurs in open, dry grasslands and scrub habitats with low-growing vegetation, perches and abundant mammal burrows. Preys upon insects and small vertebrates. Nests and roosts in old mammal burrows, most commonly those of ground squirrels.	**No Potential.** There are no open, dry grasslands and scrub habitats with low-growing vegetation and small mammal complexes suitable for denning and foraging habitat within the Project Area.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
marbled murrelet *Brachyramphus marmoratus*	FT, SE	Predominantly coastal marine. Nests in old-growth coniferous forests up to 30 miles inland along the Pacific coast, from Eureka to Oregon border, and in Santa Cruz/San Mateo Counties. Nests are highly cryptic, and typically located on platform-like branches of mature redwoods and Douglas firs. Forages on marine invertebrates and small fishes.	**No Potential.** There are no mature redwood or Douglas fir forests suitable for nesting within the Project Area.	**Not Present.** No further recommendations for this species.
western snowy plover *Charadrius nivosus (alexandrines) nivosus*	FT, SSC, RP	Federal listing applies only to the Pacific coastal population. Year-round resident and winter visitor. Occurs on sandy beaches, salt pond levees, and the shores of large alkali lakes. Nests on the ground, requiring sandy, gravelly, or friable soils.	**No Potential.** There are no sandy beaches, salt pond levees, or lake shores suitable for nesting and foraging habitat within the Project Area.	**Not Present.** No further recommendations for this species.
Northern harrier *Circus hudsonius*	SSC	Year-round resident and winter visitor. Found in open habitats including grasslands, prairies, marshes, and agricultural areas. Nests on the ground in dense vegetation, typically near water or otherwise moist areas. Preys on small vertebrates.	**Unlikely.** There are no open, treeless areas near aquatic features suitable for foraging within the Project Area. This species typically nests on the ground in dense vegetation in treeless areas which the Project Area lacks.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
yellow rail ***Coturnicops noveboracensis***	SSC	Summer resident in eastern Sierra Nevada in Mono County, breeding in shallow freshwater marshes and wet meadows with dense vegetation, also a rare winter visitor along the coast and other portions of the state. Extremely cryptic.	**No Potential.** There are no freshwater marshes or wet meadows with dense vegetation within the Project Area and therefore no suitable nesting or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
white-tailed kite ***Elanus leucurus***	CFP	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes, and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.	**Unlikely.** There are no open areas with large trees suitable for foraging within the Project Area. This species typically nests in large trees near suitable foraging areas which the Project Area lacks.	**Not Present.** No further recommendations for this species.
American peregrine falcon ***Falco peregrinus anatum***	FD, SD, CFP	Year-round resident and winter visitor. Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes and other bodies of water. Nests on protected cliffs and on man-made structures including buildings and bridges. Preys on birds, especially waterbirds. Forages widely.	**Unlikely.** There are no aquatic features suitable for foraging within the Project Area. This species typically nests in cliffs or large man-made structures which the Project Area lacks.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
saltmarsh common yellowthroat ***Geothlypis trichas sinuosa***	SSC	Resident of the San Francisco Bay region, in fresh and saltwater marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	**No Potential.** There are no marshes or wet meadows with dense vegetation within the Project Area and therefore no suitable nesting or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
bald eagle **Haliaeetus leucocephalus**	SE, CFP	Occurs year-round in California, but primarily a winter visitor; breeding population is growing. Nests in large trees in the vicinity of larger lakes, reservoirs and rivers. Wintering habitat somewhat more variable but usually features large concentrations of waterfowl or fish.	**Unlikely.** There are no open areas with large trees near aquatic features suitable for foraging within the Project Area. This species typically nests in large trees near suitable foraging areas which the Project Area lacks.	**Not Present.** No further recommendations for this species.
California black rail ***Laterallus jamaicensis coturniculus***	ST, CFP	Year-round resident in marshes (saline to freshwater) with dense vegetation within four inches of the ground. Prefers larger, undisturbed marshes that have an extensive upper zone and are close to a major water source. Extremely secretive and cryptic.	**No Potential.** There are no marshes or other water features with dense vegetation within the Project Area and therefore no suitable nesting or foraging habitat for this species.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Alameda song sparrow ***Melospiza melodia pusillula***	SSC	Year-round resident of salt marshes bordering the south arm of San Francisco Bay. Inhabits primarily pickleweed marshes; nests placed in marsh vegetation, typically shrubs such as gumplant.	**No Potential.** There are no marshes or other coast water features with dense vegetation within the Project Area and therefore no suitable nesting or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
California Ridgway's rail ***Rallus obsoletus obsoletus***	FE, SE, CFP	Year-round resident in tidal marshes of the San Francisco Bay estuary. Requires tidal sloughs and intertidal mud flats for foraging, and dense marsh vegetation for nesting and cover. Typical habitat features abundant growth of cordgrass and pickleweed. Feeds primarily on molluscs and crustaceans.	**No Potential.** There are no marshes or other coast water features with dense vegetation within the Project Area and therefore no suitable nesting or foraging habitat for this species.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
