



Final Programmatic Initial Study / Mitigated Negative Declaration

San Carlos Parks Master Plan

San Carlos, California



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List of Acronyms and Abbreviations

AB	Assembly Bill
ADA	Americans with Disabilities Act
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
AQP	Air Quality Plan
BAAD	Bay Area Air District
BAWSCA	Bay Area Water Supply & Conservation Agency
Biological Memorandum	Biological Resources Assessment Memorandum
BMPs	best management practices
CAAQS	California ambient air quality standards
CA-82	El Camino Real
CAL FIRE	California Department of Forestry and Fire Protection
California Register	California Register of Historical Resources
Caltrans	California Department of Transportation
Cal/OSHA	California Division of Occupational Safety and Health
CALGreen	Title 24 California Green Building Standards
Cal Water	California Water Service
CAP	Clean Air Plan
CARB	California Air Resources Board
CAR	California Aquatic Resource Inventory
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
CERPs	Community Emission Reduction Plans
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
City	City of San Carlos
CMAP	Climate Mitigation and Adaptation Plan
CMCP	Comprehensive Multimodal Corridor Plan
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent
CSH	Circulation and Scenic Highways
C&D	construction and demolition
dB	decibel



dba	A-weighted sound level
DBH	diameter at breast height
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EBA	Eileen Barrow & Associates
EFH	Essential Fish Habitat
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESPS	Environmental Safety and Public Services
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
HMP	Habitat Management Plan
HRA	Health Risk Assessment
Hz	Frequency
I-280	Interstate 280
IS	Initial Study
Inventory	Rare Plant Inventory
in/sec	inches per second
L_{dn}	day-night average noise level
L_{eq}	energy-equivalent noise level
L_{max}	maximum noise level
LRA	Local Responsibility Area
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MLHMP	Multijurisdictional Local Hazard Mitigation Plan
MMTCO2e	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO_x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRCS	National Resources Conservation Service
OEHHA	Office of Environmental Health Hazard Assessment
OHWM	Ordinary High Water Mark
OPR	Office of Planning and Research
OS	Open Space
OSHA	Occupational Safety and Health Administration
P	Public
PCE	Peninsula Clean Energy
PG&E	Pacific Gas and Electric Company
PK	Park
PM	particulate matter
PM_{2.5}	fine particulate matter
PM₁₀	respirable particulate matter
PPV	peak particle velocity
Rank	California Rare Plant Rank



RCRA	Resource Conservation and Recovery Act
RMS	Root Mean Square
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SamTrans	<u>San Mateo County Transit District</u>
SB	Senate Bill
SCMC	San Carlos Municipal Code
SCRCFD	San Carlos and Redwood City Fire Department
SFBAAB	San Francisco Bay Area Air Basin
SFPUC	San Francisco Public Utilities Commission
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SSC	Species of Special Concern
SVCW	Silicon Valley Clean Water
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
System Planning	<u>Caltrans District 4 Multimodal System Planning</u>
TAC	Toxic Air Contaminant
US-101	U.S. Route 101
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VdB	Vibration Decibel
VMT	vehicle miles traveled
WMP	Waste Management Plan
WBWG	Western Bat Working Group
WEAP	Worker Environmental Awareness Program
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 City of San Carlos. This Programmatic Initial Study/Mitigated Negative Declaration (Programmatic IS/MND) evaluates the potential environmental impacts which might reasonably be anticipated to result from implementation of the San Carlos Parks Master Plan and amendments to the City of San Carlos General Plan Parks and Recreation Element and Environmental Management Element, hereinafter referred to as the Plan.

The City of San Carlos is the Lead Agency under CEQA and has prepared this Programmatic IS/MND to address the impacts of implementing the Plan. The purpose of the Project is to develop both a long-range vision and an implementation strategy for the Citywide park and recreation system.

2.0 PROJECT INFORMATION

2.1 Project Title

San Carlos Parks Master Plan

2.2 Lead Agency Name and Address

City of San Carlos Parks and Recreation Department
600 Elm Street
San Carlos, CA 94070

2.3 Contact Person and Phone Number

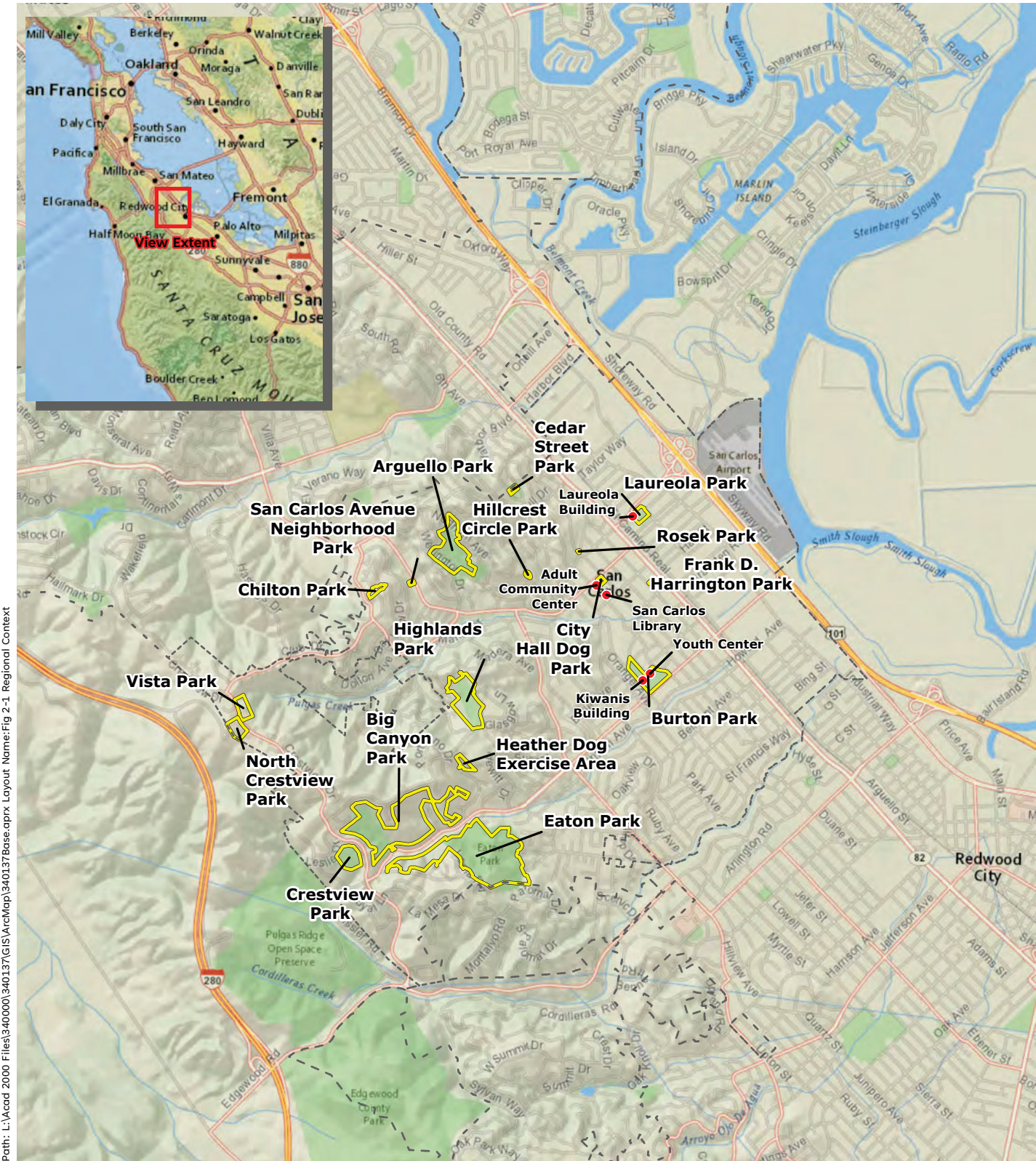
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2.4 Project Location

2.4.1 Regional Setting

The Plan Area consists of 17 parks and open spaces within the City of San Carlos, which is located in central San Mateo County on the San Francisco Peninsula. San Carlos covers 5.4 square miles and spans from the flat bayfront on the San Francisco Bay west towards the Santa Cruz Mountains. The City is bounded by Redwood City to the south, the City of Belmont to the north, open space preserves to the west, and Redwood Shores and the San Francisco Bay to the east. San Carlos is connected to the region by U.S. Route 101 (US-101) and a Caltrain station, both located on the City's east side, El Camino Real (CA-82) and Interstate 280 (I-280) on the west. Surface streets also provide access in and out of San Carlos to neighboring communities. The regional location of the Plan Area is shown in Figure 1.





Sources: National Geographic, WRA | Prepared By: rhona.mcchesney, 1/8/2026

Figure 1. Regional Location Map

San Carlos Parks Master Plan
San Mateo County, California



2.4.2 Local Setting

MASTER PLAN PARKS/FACILITIES

The Plan Area includes a total of 17 parks and open spaces which total 186.4 acres, comprising three community parks, five neighborhood parks, five mini-parks, two special use parks, two open spaces, and five facilities. Figure 2 shows the distribution of parks and recreational facilities throughout the City and Table 1 provides a summary of each park.

The City's park system designates the following types of parks and recreational facilities (City of San Carlos 2008):

- **Community Parks:** 10- to 20-acre parks containing a wide variety of facilities for active and passive recreation, organized sports, and night use
- **Neighborhood Parks:** 4- to 10-acre parks providing daily recreation for nearby residents
- **Mini-Parks:** Small parks less than 1 acre in size that accommodate daily recreation needs of nearby residents
- **Special Use Areas:** Parks providing unique recreational amenities (i.e., dog parks)
- **Open Spaces:** Lands set aside for preservation of significant natural resources, open space and public education.

Table 1. San Carlos City Parks, Open Spaces, and Facilities

PARK NAME	ACRES	TYPE*	LOCATION
Arguello Park	21.0	Community Park	260 Wellington Drive
Burton Park	10.3	Community Park	900 Chestnut Street
Highlands Park	11.3	Community Park	2600 Melendy Drive
Cedar Street	0.70	Mini-Park	10 Cedar Street
Frank D. Harrington Park	0.3	Mini-Park	759 Laurel Street
Hillcrest Circle Park	0.2	Mini-Park	280 Hillcrest Road
Rosek Park	0.2	Mini-Park	455 Elm Street
San Carlos Avenue Neighborhood Park	0.3	Mini-Park	2451 San Carlos Avenue
Chilton Park	1.6	Neighborhood Park	48 Bayview Drive
Crestview Park	7.0	Neighborhood Park	1000 Crestview Drive
Laureola Park	2.6	Neighborhood Community Park	503 Old Country Road
North Crestview Park	4.2	Neighborhood Park	350 Crestview Drive
Vista Park	3.8	Neighborhood Park	401 Crestview Drive
Big Canyon Park	55.0	Open Space	3190 Brittan
Eaton Park	65.71	Open Space	3000 Eaton Avenue
City Hall Dog Park	1.3	Special Use	1401 San Carlos Avenue
Heather Dog Exercise Area	1.5	Special Use	2757 Melendy Drive
Adult Community Center	-	Facility	601 Chestnut St
Kiwanis Building	-	Facility	1017 Cedar St



PARK NAME	ACRES	TYPE*	LOCATION
Laureola Building	-	Facility	503 Old County Rd
Library community room	-	Facility	610 Elm St
Youth Center	-	Facility	1001 Chestnut

The parks and open spaces feature trails which meander through chaparral, oak woodland, and riparian habitats; recreation areas including playgrounds and sports fields; public gathering spaces including native pollinator gardens in Vista and Chilton Parks; and picnic areas. The park facilities provide interior spaces for programming, including classes and other community events. Parks and park facilities are generally surrounded by single-family residential land use. An aerial photograph of the City's parks is provided in Figure 3.

GENERAL PLAN AND ZONING DESIGNATION

General Plan Land Use Designations: Park, Open Space, Public (City of San Carlos 2023)

Zoning District: Park (PK), Open Space (OS), Public (P) (City of San Carlos 2024)

SURROUNDING LAND USES

Land uses surrounding each of the park sites are summarized below in Table 2.

Table 2. Land Uses Surrounding San Carlos Parks

Park/Facility	Single Family Residential	Multifamily Residential	Mixed-Use	School	Open Space	Public	Neighborhood Retail
Arguello Park	X			X			
Big Canyon Park	X	X			X		
Burton Park	X			X			
Cedar Street Park	X						
Chilton Park	X						
City Hall Dog Park		X	X			X	
Crestview Park	X	X					
Eaton Park	X						
Frank D. Harrington Park			X				
Heather Dog Exercise Area	X			X			
Highlands Park	X	X					
Hillcrest Circle Park	X						
Laureola Park	X		X				X
North Crestview Park	X	X					
Rosek Park	X	X					



San Carlos Avenue Neighborhood Park	X						
Vista Park	X	X			X		



SAN CARLOS PARK AND RECREATION SYSTEM

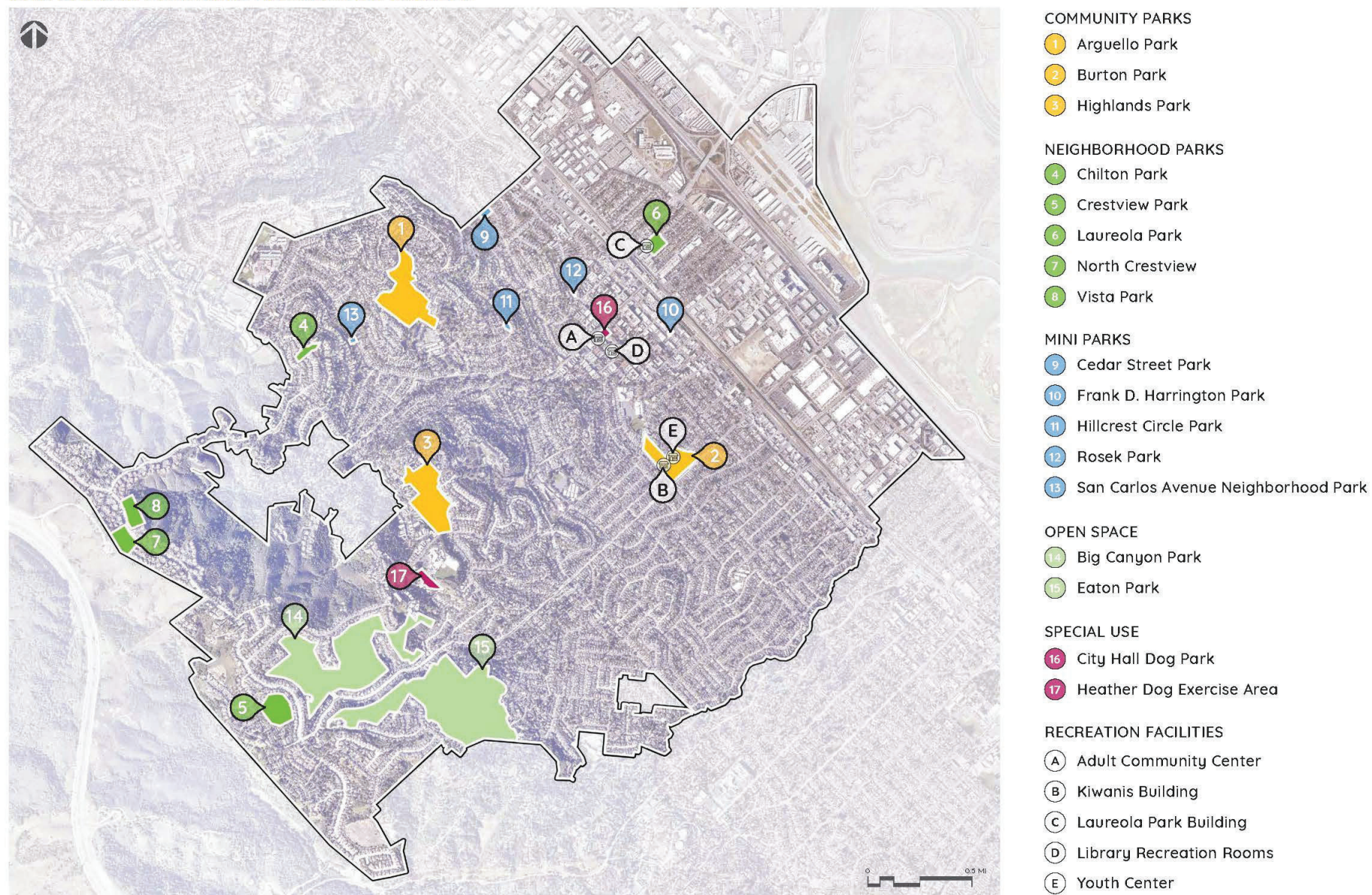


Figure 2. Park System Map

San Carlos Parks Master Plan
San Mateo County, California

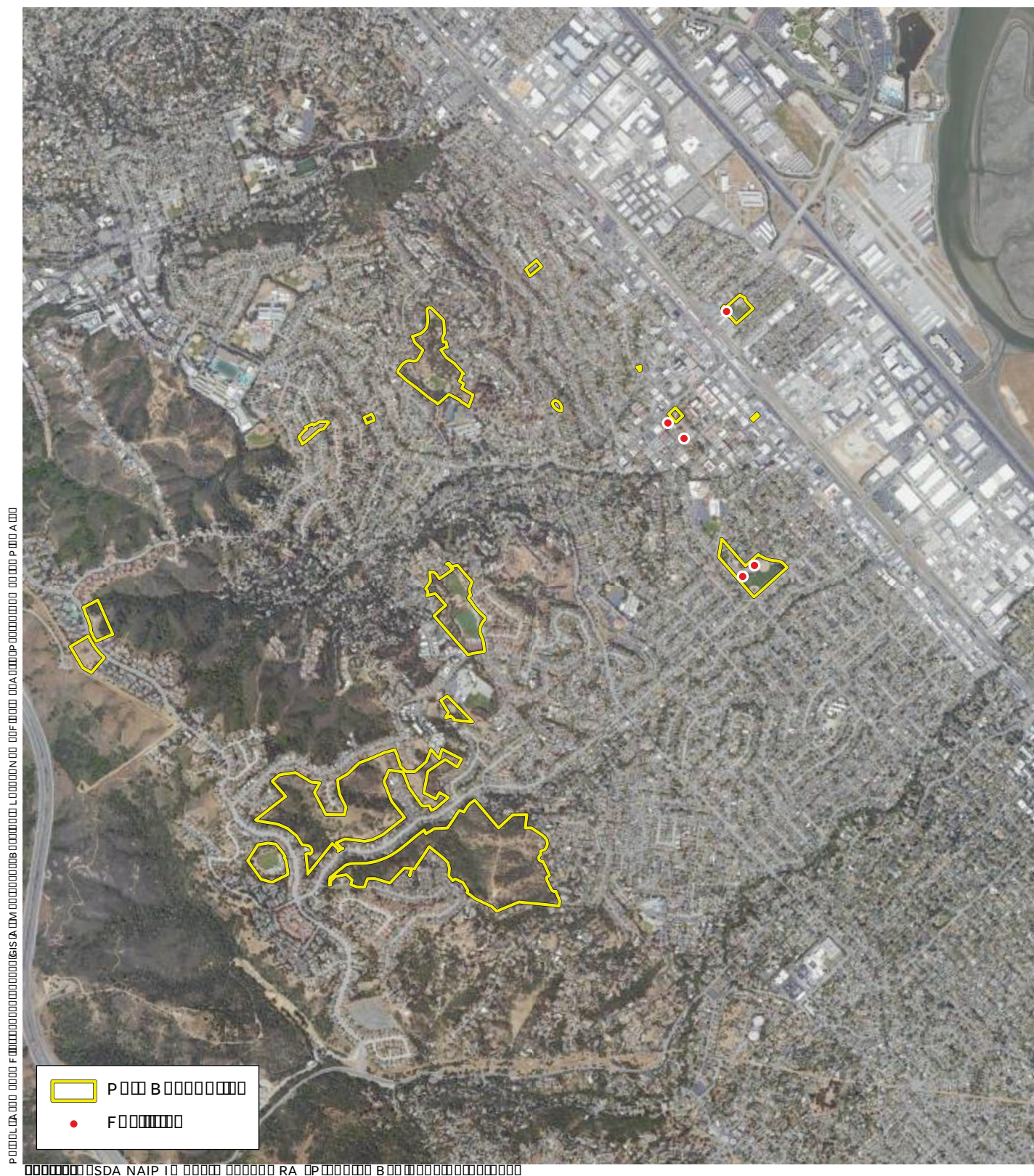
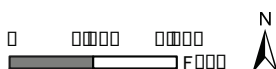


Figure 3. Aerial Photograph of the Plan Area

San Carlos Parks Master Plan
San Mateo County, California



3.0 PROJECT DESCRIPTION

3.1 Project Overview

The City initiated the preparation of a Parks Master Plan to guide the planning and implementation of parks, open space, and recreational facilities across the City's 17 parks and two open spaces. The Plan will cover a wide variety of improvements to existing recreation facilities including passive parks, community centers, playgrounds, sport courts and fields, park amenities, and natural surface trail systems. Concepts for new facilities are proposed as part of the Plan, including potential new community centers, an aquatic facility, a bicycle pump track, and a mini ropes course. The Project also includes updates to the Parks and Recreation Element and the Environmental Management Element of the General Plan for consistency with the Plan and compliance with State law.

3.2 Project Background and Need

City parks, open spaces, and facilities provide a multi-faceted offering of recreation and outdoors experiences. Park programming is provided through the Parks and Recreation Department and park maintenance is generally handled by the Public Works Department.

The most recent comprehensive planning effort for San Carlos parks was the preparation of a Community Needs Assessment and the Parks, Open Space, Buildings, and other Recreational Facilities Master Plan (Parks Facilities Master Plan) in 2008. The City's General Plan Parks and Recreation Element (Recreation Element) was also adopted in 2008 and identifies community recreation needs and goals. The Plan will build on the Recreation Element's goals to provide specific direction on improvements for each park and facility as well as a plan to execute these improvements. The City also adopted a Hillside Trails Master Plan (2012) to facilitate development of trails in open spaces to meet its trail provision goals. The Hillside Trails Master Plan provides specific guidance on trail alignments, trail design guidelines, and parking considerations for trail access. Given the Parks Facilities Master Plan was intended to be a 20-year plan, the City identified the need for a comprehensive update for City parks, open spaces and facilities and initiated the Plan process.

3.3 Plan Objectives

The purpose of the Plan is to develop both a long-range vision and an implementation strategy for the Citywide park and recreation system. The Plan builds on the 2008 Parks Master Plan to incorporate the substantial community input received during the 2024 Parks Master Plan process and identifies three phases of development over the next 20 years to address maintenance needs, updates to facilities and equipment, changes in recreation uses and activities, and accessibility.

Consistent with the Plan purpose, the proposed Plan has the following objectives:

- Assess the existing inventory of parks, open space, recreational facilities, and recreation programs.
- Understand community needs and establish a vision for future recreation opportunities in San Carlos.



- Provide for equitable community access, community resilience, and rewilding of open spaces.
- Develop strategies and an action plan for enhancements to parks, open spaces, community facilities, and recreation programs.
- Implement short-term improvements within 5 years, mid-term improvements within 5-10 years, and long-term improvements after 10 years.

3.4 Proposed Plan

The Plan covers many elements of park management and programming in the City, including existing planning documents, discussion of recreation trends, existing facilities and their conditions, community priorities, goals for the City, implementation actions, and financing strategies. The Plan includes activities that vary widely in scale, and several will require additional development beyond the level of detail provided in the Plan. Because of the range of projects, the Plan proposes a phased approach to implement projects on a short-, mid-, and long-term basis. These projects are summarized in Table 3, Table 4, and Table 5, and additional detail is provided in the sections below.

Table 3. Short-Term Improvements (0-5 Years)

PARK NAME	CLASSIFICATION	IMPROVEMENT
Adult Community Center	Facility	Renovate the kitchen to address deficiencies and provide: • Improved circulation and better use of servery space • New appliances • New flooring and other finishes • Accessible pantry space
Arguello Park	Community Park	Site pump track at bend of Dartmouth/Northam Ave; considering fencing to block cyclists from entering trail network
		Replace batting cage surfacing
		Add accessible picnic tables at snack shack picnic area
		Implement citywide tree maintenance program recommendations
		Create an overlook at "the rocks" with interpretive signage
		Add wayfinding signage and trailhead kiosk for open space trails
		Add shade structure over picnic area and bleachers
		Add and relocate picnic tables/bench seating in open space area
		Install park rules signage (including no biking)



PARK NAME	CLASSIFICATION	IMPROVEMENT
Big Canyon Park	Open Space Park	Provide a vista point at end of Oak Meadow Trail (includes view area delineation with wooden fencing, bench, interpretive signage, signage indicating “area closed” beyond fencing)
		Add wayfinding signage throughout the park
		Implement flora/fauna app/website with QR Code on signage at the site
		Implement Pulgas Creek Watershed Plan Native Plant Pilot Program
		Add or restore park benches and picnic tables
Burton Park	Community Park	Add wayfinding signage at the Woodland Avenue park entrance
		Improve lawn drainage at concert lawn
		Improve field drainage at diamond fields
		Prepare a tree succession plan in and implement citywide tree maintenance program recommendations
		Add formalized reservable picnic area with accessible path and one ADA table (minimum) to concert lawn
		Install weather-resistant material surfacing next to concrete cornhole boards
		Remove sandbox area from play area and repurpose with usable play area
Cedar Street Park	Mini-Park	Implement citywide tree maintenance program recommendations
		Replace fencing
City Hall Dog Park	Special Use Park	Enhance park landscape and dog agility amenities, consider theme elements or design
		Replace picnic tables with benches and grouped seating areas
		Improve drainage at drinking fountain
Crestview Park	Neighborhood Park	Add permanent fencing between field and parking lot
		Improve pedestrian entrance at Leslie Drive and perimeter trail in open space area (all-weather surfacing, signage)
		Plant two new trees (between parking lot and field)
		Add shade structure over bleachers
		Remove and repurpose sandbox to active play space
Eaton Park	Open Space Park	Improve fire road with durable surface and eliminate trail head erosion issues for maintenance vehicular access
		Improve wayfinding signage
Heather Dog Exercise Area	Special Use Park	Rename park and add city standard park sign
		Improve visibility and access into the site
		Maintain and enhance landscaping within park site, install irrigation system



PARK NAME	CLASSIFICATION	IMPROVEMENT
Highlands Park	Community Park	Replace picnic area by Stadium Field into formalized reservable picnic area with accessible path and one ADA table (minimum)
		Replace aging benches
		Paint a community mural along the bleacher steps at Stadium Field
		Replace batting cage surfacing
		Restripe the two dual-court tennis/pickleball courts to up to six permanent pickleball courts
		Add net at Highlands Field for soccer (6 foot net minimum)
Hillcrest Circle Park	Mini-Park	Replant landscaping (shrubs, groundcover, re-sod lawn, shade trees)
		Improve pedestrian access with informational access signage
Kiwanis Building	Facility	Consider a shortened, modified lease that aligns with the anticipated schedule for potential building improvements. Determine whether the building will be renovated for recreation programming (general community use or event rental space), replaced with a new facility, or designated as the future site of a new community and aquatic center. Upon expiration of shortened lease, cease lease agreement and return building to City operation for greater community use.
Laureola Park	<u>Community</u> Neighborhood Park	Improve visibility and access from Old County Road and Holly Street
		Reclassify park to a Community Park
		Add shade structure over bleachers
		Prepare a park master plan with community participation for the Laureola Park building and park site; Consider purchasing adjacent parcel to expand park site and improve access from Old County Road
Library Community Room	Facility	Provide improved storage for tables and chairs when not in use
		Provide interactive wayfinding signage to direct visitors on the first and second floors in coordination with the library
		Replace flooring
San Carlos Avenue Neighborhood Park	Mini-Park	Rename park and update park sign
		Replace playground, make inclusive (includes resurfacing to pour-in-place rubber surfacing)
		Replace park standard amenities (picnic tables, drinking fountain, trash cans, sign, benches)



PARK NAME	CLASSIFICATION	IMPROVEMENT
		Remove overgrown shrubs at the entrance and sidewalk to improve visibility and enhance park entrance
		Replace fencing
		Repave pathways with all-weather resilient surfacing
Vista Park	Neighborhood Park	Update floral and plant signage
		Add natural theme fitness station elements
		Consolidate regulation signage
		Add interpretive signage
		Add drinking fountain with domestic water source
Youth Center	Facility	Install large digital displays and new AV equipment in all program rooms
		Replace HVAC system
		Improve the acoustic separation of the Zen Den from the adjacent Game Room



Table 4. Mid-Term Improvements (5-10 Years)

PARK NAME	CLASSIFICATION	IMPROVEMENT
Arguello Park	Community Park	Improve access to sunken picnic area
		Repave pathways with all-weather resilient surfacing
		Construct mini ropes course, embankment slide, and zip line near Wellington Ave parking and implement erosion control measures
		Formalize existing trails (proper grading, surfacing, drainage), consider realigning some trail segments, and decommission others
		Add park trails to existing trails maintenance contract
		Pave the fire road along Sheldon Avenue to provide a multi-use maintenance and walking path/emergency access path (required by adjacent private development)
Big Canyon Park	Open Space Area	Install a restroom facility at the Brittan Avenue entrance adjacent to the street and labyrinth, include an AED device to the structure and include wayfinding signage across the street at Eaton Park entrance
		Incorporate erosion control measures on open slopes to enhance slope stability between Melendy Drive and Drake Court
		Consider integrating a floodplain detention basin as noted in the Pulgas Creek Watershed Plan
		Expand and enhance trail system per Hillside Trails Plan, including designated ADA trail at Brittan Avenue
Burton Park	Community Park	Add improved access at Woodland Avenue and Brittan Avenue corner
		Replace Kiwanis building with new community building through master plan process
Cedar Street Park	Mini-Park	Replace and expand playground with new equipment, inclusive design (includes resurfacing to poured-in-place rubber), and remove the sandbox and repurpose for usable play space; consider utilizing the site's existing topography to integrate play elements; Consider community outreach during the design process
		Repave pathways with all-weather resilient surfacing
		Replace park standard amenities (picnic tables, drinking fountain, trash receptacles, park sign, benches)
Crestview Park	Neighborhood Park	Add standard safety lighting (motion detected, low brightness levels, consider solar powered)
Eaton Park	Open Space Area	Decommission all informal trails
		Add rolling dips on Eaton Trail between Vista Trail and Summit Trail and nearby portion of Vista Trail (where moderate erosion is occurring)



PARK NAME	CLASSIFICATION	IMPROVEMENT
		Add water bars near Eaton Avenue entrance to reduce erosion
		Add rolling dips on upper section of Summit Trail
		Introduce water bars along Hawk Hill trail (if not being paved)
		Update trails map to show all existing bench locations
Heather Dog Exercise Area	Special Use Park	Expand usable dog park area
		Repave pathways with all-weather resilient surfacing
		Replace staircase with accessible ramp access
		Add and replace standard amenities (drinking fountain, benches, picnic table, dog waste station, agility course)
		Add domestic water source (for drinking fountain)
		Add rest areas and restoration planting along trail/open space area
		Install new fence to separate city property from school property
Highlands Park	Community Park	Improve field drainage and replace grass turf at Stadium Field
		Add fitness station elements along walking path
		Formalize pedestrian entrance from Elston Court
		Repave pathways around Stadium field with all-weather resilient surfacing
		Add parking stalls by converting available unused space into parking, formalize parking along Aberdeen Drive with regulation signage and striping
		Add backstop at northeast corner of Stadium Field to add additional diamond field activities/space
Hillcrest Circle Park	Mini-Park	Replace playground, incorporate the topography for play elements
Kiwanis Building (Burton Park)	Facility	Construct new community building or facility in the same general footprint as the existing building
Laureola Park	Community Neighborhood Park	Replace Laureola building with new community building through Master Plan process
San Carlos Avenue Neighborhood Park	Mini-Park	Terrace lower portion of the slope for additional seating/picnic area
Vista Park	Neighborhood Park	Replace picnic tables into a formalized, accessible picnic area with shade element
		Add crosswalk across Crestview Drive to North Crestview Park
		Replace park standard amenities (picnic tables, trash cans, sign, benches, fences)
		Add a play structure on site



PARK NAME	CLASSIFICATION	IMPROVEMENT
Youth Center	Facility	Install doors at program rooms adjacent to the Les Mundell Picnic Grove to facilitate indoor-outdoor connection
		Redesign the Les Mundell Picnic Grove into an “outdoor living room” with seating and lounging opportunities, can include outdoor games
		Renovate the restrooms to address deficiencies and provide accessible clearance at all fixtures and new, easy to clean finishes



Table 5. Long-Term Improvements (10+ Years)

PARK NAME	CLASSIFICATION	IMPROVEMENTS
Adult Community Center	Facility	Building electrification: as building systems and appliances need replacement, consider all-electric units where feasible
Arguello Park	Community Park	Replace playground (consider a themed or adventure course)
Burton Park	Community Park	Replace playgrounds to be fully inclusive; consider themed play design
		Replace water circulation for water play element to meet current code requirements
Cedar Street Park	Mini-Park	Consider restroom facilities on site
City Hall Dog Park	Special Use Park	Consider repurposing dog park into a civic park if a dog park is sited elsewhere
Crestview Park	Neighborhood Park	Replace playground, consider themed/adventure play expansion
Highlands Park	Community Park	Replace playground after structures are 20 years old
Kiwanis Building (Burton Park)	Facility	Consider site for new community and/or aquatic facility
Laureola Park	<u>Community Park</u> Facility	Replace water circulation for water play element to meet current code requirements
Youth Center	Facility	Building electrification: as building systems and appliances need replacement, consider all-electric units that are appropriately sized to meet building demand



3.4.1 No Improvements Proposed

There are several parks and facilities which are included in the Plan but have no actions proposed as part of the Plan. Parks with no action items include:

- Chilton Park (recently improved)
- Frank D. Harrington Park (included in the Downtown Specific Plan)
- North Crestview Park (separate Master Plan process)
- Rosek Park (no improvements needed)

3.4.2 Short-Term Improvements

Short-term improvements are planned to be initiated or fully implemented within five years of adoption of the Plan.



SIGNAGE

Multiple types of new signage or modification to existing signs, including trail wayfinding, regulatory signage, and interpretive, are proposed as part of the Project. Arguello Park, Big Canyon Park, Burton Park and Eaton Park are City parks and open spaces with miles of trails. The Plan calls for wayfinding signage on trails, which would likely consist of a post and a metal sign or a wooden trail marker post displaying trail information. Similar wayfinding is present in other parks and open spaces, as depicted in Figure 4. Trailhead kiosks would be installed at park entry points at Arguello Park and display trail system maps and other relevant information. San Carlos Avenue Park, Heather Dog Exercise Area, Burton Park, and Crestview Park would receive new standard City park entrance signs.



Figure 4. Wayfinding sign in Big Canyon Park

Regulatory signage would provide information regarding allowable uses, such as hiking or biking, and park rules. Signage at Vista Park would be consolidated along with the addition of signage prohibiting bikes on Arguello Park trails. Interpretive signage would be installed or updated at Arguello Park, Big Canyon Park, and Vista Park.

PARK AMENITIES

Park amenities would be replaced or relocated in several parks. A shade structure is proposed for the bleachers at Crestview Park and Laureola Park. The shade structure may consist of traditional framed construction, similar to pergolas or gazebos, or may be developed with steel posts with shade sails. Picnic tables or benches would be added or relocated in Arguello Park, Big Canyon Park, City Hall Dog Park, and Highlands Park. The picnic area near Stadium Field in Highlands Park would be replaced with a formalized and reservable picnic area that includes at



least one table and a path that meet Americans with Disabilities Act (ADA) accessibility standards. Picnic tables at the Arguello Park snack shack would be replaced with ADA accessible tables. Fencing, picnic tables, trash cans, and benches at San Carlos Avenue Neighborhood Park would be replaced. The sand boxes at Burton Park and Crestview Park will be removed and the area it occupied would be converted to play area. Playground structures at San Carlos Avenue Neighborhood Park would also be replaced with similar structures and areas surrounding play structures would be resurfaced with pour-in-place rubber. New dog agility features would be installed at City Hall Dog Park. The City would install weather-resistant surfacing near the concrete cornhole boards at Burton Park.

A new bike pump track is proposed for Arguello Park. The pump track would be located on the already flat section of the site near the intersection of Dartmouth Avenue and Northam Avenue. The pump track would include obstacles, like rollers, banked turns, and jumps, as well as fencing and seating areas. Additional design development is needed to determine more specific details of the pump track, including the type of all-weather surface.

The City would add a net with a minimum height of six feet at the Highlands Park soccer field to stop balls from leaving the field area.

SITE ACCESS AND CIRCULATION

Approximately 3,500 square feet of decomposed granite pathway would be replaced by all-weather surface walkway at San Carlos Avenue Neighborhood Park through the removal of existing surface material, path edging, and any drainage, then preparation of concrete, asphalt or a similar impermeable walkway. Access to Crestview Park from Leslie Drive would be improved, a new fence installed between the field and parking lot, and the walking path will be resurfaced with approximately 2,500 sq. ft. of an all-weather resilient surface. The City would replace fencing with a similar type of fence at San Carlos Avenue Neighborhood Park and improve visibility and access into the site at Heather Dog Exercise Area and Laureola Park.

The concert lawn at Burton Park would be replaced by a picnic area with ADA-accessible pathways and at least one ADA-accessible picnic table. This modification would entail approximately 1,500 square feet of new surfacing.

The entirety of or portions of the fire road in Eaton Park, consisting of the Hawk Hill and Eaton trails, would be improved for ingress and egress and erosion management. The existing trails would need to be regraded, compacted, and have subgrade materials installed prior to paving. Additional concept design and engineering consideration would be undertaken prior to implementation.

ATHLETIC AND FITNESS FACILITIES

Batting cages would be resurfaced with padded artificial turf in Arguello Park and Highlands Park. The tennis and pickleball courts would be resurfaced and restriped in Highland Park to convert two tennis courts that are also used for pickleball into up to six permanent pickleball courts. Vista Park is proposed to include fitness stations including equipment such as wood log steps and pull up bars.



UTILITIES AND EQUIPMENT

Drainage would be improved on the concert lawn and the diamond fields at Burton Park. Drinking fountains would be replaced at San Carlos Avenue Neighborhood Park and a new water fountain would be added to Vista Park and Heather Dog Exercise Area by extending domestic water from the street into the park.

LANDSCAPE

City-wide tree maintenance program recommendations to be determined by a city contracted arborist in the future, such as removing decaying trees, would be implemented at Cedar Street Park and Arguello Park. Preparation of a tree succession plan would identify the future maintenance and planting needs for the mature trees at Burton Park. Replanting and enhancement of landscaping at Hillcrest Circle Park, San Carlos Avenue Neighborhood Park and Heather Dog Exercise Area are proposed. New trees would be planted at Crestview Park.

VISTA POINTS

The proposed vista point in Big Canyon Park would be at the end of the Oak Meadow Trail, which is an out-and-back trail. The vista would look east towards the bay and provide a view down Brittan Avenue. The Big Canyon Park vista point would require minor grading, estimated at totaling less than ten cubic yards, with off haul avoided by repurposing the soil into trail improvements on the site.

On the northern edge of the open space at Arguello Park is an existing graded area at the highest point in the park, which features picnic tables and boulders. Creation of a vista point with interpretive signage is proposed.

BUILDING IMPROVEMENTS

To improve the functionality of the Youth Center and the Parkview Room of the Adult Community Center, installation of a large screen and improved audio-visual equipment, such as projectors and speakers, is proposed. Acoustic management measures, such as acoustic curtains or dividers, would be installed between the “Zen Den” room and the game room in the Youth Center. The Adult Community Center kitchen would be renovated to replace appliances and flooring, create an accessible pantry space, and improve circulation in the kitchen. The City would replace the HVAC system of the Youth Center.

The San Carlos library has a divisible community room that may be reserved for different events or meetings. The City would provide interactive wayfinding to direct visitors to their destinations within the library. Additional storage for tables and chairs when they are not in use would be added to the San Carlos Library community room to provide a more flexible use of space.

RECLASSIFICATION AND RENAMING

The City proposes taking administrative action on three parks as part of the Parks Master Plan. The City proposes reclassifying Laureola Park from a neighborhood park to a community park in recognition that it serves a broader function for residents and visitors outside of its immediate vicinity through programming and the amenities available there. Additionally, the Heather Dog Exercise Area and San Carlos Avenue Neighborhood Park would both be renamed as part of implementation of the Project.



AESTHETICS

The City would paint a mural on the bleacher steps at Stadium Field in Highlands Park.

LAUREOLA PARK MASTER PLAN

It is recommended develop a master plan for Laureola Park and involve community participation in the development of future improvements at the site. The Laureola Park Master Plan would consider use of the Laureola Building, park expansion needs, site access considerations, and park amenities. The details of the proposed park facilities would be further developed through the Master Planning process and would undergo a separate environmental review under CEQA.

3.4.3 Mid-Term Improvements

Mid-term projects are to be initiated or implemented within 5 to 10 years of adoption of the Plan and are listed below by park or facility. Several of these improvements are discussed at a more conceptual level in this IS/MND because project-level details are not yet finalized and additional CEQA consideration may be required prior to implementation.

PARK AMENITIES

Park amenities, including benches and rest areas, at Cedar Street Park would be replaced. Shade structures would be installed over the existing bleachers at Arguello Park. Improvements are proposed to provide additional outdoor seating and paved surfacing in Les Mundell Grove at Burton Park to extend the usable space outside of the Youth Center. Additional or replacement of park amenities, like benches, picnic tables, and dog waste stations, shade structures, would take place at Heather Dog Exercise Area and Vista Park. The off-leash dog area at Heather Dog Exercise Area would be expanded.

The Plan would include replacing existing playground equipment with new playground equipment and resurfaced play areas at Cedar Street Park, Hillcrest Circle Park, and Crestview Park. A new play structure would be added to Vista Park. The sand box at Cedar Street Park would be removed and repurposed for play space. Fitness station elements are proposed along the existing walking path at Highlands Park.

A backstop would be added at the northeast corner of Stadium Field at Highlands Park to add additional recreation space.

A mini ropes course is proposed east of the Wellington Avenue parking lot at Arguello Park. The ropes course would provide low features for climbing to promote exploratory play and a more challenging experience for young kids. The ropes course design will require further detailed design development.

SITE ACCESS AND CIRCULATION

Access to the Arguello Park sunken picnic area adjacent to the sports field would be improved to enhance accessibility, such as adding ramp access into the area and updating paving. Existing walkways at Cedar Street Park (approximately 4,000 square feet of repaving; approximately 1,000 square feet of dc) Arguello Park (approximately 8,000 square feet), Highlands Park, and Heather Dog Exercise Area would be replaced with all-weather surface pathways.



Improvements for the Burton Park entry on Woodland Avenue and Brittan Avenue and Highlands Park entrance on Elston Court are proposed. Improvements may include paving with all-weather surfacing, signage, landscaping, and enhancing pedestrian connections to the site.

The staircase at Heather Dog Exercise Area would be removed and replaced with accessible ramp access. Additional design and engineering details would need to be prepared to ensure ADA-compliant slopes and features.

A pedestrian connection across Crestview Drive from Vista Park to North Crestview Park is proposed. This would be a non-signalized standard painted striped crosswalk. The lower portion of the slope along the west side of San Carlos Avenue Neighborhood Park would be terraced to create amphitheatre-style seating or another function determined during the design phase. The terracing would require movement of an estimated 10 cubic yards of earth.

The City would convert available unused landscape areas and space along Aberdeen Drive at Highlands Park to approximately two to five paved and striped parking stalls. The new parking spaces would not require new curb cuts or major changes to traffic patterns.

UTILITIES AND EQUIPMENT

The Plan proposes extending existing electrical utilities to Crestview Park to add motion-activated safety lighting through installation of five to 10 lighting bollards in the Crestview Drive parking area. A drinking fountain would be added to Heather Dog Exercise Area. The City would install new irrigation, improve drainage, and replace grass turf at Stadium Field at Highlands Park.

A new restroom is proposed at the Brittan Avenue entrance of Big Canyon Park to provide flush toilets, hand washing sinks, and drinking fountain utilities. The restroom would also have electricity for lights and an AED device installed.

LANDSCAPING

The City would add a floodplain detention basin and implement the Native Plant Pilot Program, both recommended in the 2025 Pulgas Creek Watershed Plan, in Big Canyon Park. Restoration planting would be conducted in the open space areas of Heather Dog Exercise Area.

BUILDING IMPROVEMENTS

The restrooms at the Youth Center would be renovated to provide accessible clearances to all fixtures and replaces finishes with new materials. Exterior doors will be installed at the Youth Center to create outdoors access to the adjacent Les Mundell Grove. The Les Mundell Grove would be redesigned into a patio setting and would incorporate more seating.

The Kiwanis Building at Burton Park may be replaced with a new community building depending on the outcome of a Master Plan process. A new community and aquatic facility was deemed a high priority through community outreach and City Council discussions. The location, size and scope of this new facility is ongoing review under a separate process.

The Laureola Building at Laureola Park may be replaced with a new community building depending on the outcome of a Master Plan process.



TRAIL IMPROVEMENTS

Incorporation of water management design features into natural surface trails at Eaton Park is proposed to manage surface water runoff and reduce soil erosion on the trails. Water bars on the steeply sloped trail segment near the Eaton Avenue entrance would be installed to slow and divert water from the trail tread. Rolling dips are proposed on the Eaton Trail between Vista Trail and Summit Trail as well as a nearby portion of Vista Trail and the upper Summit Trail to improve drainage and reduce erosion. There are several social trails created by trail users on the north side of Eaton Park, which are proposed for decommissioning to reduce erosion impacts and improve trail user safety.

Most trails in Arguello Park were not formally created using current trail standards and there are many segments of social trails contributing to erosion on the site. The Plan would formalize approximately 1.12 miles of existing trails by improving the grading, surface material, and drainage. Approximately 0.42 miles of trails would be permanently decommissioned by removing trail features, restoring the landscape, and preventing continued use either through signage or fencing. To accommodate the mini ropes course and address erosion impacts, 0.2 miles of trail would be realigned through either partial or complete reconstruction but would remain in the same general area to provide important connections to other trails.

The City would work with a developer of a nearby residential project to establish a paved multi-use pathway along Sheldon Avenue. The City would add Arguello Park to an existing trail maintenance contract that would result in ongoing maintenance activities, such as minor grading, vegetation management, and hazard removal.

The City would construct an ADA-accessible trail segment in Big Canyon Park as proposed in the Hillside Trails Plan (2012). The ADA-accessible trail would be an out-and-back trail that extends approximately 360 feet from Brittan Avenue into the canyon. Construction of the trail would require grading and paving a portion of naturally surfaced area with durable surfacing.

NORTH CRESTVIEW PARK MASTER PLAN

A Master Plan process is currently underway at North Crestview Park to develop a park space that meets the needs of the community. The ultimate proposed elements of the master plan would be evaluated through a separate CEQA process.

EROSION CONTROL

Measures to manage erosion and improve slope stability on the steep, open slopes in Big Canyon Park between Melendy Drive, Drake Court, and Brittan Avenue would be evaluated to identify specific intervention sites as well as the appropriateness and feasibility of different measures at the sites.

3.4.4 Long-Term Improvements

Long-term improvements are anticipated to take place in 10 years or longer. These improvements are generally larger in scale and less well-defined, so discussion will be at a conceptual level and additional planning and design will be necessary prior to implementation.



BUILDING IMPROVEMENTS

The Plan proposes electrification of the Adult Community Center and Youth Center as part of the long-term improvements. Building electrification would entail services upgrades to accommodate the additional energy load, rewiring, and replacement of any natural gas appliances as needed.

PARK AMENITIES

The Plan would replace aging existing playground equipment with new playground equipment and resurfaced play areas at Arguello Park, Burton Park, Crestview Park, and Highlands Park. The construction of a restroom facility at Cedar Street Park with flush toilets, sinks, and electricity for lighting will be evaluated.

CIVIC PLAZA

A portion of the City Hall property at the corner of Elm Street and San Carlos Avenue is currently used as a public dog park and may be converted into a civic park if a dog park is sited elsewhere. The plaza would feature landscaping, seating, and paved elements. Additional design consideration will be undertaken at time of construction.

WATER PLAY RECYCLED WATER SYSTEMS

The current drainage systems at the existing water play areas at Laureola Park and Burton Park would be retrofitted to utilize recirculated water by introducing a surge basin or treatment tank to collect and store recirculated water and meet current code requirements per California Water Code (WAT §13551).