bank swallow ***Riparia riparia***	ST	Summer resident in riparian and other lowland habitats near rivers, lakes, and the ocean in northern California. Nests colonially in excavated burrows on vertical cliffs and bank cuts (natural and manmade) with fine-textured soils. Historical nesting range in southern and central areas of California has been eliminated by habitat loss. Currently known to breed in Siskiyou, Shasta, and Lassen Cos., portions of the north coast, and along Sacramento River from Shasta Co. south to Yolo Co.	**No Potential.** There are no riparian or other water features with excavated cliffs or banks within the Project Area and therefore no suitable nesting or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
black skimmer ***Rynchops niger***	SSC	Found primarily in southern California; South San Francisco Bay has a small resident population. Nests colonially on gravel bars, low islets, and sandy beaches	**No Potential.** There are no sandy beaches, gravel bars, or islets suitable for nesting and foraging habitat within the Project Area.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
California least tern ***Sternula antillarum browni***	FE, SE, CFP	Summer resident along the coast from San Francisco Bay south to northern Baja California; inland breeding also very rarely occurs. Nests colonially on barren or sparsely vegetated areas with sandy or gravelly substrates near water, including beaches, islands, and gravel bars. In San Francisco Bay, has also nested on salt pond margins.	**No Potential.** There are no sandy beaches, gravel bars, or islets suitable for nesting and foraging habitat within the Project Area.	**Not Present.** No further recommendations for this species.
AMPHIBIANS				
California tiger salamander ***Ambystoma californiense***	FE/FT, ST, RP	Populations in Santa Barbara and Sonoma counties currently listed as endangered; threatened in remainder of range. Inhabits grassland, oak woodland, ruderal and seasonal pool habitats. Adults are fossorial and utilize mammal burrows and other subterranean refugia. Breeding occurs primarily in vernal pools and other seasonal water features.	**No Potential.** The Project Area is outside the known range for this species. Additionally, there are no aquatic features within the Project Area suitable for breeding habitat for this species.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
Santa Cruz black salamander ***Aneides flavipunctatus niger***	SSC	Climbing salamanders of the genus *Aneides* frequent damp woodlands and are usually found hiding under various debris (i.e., bark, woodrat nests, logs). The Santa Cruz black salamander exists south of the San Francisco Bay and was only recently recognized as a separate and protected species. Santa Cruz black salamander is highly sedentary, preferring to stay hidden under riparian debris. Prey items include millipedes, spiders, and other insects (Stebbins and McGinnis 2012).	**No Potential.** The Project Area is outside the known range for the species. Additionally, there is significant human disturbance within the Project Area due to the presence of high-speed roads which act as barriers to dispersal from nearby source populations.	**Not Present.** No further recommendations for this species.
California giant salamander ***Dicamptodon ensatus***	SSC	Occurs in the north-central Coast Ranges. Moist coniferous and mixed forests are typical habitat; also uses woodland and chaparral. Adults are terrestrial and fossorial, breeding in cold, permanent, or semi-permanent streams. Larvae usually remain aquatic for over a year.	**Unlikely.** There are no streams or other water features within the Project Area suitable for breeding habitat for this species. There is foraging habitat in the form of coniferous and deciduous trees but there is significant human disturbance within the Project Area due to the presence of high-speed roads which act as barriers to dispersal from nearby source populations.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
foothill yellow-legged frog ***Rana boylii***	SC, SSC	Found in or adjacent to rocky streams in a variety of habitats. Prefers partly shaded, shallow streams and riffles with a rocky substrate; requires at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis. Feeds on both aquatic and terrestrial invertebrates.	**No Potential.** There are no rocky streams or other water features within the Project Area. Therefore, there is no suitable breeding or foraging habitat in the Project Area.	**Not Present.** No further recommendations for this species.
California red-legged frog ***Rana draytonii***	FT, SSC, RP	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development. Associated with quiet perennial to intermittent ponds, stream pools and wetlands. Prefers shorelines with extensive vegetation. Disperses through upland habitats after rains.	**Unlikely.** There is no suitable breeding habitat in the Project Area. This species requires freshwater ponds, wetlands, or creeks for breeding which is lacking in the Project Area. Additionally, there is significant human disturbance within the Project Area due to the presence of roads which act as barriers to dispersal from nearby source populations which is approximately 1 mile west (CDFW 2024). This species typically uses hydrological connectors such as streams or rivers to disperse across the landscape which are lacking in the Project Area reducing the potential of this species using it for dispersal to unlikely.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
		REPTILES		
green sea turtle ***Chelonia mydas***	FT	Found in shallow waters inside reefs, bays and inlets with marine grass and algae. Open beaches with a sloping platform and minimal disturbance are required for nesting. This species exhibits high site fidelity.	**No Potential.** There are no shallow waters, reefs, bays, inlets, or other water features within the Project Area and therefore no suitable foraging habitat for this species.	**Not Present.** No further recommendations for this species.
western pond turtle ***Emys marmorata***	PC, SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks, and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.	**No Potential.** There are no marshes, ponds, streams, or other water features within the Project Area and therefore no suitable foraging habitat for this species. The Project Area lacks suitable basking and upland sandy habitat for this species and therefore lacks breeding habitat. The Project Area is inaccessible due to dispersal barriers such as residential roads and Interstate 280 less than a mile west.	**Not Present.** No further recommendations for this species.
San Francisco garter snake ***Thamnophis sirtalis tetrataenia***	FE, SE, CFP, RP	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.	**No Potential.** There are no freshwater marshes, ponds, streams, or other water features within the Project Area and therefore no suitable foraging habitat for this species. There is upland habitat in the form of disturbed mixed forest but is inaccessible due to dispersal barriers such as residential roads and Interstate 280 less than a mile west.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
		FISHES		
green sturgeon - southern DPS ***Acipenser medirostris***	FT, SSC	Spawn in the Sacramento River and the Feather River. Spawn at temperatures between 8–14 degrees C. Preferred spawning substrate is large cobble but can range from clean sand to bedrock.	**No Potential.** There are no rivers or other water features within the Project Area and therefore no suitable spawning or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
tidewater goby ***Eucyclogobius newberryi***	FE, SSC	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; requires still but not stagnant water and high oxygen levels.	**No Potential.** There are no brackish water habitats or other water features within the Project Area and therefore no suitable spawning or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
hardhead ***Mylopharodon conocephalus***	SSC	Found in low to mid-elevation streams in the Sacramento-San Joaquin drainage; also occurs in the Russian River and tributaries. Favors clear, deep pools with sand-gravel-boulder bottoms and slow water velocity. Not found where exotic Centrarchids predominate.	**No Potential.** There are no intermittent streams or other water features within the Project Area and therefore no suitable spawning or foraging habitat for this species.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
steelhead - central CA coast DPS ***Oncorhynchus mykiss irideus***	FT	Occurs from the Russian River south to Soquel Creek and Pajaro River, also in San Francisco and San Pablo Bay Basins. Adults migrate upstream to spawn in cool, clear, well-oxygenated streams. Juveniles remain in fresh water for 1 or more years before migrating downstream to the ocean.	**No Potential.** There are no rivers or other water features within the Project Area and therefore no suitable spawning or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
longfin smelt ***Spirinchus thaleichthys***	FC, ST, SSC, RP	Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15 to 30 ppt but can be found in completely freshwater to almost pure seawater.	**No Potential.** There are no estuaries or other water features within the Project Area and therefore no suitable spawning or foraging habitat for this species.	**Not Present.** No further recommendations for this species.
INVERTEBRATES				
Crotch bumble bee ***Bombus crotchii***	SC	Range largely restricted to California, favoring grassland and scrub habitats. Typical of bumble bees, nests are usually constructed underground.	**Unlikely.** There are no grasslands or scrub habitats present within the Project Area. The understory is highly disturbed with few foraging resources.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
western bumble bee ***Bombus occidentalis***	SC	Formerly common throughout much of western North America; populations from southern British Columbia to central California have nearly disappeared (Xerces 2015). Occurs in a wide variety of habitat types. Nests are constructed annually in pre-existing cavities, usually on the ground (e.g., mammal burrows). Many plant species are visited and pollinated.	**No Potential.** The Project Area is outside the current known distribution of this species with its southern boundary being almost 100 miles north near Clear Lake (CDFW 2024).	**Not Present.** No further recommendations for this species.
San Bruno elfin butterfly ***Callophrys mossii bayensis***	FE	Limited to the vicinity of San Bruno Mountain, San Mateo County. Colonies are located on in rocky outcrops and cliffs in coastal scrub habitat on steep, north-facing slopes within the fog belt. Species range is tied to the distribution of the larval host plant, *Sedum spathulifolium*.	**No Potential.** The Project Area is outside the current known distribution of this species with its southern boundary being approximately 5 miles north (CDFW 2024). There is substantial development between San Bruno Mountain and thus limited dispersal potential. Additionally, the species' host plant was not documented during the March 7, 2024 site visit. This butterfly's distribution is closely linked with its host plant.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
monarch butterfly ***Danaus plexippus***	Winter roosts protected by CDFW	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, Monterey cypress), with nectar and water sources nearby.	**Unlikely.** There are no wind-protected tree groves with nectar and water sources within the Project Area. Additionally, the Project Area is at a residential home, and roosting monarchs would likely have been noticed by the occupant(s). There are no known monarch roost sites located within the Town of Hillsborough.	**Not Present.** No further recommendations for this species.
Bay checkerspot butterfly ***Euphydryas editha bayensis***	FT, RP	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.	**No Potential.** There are no native grasslands with serpentine soils suitable for foraging found within the Project Area. Additionally, the species' host plants were not documented during the March 7, 2024 site visit. This butterfly's distribution is closely linked with its host plants.	**Not Present.** No further recommendations for this species.
Mission blue butterfly ***Icaricia icarioides missionensis***	FE, RP	Inhabits grasslands and coastal chaparral of the San Francisco Peninsula and southern Marin County, but mostly found on San Bruno Mountain. Three larval host plants: *Lupinus albifrons*, *L. variicolor*, and *L. formosus*, of which *L. albifrons* is favored.	**No Potential.** There are no native grasslands or coastal chaparral suitable for foraging found within the Project Area. Additionally, the species' host plants were not documented during the March 7, 2024 site visit. This butterfly's distribution is closely linked with its host plants.	**Not Present.** No further recommendations for this species.