3.5 General Plan Amendments

The Project includes updates to the City's General Plan Parks and Recreation Element and Environmental Management Element to ensure consistency with the Plan and bring them into compliance with State law. Senate Bill (SB) 1425 was passed in 2022 and requires cities and counties to update their General Plan Open Space Elements to address equitable access to open space, climate resilience, and rewilding opportunities. Assembly Bill (AB) 1889 was passed in 2024 and requires cities and counties to address wildlife and habitat connectivity within their General Plan. These requirements were addressed by the inclusion of the following policies into the San Carlos General Plan:

- Policy EM-1.5: Identify, conserve, and enhance wildlife connectivity corridors. Where feasible, protect continuous habitat linkages and remove barriers to wildlife movement in coordination with regional habitat plans (per AB 1889 requirements). This includes considering wildlife crossings or buffer zones in project designs near identified corridors.
- Policy EM-1.6: Conduct a Habitat Connectivity Study to map wildlife movement routes and ecological connectivity areas within San Carlos and the region. Use this study to guide land use planning, open space acquisitions, and infrastructure designs that protect or enhance these corridors (in compliance with AB 1889).
- Policy EM-4.2: Review new development proposal for opportunities to create open space.



- Policy EM-4.8: Ensure equitable access to open space for all community members by prioritizing new parks, green spaces, and open-space improvements in park-poor or underserved neighborhoods (pursuant to SB 1425's equity requirements).
- Policy EM-4.9: Leverage open spaces to enhance climate resilience and ecosystem health. Protect and expand natural areas that buffer climate impacts (e.g. wetlands for flood control, urban forests for cooling) and pursue rewilding efforts (native habitat restoration and species support) to preserve and enhance biodiversity (consistent with SB 1425).
- Action PR-1.12: Pursue designation of City-owned Open Space as Priority Conservation Areas.
- Action PR-1.13: Strive to provide a minimum of 1 mile of trail for every 1,000 residents.
- Action PR-1.14: Pursue Joint Use Agreements and partnerships with local and regional agencies to expand recreation opportunities and shared use facilities.
- Action PR-2.11: Conduct an equity analysis as part of each update of the Parks and Recreation Element to identify park and open space access needs and guide park and recreation facility improvement priorities.
- Action PR-2.12: Enhance access to parks and recreation facilities through safe streets improvements, pedestrian crossings, and accessibility measures.
- Policy PR-3.7: Prioritize multi-generational spaces and programs in both established and future parks and facilities.
- Action PR-3.3: Explore opportunities to provide a multi-generational recreation facility in San Carlos.
- Action PR-3.4: promote the design of multi-use recreational spaces and facilities to expand recreation opportunities.
- Action PR-3.5: Consider property acquisitions adjacent to Laureola Park for expansion of park space.
- Policy PR-4.12: Continue to use electric powered landscape maintenance equipment when feasible (unless backup equipment is required).
- Policy PR-4.13: Reference the San Carlos Climate Mitigation and Adaptation Plan to ensure park and recreation improvements align with City climate goals.
- Action PR-4.8: Develop and implement a Tree Mitigation Plan, in coordination with a certified arborist, to ensure pedestrian safety and the long-term health of park trees.
- Action PR-4.9: Support the use of digital tools, such as QR codes linked to an app or website, to educate visitors about native and existing flora within open space areas.
- Action PR-5.1: Engage community members of all ages, abilities, and social groups in future park and recreation facility master planning projects.

The Parks and Recreation Element was also updated to reflect current park conditions and to reclassify Laureola Park from a Neighborhood Park to a Community Park. The updates also ensure consistency with the Parks Master Plan and the City's 2012 Hillside Trails Plan (City of San Carlos 2012).



3.6 Project Construction

Construction of individual projects under the Plan would be undertaken in a phased approach with Plan elements identified for the short term, mid-term, and long term. Most improvements included in the Plan would qualify for Categorical Exemptions under CEQA; however, some projects may not qualify for an exemption and will need to be further analyzed at a project-level prior to implementation. Actions undertaken as part of Plan implementation at the following sites may require further CEQA review due to the potential impacts to air quality, noise, geology, water quality, or other impacts:

- Kiwanis Building
- Laureola Building
- Arguello Park
- Big Canyon Park
- Eaton Park
- City Hall Dog Park

Across all phases of the Plan, construction work is anticipated to occur for eight hours per day, five days per week. The San Carlos Municipal Code limits construction activities to between 8:00 a.m. and 5:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturdays. No construction noise-related activities are permitted on Sundays and holidays. All gasoline-powered construction equipment shall be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted. The Building Official shall have the authority to grant exceptions to construction noise-related activities. Staging areas for construction materials and equipment would be determined at a later time by the construction contractor or City for each work site. Staging of materials and equipment would occur on developed or disturbed areas and would not be located in any sensitive habitat areas. Regional access to the parks sites is provided via US-101 and US-280. Detailed information regarding construction duration, staging, access, and equipment is provided for each activity in the Appendix A. Construction Details.

3.7 Plan Operation

Table 6 summarizes potential changes to use of parks, open spaces, and facilities based on the improvements included in the Parks Master Plan. “No change” means that the park or facility improvement is not likely to affect vehicle miles travelled, air quality, noise, water supply and distribution, energy consumption, or change land uses as part of ongoing operation. “Increased use” means operation of that park or facility improvement may have an impact on those previously listed environmental considerations; however, the degree of that impact and the appropriate mitigation measures are determined through project-level analysis.

Table 6. Potential Changes to Park Operations

PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
Adult Community Center	Renovate the kitchen to address deficiencies and provide:		X



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
	- Improved circulation and better use of serving space - New appliances - New flooring and other finishes - Accessible pantry space		
	Building electrification: as building systems and appliances need replacement, consider all-electric units where feasible	X	
Arguello Park	Replace batting cage surfacing	X	
	Add shade structure over picnic area and bleachers	X	
	Implement citywide tree maintenance program recommendations	X	
	Create an overlook at "the rocks" with interpretive signage	X	
	Add wayfinding signage and trailhead kiosk for open space trails	X	
	Add and relocate picnic tables/bench seating in open space area	X	
	Install park rules signage (including no biking)	X	
	Add accessible picnic tables to snack shack picnic area	X	
	Replace playground (consider a themed or adventure course)		X
	Improve access to sunken picnic area	X	
	Site pump track at bend of Dartmouth/Northam Avenue; considering fencing to block cyclists from entering trail network		X
	Construct mini ropes course, embankment slide, and zip line near Wellington Ave parking and implement erosion control measures		X
	Pave the fire road along Sheldon Avenue to provide a multi-use maintenance and walking path/emergency access path (required by adjacent private development)		X
	Formalize existing trails (proper grading, surfacing, drainage), consider realigning some trail segments, and decommission others		X
	Add park trails to existing trails maintenance contract	X	
	Repave pathways with all-weather surface or concrete	X	



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
Big Canyon Park	Provide a vista point at end of Oak Meadow Trail (includes view area delineation with wooden fencing, bench, interpretive signage, signage indicating “area closed” beyond fencing)	X	
	Add wayfinding signage throughout the park	X	
	Add or restore park benches and picnic tables	X	
	Expand and enhance trail system per Hillside Trails Master Plan, including designated ADA trail at Brittan Avenue		X
	Install a restroom facility at the Brittan Avenue entrance adjacent to the street and labyrinth, include an AED device to the structure and include wayfinding signage across the street at Eaton Park entrance		X
	Incorporate erosion control measures on open slopes to enhance slope stability between Melendy Drive and Drake Court	X	
	Implement flora/fauna app/website with QR code on signage at the site	X	
	Implement Pulgas Creek Watershed Plan Native Plant Pilot Program	X	
	Consider integrating a floodplain detention basin as noted in the Pulgas Creek Watershed Plan	X	
Burton Park	Add wayfinding signage at the Woodland Avenue park entrance	X	
	Improve lawn drainage at concert lawn	X	
	Improve field drainage at diamond fields	X	
	Prepare a tree succession plan in and implement citywide tree maintenance program recommendations	X	
	Add formalized reservable picnic area with accessible path and one ADA table (minimum) to concert lawn		X
	Remove sandbox area from play area and repurpose with usable play area	X	
	Add improved access at Woodland Avenue and Brittan Avenue corner	X	
	Replace water circulation for water play element to meet current code requirements	X	
	Replace playgrounds to be fully inclusive; consider themed play design		X



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
	Install weather-resistant material surfacing next to concrete cornhole boards	X	
	Kiwanis building to be replaced with new community building through master plan process		X
Cedar Street Park	Implement citywide tree maintenance program recommendations	X	
	Renovate and expand play area with new equipment, inclusive design (includes resurfacing to poured-in-place rubber), and remove the sandbox and repurpose for usable play space; consider utilizing the site's existing topography to integrate play elements; Consider community outreach during the design process		X
	Replace pathways with all-weather resilient surfacing	X	
	Replace park standard amenities (picnic tables, drinking fountain, trash receptacles, park sign, benches)	X	
	Consider restroom facilities on site		X
City Hall Dog Park	Enhance park landscape and dog agility amenities, consider theme elements or design		X
	Replace picnic tables with benches and grouped seating areas	X	
	Improve drainage at drinking fountain	X	
	Consider repurposing dog park into a civic park if a dog park is sited elsewhere		X
Crestview Park	Add permanent fencing between field and parking lot	X	
	Improve pedestrian entrance at Leslie Drive and perimeter trail in open space area (all-weather surfacing, signage)	X	
	Plant two new trees (between parking lot and field)	X	
	Replace playground, consider themed/adventure play expansion		X
	Remove and repurpose sandbox to active play space	X	
	Add shade structure over bleachers	X	
	Add standard safety lighting (motion detected, low brightness levels, consider solar powered)	X	



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
Eaton Park	Introduce water bars along Hawk Hill trail (if not being paved)	X	
	Add rolling dips on Eaton Trail between Vista Trail and Summit Trail and nearby portion of Vista Trail (where moderate erosion is occurring)	X	
	Improve wayfinding signage	X	
	Decommission all informal trails	X	
	Add rolling dips on upper section of Summit Trail	X	
	Add water bars near Eaton Ave entrance to reduce erosion	X	
	Update trails map to show all existing bench locations	X	
	Improve fire road with durable surface and eliminate trail head erosion issues for maintained vehicular access	X	
Heather Dog Exercise Area	Rename park and add city standard park sign	X	
	Improve visibility and access into the site	X	
	Expand usable dog park area		X
	Repave pathways with all-weather resilient surfacing	X	
	Replace staircase with accessible ramp access	X	
	Maintain and enhance landscaping within park site, install irrigation system	X	
	Add and replace standard amenities (drinking fountain, benches/picnic table, dog waste station, agility course)	X	
	Add domestic water source (for drinking fountain)	X	
	Add rest areas and restoration planting along trail/open space area	X	
	Install new fence to separate city property from school property	X	
Highlands Park	Replace picnic area by Stadium Field into formalized reservable picnic area with accessible path and one (1) ADA table (minimum)		X
	Replace aging benches	X	
	Paint a community mural along the bleacher steps at Stadium Field	X	



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
	Formalize park entry at northeast residential street	X	
	Replace batting cage surfacing	X	
	Restripe the two dual-court tennis/pickleball courts to up to six permanent pickleball courts		X
	Improve field drainage and replace grass turf at Stadium Field	X	
	Add fitness station elements along walking path	X	
	Add net at Highlands Field for soccer (6-foot net minimum)	X	
	Repave pathways around Stadium Field with all-weather resilient surfacing	X	
	Add parking stalls by converting available unused space into parking, formalize parking along Aberdeen Drive with regulation signage and striping	X	
	Add backstop at northeast corner of Stadium Field to add additional diamond field activities/space	X	
	Replace playground after structures are 20 years old		X
Hillcrest Circle Park	Replant landscaping (shrubs, groundcover, re-sod lawn, shade trees)	X	
	Improve pedestrian access with informational access signage	X	
	Replace playground, incorporate the topography for play elements	X	
Kiwanis Building (Burton Park)	Consider a shortened, modified lease that aligns with the anticipated schedule for potential building improvements. Determine whether the building will be renovated for recreation programming (general community use or event rental space), replaced with a new facility, or designated as the future site of a new community and aquatic center.		X
	Upon expiration of shortened lease, cease lease agreement and return building to City operation for greater community use.		
	Construct new community building or facility in the same general footprint as the existing building		X



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
	Consider site for new community and/or aquatic facility		X
Laureola Park	Replace water circulation for water play element to meet code requirements	X	
	Add shade structure over bleachers	X	
	Reclassify park to a Community Park	X	
	Prepare a park master plan with participation of the community for the Laureola Park building and park site; Consider purchasing adjacent Sequoia Union High School parcel to expand park site and improve access from El Camino Real.		X
	Improve visibility and access from Old County Road and Holly Street	X	
	Laureola building to be replaced with new community building through Master Plan process		X
Library Community Room	Provide improved storage for tables and chairs when not in use	X	
	Provide interactive wayfinding signage to direct visitors on the first and second floors in coordination with the library	X	
	Replace flooring	X	
San Carlos Avenue Neighborhood Park	Rename park and update park sign	X	
	Replace playground, make inclusive (includes resurfacing to pour-in-place rubber surfacing)		X
	Replace park standard amenities (picnic tables, drinking fountain, trash cans, sign, benches)	X	
	Remove overgrown shrubs at the entrance and sidewalk to improve visibility and enhance park entrance	X	
	Replace fencing	X	
	Repave pathways with all-weather resilient surfacing	X	
	Terrace lower portion of the slope for additional seating/picnic area	X	
Vista Park	Update floral and plant signage	X	



PARK NAME	IMPROVEMENT	NO CHANGE	INCREASED USE
	Add natural theme fitness station elements		X
	Consolidate regulation signage	X	
	Add interpretive signage	X	
	Add drinking fountain with domestic water source	X	
	Replace picnic tables into a formalized, accessible picnic area with shade element	X	
	Add crosswalk across Crestview Drive to North Crestview Park	X	
	Add a play structure on site		X
	Replace park standard amenities (picnic tables, trash cans, sign, benches, fences)	X	
Youth Center	Install large digital displays and new AV equipment in all program rooms	X	
	Replace HVAC system	X	
	Improve the acoustical separation of the Zen Den from the adjacent Game Room	X	
	Install doors at program rooms adjacent to the Les Mundell Picnic Grove to facilitate indoor-outdoor connection	X	
	Redesign the Les Mundell Picnic Grove into an “outdoor living room” with seating and lounging opportunities, can include outdoor games		
	Renovate the restrooms to address deficiencies and provide accessible clearance at all fixtures and new, easy to clean finishes	X	
	Building electrification: as building systems and appliances need replacement, consider all-electric units that are appropriately sized to meet building demand	X	

3.8 Plan-Related Approvals, Agreements, and Permits

The information contained in this Programmatic IS/MND will be used by the City of San Carlos (lead agency) as it considers whether to approve the proposed Plan. If the Plan is approved, the Programmatic IS/MND would be used by the City and responsible and trustee agencies in conjunction with various approvals and permits. These actions may include, but may not be limited to, the following approvals by the agencies listed below.



3.8.1 City of San Carlos

- Plan approval by the City Council
- Grading Permit
- Building Permit

3.8.2 San Francisco Bay Regional Water Quality Control Board

- Storm Water Management and Discharge Control Permit (National Pollutant Discharge Elimination System [NPDES] C.6)



4.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

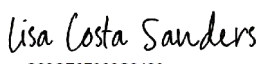
The environmental factors checked below would be potentially affected by this Plan, involving at least one impact that is potentially significant unless mitigation is incorporated, as indicated by the checklist on the following pages.

☒ 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 Plan COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the Plan could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Plan have been made by or agreed to by the Plan proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the Plan MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the Plan 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 Plan 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 Plan, nothing further is required.

Signed by:

 C29CE07966C9439...
 Signature

6/9/2026

Date

Name and Title: Lisa Costa Sanders, Principal Planner



4.2 Initial Study Checklist

This section describes the existing environmental conditions in and near the Plan Area and evaluates environmental impacts associated with the proposed Plan. The environmental checklist, as recommended in the CEQA Guidelines (Appendix G), was used to identify environmental impacts that could occur if the proposed Plan 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 Plan.

“Less than Significant Impact” means that implementation of the Plan 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 Plan-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 Impact 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 Plan Area is located in the City of San Carlos on the San Francisco Peninsula, situated between the cities of Belmont and Redwood City. San Carlos has varied topography ranging from relatively flat areas to hilly terrain in western portions of the City. The City is predominantly developed and characterized by single-family residences, multi-family developments, a downtown area, and residential and commercial uses on the east side. The Plan Area includes 17 City-owned parks and open spaces that are scattered throughout San Carlos, providing opportunities for passive and active recreation.

Parks included in the Plan Area vary in size, character, and the type of amenities offered. Arguello Park is the City's largest developed park, with a variety of amenities including a baseball diamond, soccer fields, a gated playground, two picnic areas, grilling equipment, open space and walking trails. Other developed park sites, such as Burton Park, Crestview Park, Highlands Park, and Laureola Park include amenities such as athletic fields, tennis courts, play structures, and basketball courts. Some small parks, such as Rosek Park and Frank D. Harrington Park, offer benches and tables to enjoy a quiet space outside. Special use parks, such as City Hall Dog Park and Heather Dog Exercise Area, offer dedicated off-leash dog exercise areas. Larger parks offer vast open space areas with trails for hiking, such as Eaton Park and Big Canyon Park. As discussed further in *Section 4.2.4, Biological Resources*, some of the City's parks are fully developed with paved amenities or ornamental vegetation, and others contain a mix of native vegetation communities with some eucalyptus groves scattered throughout.



REGULATORY SETTING

City of San Carlos General Plan

The City's General Plan identifies County scenic highways, including Edgewood Road and Cañada Road, as well as the following City scenic roads:

- Alameda de Las Pulgas
- San Carlos Avenue
- Brittan Avenue
- Club Drive
- Crestview Drive
- El Camino Real
- Holly Street

The City's General Plan Circulation and Scenic Highways (CSH) Element contains the following policies related to aesthetics:

- **Policy CSH-8.1:** The City shall continue its program of protecting and enhancing local scenic roads through right-of-way protection and appropriate architectural and landscape controls and requirements.
- **Policy CSH-8.2:** The City shall encourage the planting of native trees and shrubs along local scenic roads, where practical.
- **Policy CSH-8.3:** The City shall maintain local scenic roads in safe conditions.
- **Policy CSH-8.4:** The City shall continue architectural and site plan review of all signage, structures and site developments proposed in the scenic corridors to ensure appropriateness of design and materials and proper placement of structures and vegetative screening where necessary.
- **Policy CSH-8.5:** Traffic mitigation funds should be available to provide aesthetic enhancement to the city's Scenic Highways and Roads.

PARKS MASTER PLAN GUIDELINES

- Design facilities using materials and architectural elements that respond to local context, reinforcing a sense of place and connection to San Carlos' character and landscape.
- Create a distinct identity by incorporating the physical, social, cultural, and natural features of the site and surrounding neighborhood into its design.
- Design parks to relate to adjacent streets, buildings, and land uses, reinforcing connections to the surrounding community and activating edges.
- Capitalize on views into, through, and from parks, framing views of park features and preserving vistas of surrounding landmarks and natural elements.
- Use durable, high-quality materials that age well and are appropriate for the San Francisco Bay Peninsula climate, with consideration for long-term maintenance.



- Ensure site furnishings, including benches, trash and recycle receptacles, fencing, and similar elements follow a unified design vocabulary throughout the park system.
- Use decorative or integrated treatments for standard amenities, such as newspaper stands, trash enclosures, and utility elements, where appropriate.

DISCUSSION OF IMPACTS

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

Less-than-Significant Impact

The construction of individual projects under the proposed Plan may have a temporary adverse effect on views from locally designated scenic corridors and roadways in the City due to the presence of construction equipment or removal of vegetation. These temporary impacts would not be considered a substantial adverse effect on scenic vistas in San Carlos. After construction, new and improved parks and associated landscaping would generally enhance the foreground of scenic views from scenic corridors in the Plan Area, which is a beneficial impact to scenic vistas. The majority of proposed improvements would not involve new structures which would impact views from scenic vistas. As included in the Parks Master Plan Guidelines, any new structures such as playground equipment, restrooms, or building improvements would be designed using materials and architectural elements that respond to local context and incorporate the natural features of a site whenever feasible. In addition, durable, high-quality materials that are appropriate for the regional setting would be used, and decorative or integrated treatments for standard amenities would be incorporated as appropriate. Therefore, the proposed Plan would not have a substantial adverse effect on a scenic vista. The impact would be less than significant.

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

No Impact

One officially designated state scenic highway, Interstate 280 (I-280), runs along the western edge of the City (California Department of Transportation [Caltrans] 2026). The closest park to I-280 is North Crestview Park, approximately 0.25 miles east of the interstate. Due to local topography, vegetation, and built structures, no portion of the Plan Area is visible from I-280. Therefore, the proposed Plan would not substantially damage scenic resources within a state scenic highway. 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

The Plan Area is located in an urbanized area in the City of San Carlos. The City's General Plan contains policies pertaining to aesthetics and scenic quality which are described in the *Regulatory Setting* section above. Specifically, Policy CSH-8.1 directs the City to continue its program of protecting and enhancing local scenic roads through right-of-way protection and appropriate architectural and landscape controls and requirements. Further, Policy CSH-8.2 directs the City to encourage the planting of native trees and shrubs along local scenic roads,



where practicable. As described above under Threshold b), some parks within the Plan Area may be visible from local scenic roads; however, any impacts would be temporary in nature and would not be substantial. The Plan would not include any improvements or landscaping within scenic roadway corridors that would conflict with these policies of the General Plan.

General Plan Policy CSH-8.4 directs the City to continue architectural and site plan review of all signage, structures and site developments proposed in the scenic corridors to ensure appropriateness of design and materials and proper placement of structures and vegetative screening where necessary. Future projects under the proposed Plan would be required to undergo architectural and site plan review by the City, which would ensure compliance with this policy. Therefore, the proposed Plan would not conflict with applicable zoning or other regulations governing scenic quality. The impact 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 with Mitigation Incorporated

Improvements under the proposed Plan would consist of rehabilitation or replacement of existing facilities such as signage, picnic tables and benches, turf, and playground equipment; improvements to trails and walkways; and irrigation and landscaping improvements. Generally, improvements to trails/walkways and irrigation and landscaping would not introduce any new sources of light or glare. However, the replacement of existing facilities or construction of new facilities such as shade structures and restrooms could result in substantial new sources of light or glare if reflective materials are used. Therefore, Mitigation Measure AES-1 shall be implemented, which requires the use of non-reflective, low-glare materials and finishes for all new construction and improvements. Implementation of this measure would ensure that new development does not introduce substantial sources of glare or reflective surfaces that could adversely affect surrounding uses or visual character. With implementation of this measure, the proposed Plan would not result in a substantial source of light or glare that would adversely affect daytime or nighttime views in the area.

MITIGATION MEASURES

Mitigation Measure AES-1. Non-Reflective Materials

All new construction and improvements, including playground equipment, restroom facilities, lighting, fencing, irrigation appurtenances, and other site features, shall utilize non-reflective, low-glare materials and finishes to the maximum extent feasible. Exterior surfaces shall be finished with matte, textured, or earth-toned coatings, and highly reflective materials such as polished metals or mirrored surfaces shall be avoided.



4.2.2 Agricultural and Forestry Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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 Plan includes 17 parks and open space areas within the City of San Carlos. Thirteen of those sites are mapped as “Urban and Built-Up Land,” three sites are mapped as “Other Land,” and one site is mapped as “Grazing Land” by the California Department of Conservation’s (CDOC) California Important Farmland Finder online mapping tool (CDOC 2026a). Urban and Built-Up Land is occupied by structures and includes residential, industrial, commercial, institutional facilities, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. Other Land is occupied by vacant and nonagricultural land surrounded on all sides by urban development and includes brush, timber, wetland, and riparian areas not suitable for livestock grazing. Grazing Land is occupied by land on which the existing vegetation is suited to the grazing of livestock.

DISCUSSION OF IMPACTS

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

No Impact

No portion of the Plan Area is mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDOC 2026a). Therefore, the Plan would not impact any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Plan Area is zoned for park, open space, and public uses and are not under a Williamson Act contract. No impact would occur.

c, d) 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))? Result in a loss of forest land or conversion of forest land to non-forest use?

No Impact

The parks, open spaces, and facilities within the Plan Area are mapped as Urban and Built-Up Land, Other Land, and Grazing Land by the CDOC. Parks, open spaces, and facilities within the Plan Area are zoned as Park (PK), Open Space (OS), or Public (P) with a General Plan land use designation of Park, Open Space, or Public and does not include any forestland or timberland. The Plan would not convert any forest land to a non-forest use. No impact would occur.

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

The Plan would not change the land use of any of the parks included in the Plan Area. Additionally, there is no Farmland or forest land within the immediate vicinity of the Plan Area. Therefore, the Plan would not cause any changes in the existing environment which would result in the conversion of Farmland to non-agriculture use or forest land to non-forest use. 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 Impact 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 Plan Area is located in San Carlos, which is in the San Francisco Bay Area Air Basin (SFBAAB). The Bay Area Air District (BAAD) previously known as the Bay Area Air Quality Management District or BAAQMD, is the regional agency tasked with managing air quality in the region. The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (EPA), oversees regional air district activities and regulates air quality at the State level. BAAD has published the CEQA Air Quality Guidelines that are used in this assessment to evaluate air quality impacts of the Project (BAAD 2022). The 2017 Clean Air Plan (CAP) is the most current air quality management plan developed and adopted by BAAD.

Ambient Air Quality and Climate

The Bay Area has a Mediterranean climate characterized by wet winters and dry summers. During most summers, a high-pressure cell centered over the northeastern Pacific Ocean results in stable meteorological conditions and a steady northwesterly wind flow that generally keeps storms from affecting the California coast. During the winter, the Pacific high-pressure cell weakens, resulting in increased precipitation and the occurrence of storms. The highest air pollutant concentrations in the Bay Area generally occur during inversions, when a surface layer of cooler air becomes trapped beneath a layer of warmer air. An inversion reduces the amount of vertical mixing and dilution of air pollutants in the cooler air near the surface.

Air Pollutants of Concern

The CARB and U.S. EPA focus on the following air pollutants as regional indicators of ambient air quality:



- Ozone
- Coarse particulate matter (PM₁₀)
- Fine particulate matter (PM_{2.5})
- Nitrogen dioxide
- Carbon monoxide
- Sulfur dioxide
- Lead

Because these are the most prevalent air pollutants known to be harmful to human health based on extensive criteria documents, they are referred to as “criteria air pollutants.” In the SFBAAB, the primary criteria air pollutants of concern are ground-level ozone formed through reactions of oxides of nitrogen (NO_x) and reactive organic gases (ROG), PM₁₀, and PM_{2.5}. Regional air pollutants, such as ozone, PM₁₀, and PM_{2.5}, can be formed and/or transported over long distances and affect ambient air quality far from the emissions source. The magnitude and location of specific health effects from exposure to increased ozone, PM₁₀, and PM_{2.5} concentrations are the result of emissions generated by numerous sources throughout the SFBAAB, as opposed to a single project.

Localized air pollutants generally dissipate with distance from the emission source and can pose a health risk to nearby populations. Toxic air contaminants (TACs), such as diesel particulate matter (DPM), are considered localized pollutants. PM_{2.5} is also considered a localized air pollutant, in addition to being considered a regional air pollutant. Air dispersion models can be used to reliably quantify the health risks to nearby receptors associated with emissions of localized air pollutants from an individual project.

REGULATORY SETTING

Federal and State Regulations

The U.S. EPA is responsible for implementing the programs established under the Federal Clean Air Act, such as establishing and reviewing the National Ambient Air Quality Standards (NAAQS) and judging the adequacy of State Implementation Plans to attain the NAAQS. A State Implementation Plan must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. If a state fails to enforce its implementation of approved regulations, or if the EPA determines that a State Implementation Plan is inadequate, the EPA is required to prepare and enforce a Federal Implementation Plan to promulgate comprehensive control measures for a given State Implementation Plan.

CARB is responsible for establishing and reviewing the California Ambient Air Quality Standards (CAAQS), developing and managing the California State Implementation Plans, identifying TACs, and overseeing the activities of regional air quality management districts. In California, mobile emissions sources (e.g., construction equipment, trucks, and automobiles) are regulated by CARB and stationary emissions sources (e.g., industrial facilities) are regulated by the regional air quality management districts.

In accordance with the Federal Clean Air Act and California Clean Air Act, areas in California are classified as either in attainment, maintenance (i.e., former nonattainment), or nonattainment of the NAAQS and CAAQS for each criteria air pollutant, where attainment means the area is



meeting state or federal standards for a specific pollutant. To assess the regional attainment status, BAAD collects ambient air quality data from over 30 monitoring sites within the SFBAAB (BAAD 2017a). Based on current monitoring data, the SFBAAB is designated as a nonattainment area for ozone, PM₁₀ (CAAQS only), and PM_{2.5}, and is designated as an attainment or unclassified area for all other pollutants. BAAD is primarily responsible for ensuring that the NAAQS and CAAQS are attained and maintained in the SFBAAB. BAAD fulfills this responsibility by adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits, inspecting stationary sources of air pollutants, responding to citizen complaints, and monitoring ambient air quality and meteorological conditions.

City of San Carlos General Plan

The City's General Plan Environmental Management (EM) element contains the following policies and actions related to air quality:

- **Policy EM-6.4:** Implement BAAD guidelines that establish minimum screening or buffer distances between emissions sources and sensitive receptors. Exceptions may be made for projects that do not meet the distance requirements but can be determined compatible with adjacent uses through a project-specific study that determines potential health risk. Mitigation measures shall be required to reduce these risks to acceptable levels.
- **Policy EM-6.6:** BAAD recommended measures to reduce PM₁₀ and exhaust emissions associated with construction shall be applied to new development in San Carlos.
- **Action EM-6.1:** Require review by appropriate agencies of development applications that may create potential air quality impacts to assure compliance with relevant regulations.

BAAD Screening Criteria

BAAD has established screening criteria to determine whether individual projects could result in potentially significant criteria air pollutant and precursor emissions, which are described in Section 4 of the BAAD 2022 CEQA Guidelines (BAAD 2022). Preliminary screening for construction and operational criteria provides lead agencies with a conservative indication of whether a project would result in the generation of criteria air pollutants or precursors that exceed BAAD thresholds of significance. If all screening criteria for criteria air pollutants and precursors are met by a proposed project, then the lead agency need not perform a detailed assessment of the project's criteria air pollutant and precursor emissions.

Table 4-1 of the BAAD CEQA Guidelines contains single land use construction and operational criteria air pollutant and precursor screening levels for various land use categories. For operational emissions, it is assumed that projects would result in a less-than-significant impact related to criteria air pollutants and precursor emissions if: 1) the project size is at or below the operational screening level size for the applicable land use category (contained in Table 4-1 of the BAAD CEQA Guidelines); 2) operational activities would not include stationary engines and industrial sources subject to BAAD rules and regulations; and 3) operational activities would not overlap with construction activities. For construction emissions, it is assumed that projects would result in a less-than-significant impact related to criteria air pollutants and precursors if: 1) the project size is below the applicable screening level shown in Table 4-1; 2) all BAAD-recommended BMPs are included in the project design and implemented during construction; 3)



construction-related activities would not overlap with operational activities; and 4) construction-related activities would not include demolition, simultaneous occurrence of two or more construction phases, extensive site preparation, extensive material transport, or stationary sources subject to BAAD rules and regulations.

DISCUSSION OF IMPACTS

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

Less-than-Significant Impact

BAAD’s 2017 CAP is the applicable air quality plan for projects located in the SFBAAB (BAAD 2017b). Consistency may be determined by evaluating whether the proposed Plan 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 of the 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. Because the Plan would not result in any significant and unavoidable air quality impacts related to emissions, ambient concentrations, or public exposures (see discussions below), the Project would support the primary goals of the 2017 CAP.

The control measures from the 2017 CAP, which aim to reduce air pollution and greenhouse gases (GHGs) from stationary, area, and mobile sources, are organized into nine categories. As described in Table 7, the proposed Plan would be consistent with the applicable control measures from the 2017 CAP. Therefore, the Plan would not conflict with or obstruct implementation of the applicable air quality plan, and the impact would be less than significant.

Table 7. Project Consistency with BAAD 2017 Clean Air Plan

CONTROL MEASURES	PROJECT CONSISTENCY
Stationary Sources	Not applicable. The stationary source measures, which are designed to reduce emissions from stationary sources, are incorporated into rules adopted by the BAAD and then enforced by the BAAD’s Permit and Inspection programs. Because the Plan would not include new stationary sources, the stationary source control measures are not applicable to the Plan.
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. Operation of the Project would not generate a substantial increase in vehicle trips compared to the existing conditions. Therefore, the transportation control measures of the 2017 CAP are not applicable to the Project.



CONTROL MEASURES	PROJECT CONSISTENCY
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 the Plan.
Buildings	Consistent. BAAD 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. As described in <i>Section 4.2.6, Energy</i> , construction of buildings under future projects under the Plan would be required to comply with the California Green Building Standards Code, as adopted by the City of San Carlos. Further, development under the proposed Plan would adhere to implementing guidelines contained in the Plan, including many that promote energy conservation and efficiency. Therefore, the proposed Plan 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 Plan does not include any agricultural activities, the agriculture control measures of the 2017 CAP are not applicable to the Plan.
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. Since the Plan does not include the disturbance of any rangelands or wetlands, the natural and working lands control measures of the 2017 CAP are not applicable to the Plan.
Waste Management	Consistent. 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. As described further in <i>Section 4.2.19, Utilities and Service Systems</i> , the Plan would comply with local requirements for waste management. Therefore, the Plan would be consistent with the waste management control measures of the 2017 CAP.
Water	Consistent. The water control measures to reduce emissions from the water sector will reduce emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works, and promoting the use of biogas recovery systems. As described further in <i>Section 4.2.6, Energy</i> , the Plan contains implementing guidelines related to water conservation and efficiency, including “designing parks and facilities to minimize water use, incorporating efficient irrigation systems and utilizing reclaimed water sources where feasible.” Development of future projects under the Plan would be required to comply with CALGreen standards as adopted by the City, which include requirements for water efficiency for both indoor and outdoor usage. Therefore, the Plan would be consistent with the water control measures of the 2017 CAP.



CONTROL MEASURES	PROJECT CONSISTENCY
Super GHGs	Not applicable. The super-GHG control measures are designed to facilitate the adoption of best GHG control practices and policies through BAAD 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 Plan.

Source: BAAD 2017b

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 with Mitigation Incorporated

Construction of future projects under the Plan would generate temporary emissions from two primary sources: the operation of construction vehicles, which would generate criteria pollutants as well as DPM and TACs, and ground disturbance during clearing and grading, which would release fugitive dust. The amount of daily emissions generated by construction activities would depend on the quantity and type of equipment used and the total duration of construction for each project. The extent of fugitive dust (PM_{2.5} and PM₁₀) emissions would also depend on the amount of disturbed soils, the length of disturbance time, whether existing structures are being demolished, whether excavation is involved, and whether transporting excavated materials offsite or import of material to a site is necessary. Operational emissions under the Plan would result primarily from vehicle trips (mobile source emissions), natural gas and electricity uses (energy sources), landscape maintenance equipment, and other area source emissions.

BAAD’s 2022 CEQA Air Quality Guidelines describe how to analyze plan-level air quality thresholds of significance to determine if a local long-range plan has a less-than-significant impact for criteria air pollutants and precursors and local risks and hazards. The guidelines state that “for a long-range plan to have a less-than-significant impact related to criteria air pollutant and precursor impacts, the plan must satisfy two requirements: It must be consistent with current air quality plan (AQP) control measures, and the proposed plan’s projected growth rate of vehicle activity in VMT or vehicle trips must be less than or equal to the projected population growth rate.”

AQPs include clean air plans prepared per the California Clean Air Act, state implementation plans prepared per the federal Clean Air Act, and community emission reduction plans (CERPs) adopted by the regional air district. BAAD’S most current clean air plan is the 2017 CAP. As described above under Threshold a), the proposed Plan is consistent with the 2017 CAP; therefore, the Plan meets the first applicable long-range plan screening requirement.

As described further in *Section 4.2.17, Transportation*, the proposed Plan is not anticipated to result in increased VMT or vehicle trips. The type of park improvement projects contained in the Plan are intended to serve the existing community and anticipated growth identified in the City’s General Plan. Numerous park and recreational facilities are provided by the surrounding municipalities of Belmont and Redwood City, as well as regional open space areas including

Waterdog Lake & Open Space and Edgewood Park & Natural Preserve. As such, improvements to various park facilities under the proposed Plan would not generate substantial VMT or vehicle trips as people are not expected to travel from other areas to visit the City's parks. Therefore, the proposed Plan would not have a projected growth rate of vehicle activity in VMT or vehicle trips that would exceed the projected population growth rate. The Plan meets the second long-range screening requirement.

As described above, the Plan meets both of the BAAD long-range plan screening requirements for criteria air pollutant emissions. In addition, future projects under the Plan would implement BAAD-recommended screening criteria for fugitive dust control, as required by General Plan Policy EM-6.6. These measures include activities such as watering exposed soils twice daily, covering all exposed ground areas and stockpiles, and covering loads of soil to be transported off-site. Therefore, construction activities under the Plan would be less than significant.

c) *Expose sensitive receptors to substantial pollutant concentrations?*

Less-than-Significant Impact with Mitigation Incorporated

Local community risks and hazards impacts due to air pollutants are associated with TACs and PM_{2.5} because emissions of these pollutants can have significant health effects at the local level. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Residential land uses are also considered sensitive to air pollution because residents, including children and the elderly, tend to be at home for extended periods of time, resulting in sustained exposure to pollutants, if present.

BAAD's CEQA Air Quality Guidelines state that for a long-range plan to have a less-than-significant impact related to local community risks and hazards, special overlay zones should be established around existing and proposed land uses that emit TACs or PM_{2.5}, and at least a 500-foot overlay zone should be established on each side of all freeways, high-volume roadways, railyards, Ports, and rail lines using diesel locomotives. As a parks and recreation plan, the proposed Plan does not propose any new land uses that emit TACs or PM_{2.5}, or any concentrated source of mobile emissions such as freeways or rail lines.

The amount of TAC and PM_{2.5} emissions generated by future projects under the proposed Plan would depend on the total duration of construction and the quantity and type of equipment being used. The potential health effects to sensitive receptors would depend on these factors as well as the distance of the emissions source to sensitive receptors. California's Office of Environmental Health Hazard Assessment (OEHHA) does not recommend assessing cancer risk for projects lasting less than two months at the maximally exposed individual resident due to the uncertainty of cancer risk from short-term exposure to emissions (OEHHA 2015). Many future projects under the Plan would only involve construction work using hand tools and would last for 1-2 months at a maximum. Therefore, a detailed Health Risk Assessment (HRA) study would not be required for such projects. However, larger projects requiring heavy equipment and lasting for over two months could result in potential health effects to sensitive receptors, which is a potentially significant impact.

To reduce potential health effects from future projects under the Plan, Mitigation Measure AIR-1 has been developed, which requires that an HRA study be implemented for future projects requiring extensive ground disturbance that would occur for longer than two months. The HRA shall assess the potential impact of the project to sensitive receptors and recommend mitigation



measures, if needed, to reduce potential construction impacts to a less-than-significant level. With implementation of this measure, the proposed Plan would not expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant with mitigation incorporated.

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

Less-than-Significant Impact

Construction activities for future projects under the Plan would involve the use of gasoline- or diesel-powered equipment that would generate minor odors associated with vehicle exhaust. These activities would take place intermittently throughout the workday and the associated odors are expected to dissipate within the immediate vicinity of the work area. Operation of future projects under the Plan would not include uses that have been identified as potential sources of objectionable odors, such as restaurants, manufacturing plants, landfills, and agricultural and industrial operations. Therefore, Plan would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. The impact would be less than significant.

MITIGATION MEASURES

Mitigation Measure AIR-1. Construction Health Risk Assessment

Individual projects under the proposed Plan that will include the use of heavy machinery (e.g., excavators, concrete trucks, bulldozers, loaders, etc.) within 1,000 feet of a sensitive receptor for a duration of two months or longer shall prepare a Construction Health Risk Assessment (HRA) prior to project approval. A sensitive receptor includes any land use with a concentrated population of people that are highly susceptible to health effects of air pollution, such as children, the elderly, asthmatics. Therefore, land uses with a concentrated population of sensitive receptors include schools, daycare centers, playgrounds, hospitals, nursing homes, retirement homes, and residential communities. If the results of the HRA indicate that the project would have a potentially significant impact to air quality sensitive receptors, the project shall implement mitigation measures recommended in the HRA to reduce the impact to a less-than-significant level. Mitigation measures for the types of projects anticipated under the proposed Plan may include restricting vehicle idling time, implementing windbreaks, and using cleaner equipment, such as Tier 4 engines.



4.2.4 Biological Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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?	☐	☐	☐	☒

A Biological Resources Assessment Memorandum (Biological Memorandum) was prepared for the Plan by WRA, Inc. (WRA) in February 2025 (Appendix B). The Study Area for the Biological Memorandum included a total of 17 parks and open spaces in the City, totaling 136.2 acres. The Study Area did not include the Adult Community Center, Kiwanis Building, Laureola Building,



Library community room, or the Youth Center because these facilities do not contain any biological resources. The findings and recommendations included in the Biological Memorandum were based on database searches, a literature review, and a field survey of the Study Area. The information in this section of the IS/MND is based on and adapted from the Biological Memorandum.

REGULATORY SETTING – FEDERAL AND STATE

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 USFWS and the National Marine Fisheries Service (NMFS). USFWS and NMFS maintain lists of endangered and threatened plant and animal species (referred to as "listed species"). "Proposed" and "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 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 ensure 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 (California Fish and Game Code [CFG] 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 and animals on private lands, as well as extending this protection to candidate species during consideration 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, as



long as the plan covers that activity. CDFW may also authorize take for voluntary restoration projects through the Restoration Management Permit.

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 by CDFW for take of fully protected species, except for necessary scientific research and conservation purposes. The definition of "take" is the same under CFGC and the CESA. By law, CDFW may not issue an Incidental Take Permit for Fully Protected Species. Under the California Native Plant Protection Act, CDFW has listed 64 "rare" or "endangered" plant species, and prevents "take," with few exceptions, of these species.

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 (MBTA) of 1918 and CFGC 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 CNDDDB 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 2025) 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.

REGULATORY SETTING – LOCAL

San Carlos General Plan

The San Carlos General Plan contains the following applicable policies related to biological resources:

- **Policy EM-1.1:** Ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications.
- **Policy EM-1.2:** Ensure that development is consistent with all federal, State and regional regulations for habitat and species protection.
- **Policy EM-2.1:** Preserve and enhance riparian areas.
- **Policy EM-2.2:** Continue to enforce the City’s Riparian Ordinance for all four of the City’s creeks (Pulgas, Brittan, Cordilleras and Belmont) and their tributaries.

San Carlos Municipal Code

The San Carlos Municipal Code (SCMC) limits the removal or pruning of “protected trees” within the City, which include “heritage trees” and “significant trees,” as defined in Chapter 18.18 of the SCMC. No protected tree may be removed, pruned, or otherwise materially altered without a permit except, with some exceptions. Chemicals or other construction materials also may not be stored within the tree protection zone of protected trees. In addition, construction activities performed within an area ten times the diameter of a protected tree shall require submittal and implementation of a tree protection plan for review and approval by the City Arborist prior to issuance of any grading or construction permit. Underground trenching for utilities shall also avoid major support and absorbing tree roots of protected trees.

Section 18.18.070(F) includes decision-making criteria for the removal of protected trees. Tree removal permits are issued at the discretion of the City Arborist based upon the following:

- Whether the tree is dead as designated by the City Arborist.
- Whether the condition of the protected tree poses a high or extreme risk to people and property that cannot be reasonably abated to a low risk with sound arboricultural treatments.
- Whether the protected tree is 1) dying or has a severe disease, pest infestation, intolerance to adverse site conditions, or other condition, or 2) is likely to die within a year as designated by an ISA-certified arborist or the City Arborist.
- Whether the protected tree is a member of a species that has been designated as invasive or low species desirability by the City Arborist.



- Whether the protected tree interfere with existing or proposed development, repair alteration, or improvement of a site or the protected tree is causing or contributing to structural damage to a habitable building.
- Whether the removal and/or pruning is requested by a utility, public transportation agency, or other governmental agency due to a health or safety risk resulting from the protected tree's interference with existing or planned public infrastructure and there is no reasonable design alternative that would permit preservation of the protected tree.

Section 12.0.070 of the SCMC states that “the City shall not require a permit for its removal of a public tree but shall be subject to the findings in Section 18.18.070 in determining whether it should remove a protected tree which is a public tree.”

ASSESSMENT METHODOLOGY

On August 13 and 14, 2024, WRA biologists traversed over nine miles of official and unofficial trails within the Plan Area to 1) confirm vegetation communities obtained from the San Mateo County vegetation mapping dataset (2021), 2) determine if existing conditions provide suitable habitat for special-status plant or wildlife species, 3) determine the baseline conditions of habitat quality within view from trails within the Plan Area, 4) and determine the parks' consistency with existing regulations and policies. A list of incidental species observations was also compiled.

Sensitive Biological Communities

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. Additionally, the San Mateo County vegetation mapping dataset (2022) was examined to provide baseline information on plant communities. Sensitive vegetation communities are classified by the California Natural Community List (CDFW 2023) and *A Manual of California Vegetation*, Online Edition (CNPS 2024a) classifications. Each biological community in the California Natural Community List and *A Manual of California Vegetation* is given a state or global ranking, ranging from 1 to 5. These rankings are defined below, with G indicating global status, and S indicating state status for California. State and/or global rankings of 1, 2, or 3 are considered sensitive.

1. **Critically Imperiled:** At very high risk of extinction or elimination due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors.
2. **Imperiled:** At high risk of extinction or elimination due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
3. **Vulnerable:** At moderate risk of extinction or elimination due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
4. **Apparently Secure:** At fairly low risk of extinction or elimination due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
5. **Secure:** At very low risk of extinction or elimination due to a very extensive range, abundant populations or occurrences, and little to no concern from declines or threats.



Non-sensitive biological communities are those communities that are not afforded special protection under CEQA, and other state, federal, and local laws, regulations and ordinances, and generally are ranked 4 or 5 on a global or state level. These communities may provide suitable habitat for some special-status plant or wildlife species and are discussed below. Sensitive biological communities are defined as those communities that are given special protection under CEQA and other applicable federal, state, and local laws, regulations and ordinances. Applicable laws and ordinances are discussed above. Special methods used to identify sensitive biological communities are discussed below.

Wetlands and Waters

The Study Area was surveyed at a reconnaissance level to determine if any wetlands and waters potentially subject to jurisdiction by the United States Army Corps of Engineers (USACE), RWQCB, or CDFW were present. The assessment was based primarily on the presence of wetland plant indicators but may also include any observed indicators of wetland hydrology as defined by the USACE Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008). Evidence of wetland hydrology can include evidence such as visible inundation or saturation, surface sediment deposits, algal mats and drift lines, and oxidized root channels. Given that the site visits did not include a routine-level wetland delineation and was only reconnaissance level, soils were not examined in the field as part of this assessment. Streams were remotely mapped in ArcGIS using hydrologic modeling tools including aerial imagery (Google Earth 2024), the California Aquatic Resource Inventory (CARI) dataset (2023) and topography data.

Special-status Species

Potential occurrence of special-status species in the Study Area was evaluated by first determining which special-status species occur in the vicinity of the Study Area through a literature and database search. Database searches for known occurrences of special-status species was for the San Mateo, Redwood Point, Woodside, and Palo Alto 7.5-minute U.S. Geological Survey (USGS) quadrangles. The following sources were reviewed to determine which special-status plant and wildlife species have been documented to occur in the vicinity of the Study Area:

- California Natural Diversity Database (CNDDB) (CDFW 2025a)
- CNPS Inventory (CNPS 2025)
- USFWS Information for Planning and Consultation (USFWS 2025)
- California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- San Mateo County vegetation mapping databased (County of San Mateo 2022)

ENVIRONMENTAL SETTING

Vegetation Communities and Other Land Cover

Non-sensitive biological communities in the Study Area include developed/disturbed, ornamental, annual grassland, coastal scrub/chaparral, closed-cone pine-cypress, coastal oak woodland, and eucalyptus groves. Sensitive biological communities include California bay woodland, California buckeye groves, saline emergent wetland, freshwater emergent wetland, intermittent streams,



ephemeral streams, and other waters. Descriptions of land cover types are included below. Land cover types within the Study Area are shown in Appendix B. Biological Resources Memorandum.

Non-Sensitive Land Cover Types

Developed/Disturbed (no vegetation alliance). CDFW Rank: Not sensitive. This land cover type includes areas which have been cleared of natural vegetation. Developed areas include paved areas, structures, playgrounds, sports fields, and areas covered with permeable paving surfaces such as decomposed granite or mulch. Disturbed areas include undeveloped areas which have been previously disturbed and are currently dominated by weedy and/or ruderal vegetation, including yellow star-thistle (*Centaurea solstitialis*), smilo grass (*Stipa miliacea*), stinkweed (*Dittrichia graveolens*), fennel (*Foeniculum vulgare*), iceplant (*Carpobrotus edulis*), French broom (*Genista monspessulana*), and fountain grass (*Pennisetum setaceum*). Developed/disturbed areas are not classified as sensitive by the USACE, RWQCB, CDFW, or any other regulating agency.

Ornamental (no vegetation alliance). CDFW Rank: Not sensitive. Ornamental areas have been cleared of natural vegetation and now contain actively managed landscaping and City-maintained trees. This land cover type includes landscaping, turfgrass lawns, pollinator gardens, and street trees. Common ornamental species in the Study Area included turf grasses, white clover (*Trifolium repens*), and common plantain (*Plantago major*) in lawns; lavender (*Lavandula* sp.), roses (*Rosa* sp.), ornamental rosemary (*Rosmarinus officinalis*), and bank catclaw (*Acacia redolens*) bushes. Common ornamental trees included native species such as coast redwood (*Sequoia sempervirens*), Monterey pine (*Pinus radiata*), and coast live oak (*Quercus agrifolia*), as well as common ornamental species such as European plum (*Prunus domestica*), Persian silk trees (*Albizia julibrissin*), crepe myrtle (*Lagerstroemia indica*), Southern magnolia (*Magnolia grandiflora*), olive (*Olea europaea*), red pine (*Pinus rubra*), strawberry tree (*Arbutus unedo*), callery pear (*Pyrus calleryana*), London plane (*Platanus xhispanica*), Peruvian pepper tree (*Schinus molle*), and mulberry (*Morus* sp.). Ornamental areas are not classified as sensitive by the USACE, RWQCB, CDFW, or any other regulating agency.

Annual Grassland (no vegetation alliance). CDFW Rank: Not sensitive. Annual grassland is common throughout California and consists of herbaceous vegetation dominated by non-native grasses and forbs. Sparse shrubs or trees may be present at low cover (< 5% absolute cover). Within the Study Area, dominant species in the annual grasslands included slim oat (*Avena barbata*), brome fescue (*Festuca bromoides*), rattlesnake grass (*Briza maxima*), Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), foxtail barley (*H. murinum*), Italian ryegrass (*Festuca perennis*), barley (*Hordeum murinum*), common plantain, yellow star-thistle, purple star-thistle (*Centaurea calcitrapa*), Italian thistle (*Carduus pycnocephalus*), and Torrey's melic grass (*Melica torreyana*). Annual grassland was common in open spaces and neighborhood parks within the Study Area. This land cover is not classified as sensitive by the USACE, RWQCB, CDFW, or any other regulating agency.

Coastal Live Oak Woodland (various vegetation alliances). CDFW Rank: Not Sensitive. Coastal oak woodlands are common throughout open space areas (Big Canyon Park, and Eaton Park), parks (Arguello Park, Chilton Park, North Crestview Park, Vista Park, and Heather Dog Exercise Area), within the Study Area. Typical tree species in the Study Area include California buckeye (*Aesculus californica*), California bay (*Umbellularia californica*), and toyon (*Heteromeles arbutifolia*). Patches of non-native trees or escaped ornamental trees were also common, including olive, pines (*Pinus ponderosa*, *P. halepensis*, *P. resinosa*), Chinese pistache (*Pistache*



chinensis), and prickly pear (*Opuntia* sp.). Common shrub species within coastal oak woodland include poison oak (*Toxicodendron diversilobum*), snowberry (*Symphoricarpos albus*), sticky monkey flower (*Diplacus aurantiacus*), coyote brush (*Baccharis pilularis*), and toyon. The herbaceous layer is composed of annual grass species and shade tolerant native herbs. Common herbaceous species include Torrey's melic grass, dogtail grass (*Cynosurus echinatus*), maidenhair fern (*Adiantum jordanii*), soapplant (*Chlorogalum pomeridianum*), and tall sock-destroyer (*Torilis arvensis*).

Coastal oak woodlands include two alliances, the mixed oak woodland (*Quercus* [*agrifolia*, *douglasii*, *garryana*, *kelloggii*, *lobata*, *wislizeni*] woodland alliance) and the coast live oak woodland (*Q. agrifolia* woodland alliance). Both alliances are ranked G4/S4, and this land cover is not classified as sensitive to by the USACE, RWQCB, CDFW, or any other regulating agency.

Coastal Scrub/Chaparral (various vegetation alliances). CDFW Rank: Not sensitive. Coastal scrub occurs in the open space areas of Big Canyon Park and Eaton Park as well as North Crestview Park and Vista Park, primarily on dry, south-facing slopes, open hillsides, and steep, well-drained canyon walls. This land cover type consists of an intermittent to continuous shrub canopy which is usually less dense than chaparral. Within the Study Area, coastal scrub/chaparral is composed of a mix of several vegetation alliances, including coyote brush scrub (*Baccharis pilularis* shrubland alliance, G5/S5), California sagebrush scrub (*Artemisia californica* shrubland alliance, G5/S5), poison oak scrub (*Toxicodendron diversilobum* shrubland alliance, G4/S4), and chamise chaparral (*Adenostoma fasciculatum* shrubland alliance, G5/S5), each dominated by the respective species. Additional common non-dominant species included sticky monkey flower, toyon, Canada horseweed (*Erigeron canadensis*), sage (*Salvia* sp.), and occasional French broom. Occasional coast live oak occur within this community, but the individual oak trees are still relatively small and at low cover. Where an herbaceous layer is present, it was composed of non-native annual grasses typical of the annual grasslands.

Within Big Canyon Park, large portions of the coastal scrub/chaparral bordering residences had been extensively grazed and trimmed back to short basal stems. The vegetation alliances within this land cover type are ranked G4/G4 – G5/S5, and coastal scrub/chaparral is not classified as sensitive to by the USACE, RWQCB, CDFW, or any other regulating agency.

Closed-cone Pine-Cypress (*Hesperocyparis macrocarpa* - *Pinus radiata* woodland semi-natural alliance). CDFW Rank: GNA/SNA. Closed-cone pine-cypress occurs within Highlands Park, Crestview Park, and North Crestview Park. This community is composed of planted trees, groves, and windbreaks which have naturalized in coastal areas. Closed-cone pine-cypress is classified as the *Hesperocyparis macrocarpa* - *Pinus radiata* woodland semi-natural alliance and is defined by the presence of a moderately tall (<50 meters) open to continuous tree canopy dominated by Monterey cypress (*Hesperocyparis macrocarpa*) and/or introduced pines (*Pinus* spp.) (CNPS 2024b). Within the Study Area, dominant species included Monterey cypress, Monterey pines (*Pinus radiata*), red pine (*Pinus resinosa*), and Aleppo pine (*Pinus halepensis*). A sparse shrub layer was composed of coyote bush, and herbaceous species included non-native annual grassland species (as described above). Closed-cone pine cypress is ranked GNA/SNA, and this land cover is not classified as sensitive to by the USACE, RWQCB, CDFW, or any other regulating agency.

Eucalyptus Groves (*Eucalyptus* [*globulus*, *camaldulensis*] woodland semi-natural alliance). CDFW Rank: GNA/SNA. Eucalyptus groves, not including isolated eucalyptus trees, occur in



Arguello Park, Eaton Park, and the Heather Dog Exercise Area. Eucalyptus groves are dominated by one of several eucalyptus species, which are not native to North America. Eucalyptus groves are frequently situated in rural and semi-urbanized settings, along streams, and coastal hills. This community is ranked GNA/SNA, and it is not classified as sensitive to by the USACE, RWQCB, CDFW, or any other regulating agency.

Sensitive Land Cover Types

California Bay Woodland (*Umbellularia californica* woodland alliance, G4/S3). CDFW Rank:

Sensitive. California bay woodlands are known from the inner and outer Coast Ranges, Transverse Ranges, and Sierra Nevada Foothills from Del Norte County south to San Diego County. This vegetation community is typically located on terraces, canyon bottoms, north-facing slopes, and rock outcrops underlain by shallow to deep sand to loam substrates (CNPS 2024a). California bay woodlands are defined by their intermittent to continuous tree canopy dominated by California bay, with common co-dominant tree species including California buckeye (*Aesculus californica*), oaks (*Quercus agrifolia*, *Q. chrysolepis*, *Q. wislizeni*), big-leaf maple (*Acer macrophyllum*), and alder (*Alnus rhombifolia*, *A. rubra*), among others.

Within the Study Area, California bay woodland occurs in Eaton Park and cover five acres along streams in canyon bottoms. This land cover type intergrades with the neighboring coastal oak woodlands. This community is ranked G4/S3 and is classified as sensitive by CDFW.

California Buckeye Groves (*Aesculus californica* woodland alliance, G3/S3). CDFW Rank:

Sensitive. California buckeye groves are known from the southern Cascade Range, Coast Ranges, northern Transverse Range, and Sierra Nevada Foothills from Siskiyou County south to Ventura County. This vegetation community is typically located on shallow, moderate to well-drained soils in canyons and alluvial terraces (CNPS 2024b). California buckeye groves are defined by an open to continuous tree canopy dominated by California buckeye.

Within the Study Area, California buckeye groves occur in Eaton Park along a northeast-facing slope, and cover 2.55 acres. This community commonly intergrades with the California bay and coastal oak woodland. Species within this community include California buckeye, California bay, coast live oak, oceanspray (*Holodiscus discolor*), poison oak, wood fern, tall sock-destroyer, snowberry, and annual grasses including slim wild oat (*Avena barbata*) and ripgut brome (*Bromus diandrus*). California buckeye groves are ranked G3/S3 and are classified as sensitive by CDFW.

Intermittent Stream (no vegetation alliance). Intermittent streams are linear features that have indicators of an ordinary high water mark (OHWM) and within which water flows for a portion of the year, generally drying out during the driest time of the year. Two blue-line intermittent streams, Pulgas Creek and Cordilleras Creek, occur in San Carlos city limits. Within the Study Area, 0.27 acres of intermittent streams occur in Big Canyon and Eaton Parks. Indicators of the OHWM include scour, cobble sorting, and a break in vegetation. Remnant flow and remnant in-channel pools were common in intermittent streams during the August 2024 field survey. Intermittent streams are potential jurisdictional aquatic resources, under jurisdiction of the USACE, RWQCB, and CDFW.

Ephemeral Stream (no vegetation alliance). Ephemeral drainages are narrow, shallow, linear features that exhibit indicators of an OHWM and convey flows only during or immediately after a



precipitation event but remain dry otherwise. Ephemeral streams cover 0.13 acres within the Study Area in Big Canyon and Eaton Parks. Indicators of the OWHM include scouring and cobble sorting. Intermittent streams sometimes show a break in vegetation and support facultative upland species including poison oak within the channel. Ephemeral streams are potential jurisdictional aquatic resources, under jurisdiction of the RWQCB and CDFW.

Freshwater Emergent Wetland (no vegetation alliance). Freshwater emergent wetlands are areas which experience frequent flooding, and are defined by the dominance of erect, rooted herbaceous hydrophytes (wetland-adapted plant species). Within the Study Area, freshwater emergent wetlands cover 0.26 acre of Arguello Park. Dominant species within this community included California buckeye in the tree layer, California blackberry (*Rubus ursinus*), and poison oak in the shrub layer, and tall cyperus (*Cyperus eragrostis*), umbrella sedge (*C. squarrosus*), Italian rye grass (*Festuca perennis*), Torrey's melic grass, and English Ivy (*Hedera helix*) in the herbaceous layer. Indicators of the OWHM included a distinct wrack line and scour. Freshwater emergent wetlands are potential jurisdictional aquatic resources, under jurisdiction of the RWQCB and CDFW, and potentially under the jurisdiction of the USACE as well. A USACE-verified delineation would be required to determine the extent of USACE jurisdiction.

Special-status Plant Species

Based upon a review of the resource databases listed under *Assessment Methodology* above, 54 special-status plant species have been documented in the vicinity of the Study Area. Of these species, 12 were determined to have moderate to high potential to occur or are present within the Study Area, including:

- Franciscan onion (*Allium peninsulare* var. *franciscanum*), Rank 1B.2, Known to Occur
- Bent-flowered fiddleneck (*Amsinckia lunaris*), Rank 1B.2, Moderate Potential
- Brewer's calandrinia (*Calandrinia breweri*), Rank 4.2, High Potential
- San Francisco collinsia (*Collinsia multicolor*), Rank 1B.2, Known to Occur
- Panicle tarplant (*Deinandra paniculata*), Rank 4.2, Known to Occur
- Western leatherwood (*Dirca occidentalis*), Rank 1B.2, Known to Occur
- California bottle-brush grass (*Elymus californicus*), Rank 4.3, Moderate Potential
- San Mateo woolly sunflower (*Eriophyllum latilobum*), FE, SE, Rank 1B.1, Moderate Potential
- Fragrant fritillary (*Fritillaria liliacea*), Rank 1B.2, Moderate potential
- Arcuate bush-mallow (*Malacothamnus arcuatus*), Rank 1B.2, High potential
- Woodland woollythreads (*Monolopia gracilens*), Rank 1B.2, Known to Occur
- Choris's popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*), Rank 1B.2, Moderate Potential

Special-status Wildlife Species

Based on a review of literature and resource databases, 41 special-status wildlife species have been documented in the vicinity of the Plan Area. Most of these species have no potential to occur on-site due to a lack of suitable habitat features. Eight special-status species have



moderate potential to occur in the immediate vicinity of or in portions of the Plan Area, including the following:

- San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), CDFW Species of Special Concern
- White-tailed kite (*Elanus leucurus*), CDFW Fully Protected Species
- Hoary bat (*Lasiurus cinereus*), WBWG Medium Priority
- Pallid bat (*Antrozous pallidus*), CDFW Species of Special Concern, WBWG High Priority
- Olive-sided flycatcher (*Contopus cooperi*), CDFW Species of Special Concern
- Northern harrier (*Circus hudsonius [cyaneus]*), CDFW Species of Special Concern
- American badger (*Taxidea taxus*), CDFW Species of Special Concern
- Crotch's bumble bee (*Bombus crotchii*), State candidate

Critical Habitat

A review of the background literature showed that the Plan Area does not contain any critical habitat as designated by the USFWS.

PARKS MASTER PLAN GUIDELINES

- Plan for long-term tree succession, proactively planting new trees to replace aging or declining canopy.
- Integrate natural systems into park design, limiting lawn areas to active-use spaces and emphasizing plantings that provide seasonal interest and habitat value.
- Use plant palettes appropriate to San Carlos' climate, consistent with Climate Zone 10a and USDA Plant Hardiness Zone guidance.

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 Impact with Mitigation Incorporated

Special-status Plants

Twelve special-status plant species are known to occur or have potential to occur within the Study Area, including Franciscan onion, Bent-flowered fiddleneck, Brewer's calandrinia, San Francisco collinsia, paniculate tarplant, Western leatherwood, California bottle-brush grass, San Mateo woolly sunflower (*Eriophyllum latilobum*), fragrant fritillary, arcuate bush-mallow, woodland woollythreads, and Choris's popcornflower. These species have the potential to occur in several habitats present within the Plan Area, particularly in areas where associated species are found, including annual grassland, coastal scrub/chaparral, closed-cone pine-cypress, coastal oak woodland, and intermittent and ephemeral streams. Many of the proposed improvements included in the Plan would only impact already disturbed and/or developed areas which would



not result in any impact to special-status plants. However, ground-disturbing activities and vegetation removal in natural vegetation communities (i.e., all other land cover types aside from developed and ornamental) with the potential to support special-status plant species have the potential to result in direct impacts to special-status plants, if they are present.

To reduce potential impacts to special-status plants, Mitigation Measure BIO-1a shall be implemented, which requires that special-status plant surveys be conducted prior to any proposed ground disturbance in natural land cover types. Within the Plan Area, natural land cover types are present at Arguello Park, Big Canyon Park, Chilton Park, Crestview Park, Eaton Park, Heather Dog Exercise Area, Highlands Park, North Crestview Park, and Vista Park. Surveys shall be conducted within the proposed disturbance area one year prior to development during the appropriate timeframe when plants with moderate potential to occur are evident and identifiable. If no special-status plants are found, then no further measures are required.

If special-status plants are identified, Mitigation Measure BIO-1b would be implemented, which requires measures for avoidance of special-status plants during construction via established activity exclusion zones. If plants cannot be avoided, seeds will be harvested and stored for reintroduction into a preserved portion of the project site, and a Habitat Management Plan or similar document will be prepared and implemented. The Habitat Management Plan shall contain monitoring methods and performance criteria for post-construction monitoring, including criteria for the successful establishment and preservation of special-status plants within the reintroduction area.

With implementation of these mitigation measures, the proposed Plan would not have a significant impact on special-status plant species. The impact would be less than significant with mitigation incorporated.

Special-status Wildlife

A variety of special-status wildlife species have the potential to occur within the Plan Area. Eight special-status wildlife species have the potential to occur within the Plan Area, including San Francisco dusky-footed woodrat, white-tailed kite, burrowing owl, hoary bat, pallid bat, olive-sided flycatcher, Northern harrier, American badger, and Crotch's bumble bee. In addition, native nesting birds protected under the MBTA also have the potential to be present within the Plan Area. An analysis of potential impacts to each species is included below.

San Francisco Dusky-footed Woodrat

During the field survey conducted by WRA in 2024, evidence of woodrat activity was identified within Big Canyon Park, Eaton Park, and Arguello Park. Numerous woodrat structures were observed both along riparian corridors and in more upland thickets of various types of shrubs, many within 30 to 50 feet of existing trails. This species should be assumed to have potential to nest in any portion of the Plan Area that contains a relatively dense understory.

If active nests or individuals of this species are present in work areas for future projects implemented under the Plan, direct impacts may occur by destroying active nests or causing individual mortality. To avoid and minimize impacts to dusky-footed woodrat, Mitigation Measure BIO-2 and BIO-3 would be implemented.



Mitigation Measure BIO-2 requires that worker environmental awareness training be given to all personnel involved in project construction. The training shall consist of a brief presentation of special-status species that have potential to occur in the project area, as well as an explanation of their protection under state and federal legislation, and a list of measures being taken to reduce impacts to these species during construction.

Mitigation Measure BIO-3 requires pre-construction surveys for woodrat structures prior to vegetation removal and/or ground disturbance. If avoidance of woodrat structures is not possible, the structures shall be dismantled by hand under supervision of a qualified biologist; however, if woodrat young are encountered during the dismantling process, materials shall be placed back and a work exclusion buffer of 50 feet shall be placed around the structure for at least two weeks or until the young have left the structure.

Implementation of these two measures would ensure that proposed park projects under the Plan would not have a significant effect on San Francisco dusky-footed woodrat.

American Badger

American badger is found uncommonly within the Plan Area region in drier, open stages of most scrub, forest, and herbaceous habitats where friable soils and prey populations are present. Badgers are typically solitary and nocturnal, digging burrows to provide refuge during daylight hours. Burrow entrances are usually elliptical (rather than round), and each burrow generally has only one entrance. This species is likely to avoid highly trafficked areas where trails have been relatively compacted, or densely wooded or vegetated habitats within the Study Area. However, friable soils and more open habitats exist in higher elevation locations (i.e., on grassy slopes) within Big Canyon Park and Eaton Park could support this species. No large mammal burrows were observed during the site visits.

Ground-disturbing in undeveloped areas of the Plan Area (i.e., all land cover types aside from developed and ornamental) could result in potential direct or indirect impacts to American badger via destruction of burrows, which is a potentially significant impact. Mitigation Measure BIO-2 would be implemented, as described above, which requires a worker environmental awareness training for construction personnel.

In addition, Mitigation Measure BIO-4 would be implemented, which requires pre-construction surveys for badger dens no more than two weeks prior to construction activity in any suitable habitat. If dens are found, but are inactive, the den shall be excavated by hand and backfilled to prevent badgers from using the burrow. If an active den is found, a qualified biologist shall determine the state of occupancy and implement avoidance measures depending on whether the den is occupied by a single mammal or is natal den.

With implementation of these measures, park projects under the proposed Plan would not have a significant effect on American badger.

Crotch's Bumble Bee

Crotch's bumble bee occurs primarily in central and southern California, from coastal areas inland to the foothills. Crotch's bumble bee occurs in grassland and scrub habitats and has also been documented in agricultural areas. The Study Area is within the current range of this species. Crotch's bumble bee may occur in grassland and scrub habitats where flowering resources and



burrowing rodent activity are present, mostly likely within Big Canyon Park, Eaton Park, and Arguello Park. Note, the timing of vegetation management may affect the availability of flowing resources during different periods of the season. For example, if grasslands within the Study Area are heavily grazed in the summer, the Study Area may function as early season foraging habitat but may not support nesting.

If Crotch's bumble bees are present in the Plan Area, grading activities within grassland habitat may result in the mortality of individuals and their nests, which is a potentially significant impact. Mitigation Measure BIO-2 would be implemented, as described above, which requires worker environmental awareness training for construction personnel.

In addition, Mitigation Measure BIO-5 would be implemented, which requires pre-construction surveys for Crotch's bumble bee prior to commencement of construction activities in grassland habitat. If Crotch's bumble bees are observed during the survey, construction shall not commence until CDFW provides further guidance, which may include additional surveys by a bumble bee expert, waiting until the colony active season ends, obtaining take authorization or other actions.

With implementation of these measures, park projects under the proposed Plan would not have a significant effect on Crotch's bumble bee.

Special-status Bats

Hoary bat and pallid bat are known to occur in a variety of habitats within the San Francisco Bay Area. In particular, wooded habitats within the Plan Area, particularly in the vicinity of riparian areas, could provide sources of forage for hoary bat and other non-special-status bats with baseline protections. In addition, suitable roost sites, such as tree snags, basal cavities, and rock outcrops/crevices were observed in the Study Area, particularly in Big Canyon Park, Eaton Park, and Arguello Park. Numerous bat boxes were also observed along existing trails that may provide roosting habitat for pallid bats or other bat species with baseline protections.

Tree removal associated with the proposed Plan could result in the direct removal of active bat roosts protected under the CFGC and CEQA, which is a potentially significant impact. Mitigation Measure BIO-2 would be implemented, as described above, which requires worker environmental awareness training for construction personnel.

In addition, Mitigation Measure BIO-6 shall be implemented, which requires bat roosts assessments to be performed by a qualified biologist no more than 30 days prior to tree removal to determine if bat roosts are present. If roosts are detected, the roosts shall be protected by a no-disturbance buffer of no less than 100 feet. In addition, all felled trees shall remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats present within the tree to escape.

With implementation of these measures, park projects under the proposed Plan would not have a significant effect on roosting bats.

Special-status and Nesting Birds

Special-status birds, including white-tailed kite, olive-sided flycatcher, and Northern harrier have potential to occur within the Study Area. In addition to special-status nesting birds, common native avian species may also nest within the Plan Area (including facilities which were excluded



from the Study Area) and non-special status native nesting birds may be similarly affected by Project activities. Grading, vegetation removal, and demolition of existing structures may directly impact the nests of protected species or may impact these species through visual and auditory disturbance sufficient to cause nest abandonment. Due to the protected status of these species under both the MBTA and CDFW, impacts to special-status and common native nesting birds would also be considered a potentially significant impact under CEQA.

To reduce potential impacts to special-status and nesting birds, Mitigation Measure BIO-2 would be implemented, which requires a worker environmental awareness training for construction personnel.

In addition, Mitigation Measure BIO-7 would be implemented, which requires pre-construction nesting bird surveys for all project work that would occur within the nesting bird season. If nests are found, a no disturbance buffer must be established around the nest which shall be designated as an Environmentally Sensitive Area where no project activities shall occur until the young birds have fully fledged or the nest becomes otherwise inactive.

With implementation of these measures, park projects under the proposed Plan would not have a significant effect on special-status or nesting birds.

With implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, and BIO-7, the proposed Plan would not have a significant effect on any special-status plant or wildlife species. The impact would be less than significant with mitigation incorporated.

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?*

Less-than-Significant Impact with Mitigation Incorporated

The Plan Area contains sensitive land cover types such as California bay woodland, California buckeye groves, freshwater emergent wetland, intermittent streams, and ephemeral streams.

The majority of proposed improvements included in the Plan would be within developed areas or in non-sensitive land cover types. The only parks within the Plan Area that contain sensitive land cover types are Arguello Park, Big Canyon Park, and Eaton Park.

Arguello Park contains one sensitive land cover type: freshwater emergent wetland. All proposed improvements at Arguello Park would take place within already developed areas, aside from the following for which plans are not yet developed:

- Construction of a new asphalt pump track,
- Construction of a vista point,
- Formalization or realignment of trails,
- Improving access to the picnic area, and
- Installation of a mini ropes course

If these improvements encroach on freshwater emergent wetland at Arguello Park, a potentially significant impact would occur, and the City would be required to implement Mitigation Measure



BIO-8. This measure requires the City to consult with applicable regulatory agencies, including CDFW, San Francisco Bay RWQCB, and USACE for any planned improvements that could impact aquatic resources. The City would be required to consult with the applicable agency or agencies by characterizing the impacts to aquatic resources, which may require a formal wetland delineation, and implementing mitigation measures to avoid, reduce, or compensate for impacts to jurisdictional aquatic resources.

With implementation of Mitigation Measure BIO-8, the proposed Plan would not result in a significant impact to freshwater emergent wetlands at Arguello Park. The impact would be less than significant with mitigation incorporated.

Big Canyon Park contains two sensitive land cover types: ephemeral stream and intermittent stream. All proposed improvements at Big Canyon Park would take place within already developed areas, aside from the following for which plans are not yet developed:

- Construction of a vista point
- Construction of new restrooms and associated infrastructure
- Paving of an ADA trail
- Installation of erosion control measures and a floodplain detention basin

If these improvements encroach on ephemeral stream or intermittent stream areas within Big Canyon Park, a potentially significant impact would occur, and the City would be required to implement Mitigation Measure BIO-8. As described above, this measure requires the City to consult with regulatory agencies regarding potential impacts to aquatic resources and implement mitigation measures as included in the final permit conditions.

With implementation of Mitigation Measure BIO-8, the proposed Plan would not result in a significant impact to ephemeral stream or intermittent stream at Big Canyon Park. The impact would be less than significant with mitigation incorporated.

Eaton Park contains four sensitive land cover types: California bay woodland, California buckeye grove, ephemeral stream, and intermittent stream. Planned improvements to Eaton Park include updating wayfinding signage, improving existing natural surface trails, and paving an existing fire road. Therefore, improvements at Eaton Park would not occur outside of already developed areas and would not impact any sensitive land cover types.

The impact would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated

Aquatic resources, including wetlands, are present within Arguello Park, Big Canyon Park, and Eaton Park. As described above in Threshold b), if proposed improvements at Arguello Park and Big Canyon Park would impact any potential jurisdictional aquatic resources, the City would be required to implement Mitigation Measure BIO-8. This measure requires that the City consult with regulatory agencies such as CDFW, RWQCB, and USACE and implement all requirements of



the final permit conditions. As described above in Threshold b), improvements at Eaton Park would be within already developed areas; therefore, no impact to aquatic resources would occur.

With implementation of this Mitigation Measure BIO-8, the proposed Plan would not have a substantial adverse effect on state or federally protected wetlands. The impact would be less than significant.

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

Less-than-Significant Impact

The proposed Plan would include improvements to existing parks within San Carlos, primarily in the form of infrastructure upgrades, trails rehabilitation, and construction of park infrastructure such as restrooms, benches, and shade structures. These improvements would not change existing use of the parks in a way that would interfere with movement of migratory fish or wildlife or with established wildlife corridors. Wildlife species may pass through parks within the Plan Area or use portions of the Plan Area for hunting, foraging, or nesting. While construction of some individual projects under the Plan may deter wildlife from using sites during construction due to noise, these impacts would be temporary and would only occur during working hours during the day.

Operation of the proposed Plan would not interfere with wildlife movement within the Plan Area or obstruct wildlife from using the Plan Area for foraging, hunting, nesting, or other purposes. Therefore, the impact of the proposed Plan would be less than significant.

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

Less-than-Significant Impact

The SCMC prohibits the removal or pruning of any protected tree without the issuance of a tree removal permit. However, as stated in Section 12.0.070 of the SCMC, the City is not required to obtain a permit for its own removal of a public tree, but shall be subject to the findings in Section 18.18.070 in determining whether it should remove a protected tree which is a public tree. The majority of proposed improvements under the Plan would not require tree removal; however, mid- and long-range improvements may require tree removal for siting and construction of new facilities. In accordance with the SCMC, the City would be required to use the findings in Section 18.18.070 to determine whether the removal of protected trees is warranted. However, the City is not required to obtain a permit for its own removal or protected public trees. The proposed Plan would not conflict with the City's tree ordinance.

The City's General Plan contains various policies aimed at protecting biological resources, such as Policy EM-1.1 and EM-1.2, which direct the City to ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications, and ensure that development consistent with all federal, State and regional regulations for habitat and species protection. Potential impacts of the Plan regarding special-status species and their habitats and sensitive natural communities are analyzed under Threshold a) and b) and would be less than significant with the incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7.



General Plan Policy EM-2.1 directs the City to preserve and enhance riparian areas, and Policy EM-2.2 directs the City to continue to enforce the Riparian Ordinance for all four of the City's creeks (Pulgas, Brittan, Cordilleras and Belmont) and their tributaries. As described under Threshold c), the City shall implement Mitigation Measure BIO-8 for any potential impacts to aquatic resources. This measure requires that, if potential impacts to aquatic resources are proposed, the City shall consult with applicable regulatory agencies such as the USACE, RWQCB and CDFW, and adhere to all requirements in the final permit conditions. This measure would ensure that any impacts to riparian areas would be less than significant.

Therefore, the proposed Plan would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The impact would be less than significant.

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

There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans that apply to the Plan Area. No impact would occur.

MITIGATION MEASURES

Mitigation Measure BIO-1a. Special-status Plants

Targeted surveys for special-status plant species shall be conducted prior to ground-disturbing activities for any projects that would result in ground disturbance outside of developed or ornamental land cover. Botanical surveys will be conducted within the work area the year prior to development by a qualified biologist during the appropriate timeframe when plants with moderate potential to occur are evident and identifiable in accordance with CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities, dated March 20, 2018, and available at: Survey and Monitoring Protocols and Guidelines (CDFW.ca). Three appropriately timed protocol-level surveys will be performed, one during mid spring (March-May), one during late spring/early summer (May-June), and one during mid-late summer (July-August). Reference site visits will be conducted to confirm that the target species are in bloom during the surveys. If no special-status plant species are found, then the project will not have any impacts to special-status plant species and no additional mitigation measures would be necessary.

Mitigation Measure BIO-1b. Special-status Plants

If special-status plant species are found, populations or individuals will be flagged and fully avoided by a 10-foot no-disturbance buffer where no ground-disturbing activities will take place, including construction staging or other temporary work areas. Activity exclusion zones for special-status plant species will be established prior to activities around each occupied habitat site, the boundaries of which will be clearly marked with standard orange plastic construction exclusion fencing or its equivalent. The size of activity exclusion zones may be determined through consultation with a qualified biologist.



If special-status plants are present and impacts to those plant populations cannot be avoided, seed or other propagules will be harvested from at least 50 percent of plants within areas of impact. Harvested seed or propagules will be stored for reintroduction into the preserved portion of the project site. A Habitat Management Plan (HMP), or similar document(s) by a different name(s), will be prepared for the reintroduction area. The HMP will be provided to the City and CDFW for approval. The HMP will provide detailed information to the CDFW and the City on the quality of preserved habitat, location of the preserved occurrences, provisions for protecting and managing the areas, the responsible parties involved, and other pertinent information that demonstrates the feasibility of the compensation. An HMP will identify appropriate mitigation ratios developed in consultation with CDFW.

The HMP will also include monitoring methods and performance criteria for post-construction monitoring, including criteria for the successful establishment and preservation of special-status plants within the reintroduction area. Success criteria include:

- Habitat acreage for special-status plants in the reintroduction area will be equivalent to the acreage occupied by those species during the most recent survey that occurs prior to construction.
- Populations of special-status plants will be monitored annually for a minimum of 5 years following establishment of the reintroduction area.
- Management of invasive species such that species rated as “High” by the California Invasive Plant Council, with the exception of common non-native grasses that dominate undeveloped habitats in the surrounding area, will not collectively exceed 5 percent absolute cover within the reintroduction area.
- Based on the results of post-construction monitoring, adaptive management actions will be implemented, if necessary. Adaptive management actions may include reseeding and treatment of invasive species.

If propagation efforts do not meet performance standards, then the loss of individuals of special-status plants shall be compensated for through the acquisition, protection, and subsequent management of other existing occurrences, as approved by CDFW and the City.

Mitigation Measure BIO-2. Worker Environmental Awareness Training

For projects under the proposed Plan that involve ground-disturbing activities in undeveloped land cover (i.e., any land cover type within the Plan Area other than developed and ornamental), a qualified biologist shall provide a worker environmental awareness program (WEAP) training to all personnel involved in project construction. At a minimum, the WEAP shall consist of a brief presentation by persons knowledgeable about the biology of sensitive species with potential to occur in the project footprint, and about their legislative protection to explain concerns to contractors and their employees involved with implementation of the project. The WEAP will include a description of any special-status species with potential to occur in the project footprint, its habitat needs, any reports of occurrences in the area, an explanation of the status of these species and their protection under State and Federal legislation, and a list of measures being taken to reduce impacts to these species during construction.



Mitigation Measure BIO-3. San Francisco Dusky-footed Woodrat

To avoid potential impacts to San Francisco dusky-footed woodrat, the following measures will be implemented:

- Prior to vegetation removal and/or ground disturbance within suitable habitat, a pre-construction survey for woodrat structures shall be conducted by a qualified biologist. Any woodrat structures found during the survey shall be flagged and avoided.
- If avoidance is not possible, then structures to be impacted shall be dismantled by hand under the supervision of a qualified biologist. Dismantled nest material shall be moved to adjacent vegetated areas that will not be disturbed.
- If woodrat young are encountered during the dismantling process, materials shall be placed back on the structure and a work exclusion buffer of 50 feet placed around the structure. The structure shall remain undisturbed for at least two weeks to allow the young to mature and leave of their own accord, or for the female to move the young. After the avoidance period, the nest dismantling process may begin again.

Mitigation Measure BIO-4. American Badger

The following minimization measure will be implemented for any ground-disturbing activities in undeveloped land cover (i.e., any land cover type other than developed and ornamental) within Big Canyon Park and Eaton Park to avoid potential impacts to American badger:

- A qualified biologist shall conduct a focused pre-construction survey for badger dens no more than two weeks prior to construction activity in any suitable habitat proposed for ground disturbance. If no potential badger dens are present within the construction footprint, no further action is required.
- If a den is identified, but is inactive, the den will be excavated by hand and backfilled to prevent badgers from using the burrow.
- If the badger den is active the qualified biologist shall determine the state of occupancy (i.e., single animal occupancy or a natal den).
 - If the burrow is occupied by a single animal, the mouth of the burrow will be repeatedly blocked with earth, sticks and similar materials for 3-5 days to exclude the animals and allow the badger to self-relocate. After 5 or more days of burrow exclusion, the den is excavated and backfilled using hand tools.
 - If the burrow is a natal den, it shall be avoided by a minimum of 50-ft until the young are sufficiently developed to leave the burrow on their own. Once the young have developed sufficiently to leave the burrow on their own, the biologist will re-assess the burrow for occupancy. If no additional young are present, but the burrow remains occupied by the adult, burrow exclusion as described above may occur, followed by excavation and backfill.

Mitigation Measure BIO 5. Crotch's Bumble Bee

The following measures will be implemented for any ground-disturbing activities in undeveloped land cover (i.e., any land cover type other than developed and ornamental) within Big Canyon Park and Eaton Park at appropriate sites to avoid potential impacts to Crotch's bumble bee:



- A qualified biologist shall survey for Crotch's bumble bee prior to the commencement of construction activities during the colony active period or the gyne flight season (generally, April 1 to October 31). The survey shall occur at least two hours after sunrise (> 60F and < 90F with no rain) or two hours before sunset and the survey area shall include the project boundaries and a surrounding 100-foot buffer area. The survey duration shall be appropriate to the size of the project site and buffer area based on the metric of a minimum of one person-hour of searching per three acres of suitable habitat.
- During the survey(s) the qualified biologists may not capture or handle bumble bees unless specifically authorized to do so for the project by CDFW. At a minimum, survey methods shall include the following:
 - Search areas with flowering plants for foraging bumble bees. Observed foraging activity may indicate a nest is nearby, and therefore, the survey duration shall be increased when foraging bees are present.
 - Watch any bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest.
 - Visually look for nest entrances. Observe burrow, any other underground cavities, logs, or other possible nesting habitat.
 - Look for concentrated bumble bee activity.
 - Listen for humming of nest colony.
 - If bumble bees are observed, attempt to identify the species by taking a picture.
 - If foraging bees are present and a nest has not been found, floral resources within the project's disturbance footprint may be carefully removed with hand-held tools to minimize foraging bee presence during project activities. The continuation of bumble bee activity once such floral resources are removed may be an indication that a nest is present.
 - The biologist conducting the survey shall record when the survey was conducted, a general description of any suitable foraging habitat/floral resources present, a description of observed bumble bee activity, a description of any vegetation removed to facilitate the survey, and their determination of if the survey observations suggest a Crotch's bumble bee nest may be present or if construction activities could otherwise harm the species. The survey may be conducted immediately prior to construction granted all the above and below conditions are met.

If a Crotch's bumble bee is observed during the survey (not associated with a nest), or if any sign(s) of a bumble bee nest is observed and if it cannot be established the species present is not Crotch's bumble bee, then construction shall not commence until CDFW provides further guidance, which may include an additional survey by a bumble bee expert, waiting until the colony active season ends, obtaining take authorization, or other actions.

Mitigation Measure BIO-6. Roosting Bats

The following measures will be implemented at all parks included in the Plan Area to avoid potential impacts to roosting bats:



- The removal or trimming of all trees with a diameter at breast height (DBH) greater than 16 inches shall be conducted outside of the bat maternity season (October through March) whenever feasible. If this is not feasible, a bat roost assessment shall be performed by a qualified biologist no more than 30 days prior to tree removal to determine if roosting bats are present.
- If special-status bat species or potential maternity roosts of any species are detected during these surveys, the roost trees shall be protected, and a no-disturbance buffer of 100-feet shall be implemented around the active maternity roost until maternity activities have ceased.
- Irrespective of time of year, all felled trees should remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats to escape.

Mitigation Measure BIO-7: Special-status and Nesting Birds

The following measures will be implemented at all parks included in the Plan Area to avoid potential impacts to special-status and nesting birds:

- To the extent feasible, project-related activities should be avoided during the nesting bird season, generally defined as February 1 – August 31. If project work must occur during the nesting bird season, a pre-construction nesting bird survey shall be conducted by a qualified biologist within 7 days of ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys shall be conducted in all potential nesting habitat located at, and adjacent to, project work sites and in staging and storage areas.
- If an active nest is located, a no disturbance buffer shall be established around the nest. Active nest sites and protective buffer zones shall be designated as “Environmentally Sensitive Areas” where no project-related activities or personnel may enter until a qualified biologist determines that the young have fully fledged, or the nest otherwise becomes inactive (e.g., due to predation), and will no longer be adversely affected by the project. Suggested buffer zone distances differ depending on species, existing conditions, and nest placement and shall be determined and implemented in the field by a qualified biologist.
- The buffer shall remain in place until the nest fledges or otherwise becomes inactive as determined by the qualified biologist.

Mitigation Measure BIO-8. Aquatic Resources

Prior to issuance of grading permits or initiation of ground-disturbing activities for any projects that may impact potential jurisdictional aquatic resources, the City shall retain a qualified biologist to conduct a formal delineation of potential jurisdictional aquatic resources within the project site, including wetlands and other waters of the United States and/or State, consistent with current protocols of USACE, the Regional Water Quality Control Board (RWQCB), and the CDFW, as applicable. The delineation report shall be submitted to the appropriate regulatory agencies for review and verification.

If jurisdictional aquatic resources are confirmed and would be directly or indirectly impacted by project implementation, the City shall consult with the USACE, RWQCB, and CDFW to determine



applicable permitting requirements and shall obtain all required authorizations prior to initiation of activities that could result in impacts. Such authorizations may include, but are not limited to, a Clean Water Act Section 404 permit from USACE, Clean Water Act Section 401 Water Quality Certification (or Waste Discharge Requirements) from the RWQCB, and a Lake or Streambed Alteration Agreement pursuant to Fish and Game Code Section 1600 et seq. from CDFW.

The City shall comply with all permit conditions and implement all avoidance, minimization, and compensatory mitigation measures required by the regulatory agencies.



4.2.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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?	☐	☒	☐	☐

Eileen Barrow & Associates (EBA) prepared the following studies for the proposed Plan:

- Archival Study for the San Carlos Master Plan, February 2026 (Barrow 2026a)
- Architectural History Evaluation of Two Buildings at Burton Park, February 2026 (Barrow 2026b)
- Architectural History Evaluation of the Community Building at Laureola Park, February 2026 (Barrow 2026c)

The Archival Study sought to identify existing documented historical and cultural resources within the Plan Area and included archival research at the Northwest Information Center of the California Historical Resource Inventory System, and archival research of documents pertinent to the Plan Area through local and online libraries. The Architectural History Evaluation reports analyzed whether the Community Building at Laureola Park and two buildings at Burton Park are eligible for listing on the California Register of Historical Resources.

ENVIRONMENTAL SETTING

Prehistory

Current archaeological research indicates that the peopling of the Americas began with migrations from Siberia into North America during the late Pleistocene. Two primary migration routes are widely recognized: an interior route through Alaska and central Canada (circa 11,000–10,500 BC), and an earlier route along the Pacific coastline (circa 12,600 BC) (Erlandson 2002, Fiedel 1987, 2000, Fladmark 1979, Wormington 1957). In California, numerous Paleo-Indian sites (approximately 11,500–9,000 BC) have been identified, particularly along the coastline and near former lakes and marshes. Due to sea-level rise since the early Holocene, many early coastal sites are likely submerged. Within the San Francisco Bay Area, archaeological investigations began in the early twentieth century and intensified in the 1940s and 1950s, leading to the development of regional cultural chronologies that document long-term patterns of Native American occupation.



Over time, advances in archaeological method and dating techniques refined these regional chronologies. Early frameworks, such as the Central California Taxonomic System, were later supplemented by broader chronological models that incorporated radiocarbon dating and other scientific methods. The development of obsidian hydration analysis, particularly for Northern San Francisco Bay Area obsidian sources, further improved the ability to assign dates to archaeological sites. More recent efforts have focused on refining regional chronological schemes using radiocarbon-dated shell beads and other diagnostic artifacts. Although debate continues regarding the most appropriate temporal framework, current research reflects a long and complex history of Native American occupation in the San Francisco Bay Area spanning at least the past 13,000 years.

Regional History

Although Europeans first arrived in California in the sixteenth century, colonization did not begin in earnest until the late 1700s, when Spain sought to strengthen trade with the Philippines and prevent Russian expansion along the Pacific Coast (Alexander and Hamm 1916). In 1769, Gaspar de Portolá led an expedition north from San Diego along the California coast, traveling into what is now San Mateo County. This expedition marked the beginning of Spain's formal colonization efforts in Alta California. Within several years, Spain established additional presidios and missions, including those at San Francisco and Santa Clara, placing the San Carlos area between Mission Santa Clara de Asís to the south and Mission San Francisco de Asís (Mission Dolores) to the north. Following Mexico's independence from Spain in 1821, former mission lands were secularized and distributed as Mexican land grants. The San Carlos area became part of Rancho de las Pulgas, originally granted to José Darío Argüello, a military officer and former acting governor of Alta California (Hoover et al. 2002). After disputes regarding boundaries, approximately 32,240 acres were confirmed to members of the Argüello family in 1856, and the rancho lands were subsequently subdivided and sold.

The modern town of San Carlos developed later in the nineteenth century as the rancho lands were divided and transportation infrastructure expanded. Although the Pulgas ranch occupied the area earlier, San Carlos as a town dates to 1887 and grew in conjunction with the construction of the railroad in 1888. That same year, the San Carlos Land Company purchased acreage from Timothy Guy Phelps, who had acquired a substantial portion of Rancho de las Pulgas (Mahany and The San Carlos Villagers 1999). Early development focused on residential subdivision and basic infrastructure improvements. In the early twentieth century, town planning efforts formalized growth through platting, installation of utilities, and improvements to water and sewer systems. While construction slowed during the Great Depression, population growth continued, and by the onset of World War II the population had reached approximately 3,500 residents. Post-war suburban expansion further accelerated development, shaping San Carlos into part of the broader growth pattern of the San Francisco Bay Area.

REGULATORY SETTING

Cultural Resources

As set forth in Section 5024.1(c) of the Public Resources Code for a cultural resource to be deemed "important" under CEQA and thus eligible for listing on the California Register of Historical Resources (California Register), it must meet at least one of the following criteria:



1. Is associated with events that have made a significant contribution to the broad patterns of California History and cultural heritage; or
2. Is associated with the lives of persons important to our past; or
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value; or
4. Has yielded or is likely to yield, information important to prehistory or history.

Historic-era structures older than 50 years are most commonly evaluated in reference to Criterion 1 (important events), Criterion 2 (important persons), or Criterion 3 (architectural value). To be considered eligible under these criteria, the property must retain sufficient integrity to convey its important qualities. Integrity is judged in relation to seven aspects including: location, design, setting, materials, workmanship, feeling, and association. Prehistoric and historic-era archaeological resources are commonly evaluated with regard to Criterion 4 (research potential).

Guidelines for the implementation of CEQA define procedures, types of activities, persons, and public agencies required to comply with CEQA. Section 15064.5(b) prescribes that project effects that would “cause a substantial adverse change in the significance of an historical resource” constitute significant effects on the environment. Substantial adverse changes include both physical changes to the historical resource or to its immediate surroundings.

Archaeological Resources

Section 21083.2 of the CEQA guidelines also defines “unique archaeological resources” as “any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

This definition is equally applicable to recognizing “a unique paleontological resource or site.” CEQA Section 15064.5 (a)(3)(D), which indicates “generally, a resource shall be considered historically significant if it has yielded, or may be likely to yield, information important in prehistory or history,” provides additional guidance.

ASSESSMENT METHODOLOGY

Archival Research and Records Search

EBA conducted a records search for each of the parks within the Plan Area to identify any existing documented historical resources. The results of the records search indicated that there are no documented cultural resources within any of the parks included in the Plan Area.



Table 8. Summary of Cultural Resources Archival Record Search Results

Park	Previously subjected to cultural resources study?	Cultural resources documented within the park?	Cultural resources documented within one quarter mile of the park?
Arguello Park	Yes, but did not include fieldwork	No	No
Big Canyon Park	No	No	No
Burton Park	No	No	No
Cedar Street Park	No	No	No
Chilton Park	No	No	Yes
City Hall Dog Park	No	No	Yes
Crestview Park	No	No	No
Eaton Park	No	No	No
Frank D. Harrington Park	No	No	Yes
Heather Dog Exercise Area	No	No	No
Highlands Park	No	No	No
Hillcrest Circle Park	Yes	No	No
Laureola Park	No	No	Yes
North Crestview Park	Yes	No	No
Rosek Park	No	No	Yes
San Carlos Avenue Neighborhood Park	No	No	No
Vista Park	No	No	No

Buried Site Sensitivity Assessment

Because Native American archaeological sites are sometimes buried by accumulated sediments, they cannot be identified by conventional archaeological surface surveys. While it is hard to predict exactly where buried sites may be located, the potential for an area to have buried archaeological sites can be estimated using models that account for conditions which are likely to host archaeological sites. For example, most sites tend to be located on a relatively level landform located near present or former water sources such as stream channels, perennial stream confluences, and former lakes, springs, or wetlands. In addition, many lowland areas of California have a general “geologic” potential to contain buried site because they contain sediments that were deposited after Native people first entered and occupied the region.

Using data such as the age of the landform and proximity to water sources, EBA implemented a model to determine the potential for buried sites within the Plan Area. The modeling indicated a Very Low or Low sensitivity for buried archaeological sites within all of the parks except Burton Park and Frank D. Harrington Park, which both have a Moderate (2-3%) potential for encountering buried archaeological sites.