SCIENTIFIC NAME	STATUS	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
callippe silverspot butterfly ***Speyeria callippe callippe***	FE	Two populations in San Bruno Mountain and the Cordelia Hills are recognized. Hostplant is Viola pedunculata, which is found on serpentine soils. Most adults found on east-facing slopes; males congregate on hilltops in search of females.	**No Potential.** The Project Area is outside the current known distribution of this species with its southern boundary being approximately 5 miles north (CDFW 2024). There is substantial development between San Bruno Mountain and thus limited dispersal potential. Additionally, the species' host plant was not documented during the March 7, 2024 site visit. This butterfly's distribution is closely linked with its host plant.	**Not Present.** No further recommendations for this species.
Myrtle's silverspot butterfly ***Speyeria zerene myrtleae***	FE, RP	Restricted to the fog belt of northern Marin and southernmost Sonoma County, including the Point Reyes peninsula; extirpated from coastal San Mateo County. Occurs in coastal prairie, dunes, and grassland. Larval foodplant is typically *Viola adunca*. Adult flight season may range from late June to early September.	**No Potential.** The Project Area is outside the current known distribution of this species and has been extirpated from San Mateo County.	**Not Present.** No further recommendations for this species.

Note: All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2024]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2024] or Rare Plant Inventory (CNPS 2024). Sp.: "species," intended to indicate that the observer was confident in the identity of the genus but uncertain which species.