Architectural History Evaluation

An Architectural History Evaluation was conducted for the community building at Laureola Park and the Kiwanis Community Building and former restroom at Burton Park to determine whether



the structures meet the criteria for inclusion on the National or California Registers. The results of the evaluation found that none of them met any of the four criteria for inclusion on the California Register as described in the *Regulatory Setting* section above. Therefore, no further recommendations for the treatment of these buildings were warranted.

PARKS MASTER PLAN GUIDELINES

- Preserve, reuse, or adapt historic and cultural features where feasible to reinforce a sense of continuity and local identity.
- Use signage and branding thoughtfully to reflect the historic, cultural, or natural character of the community and the site.
- Provide opportunities for interpretation of unique site features, such as wetlands, tree groves, historic elements, or cultural resources.

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

The results of the cultural resources studies for the Plan found no previously documented historical resources within the Plan Area. Three built environment structures, including the community building at Laureola Park, the Kiwanis Community Building, and the former restroom at Burton Park were evaluated for historical significance; however, none of them met the criteria for listing on the California Register. Since there are no historical resources within the Plan Area, the proposed Plan would not cause a substantial adverse change in the significance of a historical resource. No impact would occur.

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

Less-than-Significant Impact with Mitigation Incorporated

The results of the records search found no previously documented archaeological resources within the Plan Area. The majority of parks included in the Plan Area were found to have a Very Low or Low potential for buried archaeological resources; however, Frank D. Harrington Park and Burton Park both have a Moderate potential for buried archaeological resources. No improvements are proposed at Frank D. Harrington Park as part of the Plan because the park is currently being designed as part of the Downtown Streetscape Master Plan, which is undergoing separate CEQA review. Improvements at Burton Park included in the Plan include installation of new wayfinding and trail signage, replacement of picnic tables and trash cans, construction of an accessible picnic area, irrigation and drainage improvements, and installation of water treatment systems to retrofit the water play element. These improvements, particularly the irrigation and drainage improvements and retrofit of the water play element, would involve ground-disturbing work which could result in a potentially significant impact to any unknown archaeological resources on-site.

The City shall implement Mitigation Measure CUL-1 for future projects at Burton Park due to the heightened potential for buried archaeological resources to be present. This measure requires



that an archaeologist who meets the Secretary of the Interior's standards review and assess any projects that are proposed to extend beyond 12 inches below the ground surface to determine if a subsurface study is warranted. In addition, ground-disturbing activities during construction at any of the parks included in the Plan Area could result in the discovery of unknown archaeological resources, which is a potentially significant impact under CEQA. Mitigation Measure CUL-2 would be implemented, which requires that, if buried materials are encountered during construction, all soil disturbing work shall be halted at the location of the discovery until a qualified archaeologist can complete a significance evaluation of the find(s) pursuant to Section 106 of the National Historic Preservation Act (NHPA). Local Native American tribes shall also be contacted regarding the find. If the archaeologist and/or local Native American tribe determine that the find includes historical, cultural, or tribal cultural resources, the City shall work with the archaeologist and tribe to determine a plan for protection, avoidance, or relocation of the resource.

With the implementation of Mitigation Measure CUL-1 and CUL-2, the proposed Plan would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. The impact would be less than significant with mitigation incorporated.

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

Less-than-Significant Impact with Mitigation Incorporated

There is one known area of reburied Native American remains located within the Plan Area. To ensure that the remains would be avoided by activities associated with the Plan, Mitigation Measure CUL-3 would be implemented. This measure requires the City to ensure that the location of any reburied Native American remains within the Plan Area is documented with the Northwest Information Center and California Historical Resource Information System, and ensure that the area remains undeveloped in perpetuity. Implementation of this measure would ensure that the Plan would not impact any known human remains within the Plan Area.

Although unlikely, ground-disturbing activities within the Plan Area have the potential to encounter unknown human remains, which is a potentially significant impact. To comply with California Health and Safety Code §§ 7050.5 and 7052 and PRC § 5097, Mitigation Measure CUL-4 would be implemented, which outlines the procedures for the treatment of accidentally discovered human remains.

With implementation of this measure, the proposed Plan would not disturb any human remains, including those interred outside of dedicated cemeteries. The impact would be less than significant with mitigation incorporated.

MITIGATION MEASURES

Mitigation Measure CUL-1. Archaeological Assessment

An archaeologist who meets the Secretary of the Interior's Standards shall review and assess any projects that are proposed to extend beyond 12 inches below the ground surface at Burton Park, to determine if a subsurface study is warranted.



Mitigation Measure CUL-2. Accidental Discovery of Archaeological Resources

If an accidental find is made during ground-disturbing activities, all soil disturbance shall stop within 100 feet of the find until an archaeologist who meets the Secretary of the Interior's Standards can complete a significance evaluation of the find(s). If the qualified archeologist determines that the find is eligible for inclusion on the National or California Register, the archaeologist shall make recommendations for appropriate methods of treatment for the find, which shall be implemented by the City.

If the qualified archaeologist determines that the resource may be a tribal cultural resource, the City shall consult with the culturally affiliated tribe(s), and a tribal representative shall be invited to evaluate the find and provide treatment recommendations. Treatment of tribal cultural resources shall be developed in consultation with the culturally affiliated tribe(s), with avoidance as the preferred method where feasible.

Potential treatment methods for resources may include, but would not be limited to, avoidance of the resource through changes in construction methods or project design or implementation of a program of testing and data recovery, in accordance with all applicable federal and state requirements. Any efforts shall be documented in a cultural resources report to be filed with the Northwest Information Center.

Mitigation Measure CUL-3. Native American Remains

The City shall hire a qualified archaeologist to document the location of any reburials within the Plan Area. The location of reburials shall be documented by the qualified archaeologist on Department of Parks and Recreation 523 forms and submitted to the Northwest Information Center of the California Historical Resource Information System. The City shall ensure that the location of the reburial will remain undeveloped in perpetuity, either through deed restrictions, fencing, or some other permanent form of protection. Consideration should be made in the future for the allowance of human reburials on City lands so that the location(s) can be kept protected.

Mitigation Measure CUL-4: Human Remains

California law recognizes the need to protect interred human remains, particularly Native American burials and items of cultural patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code §§ 7050.5 and 7052 and PRC § 5097. If remains are uncovered, ground-disturbing work shall halt within 100 feet of the find and the Lead Agency and County coroner shall be notified immediately. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (Health and Safety Code § 7050.5[b]). If the coroner determines that the remains are those of a Native American, the coroner must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code § 7050[c]). The Lead Agency and the professional archaeologist shall contact the Most Likely Descendent, as determined by the NAHC, regarding the remains. The Most Likely Descendant, in cooperation with the City, shall determine the ultimate disposition of the remains and any associated artifacts.



4.2.6 Energy

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

Electricity in San Carlos is provided by Peninsula Clean Energy (PCE) and Pacific Gas & Electric (PG&E). PCE is a public, not-for-profit agency that serves San Mateo County and the City of Los Banos and is the default electricity provider for most residents in the County.

REGULATORY SETTING

City of San Carlos General Plan

The City's General Plan contains the following policies related to energy:

- **Policy EM-9.2:** Support on-site generation of energy through alternative forms of energy production such as solar panels, wind turbines and biomass facilities.
- **Policy EM-9.5:** Design all new construction and major remodels of government agency buildings to relevant green building standards.
- **Policy EM-9.6:** Encourage new private construction and major remodels to be designed to meet or exceed Green Uniform Building Code requirements.
- **Policy EM-9.7:** Implement energy efficiency in City owned and operated facilities to reduce municipal energy costs and serve as a model for the community.

City of San Carlos Climate Mitigation and Adaptation Plan (CMAP)

The City of San Carlos CMAP is an update to the City's 2009 Climate Action Plan (City of San Carlos 2021). In 2016, California enacted a new law requiring the state to reduce statewide emissions to 40 percent below 1990 levels by 2030. The City's CMAP identifies actions and performance targets to meet statewide goals by reducing the City's emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Emissions reductions are targeted across six sectors, including energy, transportation and land use, off-road, waste, and water and wastewater (City of San Carlos 2021).



PARKS MASTER PLAN GUIDELINES

- Orient park spaces and community facilities to respond to solar exposure, prevailing winds, and local weather patterns to maximize natural light and ventilation.
- Right-size building systems, including heating, cooling, and electrical systems, to improve efficiency and reduce energy use.
- Design simple and efficient building forms that are cost-effective to construct, operate, and maintain.
- Incorporate renewable energy readiness, including battery energy storage systems and roofs designed to accommodate photovoltaic panels on buildings, shade structures, and parking canopies.
- Reduce environmental impacts through material selection, prioritizing recycled or recyclable materials, locally sourced products, natural materials, and those with low embodied carbon.
- Design parks and facilities to minimize water use, incorporating efficient irrigation systems and utilizing reclaimed water sources where feasible.
- Consider durability and maintenance needs early in the design process to ensure long-lasting facilities that are safe and cost-effective to maintain.
- Provide efficient access for operations and maintenance, including appropriate routes for maintenance vehicles and service access.
- Plan for lifecycle replacement of aging infrastructure, including site furnishings, play equipment, and building systems, using durable, high-quality replacements.
- Incorporate green infrastructure, such as bioswales, rain gardens, conservation landscapes, and permeable paving, to manage stormwater while supporting recreation and habitat restoration.

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 use of equipment and vehicles during construction of individual projects under the Plan would require the use of energy resources. The construction process would be designed to be efficient to avoid excess monetary costs. Specifically, equipment and fuel would not be used wastefully during construction due to the added expense associated with renting, maintaining, and fueling equipment. As such, energy and fuel would not be wasted or used inefficiently by construction equipment and vehicles.

Implementation of the Plan would be required to comply with applicable policies of the City's General Plan, including Policy EM-9.6, which requires that all new construction and major remodels of government agency buildings to be designed in accordance with relevant green building standards, and Policy EM-9.7 which requires the City to implement energy efficiency in City-owned and operated facilities to reduce municipal energy costs and serve as a model for the community.



Further the proposed Plan contains implementing guidelines that aim to reduce energy use, such as incorporating energy-efficient heating, cooling, electrical, and water use fixtures into new development and remodels; considering maintenance and operational needs early in the design process to ensure longevity of projects; prioritizing recyclable or recycled materials in project design; and incorporating green infrastructure such as bioswales, rain gardens, conservation landscapes, and permeable paving.

Proposed improvements to community facilities would be required to comply with standards outlined in Title 24, Part 11 of the California Building Code, referred to as the California Green Building Standards Code (CALGreen), as adopted by the City of San Carlos. The Plan identifies opportunities to increase energy efficiency of existing park facilities, including the electrification of the ACC and Youth Center. Therefore, implementation of the Plan not result in 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

The CMAP is the local energy plan that includes policies and strategies to meet statewide emissions reductions targets. Therefore, any project that complies with this plan would also comply with statewide renewable energy and energy efficiency goals.

The CMAP contains multiple strategies to promote renewable energy and energy efficiency. Strategy 4 identifies opportunities for electrification in City facilities, such as replacing gas appliances with electric alternatives where feasible. Strategy 16 proposes strategies that support the reduction of GHG emissions through the development of walkable and bikeable public space. Strategy 20 proposes replacing non-electric City fleet vehicles with electric ones when replacement of a vehicle is necessary.

The proposed Plan would not conflict with any relevant strategies of the CMAP. The Plan promotes incorporation of renewable energy into park improvement projects and includes implementing guidelines related to energy conservation and efficiency. The impact would be less than significant.



4.2.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

Regional Geology

The Plan Area lies in the central portion of the Coast Range geomorphic province that extends along the western edge of the state. The Coast Ranges are northwest-trending mountain ranges and valleys ranging from 2,000 to 6,000 feet above sea level. The Coast Ranges are generally composed of thick Mesozoic and Cenozoic sedimentary strata and are dominated by irregular, landslide-topography of the Franciscan Complex, a geologic assemblage of marine sedimentary and volcanic rocks that formed in an ancient subduction zone along the California coast. The Coast Range geomorphic province is bounded by the Transverse Ranges in the south, the Klamath Mountains in the north, and the Great Valley in the east (CGS 2002).

Geologic and Soil Units

The geology of San Carlos consists mainly of unconsolidated sedimentary deposits underlain by sedimentary rock and Franciscan bedrock west of Alameda de las Pulgas. The western border of the City is underlain by the Cretaceous age Franciscan complex, which consists primarily of greywacke sandstone, conglomerate, and shale bedrock.

The transitional alluvial zone between the western hills and flatland deposits is underlain by conglomerate, sandstone, and mudstone of the Santa Clara formation. Lowland deposits underlie most of the City and consist of Holocene age alluvium (less than 11,000 years old), composed of clay, silt, sand, and gravel. Some older Pleistocene age deposits with similar compositions are also present. Soils underlying the Plan Area include Urban land-Orthents, Los Gatos loam, Maymen gravelly loam, and Fagan loam (USDA National Resources Conservation Service [NRCS] 2025).

Faults

The Plan Area is within the San Francisco Bay Area, which is known as a seismically active region. Seismic activity can lead to various geological and seismic hazards, including fault displacement and rupture, ground shaking, liquefaction, lateral spreading, landslides, and avalanches. San Mateo County has numerous faults, and both local and external faults could impact the Project area.

The nearest major fault zone to the City is the San Andreas Fault, located approximately 1.5 miles from the southwestern edge of the City (CGS 2026b). Crestview Park is the nearest park to the San Andreas Fault Zone, located approximately 1.44 miles northeast of the fault zone. The San Andreas Fault is designated as an Alquist-Priolo Earthquake Zone of Required Investigation. While no portion of the Plan Area is within an Alquist-Priolo Earthquake Zone of Required Investigation, seismic activity along the San Andreas Fault and other faults in the area could cause seismic shaking within the Plan Area. Other Alquist-Priolo Faults that could affect the Plan Area include the Seal Cove, San Gregorio, Denniston Creek, Calaveras, and Hayward Faults, located approximately 10.7, 12, 11, 21.3, and 14.5 miles away, respectively (CGS 2026b).

DISCUSSION OF IMPACTS

a-i, a-ii) 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? 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 described in the *Environmental Setting* section above, none of the parks included in the Plan Area are located in an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Fault Zone is the San Andreas Fault, located approximately 1.5 miles from the southwestern edge of the City. Rupture along this fault and other nearby faults in the area could cause strong seismic ground shaking in the Plan Area. The construction contractor for future projects under the Plan would be required to comply with all Federal Occupational Safety and Health Administration (OSHA) and California OSHA (Cal/OSHA) requirements related to construction worker safety, which would reduce risks associated with fault rupture and strong seismic ground shaking during construction to a less-than-significant level. Many projects would only require minor excavation and construction with hand tools, which would not result in any direct or indirect impact related to fault rupture or ground shaking. Therefore, the impact during construction of the proposed Plan would be less than significant.

Building improvements and construction of new buildings and structures under the proposed Plan would be required to comply with the California Building Code as adopted by the City and additional stipulations set forth in the SCMC. These standards are in place to ensure that new buildings are seismically resilient and will not endanger occupants should seismic activity occur. Therefore, with compliance with state and local regulations, operation of the Plan would not cause substantial adverse effects associated with earthquake fault rupture or strong seismic ground shaking. The impact 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?

Less-than-Significant Impact

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. Portions of the Plan Area are within a CGS Liquefaction Zone, including Burton Park, City Hall Dog Park, Frank D. Harrington Park, San Carlos Avenue Neighborhood Park, Laureola Park, the Library, the Adult Community Center, the Youth Center, and the Kiwanis Building.(CGS 2026b).

Many of the park and facility improvements included in the proposed Plan would involve limited to no ground-disturbing work and therefore would not contribute to risks associated with liquefaction. These projects include activities such as rehabilitation and replacement of existing facilities, walkway and trail improvements, and irrigation and landscaping improvements.

Future building improvements or construction of new structures under the proposed Plan would be subject to applicable General Plan policies and City regulations designed to protect people, life, and property from risks associated with seismic-related ground failure and liquefaction. General Plan Policy ESPS-11.6 and ESPS-12.2 require that the SCMC protects development from rising seawater and groundwater levels, which can increase risk of liquefaction. Additionally, Policy ESPS-1.1 requires that the City Building Official verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist, and that new structures be



designed to withstand the effects of seismically induced ground failure (City of San Carlos 2022). Additionally, building improvements and construction of new buildings and structures under the proposed Plan would be required to comply with the California Building Code as adopted by the City and additional stipulations set forth in the SCMC. Compliance with these regulations would ensure that proposed Master Plan improvements would not cause substantial adverse effects related to seismic-related ground failure, including liquefaction. The impact would be less than significant.

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

Less-than-Significant Impact

Big Canyon Park, Heather Dog Exercise Area, Vista Park, Eaton Park, and parts of Arguello Park, Crestview Park, Highlands Park, and San Carlos Avenue Neighborhood Park are within a CGS Landslide Zone (CGS 2026b). Several park improvements are designed to reduce the risks associated with landslides. These include the installation of rolling dips and water bars on Eaton Park trails and implementation of a flood detention basin at Big Canyon Park. Additionally, the Plan does not propose the construction of any new habitable structures.

Future building improvements or construction of new structures under the proposed Plan would be subject to applicable General Plan policies and City regulations designed to protect people, life, and property from risks associated with landslides. General Plan Policy ESPS-1.1 requires that the City Building Official verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist. General Plan Policy 1.2 prohibits structural development in known areas where seismic and geologic hazards cannot be mitigated, and General Plan Policy 1.6 encourages the retrofitting of structures to withstand earthquake shaking and landslides (City of San Carlos 2022). Additionally, building improvements and construction of new structures under the proposed Plan would be required to comply with the California Building Code as adopted by the City and additional stipulations set forth in the SCMC. Compliance with these regulations would ensure that the proposed Plan improvements would not cause substantial adverse effects, including the risk of loss, injury, or death, involving landslides.

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

Less-than-Significant Impact with Mitigation Incorporated

Some activities included in the proposed Plan would involve grading or replacement of impervious surface area that could result in soil disturbance and cause erosion (e.g., realignment of trails, paving of fire roads and walkways, construction of vista points, construction of new restrooms, and trenching for utilities and irrigation improvements). If no erosion control measures are in place, construction associated with the Plan could result in substantial soil erosion, which is a potentially significant impact. As described further in *Section 4.2.10, Hydrology and Water Quality*, construction activities associated with the Plan would be required to implement Mitigation Measure HYDRO-1, which includes BMPs for erosion and pollutant control. Such measures that would help reduce erosion include installing perimeter controls (e.g., fiber rolls, silt fencing, gravel bags) to prevent sediment from leaving the work areas; covering or containing soil stockpiles and preventing tracking of sediment onto adjacent paved areas; and stabilizing disturbed soils if inactive for more than 14 days through mulch, erosion control blankets, hydroseeding, or similar methods.



All future projects under the Plan would also be required to comply with the SCMC, which requires BMPs for stormwater runoff control be implemented throughout construction, and that all disturbed soils be stabilized via revegetation and seeding. In addition, future projects under the Plan that disturb over one acre of soil would be required to obtain coverage under the NPDES Construction General Permit, which requires that a Stormwater Pollution Prevention Plan (SWPPP) be implemented throughout construction activities.

Therefore, with implementation of Mitigation Measure HYDRO-1 and compliance with local policies and regulations, the proposed Plan would not result in substantial soil erosion or loss of topsoil. The impact would be less than significant with mitigation incorporated.

- 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

Portions of the Plan Area are located within mapped landslide and liquefaction hazard zones (CGS 2026b), as discussed in thresholds *a-iii*) and *a-iv*). Many of the improvements proposed in the Plan involve little to no ground disturbance and would occur in already developed areas and would not cause a geologic unit or soil to become unstable. Improvements that do require grading or structural foundations would be required to comply with all applicable General Plan, SCMC, and CBC regulations, which include review and verification of geotechnical and soil reports. By following existing regulations, implementation of the Plan would not exacerbate soil instability or result in on- or off-site geologic hazards. Therefore, the impact 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 are found within portions of the City, including the western and northwestern hills. These areas are classified as having “low expansion potential” (City of San Carlos 2022). While some sites within the Plan Area, including Vista Park, North Crestview Park, Crestview Park, and Heather Dog Exercise Area, are located near or within areas of the City mapped as having expansive soils, the improvements proposed at these parks do not include the construction of any new habitable structures which would be at risk due to expansive soils. Any future construction of buildings under the proposed Plan would be required to comply with the CBC as adopted by the City, which would ensure that subsurface conditions and geotechnical constraints are accounted for in building design. Therefore, the proposed Plan would not create substantial direct or indirect risks to life or property associated with expansive soils. The impact 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



Implementation of the Plan would not include any septic tanks or alternative wastewater disposal systems. New restrooms proposed as part of the Plan would connect to existing wastewater infrastructure. No impact would occur.

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

Less-than-Significant Impact with Mitigation Incorporated

Paleontological resources (fossils) are the remains and traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in geologic formations in which they were originally buried. Ground-disturbing construction activities, such as grading and excavation, have the potential to directly or indirectly destroy paleontological resources if proper measures are not in place.

Therefore, the City would implement Mitigation Measure GEO-1, which requires that a paleontological resources awareness training be given to all construction personnel involved in ground-disturbing activities for park improvement projects undertaken under the Plan. This measure also requires that, if paleontological resources are found, work within 50 feet of the discovery shall halt until a qualified paleontologist can evaluate the resource and provide recommendations for its treatment. With implementation of this measure, the proposed Plan would not directly or indirectly destroy any unique paleontological resources. The impact would be less than significant with mitigation incorporated.

The Plan Area consists of parks and recreational facilities that are not known to contain any unique geologic features. Therefore, the Plan would have no impact on unique geologic features.

MITIGATION MEASURES

Mitigation Measure GEO-1. Paleontological Resources

Prior to ground-disturbing activities for any project with ground-disturbing activities deeper than 12 inches under the Plan, the City shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) standards, to develop and conduct a Paleontological Resources Awareness Training Program for all construction personnel involved in ground-disturbing activities (including but not limited to grading, excavation, trenching, drilling, and utility installation).

The training shall be conducted prior to the commencement of ground disturbance and shall include, at a minimum:

1. A description of the types of paleontological resources that may be encountered within the project area;
2. Photographic examples of fossils and fossil-bearing sediments;
3. A summary of applicable federal, state, and local regulations protecting paleontological resources;
4. Identification of the procedures to follow in the event of a discovery; and
5. Contact information for the designated qualified paleontologist.



All construction personnel shall be informed that if potential paleontological resources (e.g., fossilized bone, teeth, shell, leaf impressions, or unusual rock formations) are encountered during ground-disturbing activities, all ground-disturbing work within 50 feet of the discovery shall be halted immediately. The Construction Manager shall notify the City, who shall retain a qualified paleontologist to evaluate the find and recommend appropriate treatment measures consistent with SVP guidelines. Work in the vicinity of the find shall not resume until the paleontologist has determined that the resource has been appropriately assessed and any necessary mitigation has been implemented.

Documentation of the training, including attendance logs and training materials, shall be maintained by the construction contractor and made available to the City upon request.



4.2.8 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

GHGs are recognized by wide consensus among the scientific community to contribute to global warming/climate change and associated environmental impacts. The most common GHGs released from human activity are carbon dioxide, methane, and nitrous oxide (Governor's Office of Planning and Research 2008). The primary sources of GHGs are vehicles (including planes and trains), energy plants, and industrial and agricultural activities (e.g., dairies and hog farms).

In the United States, the major sources of GHG emissions are transportation, electricity generation, and industrial activities (U.S. EPA 2022). These three sources are also the top contributors of GHG emissions in California (CARB 2022).

REGULATORY SETTING

Global Warming Solutions Act

Assembly Bill (AB) 32, adopted in 2006, established the Global Warming Solutions Act of 2006 which requires the State to reduce GHG emissions to 1990 levels by 2020. In 2016, Senate Bill (SB) 32 was signed into law, amending the California Global Warming Solution Action. SB 32 and Executive Order B-30-15 require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of carbon dioxide equivalent (MMTCO_{2e}). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO_{2e}.

CEQA Air Quality Guidelines

As discussed in *Section 4.2.3, Air Quality*, San Carlos is under the jurisdiction of the BAAD. The BAAD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Chapter 7 of the BAAD's CEQA Air Quality Guidelines describes how to analyze plan-level climate impacts, such as GHG emissions.



City of San Carlos Climate Mitigation and Adaptation Plan

The City of San Carlos Climate Mitigation and Adaptation Plan (CMAP) was adopted in September 2021 as the City's strategic plan to reduce GHG emissions and adapt to changing climate conditions. The CMAP includes an inventory of GHG emissions generated in the City for both community-wide and City operations and establishes GHG emissions reductions targets through the year 2050.

DISCUSSION OF IMPACTS

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

Projects included in the Plan would result in temporary construction-related and long-term operational GHG emissions. The primary source of GHG emissions associated with construction and operation of the plan would be use of equipment and heavy machinery and vehicle trips associated with both short-term construction and long-term maintenance activities. The improvements included in the Plan are small in size (i.e., potential projects do not have a large footprint) and scale (i.e., potential projects do not involve substantial expansion of existing park and recreational facilities or the development of significant new facilities) and are compatible with the existing active and/or passive recreational nature of the specific park type where the improvement would occur.

The BAAD defines screening criteria for operational GHG emissions for land use projects. If the project meets the applicable criteria, the project would have a less-than-significant impact related to GHG emissions. For building development projects, the applicable criteria are:

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

Projects under the proposed Plan would not include any natural gas appliances or natural gas plumbing. As described in *Section 4.2.6, Energy*, new construction under the Plan would be required to comply with the CALGreen Code as adopted by the City of San Carlos. Therefore, the Plan meets the first screening criteria.

The proposed Plan would not introduce any new stationary sources of GHG emissions; however, GHG emissions would be indirectly generated by operational emissions such as electricity and water use for new facilities such as restrooms and drinking fountains, and occasional maintenance vehicle trips. As described in *Section 4.2.6, Energy*, construction of many of the park projects would be done only with hand tools, and construction projects would be completed efficiently to avoid excess costs associated with energy use. Implementation of the Plan would be required to comply with applicable policies of the City's General Plan, including Policy EM-9.6, which requires that all new construction and major remodels of government agency buildings to be designed in accordance with relevant green building standards, and Policy EM-9.7 which requires the City to implement energy efficiency in City-owned and operated facilities to reduce municipal energy costs and serve as a model for the community.



Further the proposed Plan contains implementing guidelines that aim to reduce energy use, such as incorporating energy-efficient heating, cooling, electrical, and water use fixtures into new development and remodels; considering maintenance and operational needs early in the design process to ensure longevity of projects; prioritizing recyclable or recycled materials in project design; and incorporating green infrastructure such as bioswales, rain gardens, conservation landscapes, and permeable paving. Therefore, the proposed Plan meets the second screening criteria.

The proposed Plan would not generate GHG emissions, either directly or indirectly, that would have a substantial impact on the environment. The impact 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

According to the BAAD CEQA Air Quality Guidelines, long-range plans would have a less-than-significant impact related to operational GHG emissions if they 1) demonstrate consistency with the State's 2030 and 2045 GHG reduction and carbon neutrality goals, and 2) demonstrate consistency with the GHG Reduction Strategy in State CEQA Guidelines Section 15183.5(b). As described in *Section 4.2.6, Energy*, the proposed Plan is consistent with the CMAP, which is the local GHG reduction strategy that is consistent with CEQA Guidelines Section 15183.5(b). As described above, the proposed Plan would comply with applicable City policies related to GHG emissions and energy use. Therefore, the proposed Plan would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The impact would be less than significant.



4.2.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

A review of the State Water Resources Control Boards (SWRCB) GeoTracker database and the Department of Toxic Substances Control's (DTSC) EnviroStor database indicated that the former San Carlos High School, which is the current site of Highlands Park, is listed as a former Leaking Underground Storage Tank (LUST) cleanup site (SWRCB 2026). The listing indicates that a LUST cleanup site at 2800 Melendy Drive was opened in 1997 and closed in 2003. According to the listing, an investigation was opened after an apartment building was built atop a UST containing waste oil with no verification that the UST had been removed. Investigators were unable to take soil or groundwater samples, or confirm whether the UST had been removed, without compromising the structural integrity of the apartment building. However, given the depth to groundwater near the site, investigators concluded that it was unlikely the UST would pose a risk to drinking water, human health, or environmental safety and the case was closed in 2003. None of the other parks within the Plan Area are included on a list of hazardous sites.

The closest airport to the City is the San Carlos Airport, located approximately two miles northeast of the City in unincorporated San Mateo County.

REGULATORY SETTING

City of San Carlos General Plan Environmental Safety and Public Services Element

The City of San Carlos General Plan Environmental Safety and Public Services (ESPS) Element was updated in 2022, and proposes policies and actions pertaining to seismic hazards, flood hazards, wildland and urban fire, hazardous materials and waste, airport operations, and emergency and disaster preparedness (City of San Carlos 2022). The General Plan contains the following applicable policies related to hazards and hazardous materials:

- **Policy ESPS-3.14:** Provide adequate evacuation routes and access for fire and emergency service vehicles to all San Carlos areas.
- **Policy ESPS-5.2:** Require producers of and users of hazardous materials in San Carlos to conform to all local, State and federal regulations regarding the production, disposal and transportation of these materials.
- **Policy ESPS-5.3:** Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria and standards enforcement.
- **Policy ESPS-5.11:** Encourage the use of green building practices to reduce potentially hazardous materials in construction materials.
- **Policy ESPS-6.1:** Maintain land use and development in the vicinity of San Carlos Airport that are consistent with the relevant airport/land use compatibility criteria and guidelines contained in the adopted Airport/Land Use Compatibility Plan for the environs of San Carlos Airport, including noise, safety, height and aviation easement requirements.

San Mateo County Multijurisdictional Local Hazard Mitigation Plan

The San Mateo County Multijurisdictional Local Hazard Mitigation Plan (MLHMP) assesses the likelihood of future hazard events and establishes mitigation protocols to address them. According to the MLHMP, the highest risk factors for the City of San Carlos are sea level rise and climate change, floods, landslides, and wildfire (County of San Mateo 2021).



San Carlos Airport Land Use Compatibility Plan

The San Mateo County Airport Land Use Commission has adopted a Comprehensive Airport Land Use Compatibility Plan (ALUCP) for areas surrounding San Carlos Airport. The ALUCP seeks to promote compatibility between the San Carlos Airport and its surrounding environment, and addresses issues such as aircraft noise, safety of persons on the ground, airspace protection, and aircraft overflights. The ALUCP also gives the San Mateo County Airport Land Use Commission authority to review development plans and projects within Area of Influence B for the San Carlos Airport. The northern part of the City of San Carlos is within the ALUCP's Airport Influence Area (AIA) B, which is the airport's most immediate AIA and encompasses the area within a 9,000-foot radius of the airport. AIA B includes Burton Park, Laureola Park, Cedar Street Park, Frank D. Harrington Park, Rosek Park, Hillcrest Circle Park, Arguello Park, City Hall Dog Park, San Carlos Avenue Neighborhood Park, the Adult Community Center, Library, the Kiwanis Building, the Laureola Building, and the Youth Center.

DISCUSSION OF IMPACTS

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

While many projects under the proposed Plan would only require the use of hand tools, construction of some individual projects would require the use and transport of typical construction-related hazardous materials such as fuels, lubricants, adhesives, and solvents.

Construction activities would be required to comply with numerous hazardous materials regulations and implement BMPs to ensure that hazardous materials are handled properly and do not pose a threat to worker safety or the environment. Workers who are handling hazardous materials are required to adhere to all OSHA and Cal/OSHA health and safety requirements. Hazardous materials must be transported to and from the park sites in accordance with the Resource Conservation and Recovery Act (RCRA) and United States Department of Transportation regulations and disposed of in accordance with RCRA at a facility that is permitted to accept the waste. In addition, future projects under the Plan that would disturb over one acre of soil would be required to obtain a Construction General Permit under the NPDES, which requires that a SWPPP also be developed and implemented throughout project construction. With compliance with existing regulations, construction of projects under the proposed Plan would not create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials. The impact would be less than significant.

Implementation of the Plan would not introduce any new substantial risks associated with hazardous materials. Standard park operation involves the use of some hazardous materials, such as paints, fuels, herbicides, and fertilizers; however, implementation of the Plan would not cause a substantial increase in the use of these materials. Parks employees and contractors would continue to adhere to all federal, state, and local regulations regarding hazardous



materials that are used routinely in park maintenance. Therefore, no impact related to hazardous materials would occur from operation of the proposed Plan.

- a) *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

Seven schools are located within one-quarter mile of parks, open spaces, or facilities included in the Plan Area: Carlmont High School, Arundel Elementary School, Heather School, Arroyo School, Central Middle School, Sora International Preschool of San Carlos, and Learn and Play Montessori School & Childcare San Carlos.. As described above in Thresholds a) and b), implementation of the Plan would require the use of typical construction-related hazardous materials such as fuels, lubricants, and solvents. The handling, storage, use, and transport of hazardous materials during construction would comply with all applicable OSHA, Cal/OSHA, and RCRA requirements. With compliance with these requirements, the Project would not pose an acute risk related to the handling of hazardous materials within the vicinity of a school. Operation of the proposed Plan would not include any new permanent uses of hazardous materials within the vicinity of a school or proposed school. While standard park maintenance does include the use of some hazardous materials, the Plan would not increase the level of use or substantially increase risks associated with the use of such materials. Therefore, the impact of the Project related to the use of hazardous materials within the vicinity of a school would be less than significant.

- b) *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?***

Less-than-Significant Impact

One site within the Master Plan, Highlands Park, is located adjacent to the former San Carlos High School, which is listed as a LUST cleanup site in the SWRCB's GeoTracker database. Given that the site is in case-closed status, no environmental hazards are anticipated from implementation of proposed improvements at Highlands Park. Therefore, although a site included in the Plan is included on a list of hazardous materials sites compiled pursuant to government Code Section 65962.5, the site would not create a significant hazard to the public or the environment because the site was determined to be safe and the case was closed in 2003. The impact would be less than significant.

- c) *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?***

Less-than-Significant Impact

14 parks and facilities within the Plan Area are located within AIA B of the San Carlos Airport ALUCP, including Burton Park, Laureola Park, Cedar Street Park, Frank D. Harrington Park, Rosek Park, Hillcrest Circle Park, Arguello Park, City Hall Dog Park, San Carlos Avenue Neighborhood Park, the Adult Community Center, Library, the Kiwanis Building, the Laureola Building, and the Youth Center. The San Carlos Airport ALUCP establishes a review process that allows the San Mateo County Airport Land Use Commission to evaluate proposed plans within AIA B for consistency with the ALUCP. Specifically, the ALUCP requires that all Facilities Master Plans within AIA B be referred to the San Mateo County Airport Land Use Commission for a



determination of consistency with the plan's four compatibility factors (C/CAG 2015). The General Plan also requires proposed land use policy actions and related development plans within AIA B be submitted to the San Mateo County Airport Land Use Commission for review (City of San Carlos 2009). Therefore, compliance with the ALUCP review process and the General Plan would ensure that the Project would not result in a safety hazard for people residing or working in the project area. The impact would be less than significant.

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

Less-than-Significant Impact

The applicable emergency response plans for the area are the San Mateo County MLHMP and the City's General Plan Environmental Safety and Public Services Element. The Plan is designed to guide future improvements to San Carlos parks, open spaces, and recreational facilities, and does not propose development that would physically interfere with an adopted emergency response plan or emergency evacuation plan. Proposed improvements would be contained within existing parks within the Plan Area and would not require any detouring of roadways or evacuation routes. In addition, the proposed Plan would include improvements to fire roads within some of the City's parks which would be a beneficial impact related to emergency response and emergency evacuation. All future park improvements undertaken under the Plan would be required to comply with applicable General Plan policies, municipal code requirements, and fire code requirements. Therefore, the implementation of the Plan would not interfere with an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

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

Less-than-Significant Impact

As described in *Section 4.2.20, Wildfire*, portions of the Plan Area are within a Fire Hazard Severity Zone (FHSZ) as designated by the California Department of Forestry and Fire Protection (CAL FIRE), including Crestview Park, North Crestview Park, Vista Park, and parts of Big Canyon Park. The Plan would not introduce any new land uses or increase use of the Plan Area in a way that would increase the risk of wildfire or the severity of the spread of wildfire. The Plan includes improvements to several fire roads within the Plan Area which would result in a beneficial impact related to wildland fires. The impact would be less than significant.



4.2.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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 Plan Area is located in the Cordilleras Creek–Frontal San Francisco Bay Estuaries sub-watershed (HUC 10-1805000409) within the larger San Mateo Creek–Frontal San Francisco Bay Estuaries watershed (HUC 12-180500040902). The primary creeks within the region include Cordilleras Creek, Brittan Creek, Pulgas Creek, Belmont Creek, Laurel Creek, and Scotts Creek, which drain to the San Francisco Bay. The Plan Area is within the planning jurisdiction of the San



Francisco Bay RWQCB, who is responsible for regulating surface water and groundwater quality in the region.

REGULATORY SETTING

Pulgas Creek Watershed Plan

The Pulgas Creek Watershed Plan provides a comprehensive planning framework to address stormwater management, flooding and watershed conditions within the Pulgas Creek drainage area. The watershed drains portions of the San Carlos foothills and urbanized areas before discharging to the San Francisco Bay. The Watershed Plan evaluates existing drainage infrastructure, identifies locations susceptible to flooding and erosion, and recommends potential watershed management strategies to improve stormwater conveyance, reduce flood risk, and enhance water quality.

Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin

The Basin Plan is the master water quality planning document for the San Francisco Bay Basin, which is adopted and implemented by the San Francisco Bay RWQCB. The Basin Plan identifies beneficial uses of certain water bodies within the region, establishes narrative and numerical water quality standards, and contains regulatory programs and strategies to achieve water quality objectives. The Basin Plan is adopted under the Porter-Cologne Water Quality Control Act and incorporated requirements of the federal Clean Water Act.

San Carlos Municipal Code

Chapter 13.14, Stormwater Management and Discharge Control, of the SCMC requires reduction of pollutants in stormwater for any activities which may result in pollutants entering the City storm sewer system. Any person engaging in such activities must undertake all practicable measures to reduce such pollutants, implementing the following minimal requirements:

- A. Littering.
 1. No person shall throw, deposit, leave, maintain, keep or permit to be thrown, deposited, placed, left or maintained, any refuse, rubbish, garbage, or other discarded or abandoned objects, articles and accumulations in or upon any street, alley, sidewalk, storm drain inlet, catch basin, conduit or other drainage structures, business place, or upon any public or private lot of land in the City, so that the same might be or become a pollutant, except in containers or in lawfully established dumping grounds.
 2. The occupant or tenant, or in the absence of occupant or tenant, the owner, lessee, or proprietor, of any real property in the City in front of which there is a paved sidewalk shall maintain said sidewalk free of litter to the maximum extent practicable.
 3. No person shall throw or deposit litter in any fountain, pond, lake, stream or any other body of water in a park or elsewhere within the city.
- B. Standard for Parking Lots and Similar Structures. Persons owning or operating a parking lot, gas station pavement or similar structure shall clean those structures as frequently and thoroughly as practicable in a manner that does not result in discharge of pollutants to the City storm sewer system.



- C. Best Management Practices for New Developments and Redevelopments. Any construction contractor performing work in the City shall endeavor, whenever possible, to provide filter materials at the catch basin to retain any debris and dirt flowing in to the City's storm sewer system. City may establish controls on the volume and rate of stormwater runoff from new developments and redevelopments as may be appropriate to minimize the discharge and transport of pollutants.
- D. Compliance with Best Management Practices. Where best management practices guidelines or requirements have been adopted by the City for any activity, operation or facility which may cause or contribute to the stormwater pollution or contamination, illicit discharges, and/or discharge of non-stormwater to the stormwater system, every person undertaking such activity or operation, or owning or operating such facility shall comply with such guidelines or requirements (as may be identified by the Director of Public Works) (Ord. 1149 § 1 (II 4), 1994).

Chapter 18.14 of the SCMC establishes the Stream Development and Maintenance Overlay District which intends to protect waterways and the health, safety, and welfare of City residents by establishing regulations for development adjacent to creeks. In accordance with this chapter, all new development shall be set back to a minimum of 25 feet from the top of bank of Cordilleras, Belmont, Brittan, and Pulgas Creeks within the City. Exceptions are granted for 1) storm drain outflows and associated drainage facilities, 2) vegetation removal or trimming for normal maintenance, or to facilitate drainage, prevent flooding, or permit adequate flow of water, 3) fill, grading, or excavating for purposes of low intensity, passive recreation or conservation uses with conditional use permit approval, and 4) minor restoration or maintenance necessary to prevent flooding, reduce siltation, remove debris, and minor weed abatement activity.

PARKS MASTER PLAN GUIDELINES

- Incorporate green infrastructure, such as bioswales, rain gardens, conservation landscapes, and permeable paving, to manage stormwater while supporting recreation and habitat restoration.

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 with Mitigation Incorporated

Water quality standards applicable to the Plan Area are established by the Basin Plan and implemented by the San Francisco Bay RWQCB through a variety of programs. Construction activities associated with the Plan would include ground-disturbing activities which could release sediment into waterways if not controlled properly, which is a potentially significant impact. Future projects under the proposed Plan that would disturb over one acre of soil would be required to obtain coverage under the NPDES Construction General Permit. This permit requires preparation and implementation of a SWPPP during construction, which must identify potential pollutants sources and contain BMPs for erosion control and spill prevention control to prevent pollution and sedimentation of nearby waterways via stormwater runoff. In addition, the SCMC requires that BMPs be implemented for any activity that may result in stormwater pollution or contamination. All projects undertaken under the proposed Plan would be required to comply



with this City regulation by implementing erosion and sediment control measures throughout construction.

In addition, Mitigation Measure HYDRO-1 has been developed which contains minimum sediment and pollutant control measures for future projects under the plan that would disturb soils or require the use of materials that could pollute nearby waterways. Therefore, adherence with local and state regulations pertaining to water quality and implementation of Mitigation Measure HYDRO-1 would reduce any potential impacts associated with Plan construction to a less-than-significant level.

Operation of park improvement projects included in the Plan would not introduce any new sources of pollutants that could permanently degrade surface or groundwater quality. Proposed improvements include activities such as replacing park furniture and playground equipment, improving trails and walkways, installing irrigation features, and in some instances, constructing new facilities such as restrooms. These new and rehabilitated facilities would not introduce any new permanent point-source pollutants or increase pollutants in stormwater runoff. Therefore, the impact of Plan operation related to water quality 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

Projects under the proposed Plan would not require the use of groundwater. While some water use would be required during construction and operation associated with the Plan, the City does not rely on groundwater for its municipal water supply. As described further in *Section 4.2.19, Utilities and Service Systems*, water in the City comes from Hetch Hetchy Reservoir and runoff in the Alameda and Peninsula watersheds. Therefore, the proposed Plan would not substantially decrease groundwater supplies.

The Plan Area is located in the San Mateo Plain Groundwater Subbasin, which is designated as a very low priority basin by DWR. According to the SWRCB, the two main sources of recharge for the basin are stream channel percolation and stormwater infiltration (SWRCB 2021). Therefore, projects that would substantially reduce either of these functions (e.g., through increasing impervious surface area in existing natural areas) could substantially impede groundwater recharge. Impervious surface areas constructed as part of the Plan would mainly be to replace existing impervious surfaces, such as the replacement of tennis courts, turf, and improvement of walkways. These projects would have no impact on groundwater recharge because the footprint of impervious surface area would remain the same. The proposed Plan would result in some minor increases in impervious surface area within the City's parks to construct new facilities such as restrooms and fire roads. These increases in impervious surface would be minor and are not anticipated to substantially impede groundwater recharge by converting large plots of undeveloped land into paved surfaces.

Therefore, the proposed Plan would not interfere substantially with groundwater recharge such that sustainable groundwater management of the basin would be impeded. The impact would be less than significant.



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

Parks projects included in the Plan that are being evaluated as part of this IS/MND are not anticipated to substantially alter existing drainage patterns on any of the City's parks. The majority of projects included in the Plan would replace or rehabilitate existing infrastructure in the same place as the structure to be replaced (e.g., trail improvement; replacement of signage, playground equipment, picnic tables; installation of shade structures), which would not alter any drainage patterns. Drainage improvements would primarily involve replacement or upgrades to existing drainage infrastructure and stormwater management systems with improved equipment and design standards rather than expansion of drainage facilities into new areas and therefore would not substantially modify existing drainage patterns. Some proposed improvements would include grading for new facilities, such as construction of an asphalt pump track at Arguello Park, construction of a vista point at Big Canyon and Arguello Park, installation of new restrooms at Big Canyon Park, construction of an expanded dog park at Heather Dog Exercise Area, and paving of trails and roads at Big Canyon Park and Eaton Park. The grading required to create these facilities would likely alter local drainage patterns slightly, but would not result in substantial erosion or siltation, or substantially increase the rate or amount of surface water runoff that would exceed the capacity of stormwater systems. As stated in the Parks Master Plan Guidelines, the City would incorporate green infrastructure, such as bioswales, rain gardens, conservation landscapes, and permeable paving, to manage stormwater while supporting recreation and habitat restoration. In addition, Chapter 17.36 of the SCMC contains requirements for drainage facilities for all improvements within the City. Such requirements include design standards for drainage channels, conduits, and culverts, and the requirement to protect all exposed slopes resulting from grading operations via seeding and planting with shrubs and trees.

Therefore, with compliance with existing regulations, improvements included in the proposed Plan would not result in a substantial impact related to drainage changes. The impact would be less than significant.

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

Less-than-Significant Impact

One small portion of the Plan Area along the southeastern border of Burton Park is within a flood zone as designated by the Federal Emergency Management Agency (FEMA). No portion of the Plan Area is within a tsunami or seiche zone (CDOC 2026b). Therefore, activities at the majority of parks included in the plan would not risk release of pollutants due to project inundation. As described above in Threshold a), construction associated with the proposed Plan would be required to implement pollution and sediment control measures described in Mitigation Measure HYDRO-1 and comply with local and State regulations pertaining to pollution and sediment



control. Compliance with these measures would ensure that park improvements at Burton Park would not risk release of pollutants due to project inundation. The impact would be less than significant.

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

Less-than-Significant Impact

The applicable water quality control plan for the Plan Area is the Basin Plan, which identifies specific beneficial uses and water quality objectives and beneficial uses for surface waters in the region. As described above in Threshold a), compliance with local and State regulations pertaining to stormwater runoff would ensure that projects under the proposed Plan would not violate any water quality objectives established in the Basin Plan. The impact would be less than significant.

The Plan Area is also within the planning area of the Pulgas Creek Watershed Plan. The proposed Plan is consistent with the goals and recommendations of the Watershed Plan and includes native plant palettes that are consistent with the Pulgas Creek Watershed Plan.

The Plan Area is located in the San Mateo Plain Groundwater Subbasin, which is designated by DWR as a very low priority basin. Only medium- and high-priority basins are required to form Groundwater Sustainability Agencies and prepare Groundwater Management Plans under the Sustainable Groundwater Management Act. Therefore, there is no applicable sustainable groundwater management plan for the Plan Area, and the proposed Plan would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

MITIGATION MEASURES

Mitigation Measure HYDRO-1. Erosion and Pollution Control Measures

Prior to the commencement of ground-disturbing activities for all future projects under the Plan, the City shall ensure that erosion and sediment control measures to minimize soil erosion are implemented. These measures are aimed to reduce sedimentation and pollutant discharge during construction activities associated with trail maintenance, paving, court and turf replacement, trenching for utilities, and related improvements.

The following measures shall be implemented, at a minimum:

1. Limit disturbance to the minimum area necessary and clearly delineate construction boundaries.
2. Install perimeter controls (e.g., fiber rolls, silt fencing, gravel bags) to prevent sediment from leaving the work areas.
3. Protect storm drain inlets with appropriate sediment control devices.
4. Stabilize disturbed soils if inactive for more than 14 days through mulch, erosion control blankets, hydroseeding, or similar methods.
5. Cover or contain soil stockpiles and prevent tracking of sediment onto adjacent paved areas.



6. Backfill and compact trenches promptly and restore disturbed areas following utility installation.
7. Provide designated concrete washout areas and prevent construction materials, slurry, or debris from entering storm drains.
8. Restore disturbed areas to pre-project conditions and stabilize prior to the onset of the rainy season.



4.2.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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 Plan Area includes parks, open spaces, and recreational facilities across Park (PK), Open Space (OS), and Public (P) zoning districts, which include allowable uses such as government offices, public parks and recreation facilities, public safety facilities, and utilities. The General Plan land use designations applicable to the Plan Area are Park, Open Space, and Public (City of San Carlos 2025b).

DISCUSSION OF IMPACTS

a) *Physically divide an established community?*

No Impact

The Plan Area consists of existing parks, open spaces, and recreational facilities throughout the City. Improvements would occur within established public parks and facilities and would include upgrades to amenities, trail and pathway enhancements, and accessibility improvements. The Project does not include construction of infrastructure that would physically divide an established community. Therefore, there would be no impact.

b) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less-than-Significant Impact

The proposed Plan is consistent with existing land use designations and zoning regulations. Parks included in the Plan Area are designated as Park, Open Space, or Public in the General Plan, and are zoned as PK, OS, or P, which allow for park and recreational uses. As described in Section 4.2.4, *Biological Resources*, the proposed Plan would comply with all applicable policies of the San Carlos General Plan pertaining to biological resources. The impact would be less than significant.



4.2.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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 State has not identified any sites in the City of San Carlos with known mineral resources (CGS 2026b). The City’s 2045 General Plan Reset EIR states that there are no known mineral resources within the City (City of San Carlos 2025a).

DISCUSSION OF IMPACTS

a, b) 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? 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 that are of value to the region or state within the City. The City’s General Plan does not identify any mineral resources within the City’s boundaries (City of San Carlos 2009). Therefore, the proposed Plan would not impact any mineral resources that are of local or regional value. No impact would occur.

4.2.13 Noise

Would the project result in:	Potentially Significant Impact	Less-than-Significant Impact 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

Background Information on Noise

Noise is commonly defined as unwanted sound that annoys or disturbs people and can have an adverse psychological or physiological effect on human health. Sound is measured in decibels (dB), which is a logarithmic scale. Decibels describe the purely physical intensity of sound based on changes in air pressure but cannot accurately describe sound as perceived by the human ear since the human ear is only capable of hearing sound within a limited frequency range. For this reason, a frequency-dependent weighting system is used, and monitoring results are reported in A-weighted decibels (dBA). Decibels and other acoustical terms are defined in Table 9.

A typical method for determining a person's subjective reaction to a new noise is by comparing it to existing conditions. The following describes the general effects of noise on people:

- A 3-dBA increase is considered barely noticeable.
- A 5-dBA increase is considered clearly noticeable, but not dramatic.
- A 10-dBA increase is perceived as a doubling in loudness.



Table 9. Definition of Acoustical Terms

TERM	DEFINITION
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure.
Decibel (dB)	A unit describing the amplitude of sound on a logarithmic scale. Sound described in decibels is usually referred to as sound or noise “level.” This unit is not used in this analysis because it includes frequencies that the human ear cannot detect.
A-Weighted Sound Level (dBA)	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound, in a manner similar to the frequency response of the human ear, and correlates well with subjective reactions to noise. All sound levels in this report are A-weighted.
Maximum Sound Levels (Lmax)	The maximum sound level measured during a given measurement period.
Equivalent Noise Level (Leq)	The average A-weighted noise level during the measurement period. For this CEQA evaluation, Leq refers to a 1-hour period unless otherwise stated.
Community Noise Equivalent Level (CNEL)	The average A-weighted noise level during a 24-hour day, obtained after addition of 5 decibels to sound levels during the evening from 7:00 to 10:00 p.m. and after addition of 10 decibels to sound levels during the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level (Ldn)	The average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to sound levels during the night between 10:00 p.m. and 7:00 a.m.
Ambient Noise Level	The existing level of environmental noise at a given location from all sources near and far.
Vibration Decibel (VdB)	A unit describing the amplitude of vibration on a logarithmic scale.
Peak Particle Velocity (PPV)	The maximum instantaneous peak of a vibration signal.
Root Mean Square (RMS) Velocity	The average of the squared amplitude of a vibration signal.

Sources: Charles M. Salter Associates, Inc. 1998, Federal Transit Administration 2018

Background Information on Vibration

Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Vibration amplitudes are usually expressed as either peak particle velocity (PPV) or the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous peak of the vibration signal. PPV is appropriate for evaluating potential damage to buildings, but it is not suitable for evaluating human response to vibration because it takes the human body time to respond to vibration signals. The response of the human body to vibration is dependent on the average amplitude of a vibration. The RMS of a signal is the average of the squared amplitude of the signal and is more appropriate for evaluating human response to vibration. PPV is



normally described in inches per second (in/sec) and RMS is often described in vibration decibels (VdB).

Existing Ambient Noise Conditions

The major noise sources in San Carlos are vehicular traffic on major roadways, railroad operations along the Caltrain corridor, and the San Carlos Airport. Noise monitoring conducted in 2009 for the City's General Plan update indicated noise levels ranging from 57 to 69 L_{dn} , measured at 75 feet from the center of the roadway, along major roadway corridors in the City. Major roadways in the City include El Camino Real, Holly Street, Old County Road, Industrial Road, San Carlos Avenue, Brittan Avenue, Howard Avenue, Dartmouth Avenue, Club Drive, and Alameda de las Pulgas.

Several parks included in the Plan Area are directly adjacent or very near to the City's major roadways. Laureola Park is located at 503 Old County Road, with entrances on Old County Road and Holly Street. San Carlos Avenue Neighborhood Park and City Hall Dog Park are located directly adjacent to San Carlos Avenue, adjacent to the San Carlos Caltrain Station, which also sits along the busy El Camino Real corridor. Other parks in the Plan Area are accessed from interior residential streets rather than major arterials; however, they may still be within a short distance of those roadways in a neighborhood context.

REGULATORY SETTING

San Carlos General Plan

The City's General Plan establishes allowable noise levels for various land use types within the City. For outdoor sports and recreation, neighborhood parks and playgrounds, noise levels up to 65 L_{dn} are always acceptable, levels of 65 to 80 L_{dn} are conditionally acceptable, and levels greater than 80 L_{dn} are unacceptable.

The City's General Plan Noise Element contains the following applicable policies related to noise:

- **Policy NOI-1.1:** Use the Noise and Land Compatibility Standards shown in Figure 9-1, the noise level performance standards in Table 9-1 and the projected future noise contours for the General Plan shown in Figure 9-3 and detailed in Table 9-2, as a guide for future planning and development decisions.
- **Policy NOI-1.4:** Require a detailed acoustic report in all cases where noise-sensitive land uses are proposed in areas exposed to exterior noise levels of 60 CNEL L_{dn} or greater. If recommended in the report, mitigation measures shall be required as conditions of project approval.
- **Policy NOI-1.5:** Where noise mitigation measures are required to achieve the noise level standards, the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall be considered after practical design-related noise mitigation measures have been integrated into the project.
- **Policy NOI-1.8:** During all phases of construction activity, reasonable noise reduction measures shall be utilized to minimize the exposure of neighboring properties to excessive noise levels.
 - a. Construction activities shall comply with the City's noise ordinance.



San Carlos Municipal Code

Chapter 9.30, Noise Control, of the SCMC establishes City policy regarding ambient noise and limitations on excess noise. A permit is generally required for any activity that would exceed allowable noise levels; however, per Section 9.30.070, construction activities are exempt from obtaining a permit, so long as they are limited to the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays. No noise-related construction activities may occur on Sundays and on City holidays as noted in Section 9.30.070.

Section 18.21.060 of the SCMC states that no noise shall be produced that is transmitted through the ground and is discernable by a reasonable person at the lot lines of the site. However, vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel are exempt from this requirement.

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?***

Less-than-Significant Impact

Construction of individual projects under the proposed Plan would result in a temporary increase in ambient noise levels in the vicinity of the park where work is occurring. While a majority of projects would only require the use of hand tools, some projects would necessitate the use of heavy machinery that would generate noise, such as forklifts, impact drills, compacting equipment, jackhammers, excavators, and demolition hammers. The applicable noise standards for the Plan Area are established by the San Carlos General Plan and SCMC. For outdoor sports and recreation and neighborhood parks and playgrounds, noise levels up to 65 L_{dn} are always acceptable, levels of 65 to 80 L_{dn} are conditionally acceptable, and levels greater than 80 L_{dn} are unacceptable. Construction activities undertaken as part of the Plan may generate noise levels in excess of 80 L_{dn} intermittently throughout the workday. The SCMC states that a permit is generally required for any activity that would exceed allowable noise levels; however, construction activities are exempt from obtaining a permit as long as they are limited to the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays. All construction activities associated with the Plan would occur during the City's allowable construction hours; therefore, no conflict with the City's noise ordinance or allowable noise levels would occur as a result of construction activities.

Once operational, the park enhancements and improvements identified in the Plan that are within the scope of this IS/MND would have little to no potential to generate noise levels that exceed the limits identified by the City's General Plan. Typical noise emanating from the City's parks include:

- Human voices from conversation, celebrations, recorded music, etc.
- Children laughing and shouting
- Whistles, cheering, and other noises associated with organized and casual sports activities
- Dogs barking



- Equipment operations from mowers, landscaping equipment, etc.
- Vehicle trips to and from parks

These noise sources are not substantial nor prolonged and are part of typical park environments. Most of the proposed improvements included in the Plan would enhance existing park infrastructure via replacement or rehabilitation (e.g., replacement of park furniture and playground equipment, trail improvements, improving ADA accessibility), or would add minor new accessory facilities that are cohesive with the existing park use (e.g., construction of restrooms and drinking fountains). These improvements would not change the existing noise environment at a park because they would not substantially alter the recreational amenities available at a park, substantially change the capacity of the park to accommodate visitors, or add a new permanent source of noise to the park.

Therefore, operation of the proposed Plan would not generate noise levels that would exceed local noise standards. The impact would be less than significant.

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

Less-than-Significant Impact

Construction of some projects under the Plan would require the use of equipment which would generate groundborne vibration, such as jackhammers, vibratory tampers, and vibratory compactors. Any vibration generated by construction activities would be temporary and intermittent and would occur only during the City's allowable construction hours. According to the SCMC, construction activities are exempt from the City's restrictions on vibration. Therefore, construction associated with the proposed Plan would not generate excessive groundborne vibration or groundborne noise levels. The impact 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?*

No Impact

As described in *Section 4.2.9, Hazards and Hazardous Materials*, portions of the Plan Area are within the San Mateo County ALUCP. However, no portion of the Plan Area is located within the airport noise contours as shown on Figure 9-2 of the City's General Plan. Therefore, construction or operational activities associated with the proposed Plan would not expose people residing or working in the Plan Area to excessive noise levels. No impact would occur.



4.2.14 Population and Housing

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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 population of the City of San Carlos has remained relatively constant for the last 15 years. As of 2024, the population of the City of San Carlos was approximately 29,403 (U.S. Census Bureau 2024). According to the City’s Housing Element, the City has approximately 12,385 housing units and plans to develop 2,735 more units by 2031 (City of San Carlos 2023).

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)?*

No Impact

The proposed Plan includes improvements to 17 existing parks, open spaces, and community facilities. The purpose of the Plan is to develop a long-range vision and implementation strategy for the City’s parks and recreation system. These improvements are intended to serve the community members that already utilize parks within the City and are not anticipated to encourage population growth in the City outside of what has already been identified by the City’s Housing Element. Many of the improvements included in the Plan are rehabilitation of existing infrastructure, trail upgrades, and installation of accessory infrastructure such as shade structures, restrooms, and updated playground equipment. These improvements are not anticipated to draw residents into the City of San Carlos. Moreover, the surrounding municipalities of Belmont and Redwood City also offer various parks and recreational facilities, and regional parks including Pulgas Ridge Open Space Preserve and Edgewood Park and Natural Preserve, are also available to residents. Therefore, the proposed Plan would not induce substantial or unplanned population growth either directly or indirectly. No impact would occur.



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

No Impact

The proposed Plan would not displace any people or housing or necessitate the construction of replacement housing. No impact would occur related to displacement of existing people or housing.



4.2.15 Public Services

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

Fire protection services within the Plan Area are provided by the San Carlos and Redwood City Fire Department (SCRCFD), which serves the Cities of San Carlos and Redwood City and the unincorporated neighborhood of North Fair Oaks. The SCRCFD includes six fire stations, two of which are in San Carlos.

Police protection services in the Plan Area are provided by the San Carlos Police Bureau, which is a substation of the San Mateo County Sheriff's Office. The San Carlos Police Bureau is located at 600 Elm Street at San Carlos City Hall.

Seven schools are located within one-quarter mile of parks, open spaces, or facilities within the Master Plan: Carlmont High School, Arundell Elementary School, Heather School, Arroyo School, Central Middle School, Sora International Preschool of San Carlos, and Learn and Play Montessori School & Childcare San Carlos.

The Plan Area comprises 17 City-owned parks and community facilities, including the San Carlos Library, the San Carlos Youth Center, and the Adult Community Center. The full list of parks and recreational facilities included in the Plan Area is provided in Table 1.

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?**

No Impact

The Plan Area would be served by existing fire and police protection and school facilities. As described in *Section 4.2.14, Population and Housing*, the Project would not cause population growth which would result in the need for new or physically altered fire or police protection or school facilities. No impact would occur.

- **Parks?**
- **Other Public Facilities?**

Less-than-Significant Impact with Mitigation Incorporated

The Plan Area comprises 17 parks and recreational facilities and community facilities. Proposed improvements to these facilities could result in temporary or ongoing impacts to the environment, which are discussed throughout this IS/MND. Potential impacts could occur related to air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, recreation, and tribal cultural resources. As described in *Section 4.2.21, Mandatory Findings of Significance*, all potential impacts associated with the Plan would be reduced to a less-than-significant level with implementation of mitigation measures included in this IS/MND. Therefore, the proposed Plan would not result in a significant impact on the environment due to the provision of new or physically altered parks or other public facilities. The impact would be less than significant with mitigation incorporated.



4.2.16 Recreation

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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 Plan Area encompasses 17 parks, open spaces, and recreational facilities throughout San Carlos, totaling 186.4 acres. The Plan Area comprises three community parks, five neighborhood parks, five mini-parks, two special use parks, two open spaces, and five facilities. Arguello Park is the largest park, totaling 21 acres, while Eaton Park is the largest open space, totaling 65.71 acres. Community facilities include the Youth Center, the Adult Community Center, the Library community room, the Kiwanis Building, and the Laureola Building. A detailed description of the recreational facilities included in the Plan Area can be found in *Section 2.0 Project Information*, and *Section 3.0, Project Description*.

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 purpose of the proposed Plan is to guide long-term improvements to parks and recreational facilities throughout the City. The Plan includes rehabilitation and enhancement of existing parks and recreational facilities and amenities. The Plan does not introduce new land uses or residential development that would substantially increase the demand for recreational facilities. Further, improvements outlined in the Plan are not anticipated to draw residents from adjacent cities, as they have their own parks and recreational infrastructure. Improvements are intended to modernize facilities, increase accessibility, and rehabilitate aging park infrastructure, which would benefit the physical character and durability of the sites within the Plan Area. Therefore, implementation of the Plan would not 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. The impact would 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?

Less-than-Significant Impact with Mitigation Incorporated

The Plan Area comprises 17 parks and recreational facilities and community facilities. Proposed improvements to these facilities could result in temporary or ongoing impacts to the environment, which are discussed throughout this IS/MND. Potential impacts could occur related to air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, recreation, and tribal cultural resources. As described in *Section 4.2.21, Mandatory Findings of Significance*, all potential impacts associated with the Plan would be reduced to a less-than-significant level with implementation of mitigation measures included in this IS/MND. Therefore, the construction or expansion of recreational facilities under the proposed Plan would not have an adverse physical effect on the environment. The impact would be less than significant with mitigation incorporated.



4.2.17 Transportation

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

Pedestrian Facilities

The San Carlos parks and recreation system includes approximately seven miles of city-managed trails, including ADA-accessible paths and natural-surface hiking trails.

Bicycle Facilities

Bikeways are typically classified into four categories:

- **Class I Multi-Use Path:** A completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- **Class II Bike Lane:** A striped and signed lane for one-way bike travel on a street or highway.
- **Class III Bike Route:** Signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- **Class IV Bikeway:** Also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

San Carlos has over 20 miles of existing bikeway facilities, including 4.1 miles of shared use paths, 10.8 miles of Class II bicycle lanes, and 7.1 miles of Class III bicycle routes. The City currently does not have any Class IV bikeways.



Transit Facilities

The San Mateo County Transit District (SamTrans) provides local and regional public transit service within San Carlos and among surrounding communities. There are four SamTrans routes within the City of San Carlos that provide access to local parks, including routes 295, 260, 61, and 73. Additionally, the San Carlos CalTrain station is located on El Camino Real, approximately 546 feet from Laureola Park and approximately 1,296 feet from City Hall Dog Park.

REGULATORY SETTING

City of San Carlos General Plan

The City of San Carlos Circulation and Scenic Highways (CSH) Element includes the following relevant policies and actions related to transportation:

- **Policy CSH-2.2:** Provide for adequate pedestrian bicycle facilities as viable transportation modes in San Carlos, as recommended in the San Carlos Bicycle and Pedestrian Master Plan.
- **Policy CSH-2.3:** Access to public transportation facilities should be convenient and designed to encourage use of public transit.
- **Policy CSH-3.3:** Support city-wide efforts to reduce vehicular trips within and through the community.
- **Policy CSH-3.12:** The City should preserve its existing alley and pedestrian path systems to the maximum extent feasible.
- **Action CSH-3.5:** The City shall coordinate with adjacent communities and responsible agencies to provide an interconnected system of pedestrian ways, trails, bikeways and transit routes.
- **Policy CSH-5.1:** Connect neighborhoods, school sites, activity centers, transportation centers, recreational sites and other important community amenities with sidewalks, pedestrian paths, trails and bikeways.
- **Policy CSH-7.7:** Public trails should be located and designed so that they serve the needs of the public while minimizing private property impacts.
- **Policy CSH-7.8:** The local public path and trail system should be linked with existing private and regional systems and the road system.
- **Action CSH-7.1:** The local trails system should be documented and enhanced as part of the city's circulation system.

City of San Carlos Bicycle and Pedestrian Master Plan

The Bicycle and Pedestrian Master Plan establishes a long-term vision for improving walking and bicycling in the City, and provides strategies to develop walking and bicycling networks. The Bicycle and Pedestrian Master Plan proposes three goals, including maintaining and expanding the pedestrian and bicycle network, increasing support for walking and bicycling, and improving access and safety for pedestrians and bicyclists (City of San Carlos 2020).



San Carlos Hillside Trails Plan

The Hillside Trails Plan provides guidance for the development of identified existing hillside trails within the City and serves as the guiding document for the design and construction of future trails. The Plan establishes criteria for hillside trail drainage, materials, design, construction, and signage (City of San Carlos 2012).

Caltrans Multimodal System Planning

Caltrans District 4 Multimodal System Planning (System Planning) has several concurrent planning efforts within the vicinity of the Parks Master Plan. System Planning is currently preparing a Comprehensive Multimodal Corridor Plan (CMCP) along all of State Route 82 within San Mateo County, called the State Route 82 North CMCP. The purpose of this document will be to identify key needs and challenges in the corridor and develop a balanced and equitable transportation system that integrates multimodal mobility choices. In addition, this CMCP is being prepared in close coordination with the SamTrans-led, multi-agency Grand Boulevard Initiative concurrently being conducted with all local cities along State Route 82 within San Mateo County. Lastly, SamTrans is also leading the Central El Camino Real Multimodal Plan, a planning project being coordinated with the cities of San Mateo, Belmont, San Carlos, and Redwood City. The Central El Camino Real Plan is aimed at providing multimodal transportation enhancements along this 8.5-mile portion of State Route 82.

PARKS MASTER PLAN GUIDELINES

- Integrate parks and facilities with surrounding circulation networks, including sidewalks, streets, trails, and bicycle routes. Provide multiple access points where appropriate, and design entries with distinctive features that clearly welcome visitors into the space.
- Prioritize pedestrian and bicycle access by providing clear, direct, and well-connected routes between parks, open spaces, and recreation facilities that emphasize safety and ease of use.
- Use low-profile or transparent landscaping near walkways and buildings to minimize visual barriers and improve visibility.
- Clearly mark park entrances, pathways, and key destinations using signage, lighting, and paving.
- Incorporate pedestrian-scaled lighting and wayfinding elements to improve visibility and nighttime comfort.

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 Plan intends to improve connectivity and provide opportunities for non-vehicular transportation through improvements to trail, cycling, and walking infrastructure. Improvements proposed within the Plan include enhanced wayfinding signage, pathway resurfacing, and landscaping maintenance to improve visibility. The Plan would create a pedestrian connection



across Crestview Drive from Vista Park to North Crestview Park through a standard painted striped crosswalk. The Plan also proposes several accessibility improvements, including an ADA-accessible trail segment in Big Canyon Park and ADA-accessible pathways at Burton Park. These improvements are aligned with those of System Planning's regional projects, including the State Route 82 North CMCP, Grand Boulevard Initiative, and Central El Camino Real Multimodal Plan. The City will make efforts to coordinate with Caltrans and SamTrans to ensure the Parks Master Plan is consistent with these ongoing planning efforts. Therefore, the proposed Plan would be consistent with and would not obstruct other local or regional policies, programs, and ordinances addressing the circulation system. The impact 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(b) describes criteria for analyzing transportation impacts based on vehicle miles traveled (VMT). For land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. In accordance with the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, Section 21099 of the PRC states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of GHG emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. Section 21099 subdivision (b)(1) further directed the Office of Planning and Research (OPR) to prepare and develop criteria for determining significance. The OPR identifies a screening threshold for small, land use projects as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer trips than this threshold may be assumed to cause a less-than-significant transportation impact (OPR 2018).

The Plan focuses on improvements to existing local parks and recreational facilities and encourages the development of multimodal transportation networks through bike and pedestrian infrastructure enhancements. Improvements outlined in the Plan are intended to serve the existing local population. The Plan does not include development of large-scale or high-density land uses that would draw new significant traffic. Replacement of the Laureola Building and Kiwanis Building may generate VMT; however, these projects would undergo environmental review under a separate process because plans are not yet available. Specific Plan elements, such as the development of the trail network at Big Canyon Park and the installation of a pedestrian connection across Crestview Drive from Vista Park to North Crestview Park, are designed to reduce vehicular trips, facilitate active transportation, and increased pedestrian safety consistent with the goals of Section 21099 of the PRC. Construction activities associated with any project under the plan would not generate over 110 vehicle trips per day. Therefore, implementation of the Plan would not generate a substantial amount of new vehicle trips. 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)?

Less-than-Significant Impact

The Plan consists of improvements within existing parks, open spaces, and recreational facilities, and includes upgrades to pathways and trails, replacement of park amenities, and minor circulation enhancements such as pedestrian access improvements and a new crosswalk across Crestview Drive to North Crestview Park. The Project does not include construction of new public



roadways that would introduce hazardous geometric design features. Additional parking stalls at Highlands Park would not require new curb cuts. Improvements to roadway infrastructure, such as pathway resurfacing, are intended to improve safety and access. Improvements would occur within existing park sites and would be designed in accordance with applicable City building and engineering standards, accessibility requirements, and safety guidelines. Therefore, implementation of the Plan would not increase hazards due to a geometric design feature or incompatible uses. The impact would be less than significant.

d) Result in inadequate emergency access?

Less-than-Significant Impact

Proposed improvements within the Master Plan are designed to accommodate and improve emergency access in the Project area. Improvements to Eaton Park and Crestview include improving the fire road with durable surfacing and eliminating trail head erosion issues for maintained vehicular access. Additionally, improvements to Arguello Park include paving the fire road along Sheldon Avenue to provide a multi-use maintenance, walking, and emergency access path. Implementation of the Plan is not anticipated to result in any construction-related or permanent road closures that would impede emergency access. Therefore, the Project is not anticipated to result in inadequate emergency access. The impact would be less than significant.



4.2.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

At the time of European contact, the Plan Area was inhabited by Costanoan-speaking peoples, commonly referred to as the Ohlone (Levy 1978). Their territory encompassed the San Francisco Peninsula, the eastern and southern margins of San Francisco Bay, and extended south to the Monterey Bay region (Kroeber 1925, Levy 1978). The Ohlone lived in autonomous tribelets occupying defined territories that included permanent villages and associated seasonal camps and resource procurement sites. They relied on a diverse array of resources, including acorns, seeds, fish, shellfish, marine mammals, and terrestrial game, and participated in regional trade networks involving obsidian and other goods; clamshell disk beads functioned as a medium of exchange. The establishment of Spanish missions between 1777 and 1797 profoundly disrupted Ohlone lifeways, resulting in dramatic population decline due to disease, cultural dislocation, and demographic collapse. Recent archaeological studies have shown that Native communities actively maintained cultural persistence through adaptation, challenging the narrative of their disappearance and demonstrating their continued connection to the land and cultural traditions.

REGULATORY SETTING

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).

TRIBAL CONSULTATION

The City sent letters via email and U.S. Postal Service to appropriate representatives of each tribal group associated with the Plan area on January 9, 2026. Two responses were received from Kanyon Sayers-Roods of the Indian Canyon Band of Costanoan Ohlone People and from Bernadette Quiroz of the Muwekma Ohlone Tribe of the San Francisco Bay Area.

A consultation meeting was held with City representatives and Kanyon Sayers-Roods of the Indian Canyon Band of Costanoan Ohlone People on March 19, 2026. The City and tribal representatives discussed the proposed Plan, went over the findings of the Cultural Resources Study, and discussed mitigation measures for the treatment of tribal cultural resources. As a result of consultation, measures including cultural resources sensitivity training were incorporated into the Project as Mitigation Measure TCR-1.

A consultation meeting was held with City representatives and Bernadette Quiroz of the Muwekma Ohlone Tribe on April 15, 2026. The City and tribal representatives discussed the proposed Plan, went over the findings of the Cultural Resources Study, and discussed mitigation measures for the treatment of tribal cultural resources. As a result of consultation, the requirement for tribal cultural monitoring for some future projects under the Plan was incorporated as Mitigation Measure TCR-2.

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 Impact with Mitigation Incorporated

The results of the Cultural Resources Study indicated that there are no documented tribal cultural resources within the Plan Area (Barrow 2026a). However, as described in Section 4.2.5, *Cultural Resources*, there is one known area of reburied Native American remains located within the Plan Area. Mitigation Measure CUL-3 would be implemented, which requires the City to ensure that the location of reburied Native American remains within the Plan Area is documented with the Northwest Information Center and California Historical Resource Information System, and ensure that the area remains undeveloped in perpetuity.

The City sent letters to representative of local Native American groups affiliated with the Plan Area to solicit input regarding tribal cultural resources that may be impacted by the proposed Plan. As described above, a response was received from the Indian Canyon Band of Costanoan Ohlone People and the Muwekma Ohlone Tribe of the San Francisco Bay Area. No other tribal cultural resources were identified within the Plan Area; however, there is potential for archaeological resources, which may be tribal cultural resources, to be discovered during ground-disturbing activities. As a result of tribal consultation, Mitigation Measure TCR-1 and TCR-2 were incorporated into the IS/MND. Mitigation Measure TCR-1 requires that a cultural resources sensitivity training be conducted for any projects that involve ground-disturbing activities 12 inches below the ground surface. Mitigation Measure TCR-2 requires that a Native American monitor be present for future projects under the Plan that have potential to result in substantial disturbance of soils, and thus may uncover unknown tribal cultural resources. With implementation of these measures, along with Mitigation Measure CUL-1, CUL-2, and CUL-3, and CUL-4, the proposed Plan would not result in a substantial adverse effect to tribal cultural resources. The impact would be less than significant with mitigation incorporated.

MITIGATION MEASURES

Mitigation Measure TCR-1. Cultural Resources Identification Training

For future projects under the Plan that would involve ground-disturbing activities more than 12 inches below the ground surface on undeveloped land, construction crews shall be trained in “basic archaeological and tribal resources identification” and have access to a cultural resources awareness and sensitivity alert sheet. The alert sheet shall photographically depict indicators of archaeological sites and artifacts and clearly outline the procedures in the event of new discovery. These procedures shall include temporary work stoppage (i.e., a stop work order) of all ground disturbance, short-term physical protection of features and artifacts and their context, and immediate advisement of the Indian Canyon Band of Costanoan Ohlone People, the Muwekma Ohlone Tribe of the San Francisco Bay Area, and City representatives.



Mitigation Measure TCR-2. Tribal Monitoring

For ground-disturbing activities associated with implementation of the Plan, the City shall retain a Native American monitor from a culturally affiliated tribe to monitor construction activities that have the potential to result in substantial disturbance of soils. Tribal monitoring shall be required for projects involving substantial ground disturbance, including but not limited to construction of new structures, replacement or expansion of existing buildings, installation of park facilities requiring continuous or large-area excavation, and other activities that extend beyond minor surface improvements.

Tribal monitoring shall not be required for limited, low-intensity ground-disturbing activities such as installation or replacement of fencing or signage, landscaping and tree planting, utility trenching, or similar minor improvements, provided that such activities do not involve extensive excavation or disturbance of previously undisturbed soils.

The requirement for tribal monitoring shall be determined by the City on a project-by-project basis depending on the nature, extent, and location of proposed ground disturbance. In the event that tribal cultural resources are encountered during construction, all work within 100 feet of the find shall halt, and the lead agency shall notify the appropriate tribe(s). A qualified tribal representative shall participate in the evaluation of the find and recommend appropriate treatment measures.



4.2.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less-than-Significant Impact 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

Water in the City is supplied by the California Water Service (Cal Water), which purchases water from the San Francisco Public Utilities Commission (SFPUC). Approximately 85 percent of SFPUC's supply comes from the Hetch Hetchy Reservoir in Yosemite National Park, which collects Sierra Nevada snowmelt. The remaining 15 percent of water comes from runoff in the Alameda and Peninsula watersheds (Bay Area Water Supply & Conservation Agency [BAWSCA] 2026). The San Carlos water system maintained by Cal Water contains 112 miles of water main, 19 storage tanks, and 25 booster pumps (Cal Water 2022).



Wastewater

Wastewater services in the City are provided by Silicon Valley Clean Water (SVCW). SVCW is a Joint Powers Authority founded in 1975 and is comprised of four member agencies, including the City of San Carlos.

The SVCW treatment plant is located in Redwood City, which borders San Carlos. Wastewater arrives at the facility through a series of pipelines and pumpstations and is then passed through a physical, chemical, and biological treatment process. High quality effluent is then discharged to the deep-water channel of the San Francisco Bay. The City's pump station is currently undergoing upgrades as a part of SVCW's Regional Environmental Sewer Conveyance Upgrade program. The pump station will be reconfigured to accommodate a drop structure connecting to a new SVCW gravity pipeline, which will eliminate the need for the existing pump station to convey wastewater to the treatment plant (SVCW 2025).

Stormwater

Stormwater infrastructure in San Carlos is provided by the City of San Carlos Public Works Department. The County also administers the Flows to Bay program, which is made up of 21 incorporated towns and cities that share a common NPDES permit to prevent harmful pollutants from entering creeks, the San Francisco Bay, and the Pacific Ocean. Additionally, Flows to Bay facilitates the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP).

Solid Waste

Solid waste collection, recycling, and disposal services for the City provided by Recology San Mateo County under franchise agreement with the City. Recology provides residential and non-residential collection services, including landfill disposal, recyclable materials processing, and organics diversion programs consistent with State mandates such as AB 939, AB 1826, and SB 1383. Solid waste generated within San Carlos is transported to permitted regional disposal facilities with available long-term capacity.

Electricity and Natural Gas

Electricity and natural gas services within the City are provided by PCE and PG&E. PCE is a public, not-for-profit electricity provider serving San Mateo County and the City of Los Banos. PG&E provides natural gas service in San Carlos and manages customer energy accounts. Existing electrical and natural gas infrastructure serves the project area and surrounding neighborhoods.

Telecommunications

Telecommunications services within the City include telephone, internet, and wireless communication services, which are provided by multiple regional service providers utilizing existing infrastructure located within public rights-of-way and developed areas.

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 Plan would include implementation of park and facility improvements designed to reduce water consumption and improve stormwater management, including installation of efficient irrigation systems; use of reclaimed water where feasible; incorporation of green infrastructure features such as bioswales, rain gardens, conservation landscaping, and permeable paving; and installation of erosion control measures (e.g., water bars at Eaton Park). Proposed improvements to the Kiwanis Building and Youth Center would include replacement of building systems and appliances with appropriately sized all-electric units, as feasible. Some projects included in the Plan would require the expansion of utility infrastructure, such as installation of new water lines at Burton Park, extension of underground electrical utilities at Crestview Park, extension of electrical, water, and sewer utilities at Big Canyon Park. Potential environmental effects associated with construction of these expanded utilities are discussed throughout this IS/MND, particularly in *Section 4.2.4, Biological Resources*, *Section 4.2.5, Cultural Resources*, *Section 4.2.7, Geology and Soils*, and *Section 4.2.10, Hydrology and Water Quality*. As described in the applicable resource sections, implementation of Parks Master Plan Guidelines and mitigation measure included in this document would minimize potential environmental effects of utility expansion to a less-than-significant level.

Therefore, the proposed Plan would not require or result in the relocation or construction of new or expanded facilities which would 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

Construction of individual projects under the Plan would require the use of water for construction activities such as watering soil stockpiles and exposed areas. The water needed for construction activities would be comparable to the water demand for similar types of construction projects in San Carlos and would not substantially increase existing demand for water within the City. Therefore, the impact of water demand associated with construction would be less than significant.

Some projects under the proposed Plan would require extension of potable water facilities, such as new restrooms, irrigation systems, drinking fountains, and retrofitting of water play structures. However, these extensions would not constitute an increase in water demand in the Plan Area, because the Plan would not encourage population growth. As described in *Section 4.2.14, Population and Housing*, the proposed Plan would not include the construction of new housing or provide services which would encourage or support growth within the City. Therefore, the Plan would not result in any significant increase of potable water demand. The impact 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

As discussed in *Section 4.2.14, Population and Housing*, the proposed Plan would not construct new housing or provide services which would encourage or support growth within the City. Although some projects under the proposed Plan would require extension of existing wastewater infrastructure, such as the construction of new restroom facilities, the Plan would not result in substantial population growth that would exceed capacity of the local wastewater treatment provider. The 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?**

Less-than-Significant Impact

The Plan would include implementation of improvements identified, such as renovation and enhancement of existing park facilities, construction of new recreational amenities, and periodic replacement or upgrade of park infrastructure. Solid waste generated by the proposed Plan would primarily include construction and demolition (C&D) waste from old park furniture, playgrounds, turf, tennis courts, etc. Projects undertaken under the Plan would be required to comply with the City's Construction and Demolition Debris Recycling Requirements, as described in Chapter 8.05 of the SCMC, which require diversion of at least 60 percent of C&D waste from landfill disposal through recycling or reuse. Prior to issuance of building permits, a Waste Management Plan (WMP) must be submitted to the Department of Planning and Building, which shall identify the estimated volume of C&D waste to be generated, the maximum amount of such materials that can be feasibly diverted, the vendor or facility the applicant proposed to receive the material, and the estimated amount of C&D material that will be landfilled. Compliance with these requirements would ensure that projects under the proposed Plan would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure. The Plan would not result in any ongoing, permanent increase in solid waste generation. The impact would be less than significant.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less-than-Significant Impact

Implementation of improvements identified in the Plan would generate C&D waste associated with renovation, replacement, and construction of park facilities and amenities. As described above in Threshold d), future projects implemented under the Plan would be required to comply with applicable federal, State, and local solid waste management regulations, including requirements for recycling and diversion of C&D materials. The City and its franchised waste hauler, Recology San Mateo County, require recycling and organics diversion consistent with State mandates, including the California Integrated Waste Management Act (AB 939), AB 1826, and SB 1383, which establish waste reduction and diversion targets aimed to reduce landfill disposal.

Operation of the Plan would generate similar amounts of solid waste as pre-project conditions, as the Plan would not introduce any new permanent sources of solid waste generation. Typical waste generated within the Plan Area includes municipal solid waste (e.g., visitor trash, event-related waste, pet waste), recyclables (e.g., cardboard, aluminum cans, plastic bottles, and glass containers), and organic waste (e.g., grass clippings, tree trimmings, fallen leaves, brush). The City's Parks and Recreation Department would continue to comply with local requirements for



solid waste, recyclables, and organic waste disposal. Therefore, the Project would comply with all federal, State, and local management and reduction statutes and regulations related to solid waste. The impact 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 Impact 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

The City of San Carlos is in a Local Responsibility Area (LRA) for wildfire prevention, meaning that wildfire protection is assigned to local, rather than state agencies (CAL FIRE 2026). The southwestern edge of the City is within a Moderate to High FHSZ. Four out of the 17 parks and facilities within the Plan are within a FHSZ, including Crestview Park (High FHSZ), North Crestview Park (Moderate FHSZ), Vista Park (Moderate FHSZ), and parts of Big Canyon Park (Moderate-High FHSZ). The nearest Very High FHSZ is located approximately 0.22 miles west of the City in unincorporated San Mateo County (CAL FIRE 2026).

REGULATORY SETTING

City of San Carlos General Plan

The City's General Plan ESPS Element contains the following applicable policies related to wildfire:

- **ESPS-3.6:** Minimize new development (residential and nonresidential) within the Very High FHSZ.
- **ESPS-3.9:** Incorporate or require the incorporation of fire safety features in new development and re-development.
- **ESPS-3.12:** Ensure adequate water supply is available.



- **ESPS-3.13:** Ensure new and existing public and privately owned properties are constructed and maintained in a manner that minimizes and reduces fire hazard threats and has adequate fire protection.
- **ESPS-3.14:** Provide adequate evacuation routes and access for fire and emergency service vehicles to all San Carlos areas.
- **ESPS-3.15:** Identify and implement measures to mitigate single access roads and non-conforming roadways, as feasible.

San Mateo County Multijurisdictional Local Hazard Mitigation Plan

The San Mateo County MLHMP assesses the likelihood of future hazard events and establishes mitigation protocols to address them. According to the MLHMP, the highest risk factors for the City of San Carlos are sea level rise and climate change, floods, landslides, and wildfire (County of San Mateo 2021).

DISCUSSION OF IMPACTS

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

No Impact

Implementation of the Plan would not impact implementation of any adopted emergency response plan or emergency evacuation plan. Parks would be accessed via existing roads and equipment and materials staging for improvement projects would be located within parking lots or within the parks themselves. Construction of individual projects under the Plan are not anticipated to result in any road closures. In addition, certain park improvements, such as paving the fire road at Eaton Park and Arguello Park and improving the fire road with durable surface at Crestview Park, are specifically designed to improve emergency vehicle access, which would result in a beneficial impact related to emergency response. The Plan would not conflict with any mitigation activities included in the County's MLHMP. Therefore, no impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less-than-Significant Impact

The Plan encompasses parks and recreational facilities throughout the City. Four out of the 17 parks and facilities within the Plan are within a FHSZ, including Crestview Park (High FHSZ), North Crestview Park (Moderate FHSZ), Vista Park (Moderate FHSZ), and parts of Big Canyon Park (Moderate-High FHSZ). Improvements at these parks include improvements to wayfinding signage; the installation of shade structures, fencing, and water fountains; and the installation of a bathroom at Big Canyon Park. No improvements are proposed at North Crestview Park. Improvements at Crestview Park, Big Canyon Park, and Vista Park are not anticipated to increase wildfire risk. None of the improvements would add ignition sources or fire hazards such as overhead electrical equipment, barbecues, or other potential fire ignition sources. These parks are already utilized by community members and the proposed improvements would not substantially increase park use, as described in *Section 4.2.16, Recreation*. Therefore, the Plan



would not exacerbate wildfire risks or expose the community to pollutant concentrations from wildfire. The impact 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?***

Less-than-Significant Impact

Four out of the 17 parks and facilities within the Plan Area are within a FHSZ, including Crestview Park (High FHSZ), North Crestview Park (Moderate FHSZ), Vista Park (Moderate FHSZ), and parts of Big Canyon Park (Moderate-High FHSZ). No improvements are proposed at North Crestview Park. Improvements to Crestview Park, Vista Park, and Big Canyon Park include signage upgrades, the installation of shade structures and other standard park amenities, playground replacements, and construction of new restrooms, and landscaping improvements.

The Plan would not introduce associated infrastructure that may exacerbate fire risk. While the Project includes new utility connections, such as the extension of existing electrical utilities to accommodate a new restroom at Big Canyon Park and the installation of new safety lighting bollards at Crestview Park, these improvements would be installed underground and would not require any new overhead power lines that could increase fire risk. Fire road improvements at Crestview Park would include durable surfacing and the elimination of trailhead erosion issues, which would result in a beneficial effect for emergency access vehicles. Additionally, the extension of water lines to Vista Park and Big Canyon Park for water fountain and restroom installation, respectively, would introduce potential new emergency water sources for the parks. All proposed improvements would be required to comply with the General Plan, the SCMC, the CBC as adopted by the City, and the MLHMP. Therefore, the Plan would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. The impact would be less than significant.

- 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 described in *Section 4.2.7, Geology and Soils*, some portions of the Plan Area are within a CGS landslide hazard zone. The majority of improvements included in the Plan would replace or rehabilitate existing equipment in kind in the same location (e.g., replacement of park furniture and playground equipment, resurfacing of tennis courts, trail improvements, replacement of signage), which would not alter the park sites in a way that would expose people or structures to risks associated with post-fire instability. The Plan also proposes improvements specifically designed to improve drainage and reduce erosion. Trail improvements at Eaton Park would involve the addition of rolling dips, which would create undulating slopes to allow for the natural flow of water off the trail. Water bars would also be installed to slow and divert water from the trailhead. At Arguello Park, approximately 1.12 miles of social trails, which are currently contributing to erosion at the site, would be formalized by improving grading, surface material, and drainage. Additionally, 0.2 miles of trail would be realigned to address existing erosion impacts. At Big Canyon Park, the Plan proposes a floodplain detention basin to protect against flooding and erosion. These improvements would reduce the risk of downslope or downstream



flooding or landslides. Therefore, the Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. The impact would be less than significant.



4.2.21 Mandatory Findings of Significance

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
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 Impact with Mitigation Incorporated

Implementation of the Plan would not substantially degrade the quality of the environment, 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, or reduce the range of a rare or endangered plant or animal. Implementation of mitigation measures presented in *Section 4.2.4, Biological Resources*, would mitigate potential significant impacts that could substantially degrade the quality of the environment or impact biological resources. As discussed in *Section 4.2.5, Cultural Resources*, and *Section 4.2.18, Tribal Cultural Resources*, impacts to potentially unknown resources within the Plan Area would be mitigated to a less-than-significant level by Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4. Given the fact that potential impacts to biological and cultural resources would primarily occur during active construction (not long term) and that measures have been identified to reduce these temporary impacts, impacts



would not be considered significant. 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

Cumulatively considerable means that the incremental effects of an individual 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. The Plan includes a variety of park improvements that would be implemented over a 20-year period within the Plan Area. The majority of projects included in the Plan include rehabilitation or replacement of existing facilities, such as signage, park furniture, playground equipment, turf, tennis courts, and trails and walkways. The purpose of these improvements is to replace existing degraded infrastructure and increase the longevity of park facilities thus limiting the need for future maintenance and replacement. As stated in the Parks Master Plan Guidelines, proposed improvements would use “durable, high-quality materials that age well and are appropriate for the San Francisco Bay Peninsula climate, with consideration for long-term maintenance.” Thus, the purpose and design of improvements is to reduce the need for future maintenance that could have cumulative incremental effects on the Plan Area.

Some improvements included in the Plan would convert natural land cover types to developed areas, such as the construction of new restroom facilities, paved picnic areas, and an asphalt pump track. These improvements are only proposed in small areas at a limited number of parks and would not convert significant amounts of habitat into developed land cover types. These improvements support the existing use of parks and open spaces in the City and are cohesive with the type of park they are proposed at (i.e., neighborhood park vs. open space area). Implementation of the Plan would support and enhance the City’s existing park system without substantially altering the nature of recreational opportunities in a way that would create cumulatively considerable impacts. The impact 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 with Mitigation Incorporated

Potential impacts to human beings have been addressed in this IS/MND, including impacts related to air quality, noise, hazards and hazardous materials, and transportation. Construction activities associated with the proposed Plan would cause potential temporary impacts to humans due to the generation of fugitive dust emissions. However, the BAAD considers implementation of dust control measures during construction sufficient to reduce air quality impacts from fugitive dust to a less-than-significant level. In accordance with City General Plan policy EM-6.6, all development projects in the City must implement BAAD’s standard BMPs for fugitive dust control. In addition, Mitigation Measure AIR-1 would be implemented, which requires that a Construction HRA be prepared for any future projects under the plan that would involve construction for a duration of two months or longer within 1,000 feet of a sensitive



receptor (e.g., residence, school, etc.). With implementation of this measure, the Plan would not result in any air quality impacts that would cause substantial adverse effects on human beings.

Impacts associated with hazards and hazardous materials, noise, and transportation resulting from the Plan were found to be less than significant, and no mitigation measures are required. As such, the Plan would not have environmental effects that would cause substantial adverse effects on human beings. The impact would be less than significant with mitigation incorporated.



5.0 RESPONSES TO COMMENTS

The Draft IS/MND for the proposed San Carlos Parks Master Plan (State Clearinghouse No. 2026040868) was circulated for a 30-day public review period from April 17, 2026, to May 18, 2026, pursuant to Section 15105 of the CEQA Guidelines.

The Draft IS/MND and the response to comments on the Draft IS/MND are informational documents prepared by the Lead Agency that must be considered by decisionmakers before approving the proposed project and that must reflect the Lead Agency's independent judgment and analysis (CEQA Guidelines, Section 15090).

This section of the Final IS/MND provides responses to the comments and questions on the Draft IS/MND circulated by the City to public agencies and the public. As discussed below in the response to comments, edits to the Draft IS/MND have incorporated the comments where appropriate. With these edits, the Final IS/MND does not describe a project having any new or substantially more severe impacts than those identified and analyzed in the Draft IS/MND. Therefore, in accordance with CEQA Guidelines Section 15073.5, recirculation of the Draft IS/MND is not required.

This section contains a copy of the comment letters submitted during the public review period on the Draft IS/MND, and the individual responses to those comments. Where responses have resulted in changes to the Draft IS/MND, these changes are shown in the response and also appear in the Final IS/MND as underlined or ~~strike-out~~ text.

During the public review period, the following organizations/persons provided written comments on the Draft IS/MND to the City:

A. Caltrans District 4



California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



May 18, 2026

SCH #: 2026040868
GTS #: 04-SM-2026-00784
GTS ID: 39869
Co/Rt/Pm: SM/VAR/VAR

Lisa Costa Sanders, Principal Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070

Re: San Carlos Parks Master Plan — Draft Initial Study/Mitigated Negative Declaration (IS/MND)

Dear Lisa Costa Sanders:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the San Carlos Parks Master Plan. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2026 Draft IS/MND.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project is a master plan for the 17 parks and open spaces located within the City of San Carlos. The plan outlines a long-term vision for the park area which includes three community parks, five neighborhood parks, five mini-parks, two special use parks, two open spaces, five facilities. These areas are spread throughout the city with Laureola Park and Frank D. Harrington Park being the closest to a State Right of Way (State Route 82).

Multimodal System Planning

Caltrans District 4 Multimodal System Planning (System Planning) would like to advise the City of several concurrent planning efforts within the Master Plan vicinity, which are described below. System Planning recommends these planning efforts be incorporated into the Transportation section of the IS/MND by reference.

Lisa Costa Sanders, Principal Planner

May 18, 2026

Page 2

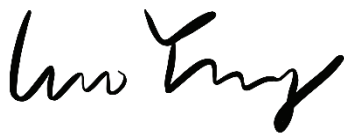
A-1

System Planning is currently preparing a Comprehensive Multimodal Corridor Plan (CMCP) along all of State Route (SR 82) within San Mateo County, the SR 82 North CMCP. The purpose of this document will be to identify key needs and challenges in the corridor and develop a balanced and equitable transportation system that integrates multimodal mobility choices. In addition, this CMCP is being prepared in close coordination with the SamTrans-led, multi-agency Grand Boulevard Initiative (GBI) concurrently being conducted with all local cities along SR 82 within San Mateo County. Lastly, more specific to the Parks Master Plan location and consistent with GBI, SamTrans is also leading the Central El Camino Real (ECR) Multimodal Plan, a planning project being coordinated with the cities of San Mateo, Belmont, San Carlos, and Redwood City. The Central ECR Plan is aimed at providing multimodal transportation enhancements along this 8.5-mile portion of SR 82.