*Special-status only at native occurrences. The Study/ does not contain a native occurrence of this species.

[1] **California Native Plant Society. 2024. Rare Plant Inventory (online edition, v9.5). Sacramento, California. Online at: http://rareplants.cnps.org/; most recently accessed: September 2024**

FC: Federal Candidate for Listing
FE: Federal Endangered

BGEPA:	Bald and Golden Eagle Protection Act Species
FT:	Federal Threatened
PC:	Proposed Candidate
SC (E/T):	State Candidate for Listing (Endangered/Threatened)
SE:	State Endangered
SFP:	State Fully Protected Animal
SR:	State Rare
SSC:	Species of Special Concern
ST:	State Threatened
Rank 1A:	CNPS Rank 1A—Plants presumed extinct in California
Rank 1B:	CNPS Rank 1B—Plants rare, threatened, or endangered in California and elsewhere
Rank 2A:	CNPS Rank 2A—Plants presumed extirpated in California, but more common elsewhere
Rank 2B:	CNPS Rank 2B—Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3:	Plants about which CNPS need more information (a review list)
Rank 4:	Plants of limited distribution (a watch list)
WBWG:	Western Bat Working Group High or Medium-high Priority Species

[2] **California Invasive Plant Council. 2024. California Invasive Plant Inventory Database. California Invasive Plant Council, Berkeley, CA. Online at: http://www.cal-ipc.org/paf/; most recently accessed: September 2024**

High:	Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate:	Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited:	Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed:	Assessed by Cal-IPC and determined to not be an existing current threat

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APPENDIX D. SITE PHOTOGRAPHS

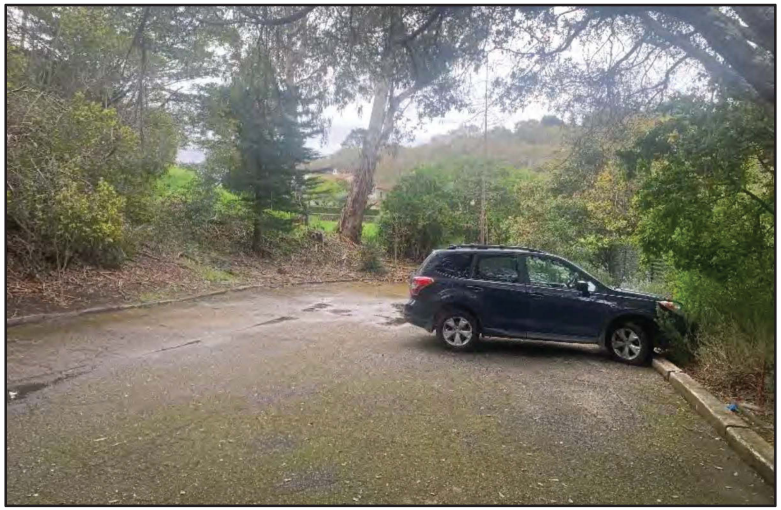

Photo 1: Representative view of the paved parking lot and driveway adjacent to San Raymundo Road in the southern portion of the Project Area.

Photo 2: Representative view of the developed/landscaped land cover type which includes structures, pavement, and landscaped ornamental vegetation.

Photo 3: Representative view of the landscaped land cover type, which has an overstory of native trees but a highly disturbed understory.

Photo 4: Representative view of the landscaped land cover type with highly disturbed understory. Photo taken from the northern corner of the Project Area adjacent to residential structures.

Photo 5: Woodrat nest observed in the southernmost corner of the Project Area.

Photo 6: Woodrat nest observed in the southernmost corner of the Project Area.

Photo 7: Representative view of the location of woodrat nest occurrences, contiguous with the Project Area, but separated by a chain-link fence.

Photo 8: Representative view of large oak trees which could support hoary bat roosting in the Project Area.