System Planning notes that some City parks identified for improvement in the Master Plan are in walking proximity to SR 82. As the IS/MND states, "the Plan intends to improve connectivity and provide opportunities for non-vehicular transportation through improvements to trail, cycling, and walking infrastructure." These Master Plan goals are seemingly aligned with those of the SR 82 North CMCP, GBI, and Central El Camino Real Multimodal Plan. System Planning recommends that the City coordinate with Caltrans and SamTrans to ensure the Parks Master Plan is consistent with these ongoing planning efforts.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

5.1 Response to Comment Letter A

COMMENT A-1

The commentor thanks the City for the opportunity to comment on the IS/MND and clarifies the comment letter is for informational purposes only. The commentor provides their understanding of the Project and states that Laureola Park and Frank D. Harrington Park are the closest parks to a State Right of Way (State Route 82).

The commentor summarizes several concurrent Multimodal System Planning efforts within the vicinity of the Plan area, including the Comprehensive Multimodal Corridor Plan (CMCP) along State Route 82 within San Mateo County, the Grand Boulevard Initiative, and the Central El Camino Real Multimodal Plan along State Route 82. The purpose of these plans and initiatives is to provide multimodal transportation enhancements along State Route 82, which is in walking distance to some parks identified within the Parks Master Plan.

The commentor states that the Parks Master Plan goals to “improve connectivity and provide opportunities for non-vehicular transportation through improvements to trail, cycling, and walking infrastructure” are seemingly aligned with the goals identified in the CMCP, the Grand Boulevard Initiative, and the Central El Camino Real Multimodal Plan. The commentor requests that these planning efforts be incorporated by reference into the Transportation section of the IS/MND and recommends that the City coordinate with Caltrans and SamTrans when implementing future projects under the Parks Master Plan to ensure consistency with the Multimodal System Planning efforts.

The commentor concludes by thanking the City for the opportunity to participate in the environmental review process.

RESPONSE TO COMMENT A-1

The City thanks the commentor for their input. Page 117 and 118 of this Final IS/MND have been updated to reference Caltrans’ regional planning efforts and to clarify that the City will coordinate with Caltrans and SamTrans regarding future upgrades to the circulation system that are associated with the Parks Master Plan.



6.0 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA Guidelines (California Code of Regulations, Title 14), Section 15097, requires public agencies to adopt reporting or monitoring programs when they approve projects to an Environmental Impact Report or negative declaration that includes mitigation measures to avoid significant environmental effects. The reporting or monitoring program shall be designed to ensure compliance with conditions of project approval during project implementation in order to avoid significant adverse environmental effects.

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to CEQA Guidelines Section 16097, which states the following:

In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision-making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. "Monitoring" is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both.

The basis for this MMRP are the mitigation measures included in the Final Programmatic IS/MND (SCH 2026040868) prepared for the Parks Master Plan. These mitigation measures are designed to eliminate or reduce significant adverse environmental effects of the Plan to less than significant levels. The City of San Carlos Parks and Recreation Department has agreed to implement the mitigation measures as required, before and during implementation of the proposed Plan.

Table 10 below presents the potentially significant impacts and proposed mitigation measures identified in the Final Programmatic IS/MND, the timing of implementation of the mitigation measures (i.e., when the measure will be implemented), the City staff or individual responsible for ensuring implementation of each mitigation measure, and the City staff member or individual responsible for monitoring the mitigation measures.



Table 10. Mitigation Monitoring and Reporting Program

MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
AESTHETICS			
Mitigation Measure AES-1. Non-Reflective Materials All new construction and improvements, including playground equipment, restroom facilities, lighting, fencing, irrigation appurtenances, and other site features, shall utilize non-reflective, low-glare materials and finishes to the maximum extent feasible. Exterior surfaces shall be finished with matte, textured, or earth-toned coatings, and highly reflective materials such as polished metals or mirrored surfaces shall be avoided.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Throughout project design, prior to construction	Initials _____ Date _____
AIR QUALITY			
Mitigation Measure AIR-1. Construction Health Risk Assessment Individual projects under the proposed Plan that will include the use of heavy machinery (e.g., excavators, concrete trucks, bulldozers, loaders, etc.) within 1,000 feet of a sensitive receptor for a duration of two months or longer shall prepare a Construction Health Risk Assessment (HRA) prior to project approval. A sensitive receptor includes any land use with a concentrated population of people that are highly susceptible to health effects of air pollution, such as children, the elderly, asthmatics. Therefore, land uses with a concentrated population of sensitive receptors include schools, daycare centers, playgrounds, hospitals, nursing homes, retirement homes, and residential communities. If the results of the HRA indicate that the project would have a potentially significant impact to air quality sensitive receptors, the project shall implement mitigation measures recommended in the HRA to reduce the impact to a less-than-significant level. Mitigation measures for the types of projects anticipated under the proposed Plan may include restricting vehicle idling time, implementing windbreaks, and using cleaner equipment, such as Tier 4 engines.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____

MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
BIOLOGICAL RESOURCES			
Mitigation Measure BIO-1a. Special-status Plants Targeted surveys for special-status plant species shall be conducted prior to ground-disturbing activities for any projects that would result in ground disturbance outside of developed or ornamental land cover. Botanical surveys will be conducted within the work area the year prior to development by a qualified biologist during the appropriate timeframe when plants with moderate potential to occur are evident and identifiable in accordance with CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities, dated March 20, 2018, and available at: Survey and Monitoring Protocols and Guidelines (CDFW.ca). Three appropriately timed protocol-level surveys will be performed, one during mid spring (March-May), one during late spring/early summer (May-June), and one during mid-late summer (July-August). Reference site visits will be conducted to confirm that the target species are in bloom during the surveys. If no special-status plant species are found, then the project will not have any impacts to special-status plant species and no additional mitigation measures would be necessary.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction	Initials _____ Date _____
Mitigation Measure BIO-1b. Special-status Plants If special-status plant species are found, populations or individuals will be flagged and fully avoided by a 10-foot no-disturbance buffer where no ground-disturbing activities will take place, including construction staging or other temporary work areas. Activity exclusion zones for special-status plant species will be established prior to activities around each occupied habitat site, the boundaries of which will be clearly marked with standard orange plastic construction exclusion fencing or its equivalent. The size of activity exclusion zones may be determined through consultation with a qualified biologist. If special-status plants are present and impacts to those plant populations cannot be avoided, seed or other propagules will be	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction, for duration of construction, and post-construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
harvested from at least 50 percent of plants within areas of impact. Harvested seed or propagules will be stored for reintroduction into the preserved portion of the project site. A Habitat Management Plan (HMP), or similar document(s) by a different name(s), will be prepared for the reintroduction area. The HMP will be provided to the City and CDFW for approval. The HMP will provide detailed information to the CDFW and the City on the quality of preserved habitat, location of the preserved occurrences, provisions for protecting and managing the areas, the responsible parties involved, and other pertinent information that demonstrates the feasibility of the compensation. An HMP will identify appropriate mitigation ratios developed in consultation with CDFW. The HMP will also include monitoring methods and performance criteria for post-construction monitoring, including criteria for the successful establishment and preservation of special-status plants within the reintroduction area. Success criteria include: • Habitat acreage for special-status plants in the reintroduction area will be equivalent to the acreage occupied by those species during the most recent survey that occurs prior to construction. • Populations of special-status plants will be monitored annually for a minimum of 5 years following establishment of the reintroduction area. • Management of invasive species such that species rated as “High” by the California Invasive Plant Council, with the exception of common non-native grasses that dominate undeveloped habitats in the surrounding area, will not collectively exceed 5 percent absolute cover within the reintroduction area. • Based on the results of post-construction monitoring, adaptive management actions will be implemented, if necessary. Adaptive management actions may include reseeding and treatment of invasive species.			



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
If propagation efforts do not meet performance standards, then the loss of individuals of special-status plants shall be compensated for through the acquisition, protection, and subsequent management of other existing occurrences, as approved by CDFW and the City.			
Mitigation Measure BIO-2: Worker Environmental Awareness Training For projects under the proposed Plan that involve ground-disturbing activities in undeveloped land cover (i.e., any land cover type within the Plan Area other than developed and ornamental), a qualified biologist shall provide a worker environmental awareness program (WEAP) training to all personnel involved in project construction. At a minimum, the WEAP shall consist of a brief presentation by persons knowledgeable about the biology of sensitive species with potential to occur in the project footprint, and about their legislative protection to explain concerns to contractors and their employees involved with implementation of the project. The WEAP will include a description of any special-status species with potential to occur in the project footprint, its habitat needs, any reports of occurrences in the area, an explanation of the status of these species and their protection under State and Federal legislation, and a list of measures being taken to reduce impacts to these species during construction.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction	Initials _____ Date _____
Mitigation Measure BIO-3. San Francisco Dusky-footed Woodrat To avoid potential impacts to San Francisco dusky-footed woodrat, the following measures will be implemented: • Prior to vegetation removal and/or ground disturbance within suitable habitat, a pre-construction survey for woodrat structures shall be conducted by a qualified biologist. Any woodrat structures found during the survey shall be flagged and avoided. • If avoidance is not possible, then structures to be impacted shall be dismantled by hand under the supervision of a qualified biologist. Dismantled nest	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
material shall be moved to adjacent vegetated areas that will not be disturbed. If woodrat young are encountered during the dismantling process, materials shall be placed back on the structure and a work exclusion buffer of 50 feet placed around the structure. The structure shall remain undisturbed for at least two weeks to allow the young to mature and leave of their own accord, or for the female to move the young. After the avoidance period, the nest dismantling process may begin again.			
Mitigation Measure BIO-4. American Badger The following minimization measure will be implemented for any ground-disturbing activities in undeveloped land cover (i.e., any land cover type other than developed and ornamental) within Big Canyon Park and Eaton Park to avoid potential impacts to American badger: - A qualified biologist shall conduct a focused pre-construction survey for badger dens no more than two weeks prior to construction activity in any suitable habitat proposed for ground disturbance. If no potential badger dens are present within the construction footprint, no further action is required. - If a den is identified, but is inactive, the den will be excavated by hand and backfilled to prevent badgers from using the burrow. - If the badger den is active the qualified biologist shall determine the state of occupancy (i.e., single animal occupancy or a natal den). - If the burrow is occupied by a single animal, the mouth of the burrow will be repeatedly blocked with earth, sticks and similar materials for 3-5 days to exclude the animals and allow the badger to self-relocate. After 5 or more days of burrow	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: No more than two weeks prior to construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
exclusion, the den is excavated and backfilled using hand tools. If the burrow is a natal den, it shall be avoided by a minimum of 50-ft until the young are sufficiently developed to leave the burrow on their own. Once the young have developed sufficiently to leave the burrow on their own, the biologist will re-assess the burrow for occupancy. If no additional young are present, but the burrow remains occupied by the adult, burrow exclusion as described above may occur, followed by excavation and backfill.			
Mitigation Measure BIO-5. Crotch's Bumble Bee The following measures will be implemented for any ground-disturbing activities in undeveloped land cover (i.e., any land cover type other than developed and ornamental) within Big Canyon Park and Eaton Park at appropriate sites to avoid potential impacts to Crotch's bumble bee: • A qualified biologist shall survey for Crotch's bumble bee prior to the commencement of construction activities during the colony active period or the gyne flight season (generally, April 1 to October 31). The survey shall occur at least two hours after sunrise (> 60F and < 90F with no rain) or two hours before sunset and the survey area shall include the project boundaries and a surrounding 100-foot buffer area. The survey duration shall be appropriate to the size of the project site and buffer area based on the metric of a minimum of one person-hour of searching per three acres of suitable habitat. • During the survey(s) the qualified biologists may not capture or handle bumble bees unless specifically authorized to do so for the project by CDFW. At a minimum, survey methods shall include the following: ○ Search areas with flowering plants for foraging bumble bees. Observed foraging activity may	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
indicate a nest is nearby, and therefore, the survey duration shall be increased when foraging bees are present. ○ Watch any bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest. ○ Visually look for nest entrances. Observe burrow, any other underground cavities, logs, or other possible nesting habitat. ○ Look for concentrated bumble bee activity. ○ Listen for humming of nest colony. ○ If bumble bees are observed, attempt to identify the species by taking a picture. ○ If foraging bees are present and a nest has not been found, floral resources within the project's disturbance footprint may be carefully removed with hand-held tools to minimize foraging bee presence during project activities. The continuation of bumble bee activity once such floral resources are removed may be an indication that a nest is present. ○ The biologist conducting the survey shall record when the survey was conducted, a general description of any suitable foraging habitat/floral resources present, a description of observed bumble bee activity, a description of any vegetation removed to facilitate the survey, and their determination of if the survey observations suggest a Crotch's bumble bee nest may be present or if construction activities could otherwise harm the species. The survey may be conducted			



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
immediately prior to construction granted all the above and below conditions are met. If a Crotch's bumble bee is observed during the survey (not associated with a nest), or if any sign(s) of a bumble bee nest is observed and if it cannot be established the species present is not Crotch's bumble bee, then construction shall not commence until CDFW provides further guidance, which may include an additional survey by a bumble bee expert, waiting until the colony active season ends, obtaining take authorization, or other actions.			
Mitigation Measure BIO-6. Roosting Bats The following measures will be implemented at all parks included in the Plan Area to avoid potential impacts to roosting bats: • The removal or trimming of all trees with a diameter at breast height (DBH) greater than 16 inches shall be conducted outside of the bat maternity season (October through March) whenever feasible. If this is not feasible, a bat roost assessment shall be performed by a qualified biologist no more than 30 days prior to tree removal to determine if roosting bats are present. • If special-status bat species or potential maternity roosts of any species are detected during these surveys, the roost trees shall be protected, and a no-disturbance buffer of 100-feet shall be implemented around the active maternity roost until maternity activities have ceased. Irrespective of time of year, all felled trees should remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats to escape.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
Mitigation Measure BIO-7. Special-status and Nesting Birds The following measures will be implemented at all parks included in the Plan Area to avoid potential impacts to special-status and nesting birds: • To the extent feasible, project-related activities should be avoided during the nesting bird season, generally defined as February 1 – August 31. If project work must occur during the nesting bird season, a pre-construction nesting bird survey shall be conducted by a qualified biologist within 7 days of ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys shall be conducted in all potential nesting habitat located at, and adjacent to, project work sites and in staging and storage areas. • If an active nest is located, a no disturbance buffer shall be established around the nest. Active nest sites and protective buffer zones shall be designated as “Environmentally Sensitive Areas” where no project-related activities or personnel may enter until a qualified biologist determines that the young have fully fledged, or the nest otherwise becomes inactive (e.g., due to predation), and will no longer be adversely affected by the project. Suggested buffer zone distances differ depending on species, existing conditions, and nest placement and shall be determined and implemented in the field by a qualified biologist. • The buffer shall remain in place until the nest fledges or otherwise becomes inactive as determined by the qualified biologist.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
Mitigation Measure BIO-8. Aquatic Resources Prior to issuance of grading permits or initiation of ground-disturbing activities for any projects that may impact potential jurisdictional aquatic resources, the City shall retain a qualified biologist to conduct a formal delineation of potential jurisdictional aquatic resources within the project site, including wetlands and other waters of the United States and/or State, consistent with current protocols of USACE, the Regional Water Quality Control Board (RWQCB), and the CDFW, as applicable. The delineation report shall be submitted to the appropriate regulatory agencies for review and verification. If jurisdictional aquatic resources are confirmed and would be directly or indirectly impacted by project implementation, the City shall consult with the USACE, RWQCB, and CDFW to determine applicable permitting requirements and shall obtain all required authorizations prior to initiation of activities that could result in impacts. Such authorizations may include, but are not limited to, a Clean Water Act Section 404 permit from USACE, Clean Water Act Section 401 Water Quality Certification (or Waste Discharge Requirements) from the RWQCB, and a Lake or Streambed Alteration Agreement pursuant to Fish and Game Code Section 1600 et seq. from CDFW. The City shall comply with all permit conditions and implement all avoidance, minimization, and compensatory mitigation measures required by the regulatory agencies.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____
CULTURAL RESOURCES			
Mitigation Measure CUL-1. Archaeological Assessment An archaeologist who meets the Secretary of the Interior's Standards shall review and assess any projects that are proposed	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
to extend beyond 12 inches below the ground surface at Burton Park, to determine if a subsurface study is warranted.			
Mitigation Measure CUL-2. Accidental Discovery of Archaeological Resources If an accidental find is made during ground-disturbing activities, all soil disturbance shall stop within 100 feet of the find until an archaeologist who meets the Secretary of the Interior's Standards can complete a significance evaluation of the find(s). If the qualified archeologist determines that the find is eligible for inclusion on the National or California Register, the archaeologist shall make recommendations for appropriate methods of treatment for the find, which shall be implemented by the City. If the qualified archaeologist determines that the resource may be a tribal cultural resource, the City shall consult with the culturally affiliated tribe(s), and a tribal representative shall be invited to evaluate the find and provide treatment recommendations. Treatment of tribal cultural resources shall be developed in consultation with the culturally affiliated tribe(s), with avoidance as the preferred method where feasible. Potential treatment methods for resources may include, but would not be limited to, avoidance of the resource through changes in construction methods or project design or implementation of a program of testing and data recovery, in accordance with all applicable federal and state requirements. Any efforts shall be documented in a cultural resources report to be filed with the Northwest Information Center.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Duration of construction	Initials _____ Date _____
Mitigation Measure CUL-3. Native American Remains The City shall hire a qualified archaeologist to document the location of any reburials within the Plan Area. The location of reburials shall be documented by the qualified archaeologist on Department of Parks and Recreation 523 forms and submitted to the Northwest Information Center of the California Historical	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction of any projects at Arguello Park	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
Resource Information System. The City shall ensure that the location of the reburial will remain undeveloped in perpetuity, either through deed restrictions, fencing, or some other permanent form of protection. Consideration should be made in the future for the allowance of human reburials on City lands so that the location(s) can be kept protected.			
Mitigation Measure CUL-4. Human Remains California law recognizes the need to protect interred human remains, particularly Native American burials and items of cultural patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code §§ 7050.5 and 7052 and PRC § 5097. If remains are uncovered, ground-disturbing work shall halt within 100 feet of the find and the Lead Agency and County coroner shall be notified immediately. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (Health and Safety Code § 7050.5[b]). If the coroner determines that the remains are those of a Native American, the coroner must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code § 7050[c]). The Lead Agency and the professional archaeologist shall contact the Most Likely Descendent, as determined by the NAHC, regarding the remains. The Most Likely Descendant, in cooperation with the City, shall determine the ultimate disposition of the remains and any associated artifacts.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Duration of construction	Initials _____ Date _____
GEOLOGY AND SOILS			
Mitigation Measure GEO-1. Paleontological Resources Prior to ground-disturbing activities for any project with ground-disturbing activities deeper than 12 inches under the Plan, the City shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology (SVP) standards, to develop and conduct a Paleontological Resources Awareness Training Program for all	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
construction personnel involved in ground-disturbing activities (including but not limited to grading, excavation, trenching, drilling, and utility installation). The training shall be conducted prior to the commencement of ground disturbance and shall include, at a minimum: 1. A description of the types of paleontological resources that may be encountered within the project area; 2. Photographic examples of fossils and fossil-bearing sediments; 3. A summary of applicable federal, state, and local regulations protecting paleontological resources; 4. Identification of the procedures to follow in the event of a discovery; and 5. Contact information for the designated qualified paleontologist. All construction personnel shall be informed that if potential paleontological resources (e.g., fossilized bone, teeth, shell, leaf impressions, or unusual rock formations) are encountered during ground-disturbing activities, all ground-disturbing work within 50 feet of the discovery shall be halted immediately. The Construction Manager shall notify the City, who shall retain a qualified paleontologist to evaluate the find and recommend appropriate treatment measures consistent with SVP guidelines. Work in the vicinity of the find shall not resume until the paleontologist has determined that the resource has been appropriately assessed and any necessary mitigation has been implemented. Documentation of the training, including attendance logs and training materials, shall be maintained by the construction contractor and made available to the City upon request.			



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
HYDROLOGY AND WATER QUALITY			
Mitigation Measure HYDRO-1. Erosion and Pollution Control Measures Prior to the commencement of ground-disturbing activities for all future projects under the Plan, the City shall ensure that erosion and sediment control measures to minimize soil erosion are implemented. These measures are aimed to reduce sedimentation and pollutant discharge during construction activities associated with trail maintenance, paving, court and turf replacement, trenching for utilities, and related improvements. The following measures shall be implemented, at a minimum: 1. Limit disturbance to the minimum area necessary and clearly delineate construction boundaries. 2. Install perimeter controls (e.g., fiber rolls, silt fencing, gravel bags) to prevent sediment from leaving the work areas. 3. Protect storm drain inlets with appropriate sediment control devices. 4. Stabilize disturbed soils if inactive for more than 14 days through mulch, erosion control blankets, hydroseeding, or similar methods. 5. Cover or contain soil stockpiles and prevent tracking of sediment onto adjacent paved areas. 6. Backfill and compact trenches promptly and restore disturbed areas following utility installation. 7. Provide designated concrete washout areas and prevent construction materials, slurry, or debris from entering storm drains. 8. Restore disturbed areas to pre-project conditions and stabilize prior to the onset of the rainy season.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
TRIBAL CULTURAL RESOURCES			
Mitigation Measure TCR-1. Cultural Resources identification Training For future projects under the Plan that would involve ground-disturbing activities more than 12 inches below the ground surface on undeveloped land, construction crews shall be trained in “basic archaeological and tribal resources identification” and have access to a cultural resources awareness and sensitivity alert sheet. The alert sheet shall photographically depict indicators of archaeological sites and artifacts and clearly outline the procedures in the event of new discovery. These procedures shall include temporary work stoppage (i.e., a stop work order) of all ground disturbance, short-term physical protection of features and artifacts and their context, and immediate advisement of the Indian Canyon Band of Costanoan Ohlone People, the Muwekma Ohlone Tribe of the San Francisco Bay Area, and City representatives.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____
Mitigation Measure TCR-2. Tribal Monitoring For ground-disturbing activities associated with implementation of the Plan, the City shall retain a Native American monitor from a culturally affiliated tribe to monitor construction activities that have the potential to result in substantial disturbance of soils. Tribal monitoring shall be required for projects involving substantial ground disturbance, including but not limited to construction of new structures, replacement or expansion of existing buildings, installation of park facilities requiring continuous or large-area excavation, and other activities that extend beyond minor surface improvements. Tribal monitoring shall not be required for limited, low-intensity ground-disturbing activities such as installation or replacement of fencing or signage, landscaping and tree planting, utility trenching, or similar minor improvements, provided that such activities do not involve extensive excavation or disturbance of previously undisturbed soils.	Implementation Responsibility: City of San Carlos Parks and Recreation Department	Implementation Timing: Prior to and for duration of construction	Initials _____ Date _____



MITIGATION MEASURES	IMPLEMENTATION RESPONSIBILITY	IMPLEMENTATION TIMING	COMPLIANCE RECORD
The requirement for tribal monitoring shall be determined by the City on a project-by-project basis depending on the nature, extent, and location of proposed ground disturbance. In the event that tribal cultural resources are encountered during construction, all work within 100 feet of the find shall halt, and the lead agency shall notify the appropriate tribe(s). A qualified tribal representative shall participate in the evaluation of the find and recommend appropriate treatment measures.			

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APPENDIX A. CONSTRUCTION DETAILS



1.1 Short-term Improvements

Short-term improvements are anticipated to occur within five years of San Carlos PMPM adoption with projects starting as early as fall 2026. Information for each improvement regarding construction duration, staging, access, and equipment is provided in the following sections.

1.1.1 Wayfinding signage

- Installation of new wayfinding and trail signage at Arguello Park, Big Canyon Park, Burton Park, Eaton Park, Crestview Park, Heather Dog Exercise Area, and San Carlos Avenue Neighborhood Park would require digging of holes for the signpost(s) and tamping of soil around the post once set into the hole. Consolidation of regulatory signage at Vista Park would involve repurposing existing signposts with new signage. San Carlos Avenue Neighborhood Park would be renamed, and a new entry sign would be installed.
 - **Duration:** Less than one day per sign
 - **Access:** Signs would be hiked into certain areas of the open spaces inaccessible to trucks. Some sign locations would be more easily accessed by the existing fire roads in each open space
 - **Equipment:** Hand tools would be used for sign installation, and a power drill would be used to remount signs to existing posts.

1.1.2 New and Rehabilitated Facilities

- Construction or installation of shade structures at Crestview Park would entail attachment of steel or wood posts to the existing poured concrete pads at the park. Old picnic tables and trash cans would be removed, and new picnic tables and trash cans would be assembled on site at Arguello Park, Big Canyon Park, Burton Park, Highlands Park, City Hall Dog Park, and San Carlos Avenue Neighborhood Park. The chain link fencing would be replaced at San Carlos Avenue Neighborhood Park with similar fencing and would require minor excavation for fence posts. The sand box at Burton Park would be removed and replaced with pour-in-place rubber playground surfacing.
 - **Duration:** Two weeks
 - **Access:** Arguello would be accessed via the parking lot on Wellington Avenue and the ramp down to the snack shack area. Access for Crestview Park would be accessed via Crestview Drive.
 - **Equipment:** Forklift to move or position shade structure components, one flatbed truck for removal of old picnic tables and trash cans, post hole diggers, shovels, or pry bars would be used for digging post holes, impact drill for picnic table, trash can, and fence assembly, hand tools for removal of sand box, mortar mixer and power drill for blending pour-in-place rubber surfacing, hand tools for spreading pour-in-place rubber
- Construction of an accessible picnic area at Burton Park would require old picnic tables and trash cans to be removed, and new picnic tables and trash cans to be assembled on site. Existing surfacing or edging in this area would be removed, then the subgrade (area under the proposed area and access path) would be compacted to create a flat surface. Finally, concrete or other all-weather resilient surface material would be placed in the picnic and pathway area and compacted in place.
 - **Duration:** Six weeks
 - **Access:** Burton Park would be accessed via Brittan Avenue and Cedar Street.



- **Equipment:** One flatbed truck for removal of old picnic tables and trash cans, post hole diggers, impact drill for picnic table and trash can assembly, one skid steer for removal of and one dump truck for off-haul of existing surface materials, one vibratory tamper or vibrating plate compactor for soil compaction, concrete truck for pouring slab.
- The batting cage ground material would be demolished at Arguello Park and Highlands Park and replaced with artificial padded turf.
 - **Duration:** One week
 - **Access:** Arguello Park would be accessed by Wellington Avenue and Highlands Park would be accessed on Aberdeen Drive.
 - **Equipment:** Hand tools for removal of existing material
- The tennis courts at Highlands Park would be demolished and removed using a skid steer or jack hammer. Trenches would be placed to relocate electrical utilities to the center of the courts for court lighting. The base material would be replaced and a concrete slab poured to the appropriate depth. Paint and striping for courts would be applied using hand tools.
 - **Duration:** Eight weeks
 - **Access:** Highlands Park would be accessed on Aberdeen Drive
 - **Equipment:** Jack hammer or skid steer for demolition, truck for debris removal, concrete truck for pouring slab.
- Drinking fountains would be removed and replaced at San Carlos Avenue Neighborhood Park. Domestic water utilities would be extended from the street into Vista Park to add a new drinking fountain by trenching to lay water lines and connecting to a drinking fountain unit. Asphalt and concrete patches would be needed for sections removed to lay water pipes.
 - **Duration:** Ten weeks
 - **Access:** San Carlos Avenue Neighborhood Park would be accessed San Carlos Avenue. Vista Park would be access via Crestview Drive.
 - **Equipment:** Excavator for water play element storage tank, walk-behind or ride-on trencher, hand tools to patch asphalt
- Installation of digital displays and new audiovisual equipment in all program rooms at the Youth Center would involve rewiring of rooms to accommodate new equipment and mounting of displays and equipment to walls within program rooms. Acoustic management elements, such as acoustic curtains, would be installed between the Zen Den and Game Room.
 - **Duration:** Four weeks
 - **Access:** Chestnut Street
 - **Equipment:** Power drill
- The City Hall Dog Park dog agility elements would be replaced with new agility features. Existing equipment would be removed, and new equipment would be installed that would require digging with hand tools for post holes.
 - **Duration:** One week
 - **Access:** San Carlos Avenue
 - **Equipment:** Hand tools, pick-up truck for transport of old and new equipment
- Replacement of the playground area and equipment at San Carlos Avenue Neighborhood Park would include the removal of the existing play structures and equipment. Existing engineered wood fiber surfacing would be removed and resurfaced with poured-in-place surfacing.
 - **Duration:** Eight weeks



- **Access:** San Carlos Avenue would be the access point for San Carlos Avenue Neighborhood Park.
- **Equipment:** Forklift to move or position play structure components, one flatbed truck for removal of old structures, one skid steer for removal of and one dump truck for off-haul of existing surfacing materials, one vibratory tamper or vibrating plate compactor, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction, pick-up truck for transport of old and new equipment, mortar mixer and power drill for blending pour-in-place rubber surfacing, hand tools for spreading pour-in-place rubber, walk-behind or ride-on trencher, one flatbed truck, one crane, concrete truck.
- Construction of a new asphalt pump track at Arguello Park would involve site preparation and grading to establish a compacted subgrade, followed by placement and shaping of aggregate base and asphalt surfacing to form rolling track features. Work would include minor excavation and fill to achieve final track geometry, installation of edge restraints where needed, and restoration of disturbed areas adjacent to the track.
 - **Duration:** Eight weeks
 - **Access:** Dartmouth Avenue/Northam Avenue would be the access point for Arguello Park.
 - **Equipment:** One skid steer for removal of and one dump truck for off-haul of existing surfacing materials, one vibratory tamper or vibrating plate compactor, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction, hand tools
- Installation of fitness structures at Vista Park would entail attachment of steel or wood posts to poured concrete pads covered in decomposed granite surfacing. Soil would be excavated using a skid steer or excavator to prepare a concrete pad. New fitness equipment would be assembled on site.
 - **Duration:** Four weeks
 - **Access:** Vista Park would be accessed via Crestview Drive.
 - **Equipment:** Walk-behind or ride-on trencher, vibratory compactor, one flatbed truck, one crane, concrete truck, impact drill for fitness structure assembly.

1.1.3 Walkway and Trail Improvements

- Improvement of walkways at San Carlos Avenue Neighborhood Park would require removal of any existing surfacing or edging associated with the walkways. Then the subgrade (area under the proposed path) would be compacted to create a flat surface then asphalt or other all-weather resilient surface would be placed in the location of the pathway and compacted in place.
 - **Duration:** Four weeks
 - **Access:** San Carlos Avenue Neighborhood Park would be accessed via San Carlos Avenue and Highlands Park would be accessed on Aberdeen Drive Crestview Park is accessible via Crestview Drive.
 - **Equipment:** One skid steer for removal of and one dump truck for off-haul of existing pathway materials, one vibratory tamper or vibrating plate compactor for soil compaction, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction



1.1.4 Irrigation and Landscaping Improvements

- Irrigation and drainage management measures would be installed at the concert lawn and diamond field at Burton Park. The perimeter of the athletic fields would be trenched for new water lines and rotary gun sprinklers would be installed at a spacing to adequately irrigate the fields. Trenching would occur across the concert lawn and pop-up emitters would be installed at regular intervals for even coverage of the lawn.
 - **Duration:** Four weeks
 - **Access:** Burton Park would be accessed via Brittan Avenue and Cedar Street.
 - **Equipment:** Ride-on trencher, skid steer to cover with soil, hand tools
- City-wide tree maintenance recommendations at Cedar Street Park. Existing landscaping shrubs at the entrance to San Carlos Avenue Neighborhood Park will be removed. Landscaping, including shrubs, sod, and shade trees, at Hillcrest Circle Park will be replanted.
 - **Duration:** One week
 - **Access:** Cedar Street (Cedar Street); San Carlos Avenue (San Carlos Avenue Neighborhood). Hillcrest Road or Highland Avenue (Hillcrest Circle).
 - **Equipment:** Hand tools
- Construction of a vista point at Big Canyon Park and Arguello Park would involve minor grading (estimated at less than ten cubic yards) to create level landings. Some other minor digging would be involved for installation of interpretive signage.
 - **Duration:** One week
 - **Access:** Brittan Avenue (Big Canyon); Dartmouth Avenue/Northam Avenue (Arguello)
 - **Equipment:** Mini excavator or skid steer, vibrating plate compactor, post hole auger, hand tools, wheelbarrow, small concrete mixer, pick-up truck for new amenities
- Up to two 24-inch box trees would be installed at Crestview Park, which would require a flatbed truck for transport, a demolition hammer to dig the hole, and a crane to place the trees.
 - **Duration:** One day
 - **Access:** Crestview Drive
 - **Equipment:** One flatbed truck, one crane, demolition hammer

Construction details for these improvements are not available and, therefore, cannot be discussed in this section:

- Arguello Park
- Vista Park

1.2 Mid-term Improvements

Mid-term improvements are anticipated to occur between five to ten years after adoption of the PMP. Information available regarding construction duration, staging, access, and equipment is provided for each activity below:

1.2.1 New and Rehabilitated Facilities

- Construction or installation of shade structures over the bleachers at Arguello Park and Laureola Park would entail attachment of steel or wood posts to the existing poured concrete pads.



- **Duration:** Three days
- **Access:** Arguello Park would be accessed via the parking lot off Wellington Drive. Laureola Park would be accessed via the parking lot off of Old County Road.
- **Equipment:** Forklift to move or position shade structure components, one flatbed truck for delivery of shade structure
- Old picnic tables and trash cans would be removed, and new picnic tables and trash cans would be assembled on site at Arguello Park and Cedar Street Park. New picnic areas with picnic tables, benches, and drinking fountains will be added at Heather Dog Exercise Area.
 - **Duration:** Two weeks
 - **Access:** Cedar Street Park would be accessed via Cedar Street, Arguello would be accessed via Wellington Drive, and Heather Dog Exercise Area would be accessed via Melendy Drive.
 - **Equipment:** One flatbed truck for removal of old and transport of new picnic tables and benches, post hole diggers, shovels, or pry bars would be used for digging post holes, impact drill for picnic table and bench assembly and installation
- Installation of bollards with motion-activated safety lighting would involve trenching to extend existing electrical utilities to the parking lot at Crestview Park.
 - **Duration:** Two weeks
 - **Access:** Crestview Park would be accessed via Crestview Drive.
 - **Equipment:** Walk-behind or ride-on trencher, hand tools to patch asphalt
- The kitchen in the Adult Community Center would be renovated to provide greater accessibility, update appliances and to accommodate future programming. Demolition and installation of new cabinets, countertops, tables, shelving, and appliances can be completed with impact and power drills and hand tools. The bathrooms in the Youth Center would be renovated to provide accessible clearances.
 - **Duration:** Ten weeks
 - **Access:** The Adult Community Center and Youth Center would be accessed via Chestnut Street
 - **Equipment:** Impact drills, power drills, hand tools for demolition and installation
- New restrooms with flushable toilets, running water, and lighting in Big Canyon Park at the Brittan Avenue entrance. The new restrooms would involve trenching to extend utilities for electricity, water, and sewer from the street to the restroom site. Soil would be excavated using a skid steer or excavator to prepare a concrete pad. The restroom would be a prefabricated model transported to the site on a flatbed truck, which would require a crane to move and assemble the restroom components.
 - **Duration:** Two months
 - **Access:** Big Canyon Park would be accessed via Brittan Avenue.
 - **Equipment:** Walk-behind or ride-on trencher, vibratory compactor, one flatbed truck, one crane, concrete truck
- Installation of a backstop and net at Highlands Park in the northeast corner of Stadium Field would require digging of holes for the post(s) and tamping of soil around the post once set into the hole.
 - **Duration:** One week
 - **Access:** Highlands Park would be accessed via the parking lot off Aberdeen Drive.
 - **Equipment:** Hand tools/drill would be used for post installation.
- Replacement of the playground area and equipment at Arguello Park, Cedar Street Park, Crestview Park, and Hillcrest Circle Park would include the removal of the existing play



structures and equipment. Existing engineered wood fiber surfacing or poured-in-place surfacing would be removed and resurfaced with poured-in-place surfacing. The sand boxes at Cedar Street and Crestview Parks will be removed and resurfaced with poured-in-place rubber playground surfacing to expand playground space.

- **Duration:** Eight weeks
- **Access:** Cedar Street Park would be accessed via Cedar Street and Crestview Park would be accessed via Crestview Drive.
- **Equipment:** Forklift to move or position play structure components, one flatbed truck for removal of old structures, one skid steer for removal of and one dump truck for off-haul of existing surfacing materials, one vibratory tamper or vibrating plate compactor, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction, pick-up truck for transport of old and new equipment, mortar mixer and power drill for blending pour-in-place rubber surfacing, hand tools for spreading pour-in-place rubber, walk-behind or ride-on trencher, one flatbed truck, one crane, concrete truck.
- Installation of an “outdoor living room” space at Mundell Grove at Burton Park would entail the construction of a paved area with furnishing for lounging and gathering. Construction would require existing amenities to be removed, and new lounge seating and trash cans would be assembled on site. Existing surfacing would require removal of any existing surfacing or edging associated with the area. Then the subgrade (area under the proposed area and access path) would be compacted to create a flat surface then concrete or other all-weather resilient surface material would be placed in the location of the area and pathway and compacted in place
 - **Duration:** Six weeks
 - **Access:** Les Mundell Grove would be accessed via Woodland Avenue.
 - **Equipment:** One flatbed truck for removal of existing equipment, impact drill for lounge seating assembly, one skid steer for removal of and one dump truck for off-haul of existing surface materials, one vibratory tamper or vibrating plate compactor for soil compaction, concrete truck for pouring slab.
- Installation of fitness structures at Highlands Park would entail attachment of steel or wood posts to poured concrete pads covered in decomposed granite surfacing. Soil would be excavated using a skid steer or excavator to prepare a concrete pad. New fitness equipment would be assembled on site.
 - **Duration:** Four weeks
 - **Access:** Highlands Park would be accessed via Aberdeen Drive.
 - **Equipment:** Walk-behind or ride-on trencher, vibratory compactor, one flatbed truck, one crane, concrete truck, impact drill for fitness structure assembly.
- New dog agility equipment would be installed at Heather Dog Exercise Area. New equipment would be installed that would require digging with hand tools for post holes.
 - **Duration:** One week
 - **Access:** Heather Dog Exercise Area would be accessed via Melendy Drive.
 - **Equipment:** Hand tools, pick-up truck for transport of new equipment
- Construction of an expanded dog park at Heather Dog Exercise Area would involve site preparation and minor grading to establish finished grades and drainage, then installation of perimeter fencing, gates, and external circulation paths. Improvements would include placement of decomposed granite or turf surfacing, concrete pads at entries, staging areas with double-gated entry, and installation of site amenities such as benches, waste stations, and signage. Minor trenching would occur for irrigation and drainage where applicable.



Construction would require removal of any existing surfacing or edging associated with the existing pathway on site.

- **Duration:** Ten weeks
- **Access:** Heather Dog Exercise Area would be accessed via Melendy Drive.
- **Equipment:** One skid steer for removal of and one dump truck for off-haul of existing pathway materials, one vibratory tamper or vibrating plate compactor for soil compaction, post hole diggers, shovels, or pry bars would be used for digging post holes, impact drill for fence assembly, wood fiber surfacing or turf installation.

1.2.2 Walkway and Trail Improvements

- Improvement of walkways at Arguello, Cedar Street, City Hall Dog Park, Heather Dog Exercise Area, and Highlands Parks would require removal of any existing surfacing or edging associated with the walkways. Then the subgrade (area under the proposed path) would be compacted to create a flat surface then asphalt or other all weather-resilient surface would be placed in the location of the pathway and compacted in place.
 - **Duration:** Four weeks
 - **Access:** Arguello Park would be accessed via Wellington Avenue, Cedar Street Park would be accessed via Cedar Street, City Hall dog Park would be accessed via San Carlos Avenue, Heather Dog Exercise Area would be accessed via Melendy Drive, and Highlands Park would be accessed via Aberdeen Drive.
 - **Equipment:** One skid steer for removal of and one truck for off-haul of existing pathway materials, one vibratory tamper or vibrating plate compactor for soil compaction, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction
- Trail improvements to natural surface trails in Eaton Park would involve the addition of drainage features. Rolling dips would be built by redistributing soil on the trail tread to create undulating slopes that allow for the natural flow of water off the tread, which can be accomplished using hand tools. Water bars involve soil excavation install a reinforcing log generally held in place by rebar or stakes then digging approximately 12" deep to create a drain dip upslope of the log. Trails to be decommissioned would be scarified to remove visible trail tread, have seeds sown to encourage revegetation, or placement of natural debris, like logs, across the social trail to limit future use.
 - **Duration:** Two weeks
 - **Access:** Eaton Park would be accessed via the fire road off the Eaton Avenue park entrance.
 - **Equipment:** All work would be completed with hand tools.
- Arguello Park trails would be formalized or realigned through the preparation of trail tread using hand tools. In some circumstances, a skid steer and chainsaw would be needed to clear debris or soil. To the greatest extent possible, soil excavated as part of the trail construction process would remain on site. Ongoing maintenance to the Arguello Park trails would be conducted as part of the PMP and would also likely involve use of hand tools, chainsaws, and, to a limited extent, a skid steer. Construction of a paved multi-use emergency access pathway would entail similar equipment for grading and compaction and the placement of asphalt or other durable surfacing.
 - **Duration:** One month
 - **Access:** Arguello Park would be accessed on Wellington Avenue.
 - **Equipment:** Skid steer, chainsaw, hand tools for demolition and installation



- Paving of an ADA trail at Big Canyon Park would require removal of any existing surfacing or edging associated with the trail section designated. Then the subgrade (area under the proposed path) would be compacted to create a flat surface then asphalt or other all-weather resilient surface would be placed in the location of the pathway and compacted in place.
 - **Duration:** Four weeks
 - **Access:** Big Canyon Park would be accessed via Brittan Avenue.
 - **Equipment:** One skid steer for removal of and one dump truck for off-haul of existing pathway materials, one vibratory tamper or vibrating plate compactor for soil compaction, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction.
- Paving of a fire road at Eaton Park would require removal of any existing surfacing or edging associated with the trail section designated. Then the subgrade (the area under the proposed path) would be compacted to create a flat surface and asphalt or another all-weather resilient surface would be placed in the location of the pathway and compacted in place.
 - **Duration:** Four weeks
 - **Access:** Eaton Park would be accessed via Loma Avenue.
 - **Equipment:** One skid steer for removal of and one dump truck for off-haul of existing pathway materials, one vibratory tamper or vibrating plate compactor for soil compaction, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction.
- Formalizing the residential entry at Elston Court in Highlands Park would require removal of any existing surfacing or edging associated with the existing pathway. Then the subgrade (area under the proposed path) would be compacted to create a flat surface then asphalt or other all-weather resilient surface would be placed in the location of the pathway and compacted in place.
 - **Duration:** Four weeks
 - **Access:** Highlands Park would be accessed via Elston Court.
 - **Equipment:** One skid steer for removal of and one dump truck for off-haul of existing pathway materials, one vibratory tamper or vibrating plate compactor for soil compaction, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction.

Because the following improvements are planned for implementation over a longer timeframe, construction details have not been developed, and the improvements are being evaluated at a conceptual level in this IS/MND:

- Arguello Park
 - Improving access to picnic area
 - Mini ropes course
- Big Canyon Park
 - Erosion control measures
 - Floodplain detention basin
- Highlands Park
 - Converting lawn space to additional parking
- Heather Dog Exercise Area
 - Replace staircase with accessible ramp



- San Carlos Avenue Neighborhood Park
 - Terraced seating and/or play areas, to be determined at time of design phase

1.3 Long-term Improvements

The long-term improvements described in the following sections are planned to occur over 10 years from adoption of the PMP.

1.3.1 New and Rehabilitated Facilities

- Water treatment systems would be installed to retrofit the water play element at Burton Park and Laureola Park. A surge basin or treatment tank would be added to the existing play elements by digging a hole near the play element and trenching lines from the water element to the storage tank and from the storage tank to the treatment system then back to the water element.
 - **Duration:** Ten weeks
 - **Access:** Laureola Park would be accessed via the parking lot off Old County Road. Burton Park would be accessed via Chestnut Street.
 - **Equipment:** Excavator for water play element storage tank, walk-behind or ride-on trencher, hand tools to patch asphalt.
- New restrooms with flushable toilets, running water, and lighting would be considered at Cedar Street Park. The new restrooms would involve trenching to extend utilities for electricity, water, and sewer from the street to the restroom site. Soil would be excavated using a skid steer or excavator to prepare a concrete pad. The restroom would be a prefabricated model transported to the site on a flatbed truck, which would require a crane to move and assemble the restroom components.
 - **Duration:** Two months
 - **Access:** Cedar Street Park would be accessed via Cedar Street.
 - **Equipment:** Walk-behind or ride-on trencher, vibratory compactor, one flatbed truck, one crane, concrete truck
- Replacement of the playground area and equipment at Highlands Park would include the removal of the existing play structures and equipment. Existing poured-in-place surfacing would be removed and resurfaced with new poured-in-place surfacing.
 - **Duration:** Eight weeks
 - **Access:** Highlands Park would be accessed via Aberdeen Drive.
 - **Equipment:** Forklift to move or position play structure components, one flatbed truck for removal of old structures, one skid steer for removal of and one dump truck for off-haul of existing surfacing materials, one vibratory tamper or vibrating plate compactor, wheeled or small track asphalt paver, self-propelled roller for asphalt compaction, pick-up truck for transport of old and new equipment, mortar mixer and power drill for blending pour-in-place rubber surfacing, hand tools for spreading pour-in-place rubber, walk-behind or ride-on trencher, one flatbed truck, one crane, concrete truck.

Because the following improvements are planned for implementation over a longer timeframe, construction details have not been developed and the improvements are being evaluated at a conceptual level in this IS/MND:



- Building electrification of the Adult Community Center, Kiwanis building, Youth Center, and Laureola building
- Demolition of the Kiwanis building and Laureola building for the construction of new community buildings
- Youth Center renovations for restrooms, storage, and office space
- Conversion of City Hall Dog Park into a civic plaza



APPENDIX B. BIOLOGICAL RESOURCES MEMORANDUM



MEMORANDUM

TO:	Rylee Rodriguez Gates and Associates	FROM:	Tommy Dryer, WRA, Inc. Rachel Miller, WRA, Inc.
CC:	Melonie Reynolds, Gates and Associates Shauna Wright, Gates and Associates		Robin Graham, WRA, Inc. Renata Robles, WRA, Inc.
DATE:	February 10, 2025		
SUBJECT:	Biological Resources Assessment for San Carlos Parks Master Plan		

1.0 INTRODUCTION

This memorandum provides a high-level assessment of existing conditions pertaining to biological resources, recreation (including trail use), and wildfire hazards at Parks and Open Space in the City of San Carlos, San Mateo County, California (Attachment A – Figure 1). Following the baseline information collected for these resources, management recommendations are provided to promote a balanced and fair approach that considers environmental protection, public health and safety, diverse recreation, and sustainability. This assessment was conducted by WRA, Inc. (WRA) at the request of the City of San Carlos Parks and Recreation Department (City) to inform and support the Parks Master Plan update.

The Study Area evaluated in this assessment includes a total of 17 Parks and Open Space areas within the City of San Carlos which total 136.2 acres, comprised of 3 community parks, 5 neighborhood parks, 5 mini parks, 3 special use areas, and 2 open space areas. A summary of park types within the City's park system is as follows (City of San Carlos 2009):

- Community parks: 10- to 20-acre parks containing a wide variety of facilities for active and passive recreation, organized sports, and night use
- Neighborhood parks: 4- to 10-acre parks providing daily recreation for nearby residents
- Mini parks: small parks less than 1 acre in size that accommodate daily recreation needs of nearby residents
- Special use areas: parks providing unique recreational amenities (i.e., dog parks)
- Open space areas: lands set aside for preservation of significant natural resources, open space and public education.

The Parks and Open Space areas feature the following: trails which meander through chaparral, oak woodland, and riparian habitats; recreation areas including playgrounds and sports fields; and public gathering spaces including native pollinator gardens in Vista and Chilton Parks; and picnic areas. Parks and open space areas are generally surrounded by single-family residential land use.

In addition to documenting existing biological communities and sensitive habitats in City parks and Open Space areas, WRA broadly assessed the baseline quality of such habitats located near the trails. This will enable the City to track and evaluate any changes in habitat quality and implement management actions accordingly. Since this is a programmatic, high-level planning effort intended to inform future actions, there is no current proposed “project” in which impacts



can be assessed. Examples of potential future “projects” may include e but are not limited to: trail repair, trail building, constructing footbridges, pruning back vegetation along trails, sediment dredging, and vegetative fuels management.

Table 1. San Carlos City Parks and Open Spaces

PARK NAME	ACRES	TYPE*	LOCATION
Arguello Park	19.67	Community Park	260 Wellington Drive
Burton Park	9.61	Community Park	900 Chestnut Street
Highlands Park	17.80	Community Park	2600 Melendy Drive
Cedar Street	0.70	Mini-Park	10 Cedar Street
Frank D. Harrinton Park	0.12	Mini-Park	759 Laurel Street
Hillcrest Circle Park	0.39	Mini-Park	280 Hillcrest Road
Rosek Park	0.06	Mini-Park	455 Elm Street
San Carlos Avenue Neighborhood Park	0.35	Mini-Park	2451 San Carlos Avenue
Chilton Park	1.65	Neighborhood Park	48 Bayview Drive
Crestview Park	6.84	Neighborhood Park	Crestview Drive at Leslie Court
Laureola Park	2.73	Neighborhood Park	503 Old Country Road
North Crestview Park	4.00	Neighborhood Park	350 Crestview Drive
Vista Park	4.01	Neighborhood Park	401 Crestview Drive
Big Canyon Park	55.47	Open Space	3190 Brittan
Eaton Park	65.71	Open Space	3000 Eaton Avenue
City Hall Dog Park	0.64	Special Use	1401 San Carlos Avenue
Heather Dog Area	2.05	Special Use	2757 Melendy Drive
Skyway Road Land	2.51	Special Use	By San Carlos Airport

2.0 REGULATORY BACKGROUND

The following sections explain the regulatory context of the biological assessment, including applicable laws and regulations that were applied to the field investigations and would apply to any future, ground disturbing actions to sensitive and common species that the City may choose to implement following adoption of the San Carlos Parks Master Plan.

2.1 Special-Status Species

Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (FESA) or California Endangered Species Act (CESA). These Acts afford protection to both listed and proposed species. In addition, California Department of Fish and

Wildlife (CDFW) Species of Special Concern (SSC), and National Marine Fisheries Service (NMFS) Species of Concern (SOC), are species that face extirpation if current population and habitat trends continue. U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, sensitive species included in USFWS Recovery Plans, and CDFW special-status invertebrates are also considered special-status species. Although CDFW SSC generally have no special legal status, they are given special consideration under CEQA. In addition to regulations for special-status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act (MBTA) of 1918. Under this legislation, destroying active nests, eggs, and young is illegal. Bat species designated as “High Priority” by the Western Bat Working Group qualify for legal protection under Section 15380(d) of the CEQA Guidelines. “High Priority” species are defined as “imperiled or are at high risk of imperilment based on available information on distribution, status, ecology and known threats”.

Plant species included within the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (Inventory, CNPS 2020) with California Rare Plant Rank (Rank) of 1, 2, and 3 are also considered special-status plant species and must be considered under the CEQA. Some Rank 4 plant species meet the definitions of Section 1901 Chapter 10 of the Native Plant Protection Act or Sections 2062 and 2067 of the California Fish and Game Code (CFGF) that outlines CESA. However, the CNPS and CDFW strongly recommend that these species be fully considered during the preparation of environmental documentation related to CEQA. This may be particularly appropriate for the type locality of a Rank 4 plant species, for populations at the periphery of a species range, or in areas where the taxon is especially uncommon or has sustained heavy losses, or from populations exhibiting unusual morphology or occurring on unusual substrates. A description of Ranks is provided below in Table 1.

Table 2. Description of Ranks and Threat Codes

CALIFORNIA RARE PLANT RANKS	
Rank 1A	Presumed extirpated in California and either rare or extinct elsewhere
Rank 1B	Rare, threatened, or endangered in California and elsewhere
Rank 2A	Presumed extirpated in California, but common elsewhere
Rank 2B	Rare, threatened, or endangered in California, but common elsewhere
Rank 3	Plants about which more information is needed - A review list
Rank 4	Plants of limited distribution - A watch list
THREAT RANKS	
0.1	Seriously threatened in California
0.2	Moderately threatened in California
0.3	Not very threatened in California

2.2 Sensitive Biological Communities

Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, and riparian habitat. These habitats are regulated under federal regulations (such as the Clean Water Act [CWA]), state regulations (such as the Porter-Cologne Act, the CDFW Streambed Alteration Program, and CEQA), or local ordinances or policies (such as City or County Tree Ordinances, Special Habitat Management Areas, applicable Local Coastal Programs, and General Plan Elements).

2.3 Waters of the United States

Section 404 of the CWA gives the U.S. Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (Corps) regulatory and permitting authority regarding discharge of dredged or fill material into “navigable waters of the United States”. Section 502(7) of the CWA defines waters as “waters of the United States, including territorial seas.” Section 328 of Chapter 33 in the Code of Federal Regulations (CFR) defines the term “waters of the United States” as it applies to the jurisdictional limits of the authority of the Corps under the CWA.

A summary of the definition of “waters of the U.S.” in 33 CFR 328.3 as published in 1986 includes:

- (1) waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; the territorial seas; or interstate waters;*
- (2) impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (5) of this section;*
- (3) tributaries of waters identified in paragraph (1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;*
- (4) wetlands adjacent to the following waters: waters identified in paragraph (1) of this section; or relatively permanent, standing or continuously flowing bodies of water identified in paragraph (2) or (3) of this section and with a continuous surface connection to those waters;*
- (5) intrastate lakes and ponds not identified in paragraphs (1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (1) or (3) of this section.*

Some areas that meet the technical criteria for wetlands or waters may not be jurisdictional under the CWA per Section 404 regulations and the Corps Manual. As defined in 33 CFR 328.3(b), the following features are exempt from Section 404 Jurisdiction:

- (1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;*

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body water meets the definition of waters of the United States; and

(8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

In the Corps Rivers and Harbors regulations (33 CFR Part 329.4), the term “navigable waters of the U.S.” is defined to include all those waters that are subject to the ebb and flow of the tide, and/or presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.

The limits of Corps jurisdiction under Section 404 as given in 33 CFR Section 328.4 are as follows:

(1) Territorial seas: three nautical miles in a seaward direction from the baseline;

(2) Tidal waters of the U.S.: high tide line (HTL) or to the limit of adjacent non-tidal waters;

(3) Non-tidal waters of the U.S.: ordinary highwater mark or to the limit of adjacent wetlands; or

(4) Wetlands: to the limit of the wetland.

The Corps has developed standard methods and data reporting forms contained in the U.S. Army Corps of Engineers Wetlands Delineation Manual (Corps Manual; Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Arid West Supplement; Corps 2008) to determine the presence or absence of Waters of the U.S. Note that this assessment did not include a formal delineation, and a Corps-verified delineation would be required to identify wetlands and non-wetland waters in the Study Area that are potentially subject to regulation under Section 404 of the CWA.

2.4 Waters of the State

The Dickey Water Pollution Act of 1949 and Porter Cologne Act of 1969 established the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Board (RWQCB) districts in the State of California. The SWRCB and each RWQCB district regulates activities in Waters of the State, which include Waters of the U.S. Waters of the State are defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” In addition, the SWRCB has adopted a wetland definition that is similar to, but slightly different from, that used by the Corps. The state definition as adopted in April 2019 and currently in effect, states that:

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

The RWQCB regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act through the State Water Quality Certification Program. State Water Quality Certification is necessary for all projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State. In order for a Section 404 permit to be valid, Section 401 of the CWA requires a Water Quality Certification or waiver to be obtained. The Water Quality Certification (or waiver) determines that the permitted activities will not violate water quality standards individually or cumulatively over the term of the action. Water quality certification must be consistent with the requirements of the CWA, CEQA, the CESA and Porter-Cologne Act.

If a proposed project or portion of a proposed project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to Waters of the State, the RWQCB has the option to regulate the dredge and fill activity under its state authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements. In these cases, a Water Quality Certification is not necessary under Section 401 of the CWA because federal jurisdiction does not apply.

2.5 Streams, Lakes, and Riparian Habitat

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by CDFW under Sections 1600-1616 of the 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 California Code of Regulations (CCR) as follows: “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. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72). In addition, 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 ESD 1994). Riparian is defined as, “on, or pertaining to, the banks of a stream;” therefore, riparian vegetation is defined as, “vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself” (CDFG ESD 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

2.6 Other Sensitive Biological Communities

Other sensitive biological communities not discussed above 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. The CDFW ranks sensitive communities as “threatened” or “very threatened” and keeps records of their occurrences in its Natural Diversity Database (CNDDDB, CDFW 2024b). Sensitive plant communities are also identified by CDFW on their List of California Natural Communities Recognized by the CNDDDB (CDFW 2023). Impacts to sensitive natural communities identified in local or regional plans, policies, regulations or by the CDFW or USFWS must be considered and evaluated under CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G). Specific habitats may also be identified as sensitive in City or County General Plans or ordinances.

2.7 Relevant City of San Carlos Policies

Policies relative to management and conservation of the City’s open space areas are found in the following planning documents:

- City of San Carlos General Plan (2009, 2023)
- San Carlos Parks, Open Space, Buildings, and other Recreational Facilities Master Plan 2009 - 2029
- East Side Innovation District Vision Plan (2021)

CITY OF SAN CARLOS GENERAL PLAN (GENERAL PLAN)

The General Plan combines Conservation and Open Space elements into a single Environmental Management Element that addresses each element’s similar and overlapping concerns. Relevant goals and policies from the General Plan Environmental Management Elements (City of San Carlos 2009, 2023) include the following:

- Work to manage or eliminate non- native invasive species from City- owned property and open space.
- Promote the preservation of native species, habitat and vegetation types and overall natural diversity.
- Use native plants wherever possible on City-owned and controlled property.
- Preserve and enhance riparian areas.
- Promote the establishment of native vegetation and the removal of non- native invasive plants in riparian areas.
- Retain Pulgas, Brittan, Cordilleras and Belmont Creek channels and their 100 year floodplains wherever possible as natural open space areas. These areas are to function as storm drainage facilities and as open space greenbelts to support natural habitat.
- Retain existing public open space as open space.
- Support an open space system that is diverse in uses and opportunities and includes natural function/wildlife habitat as well as passive and appropriate active recreation.
- Establish public access to public open space lands appropriate to the character and conservation value of the open space.

The City's 2045 General Plan Reset contains the following relevant proposed General Plan amendment:

- Policy PR-2.3: Continue to support implementation of trail connections as identified in the City's Master Plan for Parks, ~~Open Space, Buildings and other Recreation Facilities~~ Potential Trail Connections Plan.

In addition, the General Plan includes a Parks and Recreation Element that is aimed at providing, protecting and enhancing San Carlos' public parks and recreational opportunities. Actions and policies that are relevant to this assessment are included below:

- Maintain a balance of athletic fields, active parks and passive open space that supports a variety of recreational uses.
- Continue to maintain City owned open space trails and connections to regional trails.
- Encourage new development to provide trails and trail connection easements or dedications where feasible and appropriate.
- Coordinate with relevant agencies and organizations to support development of the Bay Trail Network and to provide a safe and convenient route in the vicinity of the San Carlos Airport.
- Extend and improve trails in Big Canyon, Eaton Park and Arguello Park.
- Preserve and protect sensitive species and habitats in City parks and open space, as identified by the Environmental Management Element of this Plan or state and federal guidelines.
- Maintain and enhance ecological diversity in City parks and open space.
- Incorporate sustainable practices into the on-going maintenance of City parks and recreational facilities.
- Continue to employ integrated pest management policy and practices as part of parks maintenance and recreation services programs.
- Replant, when necessary, with native species and/or climate appropriate plants.
- Design and maintain trails with appropriate drainage standards and to prevent soil erosion.

PARKS, OPEN SPACE, BUILDINGS, AND OTHER RECREATIONAL FACILITIES MASTER PLAN (2009)

The Parks, Open Space, Buildings, and other Recreational Facilities Master Plan (Parks Master Plan) was adopted in 2009 and provides an inventory of existing parks and recreation facilities as well as an analysis of the projected demand for these facilities. The Parks Master Plan also includes an implementation plan to quantify costs for development and operation of park facilities throughout the City. The current Parks Master Plan includes limited discussion of conservation management strategies. A section on environmental design encourages the use of native plant species in landscaped areas. The Parks Master Plan also mentions the use of pesticides and herbicides as part of the City's standard maintenance activities. The implementation plan identifies the need for an Open Space and Trails Management plan to "address trails, wildlife, vegetation, geology and unstable soils, erosion, sensitive environmental resources..." among other considerations.

EAST SIDE INNOVATION DISTRICT VISION PLAN (VISION PLAN; 2021)

The Vision Plan sets forth goals and principles that are intended to achieve the desired character for this area of the City. In particular, the Vision Plan identifies opportunities for open space and inspires the activation of public places for community enjoyment. The following goals pertain to open space and the environment:

Establish an Open Space Network: Provide publicly accessible connected open spaces and trails in the District to serve existing and future district users and the greater San Carlos community.

Promote Environmental Stewardship: Establish environmental and resilience best practices for the District to address flooding and environmental remediation, and increase the ecological value of the area with new connections to nature for the greater community to enjoy.

3.0 METHODS

On August 13 and 14, 2024 WRA biologists, Rachel Miller and Tommy Dryer, traversed over 9 miles of official and unofficial trails within the Study Area to:

- 1) Ground-truth vegetation communities obtained from the San Mateo County vegetation mapping dataset (2021)
- 2) Determine if existing conditions provide suitable habitat for special-status plant or wildlife species,
- 3) Determine the baseline conditions of habitat quality within view from the trails,
- 4) Conduct a qualitative trail assessment, and
- 5) Determine the open spaces' consistency with existing regulations and policies.

A list of incidental species observations was also compiled. Plant nomenclature follows the Jepson eFlora Project (2024), except where noted. For cases in which taxonomic discrepancies occur between Baldwin et al. and the Inventory, precedence was given to the species classification used in the Inventory.

3.1 Sensitive Biological Communities

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. Additionally, the San Mateo County vegetation mapping dataset (2022) was examined to provide baseline information on plant communities. In most instances, communities are characterized and mapped based on distinct shifts in plant assemblage (vegetation) and follow the California Wildlife Habitat Relationships (CWHR) system (CDFW 2024a). However, sensitive communities are classified at a more specific level and follow the California Natural Community List (CDFW 2023) and A Manual of California Vegetation (MCV), Online Edition (CNPS 2024a) classifications. Each biological community in the California Natural Community List and MCV is given a state or global ranking, ranging from 1 to 5. These rankings are defined below, with G indicating global status, and S indicating state status for California. State and/or global rankings of 1, 2, or 3 are considered sensitive.

1. **Critically Imperiled** — At very high risk of extinction or elimination due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors.

2. **Imperiled** — At high risk of extinction or elimination due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
3. **Vulnerable** — At moderate risk of extinction or elimination due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
4. **Apparently Secure** — At fairly low risk of extinction or elimination due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
5. **Secure** — At very low risk of extinction or elimination due to a very extensive range, abundant populations or occurrences, and little to no concern from declines or threats.

Non-sensitive biological communities are those communities that are not afforded special protection under CEQA, and other state, federal, and local laws, regulations and ordinances, and generally are ranked 4 or 5 on a global or state level. These communities may provide suitable habitat for some special-status plant or wildlife species and are discussed below. Sensitive biological communities are defined as those communities that are given special protection under CEQA and other applicable federal, state, and local laws, regulations and ordinances. Applicable laws and ordinances are discussed above. Special methods used to identify sensitive biological communities are discussed below.

3.1.1 Wetlands and Waters

The Study Area was surveyed at a reconnaissance level to determine if any wetlands and waters potentially subject to jurisdiction by the Corps, RWQCB, or CDFW were present. The assessment was based primarily on the presence of wetland plant indicators but may also include any observed indicators of wetland hydrology as defined by the Corps Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Corps 2008). Any potential wetland areas were identified as areas dominated by plant species with a wetland indicator status of obligate wetland (OBL), facultative wetland (FACW), or facultative (FAC) as given on the U.S. Department of Agriculture: National Wetland Plant List (Corps 2020). Evidence of wetland hydrology can include evidence such as visible inundation or saturation, surface sediment deposits, algal mats and drift lines, and oxidized root channels. Given that the site visits did not include a routine-level wetland delineation and was only reconnaissance level, soils were not examined in the field as part of this assessment. Streams were remotely mapped in ArcGIS using hydrologic modeling tools including aerial imagery (Google Earth 2024), the California Aquatic Resource Inventory (CARI) dataset (2023) and topography data.

3.2 Special-status Species

Potential occurrence of special-status species in the Study Area was evaluated by first determining which special-status species occur in the vicinity of the Study Area through a literature and database search. Database searches for known occurrences of special-status species was for the San Mateo, Redwood Point, Woodside, and Palo Alto 7.5-minute U.S. Geological Survey (USGS) quadrangles. The following sources were reviewed to determine which special-status plant and wildlife species have been documented to occur in the vicinity of the Study Area:

- CNDDB records (CDFW 2024b)
- USFWS Information for Planning and Conservation Species (USFWS 2024)

- CNPS Inventory records (CNPS 2024b)
- California Bird Species of Special Concern (Shuford and Gardali 2008)
- USFWS Critical Habitat Mapper (USFWS 2024)

Special-status species are defined as federally or state listed species (threatened or endangered; FT, ST, FE, SE), CDFW Species of Special Concern (SSC) and CDFW Fully Protected (FP). In addition to federal and state listing status for plant species, species with a California Native Plant Society Rare Plant Ranking (CRPR) of 1 through 4 is also included in this report. Bats are also given special consideration if they are listed by the Western Bat Working Group (WBWG) as Medium or High.

3.3 Habitat Quality

The overall habitat quality of the Study Area was evaluated based on the cover of native versus non-native plant species, presence and extent of invasive plant species, and extent of anthropogenic disturbance. General notes and observations of plant species composition were made throughout the Study Area by WRA biologists while traversing throughout the existing trail network, followed by a review of aerial imagery, in order to assign a general value to the Study Area. This assessment is qualitative in nature and should not be interpreted to be a comprehensive assessment of each biological community that is identified within the Study Area. The definitions of habitat quality ranking are listed below.

Table 3. Habitat Quality Categories

CATEGORY	HABITAT DESCRIPTION
High Quality / Mostly Intact	• Vegetation is composed of greater than 75% native plant cover • Invasive species are generally absent based on visual estimates from the trail network • Visible evidence of vegetation trampling by trail users is absent or negligible
Moderate Quality / Moderately Altered or Impacted	• Vegetation is composed of greater than 50% native plant cover • Invasive species are present but was observed to be less than 50 square feet based on visual estimates from the trail • Visible evidence of vegetation trampling by trail users is present but not extensive
Low Quality	• Vegetation is composed of less than 50% native plant cover based on visual estimates from the trail • Invasive species are present, comprise more than 100 square feet, and is observed to be crowding out/negatively impacting native species within the vegetation community • Visible evidence of vegetation trampling by trail users is present but not extensive

CATEGORY	HABITAT DESCRIPTION
Low Quality / Extensively Altered or Impacted	• Vegetation is composed of less than 50% native plant cover based on visual estimates from the trail • This habitat features an invasive species as a dominant or codominant in the tree/shrub/herb stratum • Visible evidence of vegetation trampling by trail users is present and extensive

4.0 RESULTS

4.1 Biological Communities and Vegetation Management

Non-sensitive biological communities in the Study Area include developed/disturbed, ornamental, annual grassland, coastal scrub/chaparral, closed-cone pine-cypress, coastal oak woodland, and eucalyptus groves. Sensitive biological communities include California bay woodland, California buckeye groves, saline emergent wetland, freshwater emergent wetland, intermittent streams, ephemeral streams, and other waters.

Attachment A - Figure 3 shows the location of each biological community within the 17 San Carlos Parks and one City-owned site (Skyway). Attachment A – Figure 4 displays potential jurisdictional aquatic features within the San Carlos Parks and City-owned site. Descriptions for each biological community are provided below. The mapped extent of each land cover type by park is provided in Attachment B.

Table 4. Biological Communities in the Study Area

LAND COVER TYPE ¹	VEGETATION ALLIANCE ²	RARITY RANKING	ACRES WITHIN STUDY AREA
NON-SENSITIVE			
Developed/Disturbed	-	-	25.15
Ornamental	-	-	7.17
Annual Grassland	-	-	28.05
Coastal Scrub/Chaparral	<i>Adenostoma fasciculatum</i> shrubland alliance	G5/S5	26.02
	<i>Artemisia californica</i> shrubland alliance	G5/S5	
	<i>Baccharis pilularis</i> shrubland alliance	G5/S5	
	<i>Toxicodendron diversilobum</i> shrubland alliance	G4/S4	
Closed-Cone Pine-Cypress	<i>Hesperocyparis macrocarpa</i> - <i>Pinus radiata</i> woodland semi-natural alliance	GNA/SNA	9.82
Coastal Oak Woodland	<i>Quercus (agrifolia, douglasii, garryana, kelloggii, lobata, wislizeni)</i> woodland alliance	G4/S4	87.04
	<i>Quercus agrifolia</i> woodland alliance	G4/S4	
Eucalyptus Groves	<i>Eucalyptus (globulus, camaldulensis)</i> woodland semi-natural alliance	GNA/SNA	0.93
SENSITIVE			
California bay woodland	<i>Umbellularia californica</i> woodland alliance	G3/S3	5.00
California buckeye grove	<i>Aesculus californica</i> woodland alliance	G3/S3	2.55
Saline Emergent Wetland	<i>Grindelia stricta</i> provisional herbaceous alliance	S23/G23	1.19
	<i>Sarcocornia pacifica (Salicornia depressa)</i> herbaceous alliance	G4/S4	
	<i>Spartina (alterniflora, densiflora)</i> semi-natural herbaceous alliance	S3.2/G3	
Freshwater Emergent Wetland	-	-	0.25
Intermittent Stream	-	-	0.26
Ephemeral Stream	-	-	0.13
Other waters	-	-	0.75

4.1.1 Non-sensitive biological communities

Developed/Disturbed (no vegetation alliance). CDFW Rank: Not sensitive. This land cover type includes areas which have been cleared of natural vegetation. Developed areas include paved areas, structures, playgrounds, sports fields, and areas covered with permeable paving surfaces such as decomposed granite or mulch. Disturbed areas include undeveloped areas which have been previously disturbed and are currently dominated by weedy and/or ruderal vegetation, including yellow star-thistle (*Centaurea solstitialis*), smilo grass (*Stipa miliacea*), stinkweed (*Digitaria graveolens*), fennel (*Foeniculum vulgare*), iceplant (*Carpobrotus edulis*), French broom (*Genista monspessulana*), and fountain grass (*Pennisetum setaceum*).

Developed areas cover a total of 25.15 acres of the Study Area. Developed areas are not classified as sensitive by the Corps, RWQCB, CDFW, or any other regulating agency.

Ornamental (no vegetation alliance). CDFW Rank: Not sensitive. Ornamental areas have been cleared of natural vegetation and now contain actively managed landscaping and City-maintained trees. This land cover type includes landscaping, turfgrass lawns, pollinator gardens, and street trees. Common ornamental species in the Study Area included turf grasses, white clover (*Trifolium repens*), and common plantain (*Plantago major*) in lawns; lavender (*Lavandula* sp.), roses (*Rosa* sp.), ornamental rosemary (*Rosmarinus officinalis*), and bank catclaw (*Acacia redolens*) bushes. Common ornamental trees included native species such as coast redwood (*Sequoia sempervirens*), Monterey pine (*Pinus radiata*), and coast live oak (*Quercus agrifolia*), as well as common ornamental species such as European plum (*Prunus domestica*), persian silk trees (*Albizia julibrissin*), crepe myrtle (*Lagerstroemia indica*), southern magnolia (*Magnolia grandiflora*), olive (*Olea europaea*), red pine (*Pinus rubra*), strawberry tree (*Arbutus unedo*), callery pear (*Pyrus calleryana*), London plane (*Platanus xhispanica*), Peruvian pepper tree (*Schinus molle*), and mulberry (*Morus* sp.).

Ornamental areas cover a total of 7.17 acres of the Study Area. Ornamental areas are not classified as sensitive by the Corps, RWQCB, CDFW, or any other regulating agency.

Annual Grassland (no vegetation alliance). CDFW Rank: Not sensitive. Annual grassland is common throughout California and consists of herbaceous vegetation dominated by non-native grasses and forbs. Sparse shrubs or trees may be present at low cover (< 5% absolute cover). Within the Study Area, dominant species in the annual grasslands included slim oat (*Avena barbata*), brome fescue (*Festuca bromoides*), rattlesnake grass (*Briza maxima*), Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), foxtail barley (*H. murinum*), Italian ryegrass (*Festuca perennis*), barley (*Hordeum murinum*), common plantain, yellow star-thistle, purple star-thistle (*Centaurea calcitrapa*), Italian thistle (*Carduus pycnocephalus*), and Torrey's melic grass (*Melica torreyana*).

Annual grassland was common in open spaces and neighborhood parks, covering a total of 28.05 acres in the Study Area. This land cover is not classified as sensitive by the Corps, RWQCB, CDFW, or any other regulating agency.

Coastal Live Oak Woodland (various vegetation alliances). CDFW Rank: Not Sensitive. Coastal oak woodlands are common throughout open space areas (Big Canyon Park, and Eaton Park), parks (Arguello Park, Chilton Park, North Crestview Park, Vista Park, and Heather Dog Exercise Area), covering a total of 87.04 acres in the Study Area. This land cover consists of remnant

natural vegetation with an open to continuous canopy with coast live oak dominant (>50% relative cover) or co-dominant (>30% relative cover) with other broadleaf tree species. Typical co-dominant tree species in the Study Area include California buckeye (*Aesculus californica*), California bay (*Umbellularia californica*), and toyon (*Heteromeles arbutifolia*). Patches of non-native trees or escaped ornamental trees were also common, including olive (*Olea europaea*), pines (*Pinus ponderosa*, *P. halepensis*, *P. resinosa*), Chinese pistache (*Pistache chinensis*), and prickly pear (*Opuntia* sp.). Common shrub species within coastal oak woodland include poison oak (*Toxicodendron diversilobum*), snowberry (*Symphoricarpos albus*), sticky monkey flower (*Diplacus aurantiacus*), coyote brush (*Baccharis pilularis*), and toyon. The herbaceous layer is composed of annual grass species (described above) and shade tolerant native herbs. Common herbaceous species include Torrey's melic grass, dogtail grass (*Cynosurus echinatus*), maidenhair fern (*Adiantum jordanii*), soapplant (*Chlorogalum pomeridianum*), and tall sock-destroyer (*Torilis arvensis*).

Coastal oak woodlands include two alliances, the mixed oak woodland (*Quercus [agrifolia, douglasii, garryana, kelloggii, lobata, wislizeni]* woodland alliance) and the coast live oak woodland (*Q. agrifolia* woodland alliance). Both alliances are ranked G4/S4, and this land cover is not classified as sensitive to by the Corps, RWQCB, CDFW, or any other regulating agency.

Coastal Scrub/Chaparral (various vegetation alliances). CDFW Rank: Not sensitive. Coastal scrub occurs in the open space areas of Big Canyon Park and Eaton Park as well as North Crestview Park and Vista Park, and covers 26.02 acres of the Study Area. Coastal scrub/chaparral occurs on dry, south-facing slopes, open hillsides, and steep, well-drained canyon walls. This land cover type consists of an intermittent to continuous shrub canopy which is usually less dense than chaparral. Within the Study Area, coastal scrub/chaparral is composed of a mix of several vegetation alliances, including coyote brush scrub (*Baccharis pilularis* shrubland alliance, G5/S5), California sagebrush scrub (*Artemisia californica* shrubland alliance, G5/S5), poison oak scrub (*Toxicodendron diversilobum* shrubland alliance, G4/S4), and chamise chaparral (*Adenostoma fasciculatum* shrubland alliance, G5/S5), each dominated by the respective species. Additional common non-dominant species included sticky monkey flower, toyon, Canada horseweed (*Erigeron canadensis*), sage (*Salvia* sp.), and occasional French broom (*Genista monspessulana*). Occasional coast live oak occur within this community, but the individual oak trees are still relatively small and at low cover. Where an herbaceous layer is present, it was composed of non-native annual grasses typical of the annual grasslands (described above).

Within Big Canyon Park, large portions of the coastal scrub/chaparral bordering residences had been extensively grazed and trimmed back to short (6-inch) basal stems. The vegetation alliances within this land cover type are ranked G4/G4 – G5/S5, and coastal scrub/chaparral is not classified as sensitive to by the Corps, RWQCB, CDFW, or any other regulating agency.

Closed-cone Pine-Cypress (*Hesperocyparis macrocarpa* - *Pinus radiata* woodland semi-natural alliance). CDFW Rank: GNA/SNA. Closed-cone pine-cypress occurs within Highlands Park, Crestview Park, and North Crestview Park, covering 9.82 acres of the Study Area. This community is composed of planted trees, groves, and windbreaks which have naturalized in coastal areas. Closed-cone pine-cypress is classified as the *Hesperocyparis macrocarpa* - *Pinus radiata* woodland semi-natural alliance and is defined by the presence of a moderately tall (<50 meters) open to continuous tree canopy dominated by Monterey cypress (*Hesperocyparis macrocarpa*) and/or introduced pines (*Pinus* spp.) (CNPS 2024b). Within the Study Area, dominant species included Monterey cypress, Monterey pines (*Pinus radiata*), red pine (*Pinus resinosa*), and Aleppo

pine (*Pinus halepensis*). A sparse shrub layer was composed of coyote bush, and herbaceous species included non-native annual grassland species (as described above).

Closed-cone pine cypress is ranked GNA/SNA, and this land cover is not classified as sensitive to by the Corps, RWQCB, CDFW, or any other regulating agency.

Eucalyptus Groves (*Eucalyptus (globulus, camaldulensis)* woodland semi-natural alliance).

CDFW Rank: GNA/SNA. Eucalyptus groves occur in Arguello Park, Eaton Park, and the Heather Dog Exercise Area, covering 0.93 acres. Isolated eucalyptus trees are not included in this land cover type. Eucalyptus groves are dominated by one of several eucalyptus species, which are not native to North America. Eucalyptus groves are frequently situated in rural and semi-urbanized settings, along streams, and coastal hills. This community is ranked GNA/SNA, and it is not classified as sensitive to by the Corps, RWQCB, CDFW, or any other regulating agency.

4.1.2 Sensitive Biological Communities

California Bay Woodland (*Umbellularia californica* woodland alliance, G4/S3). CDFW Rank:

Sensitive. California bay woodlands are known from the inner and outer Coast Ranges, Transverse Ranges, and Sierra Nevada Foothills from Del Norte County south to San Diego County. This vegetation community is typically located on terraces, canyon bottoms, north-facing slopes, and rock outcrops underlain by shallow to deep sand to loam substrates (CNPS 2024a). California bay woodlands are defined by their intermittent to continuous tree canopy dominated by California bay, with common co-dominant tree species including California buckeye (*Aesculus californica*), oaks (*Quercus agrifolia*, *Q. chrysolepis*, *Q. wislizeni*), big-leaf maple (*Acer macrophyllum*), and alder (*Alnus rhombifolia*, *A. rubra*), among others.

Within the Study Area, California bay woodland occurs in Eaton Park and cover 5.00 acres along streams in canyon bottoms. This land cover type intergrades with the neighboring coastal oak woodlands. This community is dominated by California bay (>30% relative cover), with coast live oak co-dominant, and California buckeye also common. The shrub layer was sparse, consisting of scattered individuals of poison oak, or California bay and California buckeye saplings. The herbaceous layer is sparse and dominated by shade tolerant forbs including California maidenhair (*Adiantum jordanii*), Torrey's melic grass, and wood fern (*Dryopteris arguta*).

California bay is a noted alternate host for sudden oak death (SOD) caused by the water mold, *Phytophthora ramorum*. This community is ranked G4/S3 and is classified as sensitive by CDFW.

California Buckeye Groves (*Aesculus californica* woodland alliance, G3/S3). CDFW Rank:

Sensitive. California buckeye groves are known from the southern Cascade Range, Coast Ranges, northern Transverse Range, and Sierra Nevada Foothills from Siskiyou County south to Ventura County. This vegetation community is typically located on shallow, moderate to well-drained soils in canyons and alluvial terraces (CNPS 2024b). California buckeye groves are defined by an open to continuous tree canopy dominated by California buckeye (>30%-50% relative cover).

Within the Study Area, California buckeye groves occur in Eaton Park, along a northeast-facing slope, and covers 2.55 acres. This community commonly intergrades with the California bay and coastal oak woodland. Co-dominant species within the tree stratum include California buckeye, California bay, and coast live oak. Common shrub species include oceanspray (*Holodiscus discolor*), poison oak, along with coast life oak, and California bay saplings. Common

herbaceous species include wood fern, tall sock-destroyer (*Torilis arvensis*), snowberry (*Symphoricarpos albus*), and annual grasses including slim wild oat (*Avena barbata*) and ripgut brome (*Bromus diandrus*). California buckeye groves are ranked G3/S3 and are classified as sensitive by CDFW.

Saline Emergent Wetland (various vegetation alliances). CDFW Rank: Sensitive. Saline Emergent Wetland includes saltwater and brackish marshes dominated by perennial graminoids and forbs. Within the Study Area, saline emergent marsh covers 1.19 acres in the Skyway Road Land within and the intertidal zone.

This community is composed of several vegetation alliances, including gumplant patches (*Grindelia stricta* provisional herbaceous alliance, G23/S23), pickleweed marsh (*Sarcocornia pacifica* herbaceous alliance, G4/S4), and cordgrass marsh (*Spartina [alterniflora, densiflora]*, SNA), which are stratified by elevation and the resulting tidal inundation. Common species within saline emergent marsh include gumplant (*Grindelia stricta*), Australian saltbush (*Atriplex semibaccata*), sea lavender (*Limonium* sp.), pickleweed (*Salicornia pacifica*), and cordgrass (*Spartina* sp.). Shrubs and trees are absent from this community. Saline emergent wetlands are potential jurisdictional aquatic resources, under jurisdiction of the Corps and RWQCB.

Intermittent Stream (no vegetation alliance). Intermittent streams are linear features that have indicators of an ordinary high water mark (OHWM) and within which water flows for a portion of the year, generally drying out during the driest time of the year. Two blue-line intermittent streams, Pulgas Creek and Cordilleras Creek, occur in San Carlos city limits. Within the Study Area, 0.27 acres of intermittent streams occur in Big Canyon and Eaton Parks. Indicators of the OHWM include scour, cobble sorting, and a break in vegetation. Remnant flow and remnant in-channel pools were common in intermittent streams during the August 2024 survey. Intermittent streams within the Study Area are typically unvegetated below the OHWM, and supported mesic species immediately above the OHWM, dominated by woodfern and maidenhair fern. Ephemeral streams are potential jurisdictional aquatic resources, under jurisdiction of the Corps, RWQCB, and CDFW.

Ephemeral Stream (no vegetation alliance). Ephemeral drainages are narrow, shallow, linear features that exhibit indicators of an OHWM and convey flows only during or immediately after a precipitation event but remain dry otherwise. Ephemeral streams cover 0.13 acre within the Study Area in Big Canyon and Eaton Parks. Indicators of the OHWM include scouring and cobble sorting. Intermittent streams sometimes show a break in vegetation and support facultative upland species including poison oak within the channel. Ephemeral streams are potential jurisdictional aquatic resources, under jurisdiction of the RWQCB and CDFW.

Other Waters (no vegetation alliance). Other waters include unvegetated, open water of the tidal channels. A total of 0.75 acres of other waters occurs in the Study Area, within the Skyway Road Land. Other waters occur below the MHW (MHW) and convey tidal flows between the San Francisco Bay and the saline emergent wetland. Other waters are potential jurisdictional aquatic resources, under jurisdiction of the Corps, RWQCB, and CDFW

Freshwater Emergent Wetland (no vegetation alliance). Freshwater emergent wetlands are areas which experience frequent flooding, and are defined by the dominance of erect, rooted herbaceous hydrophytes (wetland-adapted plant species). Within the Study Area, freshwater emergent wetlands cover 0.26 acre of Arguello Park. Dominant species within this community

included California buckeye in the tree layer, California blackberry (*Rubus ursinus*), and poison oak in the shrub layer, and tall cyperus (*Cyperus eragrostis*), umbrella sedge (*C. squarrosus*), Italian rye grass (*Festuca perennis*), Torry's melic grass, and English Ivy (*Hedera helix*) in the herbaceous layer. Indicators of the OWHM included a distinct wrack line and scour. Freshwater emergent wetlands are potential jurisdictional aquatic resources, under jurisdiction of the RWQCB and CDFW, and potentially under the jurisdiction of the Corps as well. A Corps-verified delineation would be required to determine the extent of Corps jurisdiction.

4.2 Special-Status Species

A total of 54 special-status plant species and 40 special-status wildlife species were evaluated for potential to occur within the Study Area. Of these, 12 special-status plant species and 12 special-status wildlife species have moderate or higher potential to occur or are present within the Study Area. Species were ruled out if the Study Area was not within the known/expected range for the species, if the Study Area does not contain suitable habitat/microhabitat necessary to support this species, or if the species is generally understood to be extirpated from the region. All plant and wildlife species observed during the August 2024 site visits are included as **Attachment C**. The full list of the special status-species considered for this project is listed in **Attachment D**. Each species that has moderate or high potential to occur on site, or are present, are discussed below.

4.2.1 Plants

Franciscan onion (*Allium peninsulare* var. *franciscanum*), CRPR 1B.2. Known to Occur. Franciscan onion is a perennial forb in the lily family (Liliaceae) that blooms from May to June. It typically occurs on dry hillsides underlain by clay substrate, often derived from serpentine, in cismontane woodland and valley and foothill grassland habitat at elevations ranging from 165 to 975 feet (CDFW 2024, CNPS 2024b). This species has a serpentine affinity rank of weak indicator (1.8) (Safford et al. 2005). Associated species include California bay, California buckeye, coast live oak, leather oak (*Q. durata*), and purple needlegrass (CDFW 2024). Two occurrences of this species are documented in Eaton Park (CDFW 2024). This species was not observed during the August surveys; however, the surveys did not take place during the blooming period for this species and was not intended to be a rare plant survey.

Bent-flowered fiddleneck (*Amsinckia lunaris*), CRPR 1B.2. Moderate Potential. Bent-flowered fiddleneck is an annual forb in the forget-me-not family (Boraginaceae) that blooms from March to June. It typically occurs in open areas within cismontane woodland, valley and foothill grassland, and coastal bluff scrub habitat often underlain by clay substrate at elevations ranging from 10 to 1,625 feet (CDFW 2024, CNPS 2024b). Associated species include coast live oak, buck brush, poison oak, common yarrow, goldenback fern (*Pentagramma triangularis*), one-sided bluegrass (*Poa secunda*), woolly sunflower (*Eriophyllum lanatum*), and slender wild oat (*Avena barbata*) (CDFW 2024). Coastal oak woodland and annual grasslands within the Study Area provide suitable habitat to support this species. The nearest documented CNDDDB occurrence a historical occurrence from 1933 in Redwood City; the nearest modern CNDDDB occurrence is 2.3 miles northwest of the Study Area on the southeast side of Pulgas Ridge near the Crystal Springs Reservoir (CDFW 204b).

Brewer's calandrinia (*Calandrinia breweri*), CRPR 4.2. High potential. Brewer's red maids are annual forbs in the purslane family (Montiaceae) that bloom from March to June. This species typically occurs in recently burned or disturbed sites on sandy and loamy substrate in chaparral

and coastal scrub habitat at elevations ranging from 30 to 3965 feet (CNPS 2024b). Observed associated species include blue oak (*Quercus douglasii*), chamise, Chilean trefoil (*Acemisson wrangelianus*), sticky monkey flower, coyote brush, and whispering bells (*Emmenanthe penduliflora*; CCH2 2024). Brewer's red maids have a high potential to occur in the Study Area due to the presence of coastal scrub/chaparral habitat and sandy or loamy soils in disturbed areas. One CNDDDB occurrence is documented within 5 miles, a historical collection from 1973 within the City of San Carlos at Malabar Rd and Melendy Drive.

San Francisco collinsia (*Collinsia multicolor*), CRPR 1B.2. Known to Occur. San Francisco collinsia is an annual herb that blooms from March to May. It typically occurs in closed-cone coniferous forest and coastal scrub at elevations ranging from 100 to 900 feet (CNPS 2024b). Associated species include poison oak, coyote brush, California coffeeberry (*Frangula californica*), snowberry, California blackberry, western leatherwood, oso berry (*Oemleria cerasiformis*), baby blue eyes (*Nemophila menziesii*), and California buttercup (*Ranunculus californicus*) (CDFW 2024). Coastal scrub/chaparral and moist, shady scrub or forest microhabitat suitable to support this species is located within the Study Area. Two (2) CNDDDB occurrences of this species are documented in Big Canyon Park and 3 CNDDDB occurrences are documented in Eaton Park, all from 2015.

Paniculate tarplant (*Deinandra paniculata*), CRPR 4.2. Known to Occur. Paniculate tarplant is an annual herb in the sunflower family (Asteraceae) that blooms from April (occasionally March) to November at elevations ranging from 80 to 3,085 feet (CDFW 2025, CNPS 2025b). Known associated species include common madia (*Madia elegans*), coastal tarweed (*Deinandra corymbose*), chamise, coast live oak, black sage (*Salvia mellifera*), upright veldt grass (*Ehrharta erecta*), and California spineflower (*Mucronea californica*) (CDFW 2025, CCH2 2025). The Study Area contains suitable coastal oak woodland and coastal scrub/chaparral to support this species. The nearest documented occurrence is a collection from 2023 in North Crestview Park.

Western leatherwood (*Dirca occidentalis*), CRPR 1B.2. Known to Occur. Western leatherwood is a deciduous shrub in the mezereum family (Thymelaeaceae) that blooms from January to April, but is typically identifiable via vegetative structures into late summer and/or early fall. It typically occurs on brushy, mesic slopes in partial shade in broadleaf upland forest, chaparral, closed-cone coniferous forest, cismontane woodland, North Coast coniferous forest, riparian forest, and riparian woodland habitat at elevations range from 165 to 1,285 feet (CDFW 2024, CNPS 2024b, Baldwin et al. 2012). Associated species include coast live oak, California bay, poison oak, toyon, California buckeye, coyote brush, yerba buena (*Clinopodium douglasii*), sword fern (*Polystichum munitum*), Pacific sanicle, and Douglas iris (*Iris douglasiana*) (CDFW 2024). One (1) CNDDDB occurrence dated 2015 is documented within Eaton Park.

California bottle-brush grass (*Elymus californicus*), CRPR 4.3. Moderate Potential. California bottle-brush grass is a perennial graminoid in the grass family (Poaceae) that blooms from May to November. It typically occurs along stream banks or other mesic sites within broadleaf upland forest, cismontane woodland, North Coast coniferous forest, and riparian woodland habitat at elevations ranging from 45 to 1,530 feet (CNPS 2024b). Associated species include Douglas fir (*Pseudotsuga menziesii*), coast redwood (*Sequoia sempervirens*), California bay, red alder (*Alnus rubra*), California hazelnut (*Corylus cornuta* var. *californica*), California coffeeberry, California blackberry, sword fern, hedge nettle (*Stachys ajugoides*), bracken fern (*Pteridium aquilinum*) and woodland brome (*Bromus laevipes*) (CNPS 2024b, CCH2 2024). California bottle-brush grass has a moderate potential to occur in the Study Area due the presence of broadleafed upland forest, cismontane woodland, and riparian forest habitats located within the Study Area, and

microhabitats of sandy humus soils are also present to support this species. The nearest documented occurrence is located 4.3 miles northwest of the Study Area, from a 1994 collection along Crystal Springs Road in the San Mateo Creek drainage (CCH2 2024).

San Mateo woolly sunflower (*Eriophyllum latilobum*), FE, SE, CRPR 1B.1. Moderate Potential. San Mateo woolly sunflower is a perennial herb that blooms from May to June. It typically occurs in cismontane woodland, coastal scrub, and lower montane coniferous forest habitats at elevations ranging from 150 to 1085 feet (CNPS 2024b). Associated species include coast live oak, California buckeye, California bay, foothill needle grass (*Stipa lepida*), California sagebrush, and white globe lily (*Calochortus albus*) (CDFW 2024). Suitable habitat of coastal oak woodlands and coastal scrub/chaparral habitats are located within the Study Area, and many of the associated species were also observed throughout the Study Area. The nearest CNDDDB occurrence is 3.8 miles northwest, along the west side of the Crystal Springs Reservoir.

Fragrant fritillary (*Fritillaria liliacea*), CRPR 1B.2. Moderate potential. Fragrant fritillary is a low-growing, bulbiferous perennial forb in the lily family (Liliaceae) that blooms from February to April. It typically occurs in open, grassy areas in valley and foothill grassland, coastal scrub, and coastal prairie habitat at elevations ranging from 10 to 1,345 feet (CDFW 2024, CNPS 2024b). This species has a serpentine affinity rank of weak indicator (1.8) (Safford et al. 2005). Known associated species include soap plant (*Chlorogalum pomeridianum* var. *pomeridianum*), coyote brush (*Baccharis pilularis*), purple needlegrass (*Stipa pulchra*), California oat grass (*Danthonia californica*), large flowered star tulip (*Calochortus uniflorus*), California buttercup (*Ranunculus californicus*), sun cups (*Camissonia ovata*), shooting stars (*Dodecatheon hendersonii*), needleleaf pincushion plant (*Navaretia intertexta*), one-sided bluegrass (*Poa secunda*), and Greene's popcornflower (*Plagiobothrys greenei*) (CDFW 2024). The Study Area contains suitable annual grasslands and coastal scrub/chaparral to support this species. The nearest CNDDDB occurrence is 0.8 miles south of the Study Area in Edgewood Park.

Arcuate bush-mallow (*Malacothamnus arcuatus*), CRPR 1B.2. High potential. Arcuate bush-mallow is a shrub that blooms from April to September. It typically occurs in chaparral and cismontane woodland habitats at elevations ranging from 50 to 1165 feet (CNPS 2024b). Associated species include coast live oak, bigberry manzanita (*Arctostaphylos glauca*), chamise, western leather wood, California sagebrush, coyote brush, and buck brush (CDFW 2024). Coastal scrub/chaparral, coastal oak woodland, and annual grassland habitats within the Study Area provide suitable habitat to support this species. The nearest CNDDDB occurrence was recorded in 2004, less than 0.25 mile from Big Canyon Park and Highlands Park, along Canyon Vista Way.

Woodland woollythreads (*Monolopia gracilens*), CRPR 1B.2. Known to Occur. Woodland woollythreads is an annual herb that blooms from March to July. It typically occurs in broadleafed upland forest, chaparral, cismontane woodland, north coast coniferous forest, and valley and foothill grassland habitats at elevations ranging from 330 to 3935 feet (CNPS 2024b). Associated species include yerba santa (*Eriodictyon* spp.), chamise, buck brush, poison oak, bigberry manzanita, and sticky monkey flower (CDFW 2024). Suitable habitat of coastal oak woodland, coastal scrub/chaparral, and annual grasslands are present in the Study Area to support this species. The nearest CNDDDB occurrence is a historical occurrence from 1973, in San Carlos north of Malabar Road and Melendy Drive. The nearest modern occurrence is from 2021, 0.8 mile east of the Study Area, along west side of Edgewood Park.

Choris's popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*), CRPR 1B.2. Moderate Potential. Choris's popcornflower is an annual herb that blooms from March to June. It typically occurs in chaparral, coastal prairie, coastal scrub at elevations ranging from 10 to 525 feet (CNPS 2024b). Associated species include common yarrow, coyote brush, common toad rush (*Juncus bufonius*), brass buttons (*Cotula coronopifolia*), fringed willowherb (*Epilobium ciliatum*), California blackberry and Buck's horn plantain (*Plantago coronopus*) (CDFW 2024). Coastal scrub/chaparral habitats with mesic microhabitats suitable to support this species are located within the Study Area. The nearest CNDDDB occurrence is approximately 1.7 miles southwest, along Old Canada Road.

4.2.2 Wildlife

A total of 41 special-status wildlife species have been documented in the vicinity of the Study Area (CDFW 2024a, USFWS 2024b). Thirteen (13) of these species are known to occur within the Study Area or have the potential to occur and are discussed in greater detail below. The remaining species are unlikely or have no potential to occur due to one or more of the following reasons:

- Specific aquatic habitats (e.g., vernal pools, rivers, lakes, estuaries, ponds) necessary to support the special-status wildlife species are not present in the Study Area;
- Vegetation habitats (e.g., old growth coniferous forest, dense pickleweed marsh) that provide nesting and/or foraging resources necessary support the special-status wildlife species are not present in the Study Area;
- Physical structures (e.g., mines/caves, tall cliffs, abandoned buildings) necessary to provide nesting, roosting, or cover habitat for special-status wildlife species are not present in the Study Area;
- Soil substrates (e.g., serpentine soils, sandy soils) necessary support special-status wildlife species and specific host plants are not present in the Study Area;
- The Study Area is outside of the species' documented range;
- The Study Area is beyond the known maximum dispersal distance from any potential source populations.

KNOWN TO OCCUR

San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), CDFW Species of Special Concern. This subspecies of the dusky-footed woodrat occurs in the Coast Ranges between San Francisco Bay and the Salinas River (Matocq 2004). 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/nests 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 generally nocturnal.

Evidence of woodrat activity was identified during the site visit(s) within Big Canyon Park, Eaton Park, and Arguello Park. Numerous woodrat structures were observed both along riparian corridors and in more upland thickets of various types of shrubs, many within 30 to 50 feet of existing trails. While no woodrat individuals were observed, this species should be assumed to

have potential to nest in any portion of the Study Area that contains a relatively dense understory.

White tailed kite (*Elanus leucurus*), CDFW Fully Protected Species. The white-tailed kite is resident in open to semi-open habitats throughout the lower elevations of California, including grasslands, savannahs, woodlands, agricultural areas and wetlands. Vegetative structure and prey availability seem to be more important habitat elements than associations with specific plants or vegetative communities (Dunk 1995). Nests are constructed mostly of twigs and placed in trees, often at habitat edges. Nest trees are highly variable in size, structure, and immediate surroundings, ranging from shrubs to trees greater than 150 feet tall (Dunk 1995). This species preys upon a variety of small mammals, as well as other vertebrates and invertebrates.

While this species was not observed during the site visit(s), white-tailed kite commonly occurs in the region and several local occurrences have been documented throughout the Study Area in eBird. This species should be considered present in parks and open spaces that provide small trees interspersed with grasses and low shrubs, which may provide suitable nesting or foraging habitat.

Burrowing owl (*Athene cunicularia*). CDFW Species of Special Concern; Currently petitioned as a CDFW Candidate Species. The burrowing owl occurs as a year-round resident and winter visitor in much of California's lowlands, inhabiting open areas with sparse or non-existent tree or shrub canopies. Typical habitat is annual or perennial grassland, although human-modified areas such as agricultural lands and airports are also used (Poulin et al. 1993). This species is dependent on burrowing mammals to provide the burrows that are characteristically used for shelter and nesting, and in northern California is typically found in close association with California ground squirrels (*Otospermophilus beecheyi*). Manmade substrates such as pipes or debris piles may also be occupied in place of burrows. Prey consists of insects and small vertebrates. Breeding typically takes place from March to July.

Burrowing owls are known to occur at the San Carlos Airport and immediate vicinity. A wintering owl was documented between Skyway Road and the southernmost extent of the airport as recently as December 2021 (eBird 2024). As such, this species should be presumed present on parcels in close proximity to San Carlos Airport. However, suitable habitat components were not observed within other City parks or open space areas evaluated in this assessment and this species has not been documented elsewhere in San Carlos (CDFW 2024b).

MODERATE OR HIGHER POTENTIAL TO OCCUR

Hoary bat (*Lasiurus cinereus*), WBWG Medium. 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. This species tolerates a wide range of temperatures and has been captured at air temperatures between 0 and 22 degrees Celsius. They usually emerge late in the evening to forage, typically from just over one hour after sunset to after midnight.

Many of the CNDDDB occurrences in the vicinity that document this species are older "specimen samples" from the early 1900's. However, this species is known to occur in forested and woodland habitats within the San Francisco Bay Area. Wooded habitats within the Study Area,

particularly in the vicinity of riparian areas that could provide sources of forage, should thus be considered to have moderate potential to support hoary bat and other non-special-status bats with baseline protections.

Pallid bat (*Antrozous pallidus*). CDFW Species of Special Concern, WBWG High Priority. The pallid bat is broadly distributed throughout much of western North America and typically occurs in association with open, rocky areas. Occupied habitats are highly variable and range from deserts to forests in lowland areas, and include higher-elevation forests. Roosting may occur singly or in groups of up to hundreds of individuals. Roosts must offer protection from high temperatures and are typically in rock crevices, mines, caves, or tree hollows; manmade structures are also used, including buildings (both vacant and occupied) and bridges. Pallid bats are primarily insectivorous, feeding on large prey that is usually taken on the ground but sometimes in flight (WBWG 2018).

Many of the CNDDDB occurrences that document this species are older “specimen samples” from the early to mid-1900’s. However, this species is known to occur in a variety of habitats within the San Francisco Bay Area. Suitable roost sites (i.e. tree snags, basal cavities, and rock outcrops/crevices) were observed within the Study Area, particularly in Big Canyon Park, Eaton Park, and Arguello Park. In addition, numerous bat boxes were observed along existing trails that may provide roosting habitat for pallid bats or other bat species with baseline protections.

Olive-sided flycatcher (*Contopus cooperi*), CDFW Species of Special Concern. The olive-sided flycatcher is a summer resident in California, wintering in Latin America. It breeds in a variety of forested habitats, typically coniferous forests at higher elevations, but also in mixed forest and woodlands at lower elevations. Breeding habitat is often associated with forest openings and edges, both natural (e.g., meadows, canyons) and man-made (e.g., logged areas) (Altman and Sallabanks 2012). Nests are usually in conifers, and placed at variable height on the outer portions of branches. This species forages for insects, usually from prominent tree snags.

Although this species was not observed during site visits, olive-sided flycatcher sightings are regularly reported east of the Study Area, within Pulgas Ridge Open Space Preserve (CDFW 2024b). Given that Big Canyon and Eaton Park provide mixed woodland habitat and habitat edges, this species may be present. Although these habitats could support nesting, this species may be more commonly observed foraging within the Study Area given that more densely forested habitat is present in the region.

San Francisco (saltmarsh) common yellowthroat (*Geothlypis trichas sinuosa*), CDFW Species of Special Concern. This subspecies of the common yellowthroat is found in freshwater marshes, coastal swales, riparian thickets, brackish marshes, and saltwater marshes. Their breeding range extends from Tomales Bay in the north, Carquinez Strait to the east, and Santa Cruz County to the south. This species requires thick, continuous cover such as tall grasses, tule patches, or riparian vegetation down to the water surface for foraging and prefers willows for nesting (Shuford and Gardali 2008).

Marsh vegetation within the Skyway Road Land and immediate vicinity has potential to support nesting and foraging. However, this species is unlikely to occur within other parks and open space areas due to the absence of suitable habitat types and vegetation characteristics. For example, intermittent and ephemeral streams within Big Canyon and Eaton Park lack thick, continuous cover down to the water surface and do not provide willows for nesting.

Alameda (South Bay) song sparrow (*Melospiza melodia pusillula*), CDFW Species of Special Concern, USFWS Bird of Conservation Concern. Alameda song sparrow, a subspecies of the common and widespread song sparrow (*M. melodia*), is an endemic resident of marsh habitat along the fringes of south and east San Francisco Bay. This subspecies prefers tidally influenced marsh, and taller shrubs such as gumplant are required for breeding to avoid nest flooding during high tides (Shuford and Gardali 2008).

Marsh vegetation within the Skyway Road Land and immediate vicinity likely support nesting and foraging. Other parks and open spaces evaluated in this assessment do not provide suitable habitat to support this species.

Northern harrier (*Circus hudsonius [cyaneus]*), CDFW Species of Special Concern. The northern harrier occurs as a resident and winter visitor in open habitats throughout most of California, including freshwater and brackish marshes, grasslands and fields, agricultural areas, and deserts. Harriers typically nest in treeless areas within patches of dense, relatively tall, vegetation, the composition of which is highly variable; nests are placed on the ground and often located near water or within wetlands (Shuford and Gardali 2008). Harriers are birds of prey and subsist on a variety of small mammals and other vertebrates.

Marsh vegetation within the Skyway Road Land and immediate vicinity has potential to support nesting and foraging. However, this species is unlikely to occur in other parks and open spaces due to the absence of suitable habitat types and vegetation characteristics. For example, open grassland areas within Big Canyon Park are regularly mowed/grazed for fire control purposes and thus do not provide tall, dense grasses suitable for nesting.

American badger (*Taxidea taxus*), CDFW Species of Special Concern. The American badger is a large, semi-fossorial member of the Mustelidae (i.e. weasel family). It is found uncommonly within the region in drier open stages of most scrub, forest, and herbaceous habitats where friable soils and prey populations are present. Badgers are typically solitary and nocturnal, digging burrows to provide refuge during daylight hours. Burrow entrances are usually elliptical (rather than round), and each burrow generally has only one entrance. Young are born in the spring and independent by the end of summer. Badgers are carnivores, preying on a variety of fossorial mammals (especially ground squirrels) and occasionally other vertebrates and their eggs. Home ranges for this species tend to be large, depending on the habitat available; population density averages one badger per square mile in prime open country (Long 1973).

This species is likely to avoid highly trafficked areas where trails have been relatively compacted, or densely wooded or vegetated habitats within the Study Area. However, friable soils and more open habitats exist in higher elevation locations (i.e. on grassy slopes) within Big Canyon Park and Eaton Park could support this species. No large mammal burrows were observed during the site visits.

Crotch bumble bee (*Bombus crotchii*), State candidate. Crotch bumble bee (CBB) occurs primarily in central and southern California, from coastal areas inland to the foothills (Williams et al. 2014). This species is now largely absent from the Central Valley, although it was historically common in this region (Hatfield et al. 2015). CBB occurs in grassland and scrub habitats and has also been documented in agricultural areas. Like other bumble bee species, CBB is a social species with an annual life cycle. Queens emerge from hibernation in the late

winter/early spring to establish a new colony. The colony produces workers throughout the spring and summer, and reproductives (i.e. drones and queens) in the early fall. Nests are built in pre-existing cavities. They are commonly found underground, in abandoned rodent burrows, or aboveground in grass tufts, rock piles, abandoned bird nests, or tree cavities. CBB feeds on pollen and nectar during all life stages; preferred host species include (but are not limited to) milkweeds (*Asclepias* spp.), chaenactis (*Chaenactis* spp.), clarkias (*Clarkia* spp.), larkspurs (*Delphinium* spp.), buckwheats (*Eriogonum* spp.), lupines (*Lupinus* spp.), medicks (*Medicago* spp.), bladderpod (*Peritoma arborea*), phacelias (*Phacelia* spp.), poppies (*Eschscholzia* spp.), and sages (*Salvia* spp.). Queens overwinter in hibernacula; little is known about habitat requirements for hibernacula; bare ground, leaf litter and/or duff, and pre-existing cavities may provide overwintering habitat.

The Study Area is within the current range of this species. CBB may occur in grassland and scrub habitats where flowering resources and burrowing rodent activity are present, mostly likely within Big Canyon Park, Eaton Park, and Arguello Park. Note, the timing of vegetation management may affect the availability of flowing resources during different periods of the season. For example, if grasslands within the Study Area are heavily grazed in the summer, the Study Area may function as early season foraging habitat but may not support nesting.

California Ridgway's (clapper) rail (*Rallus obsoletus obsoletus*). Federal Endangered, State Endangered, CDFW Fully Protected Species. The California Ridgway's rail (CRR), formerly known as California clapper rail (*R. longirostris obsoletus*), is the resident Ridgway's/clapper rail subspecies of northern and central California. Although more widespread in the past, it is currently restricted to the San Francisco Bay estuary. The CRR occurs only within salt and brackish marshes. According to Harvey (1988), Shuford (1993) and Eddleman and Conway (1998), important CRR habitat components are: 1) well-developed tidal sloughs and secondary channels; 2) beds of cordgrass (*Spartina* spp.) in the lower marsh zone; 3) dense salt marsh vegetation for cover, nest sites, and brooding areas; 4) intertidal mudflats, gradually sloping banks of tidal channels, and cordgrass beds for foraging; 5) abundant invertebrate food resources; and 6) transitional vegetation at the marsh edge to serve as a refuge during high tides. In south and central San Francisco Bay and along the perimeter of San Pablo Bay, CRR typically inhabits salt marshes dominated by pickleweed and cordgrass. Brackish marshes supporting CRR occur along major sloughs and rivers of San Pablo Bay and along tidal sloughs of Suisun Marsh. Nesting occurs from March through July, with peak activity in late April to late May (DeGroot 1927, Harvey 1980, Harvey 1988). CRR nests, constructed of wetland vegetation and platform-shaped, are placed near the ground in clumps of dense vegetation, usually in the lower marsh zone near small tidal channels (DeGroot 1927, Evens and Page 1983, Harvey 1988).

CRR is known to occur in sloughs associated with Bair Island State Marine Park, in the vicinity of the Study Area (CDFW 2024b). The Skyway Road Land contains a tidal channel and secondary channels that border existing development, Highway 101, and a portion of the San Francisco Bay Trail. Although tidal marsh habitat within this parcel is limited in extent and relatively homogenous in terms of zonation and other characteristics, some habitat features are present, including exposed mudflats and pockets of cordgrass. It is unlikely that CRR would nest within the Study Area given the proximity to existing development/disturbance and the availability of more extensive habitat in the vicinity. However, given the connectivity to expansive habitat with known occurrences, CRR has some potential to occur within marsh habitat adjacent to the San Carlos Airport.

UNLIKELY TO OCCUR

Northwestern pond turtle (*Actinemys marmorata*), Proposed Federal Threatened, CDFW Species of Special Concern. The western pond turtle is the only native freshwater turtle in California. This turtle is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and Transverse Ranges. Western pond turtles inhabit perennial aquatic habitats, such as lakes, ponds, rivers, streams, and canals that provide submerged cover and suitable basking structures, such as rocks and logs (Zeiner et. al. 1990). Western pond turtles prefer to nest on unshaded upland slopes close to their aquatic habitat, and hatchlings require shallow water with relatively dense emergent and submergent vegetation for foraging for aquatic invertebrates (Jennings and Hayes 1994).

The Study Area does not provide perennial aquatic habitat to support this species. Streams observed within the Study Area are intermittent or ephemeral and do not have direct connectivity to larger perennial features. Furthermore, stream channels are fairly narrow, lack emergent vegetation, provide limited opportunities for basking, and are unlikely to provide flows sufficient to support this species. In addition, surrounding uplands are not suitable for nesting. As such, aquatic habitats within the Study Area are unlikely to support this species.

California red-legged frog (*Rana draytonii*). Federal Threatened, CDFW Species of Special Concern. The California red-legged frog (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-), 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, CRLFs 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 CRLFs 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.

CRLF has not been documented within the Study Area or immediate vicinity. This species is known to occur in the greater vicinity of the Study Area, mainly within Crystal Springs reservoir and adjacent wetlands/ponds (CDFW 2024b). However, the Study Area is separated from Crystal Springs Reservoir by Interstate 280 and there is no hydrologic connectivity that would allow for passage of this species from known occupied habitats and source populations. Potentially suitable aquatic habitat within the Study Area is also extremely limited, given that most stream features are intermittent or ephemeral and do not provide appropriate vegetation to support breeding. Considering barriers to dispersal and the relative lack of suitable habitat, CRLF is unlikely to occur within the Study Area.

Mountain Lion (*Puma concolor*). CDFW Candidate Species. Mountain lions are the second largest felid in North America and have the largest geographic range of any carnivore in the western

hemisphere that stretches from southern Chile to the Canadian Yukon. This large distribution speaks to the extreme adaptability of the species with respect to its ability to exploit a great variety of different habitats. This adaptability is largely explained by the species' ability to thrive across a huge range of environmental conditions. Mountain lions are mobile predators of the landscapes that they inhabit, with home ranges within the Santa Cruz mountains estimated to be between 40 and 150 square miles. Males tend to defend smaller territories against other males and females tend to have larger territories that may overlap with other lion's territories. Deer and smaller mammals make up the majority of their diets and their hunting activities are mostly nocturnal.

Open Spaces within the Study Area represent a pocket of marginally suitable habitat, largely surrounded by urban development. However, highway 280 represents a major barrier to dispersal from more suitable habitat in the Santa Cruz mountains, and areas to the west are very densely populated. While some mountain lions may occasionally pass through the Study Area, it is likely that most mountain lions would not traverse into this area due to offsite barriers and onsite recreational activities that are currently present. The Study Area may be temporarily attractive to an individual mountain lion with a higher than typical tolerance for anthropogenic disturbance. However, it is unlikely that the site would remain occupied by a mountain lion for extended periods due to its limited size and correspondingly limited prey availability. Because the species is so adaptable, any future recreational improvements within the Study Area would not be expected to have a significant impact on mountain lions, if present, because they would simply move on to another, more suitable part of their range.

All species evaluated as part of this assessment are included in **Attachment C**. Table 5 below provides an overview of species with potential to occur within each of the 17 parks evaluated during the site visit.

Table 5. Overview of Special-status Wildlife Species Potentials

	WPT	San Francisco dusky-footed woodrat	American badger	White-tailed kite	BUOW	Northern harrier	Olive-sided flycatcher	Saltmarsh common yellowthroat	Alameda song sparrow	CRR	CBB	Roosting Bats	Native Nesting Birds
Arguello Park		X		X								X	X
Big Canyon Park	X	X	X	X			X				X	X	X
Burton Park													X
Cedar Street Park													X
Chilton Park													X
City Hall Dog Park													X
Crestview Park													X
Eaton Park	X	X	X	X			X				X	X	X
Frank D. Harrington Park													X
Heather Dog Area													X
Highlands Park				X									X
Hillcrest Circle Park													X
Laureola Park													X
North Crestview Park				X									X
Rosek Park													X
San Carlos Avenue Park													X
Vista Park				X									X
Skyway Road Land					X	X		X	X	X			X



4.3 Habitat Quality

Habitat quality varies by park type within the San Carlos Parks. Open space areas, which include Big Canyon Park and Eaton Park, are moderate to high quality habitat. Within open space areas, most of the vegetation (>75% relative cover) is composed of native plant species, apart from eucalyptus groves and non-native annual grasslands. Native cover in the open space areas includes coast live oak, California buckeye, and California bay in the tree strata and toyon, poison oak, and coyote brush in the shrub strata. Invasive species were observed in open space areas but were typically limited to patches of less than 50 square feet; these represent a small portion of the overall open space areas. Visible evidence of vegetation trampling by trail users was minimal throughout open space areas. However, portions of Eaton Park adjacent to residential areas have been extensively grazed, creating a disturbed area which is recolonized with non-native annual grassland species.

Moderate quality habitat occurs in the undeveloped portions Arguello Park, Chilton Park, North Crestview Park, and Vista Park. Other than non-native annual grasslands, invasive species were limited to discrete groves of non-native trees such as eucalyptus, non-native pines, and olive less than 50 square feet. Vegetation trampling by trail users was minimal. Anthropogenic native plant gardens in Vista Park and Highlands Park increase the pollinator habitat quality of these parks.

Low quality habitat is present in the remaining parks, which have extensive development such as sports fields, parking lots, playgrounds, and ornamental landscaping. These parks have less than 50% relative cover of native species, although this is typically due to non-native landscaping rather than invasive species presence. Vegetation trampling is evident, especially adjacent to playgrounds and sports fields. Low quality habitat includes developed areas of the parks. The table below displays habitat quality for each of the 17 San Carlos Parks.

Table 6. Habitat Quality by Park

PARK	PARK TYPE	HABITAT QUALITY
Arguello Park	Community Park	Moderate
Big Canyon Park	Open Space	High
Burton Park	Community Park	Moderate
Cedar Street	Mini-Park	Low
Chilton Park	Neighborhood Park	Moderate
City Hall Dog Park	Special Use	Low
Crestview Park	Neighborhood Park	Low
Eaton Park	Open Space	High
Frank D. Harrinton Park	Mini-Park	Low
Heather Dog Area	Special Use	Low
Highlands Park	Community Park	Moderate
Hillcrest Circle Park	Mini-Park	Low
Laureola Park	Neighborhood Park	Low
North Crestview Park	Neighborhood Park	Moderate
Rosek Park	Mini-Park	Low
San Carlos Avenue Neighborhood Park	Mini-Park	Low
Skyway Road Land	Special Use	Moderate
Vista Park	Neighborhood Park	Moderate



5.0 RECOMMENDATIONS

5.1 Habitat and Species

Although the habitat within the Open Space areas appears to be in good health, there are still management considerations and actions that should be taken to ensure this valuable community resource continues to thrive, for both residents and wildlife alike. The following recommendations are a result of observations from the reconnaissance site visits.

SUDDEN OAK DEATH. Sudden oak death (SOD, or *Phytophthora ramorum*) is a pathogen that is a common management concern for the City of San Carlos Parks and Open Spaces. Although SOD has been detected in San Mateo County (and much of the west coast), there are no current or active cases in the county as reported by statewide, citizen science SOD mapping efforts through Calinvasives or University of California Berkeley's SODmap (Calflora 2024 and UC Berkeley 2024). Two previously reported cases occurred in Eaton Park in 2008 and 2013. The 2013 case is inactive according to follow-up visits to the same infected trees as part of the Calinvasives mapping program in 2014 and 2015. The 2008 case was not revisited; however no additional new cases have been reported (Calflora 2024 and UC Berkeley 2024).

Although there are no known active cases according to these databases, it is still possible that SOD is present and dormant within City of San Carlos Parks and Open Spaces. Therefore, recommendations for SOD management include adding educational signage and decontamination equipment at all trailheads for these open spaces. Educational signage may include but is not limited to the following: photos that show what symptoms of SOD look like, how to report cases to the citizen science programs mentioned previously (if observed), how to reduce the risk of spread by avoiding trails 24-48 hours after a significant precipitation event and encouraging trail users to remove tracked mud found on the bottom of shoes and bike tires. Decontamination stations located at access points may include boot brushes and 70% isopropyl alcohol spray bottles that are mounted to the educational signage.

INVASIVE SPECIES. Several occurrences of moderate and highly-invasive species occur within the open space areas of Eaton Park and Big Canyon Park as well as undeveloped portions of Skyway Road Land, North Crestview Park, Vista Park, and the Heather Dog Area. Common invasive plant species within the Study Area include ice plant (*Carpobrotus edulis*, Cal-IPC: High), French broom (*Genista monspessulana*, Cal-IPC: High), English ivy (*Hedera helix*, Cal-IPC: High), Himalayan blackberry (*Rubus armeniacus*, Cal-IPC High), yellow star-thistle (*Centaurea solstitialis*), stinkwort (*Dittrichia graveolens*, Cal-IPC Moderate), and Italian thistle (*Carduus pycnocephalus*, Cal-IPC Moderate).

Invasive species were uncommon within developed and ornamental areas, due to the active management of these spaces. Recommendations for managing invasive species found within the Study Area include early detection and response. Early detection and response is a best management practice for invasive species control that focuses monitoring for new or spreading occurrences of undesirable species, then applies the most effective management action for the control of the species. For example, if an invasive species is primarily spread via seed, then attempts would be made to remove the flowering portion of the plant before the seeds have a chance to develop, mature, and spread. Another example would be species that spread via rhizome/stolons; the entire plant would be manually removed to prevent further spread.

Goat or sheep grazing can be used for invasive species control; however, the timing is important. Grazing is typically targeted prior to seed maturity and development. For example, the California Invasive Plant Council (Cal-IPC) recommends high-intensity short-duration grazing by sheep, goats, or cattle for yellow star-thistle control, after the plants have bolted but before they produce spiny heads (DiTomaso 2013).

Herbicide use may be an effective control for invasive species management within the context of Integrated Pest Management (IPM), which considers all potential treatment methods and assesses the potential wildlife and habitat impacts of each. Cal-IPC recommends that when using herbicides, the most specifically targeted application method that can effectively achieve program goals should be used (Cal-IPC 2015).

Public community meetings and collaboration between the City and community groups would be helpful for invasive species control efforts. Another advantage of the SOD decontamination stations (brushes and rubbing alcohol) also reduces the inadvertent introduction of weedy species by trail users.

ADDITIONAL SURVEYS. Due to the large Study Area and number of special-status plant and wildlife species with potential to occur, protocol-level surveys for these species are recommended once the City has a clearly established project, with a project description (which includes the limits of disturbance). Having clearly defined project footprints, or smaller study areas, for protocol-level surveys will allow the City to use resource management budget wisely and comply with applicable federal, state, and local policies. This is because the number of species with potential to occur may be tailored based on the habitat present within the project footprint and will generally result in reduced species that need protocol-level surveys to determine presence/absence.

Generally, appropriately timed work can avoid or minimize impacts to special-status species and sensitive natural resources. For example, vegetation management activities should take place during September through January to avoid impacts to nesting birds. Nesting bird season is generally accepted as February 1 through August 31 for the City of Belmont. Another example includes conducting ground disturbance activities during the dry season (June through October), particularly if the project footprint will be located near waterways.

HABITAT ENHANCEMENT AND RESTORATION OPPORTUNITIES. While most of the natural habitats found within the parks and open spaces were in good condition, there are still opportunities for habitat enhancement and restoration. The non-native annual grassland and extensively grazed coastal scrub/chapparral provide particular opportunities for habitat enhancement and restoration. As is typical in non-native grasslands throughout California, the annual grasslands within the Study Area are dominated by non-native species with some native grasses and forbs.

Within the extensively grazed areas of Eaton Park, large areas of coastal scrub/chaparral have been cleared to within 6 inches of ground level. Such extensive clearing often promotes invasive species growth, particularly invasive species found in non-native annual grasslands.

If brush clearing projects near residential areas are required for fire hazard reduction, the annual grasslands could be enhanced by hydroseeding a native grass mix in disturbed areas or planting

plugs of perennial native bunchgrasses to compete with the non-native annuals. This should be followed up by monitoring these re-seeded or revegetated areas, with some supplemental water to help perennial bunchgrasses become established. Additionally, conducting a grazing study would allow the City to adjust the grazing regime within San Carlos open spaces to balance grassland management and fire hazard concerns. Additionally, a grazing study could investigate the potential to use goat or sheep grazing for invasive species control.

The presence of some native pollinator gardens in Chilton Park and Vista Park is promising, and the planting of native species could be expanded throughout ornamental landscaping in San Carlos Parks. Native trees and hearty native shrubs could incrementally replace non-native ornamental species, as the current ornamentals mature and are naturally replaced over time.

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ATTACHMENTS

Attachment A. Figures

Figure 1. Regional Location Map

Figure 2. Soil Types Series

Figure 3. Land Cover Series

Figure 4. Aquatic Features Series

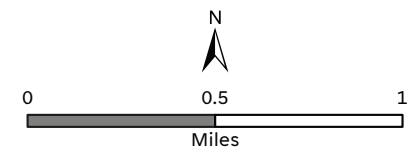
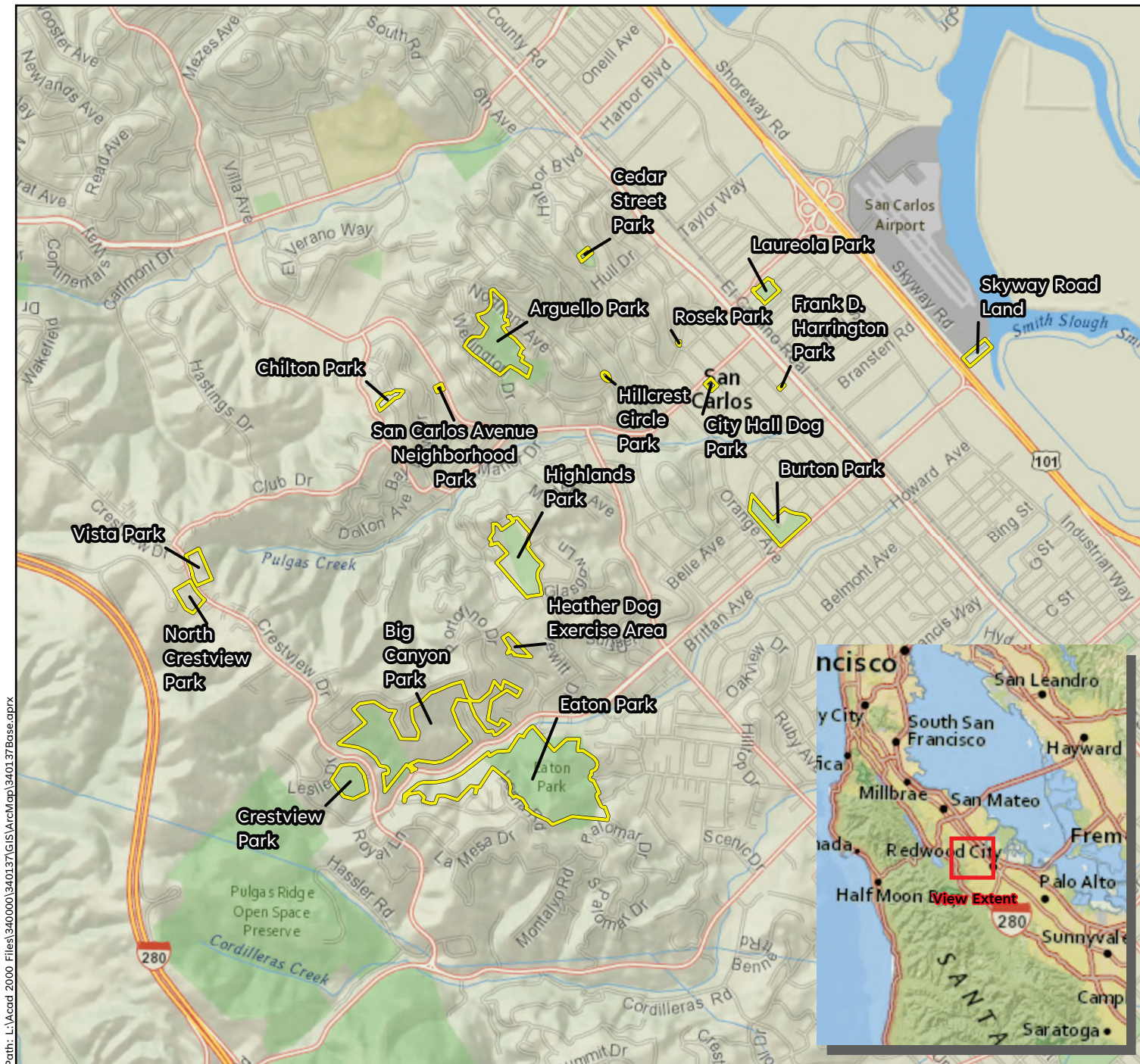
Attachment B. Land Cover Types by within San Carlos Parks

Attachment C. Species Observed within the Study Area

Attachment D. Special-Status Species Potentials Table

Figure 1. Regional Location Map

San Carlos Parks Master Plan
San Mateo County, California



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Sources: National Geographic, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Figure 2. Soils

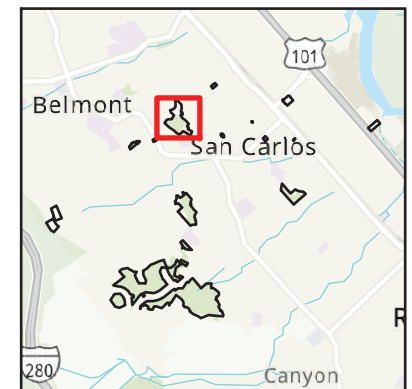
San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

 113: Fagan loam, 15 to 50 percent slopes

 124: Orthents, cut and fill-
Urban land complex, 5 to 75 percent slopes



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Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

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Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Soils**
-  113: Fagan loam, 15 to 50 percent slopes
 -  116: Maymen gravelly loam, 30 to 50 percent slopes
 -  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



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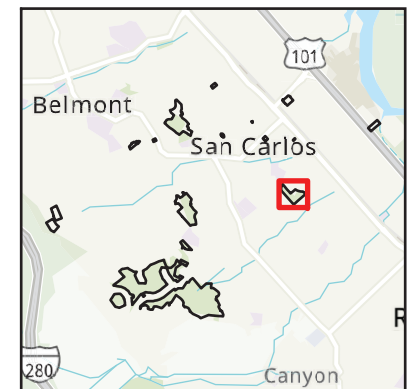
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

-  121: Orthents, cut and fill, 0 to 15 percent slopes
-  132: Urban land-Orthents, cut and fill complex, 0 to 5 percent slopes



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Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

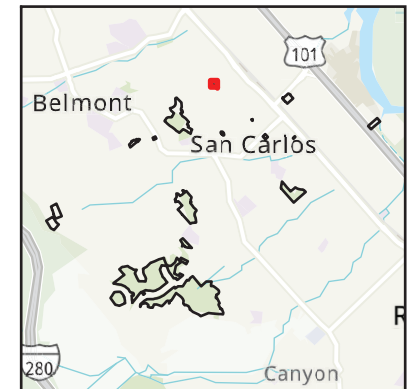
Soils

124: Orthents, cut and fill-

 Urban land complex, 5 to 75 percent slopes

124

Cedar
Street
Park



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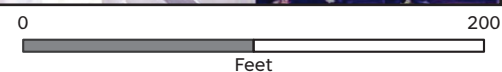
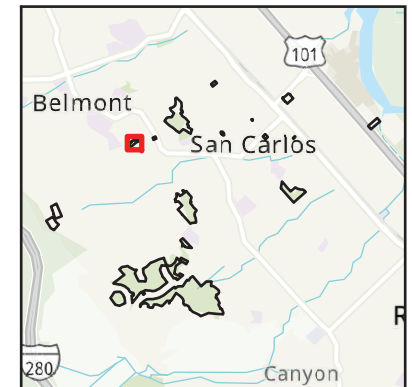
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Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Soils**
-  113: Fagan loam, 15 to 50 percent slopes
 -  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



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Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Figure 2. Soils

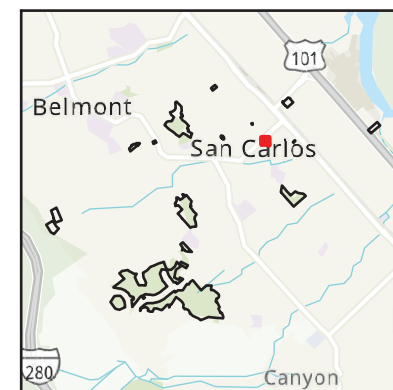
San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

 132: Urban land-Orthents,
cut and fill complex, 0 to 5
percent slopes

132
City
Hall Dog
Park



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Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

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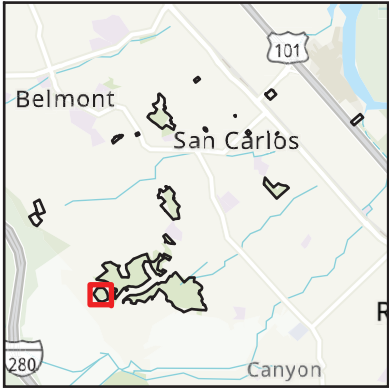
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**Figure 2.
Soils**

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Soils**
-  121: Orthents, cut and fill, 0 to 15 percent slopes
-  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

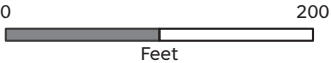


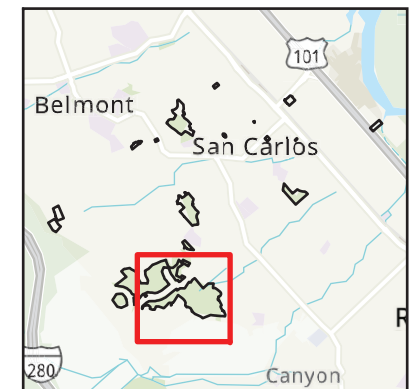
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

-  115: Los Gatos loam, 30 to 75 percent slopes, MLRA 15
-  124: Orthents, cut and fill-Urban land complex, 5 to 75 percent slopes
-  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



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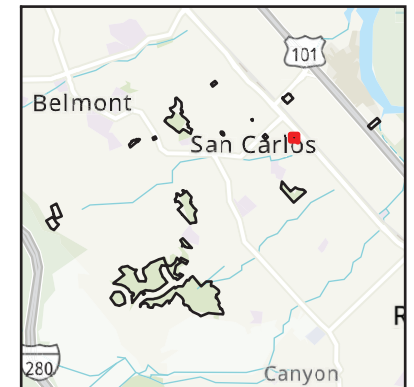
Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Soils**
-  131: Urban land



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Feet

200



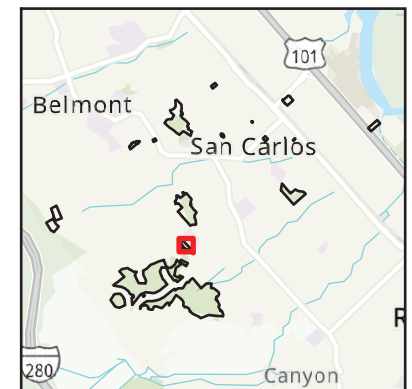
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

-  113: Fagan loam, 15 to 50 percent slopes
-  121: Orthents, cut and fill, 0 to 15 percent slopes
-  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



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Feet

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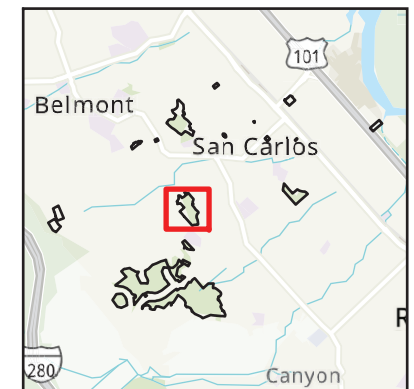
Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Soils**
-  121: Orthents, cut and fill, 0 to 15 percent slopes
 -  124: Orthents, cut and fill- Urban land complex, 5 to 75 percent slopes
 -  131: Urban land
 -  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



0 200
Feet

Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

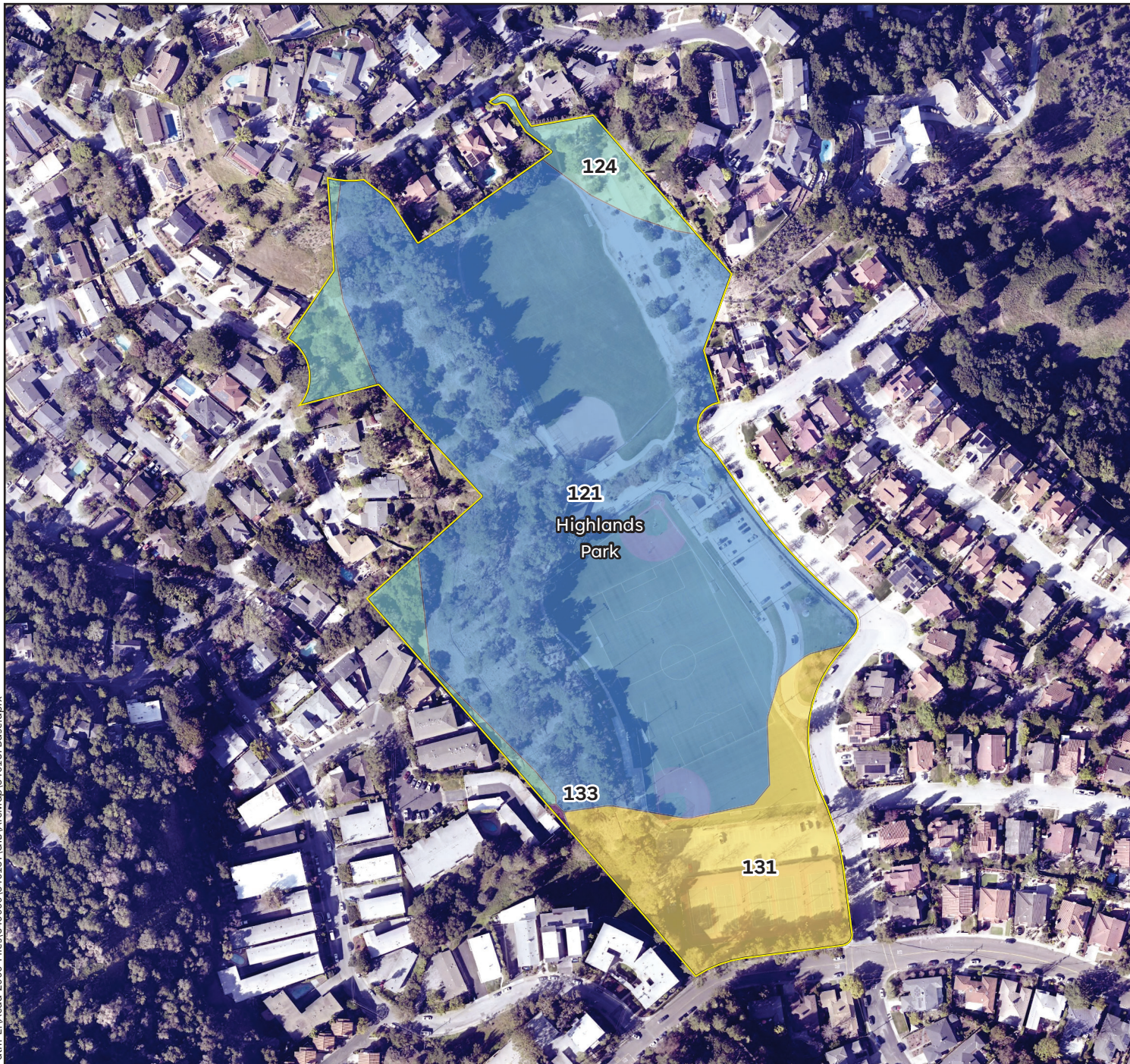


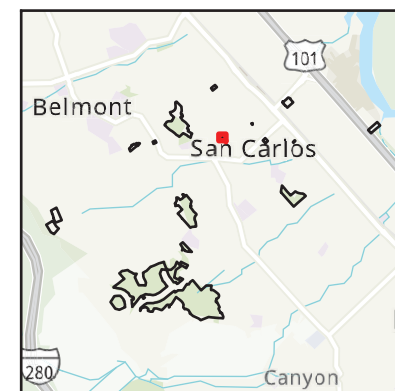
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

124: Orthents, cut and fill-
 Urban land complex, 5 to
75 percent slopes



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

200

Feet

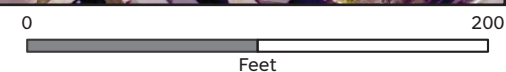
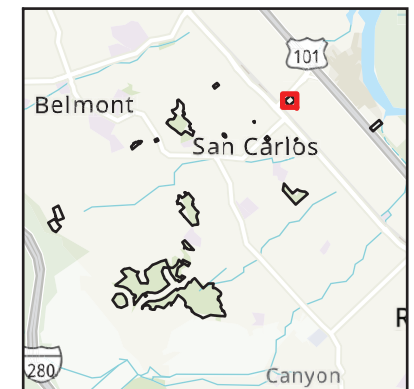
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

-  131: Urban land
-  132: Urban land-Orthents, cut and fill complex, 0 to 5 percent slopes
-  134: Urban land-Orthents, reclaimed complex, 0 to 2 percent slopes



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

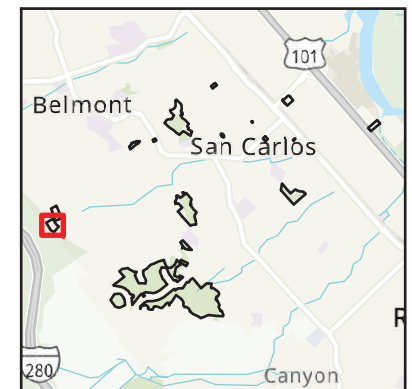
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

-  113: Fagan loam, 15 to 50 percent slopes
-  133: Urban land-Orthents, cut and fill complex, 5 to 75 percent slopes



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

0 200
Feet

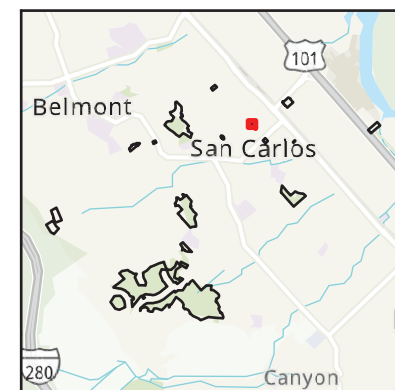
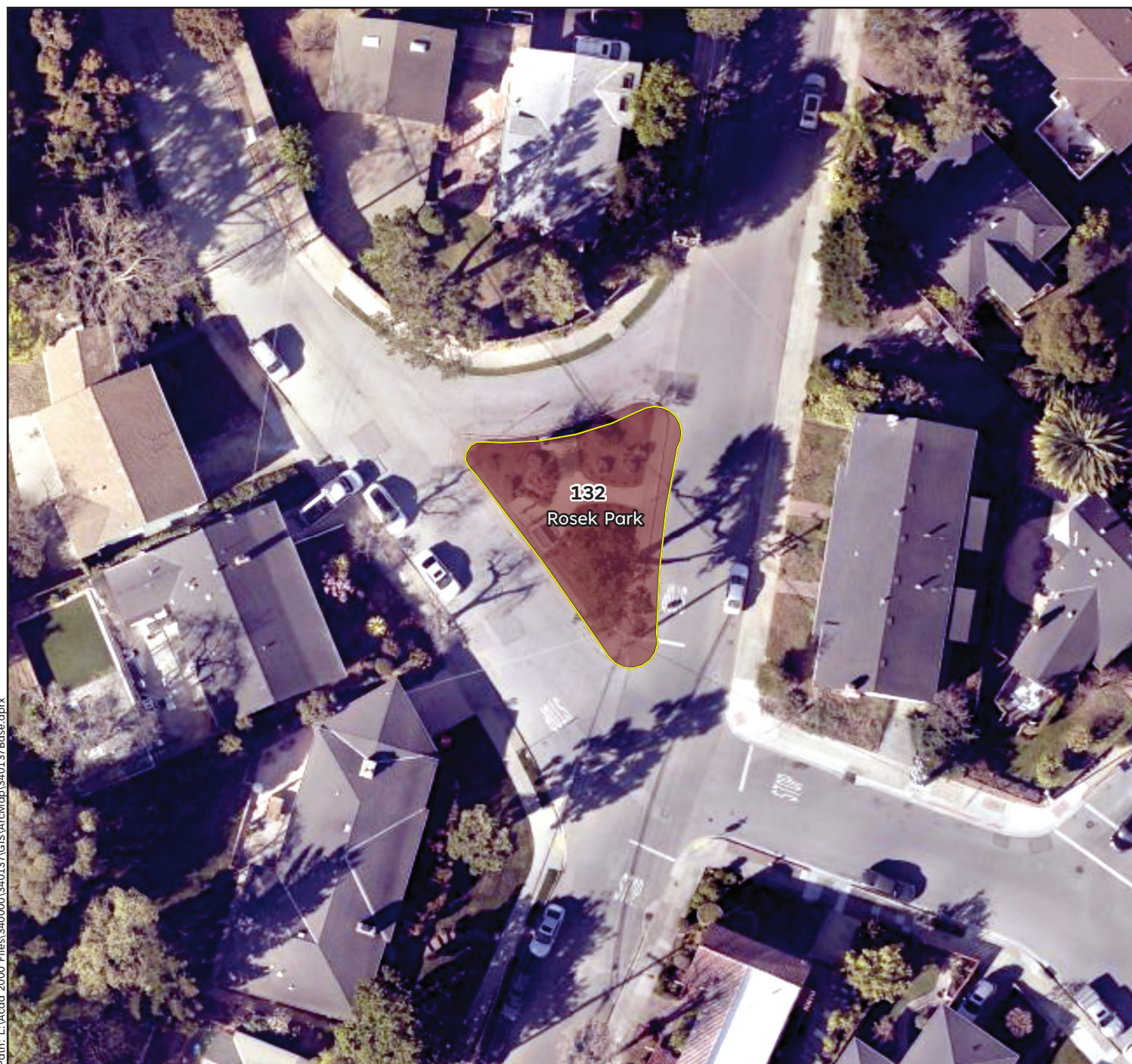
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

 132: Urban land-Orthents, cut and fill complex, 0 to 5 percent slopes



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

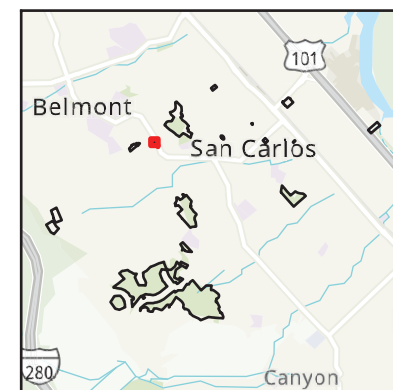
Feet

200

Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Soils**
-  113: Fagan loam, 15 to 50 percent slopes
 -  124: Orthents, cut and fill-
Urban land complex, 5 to 75 percent slopes



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

200

Feet



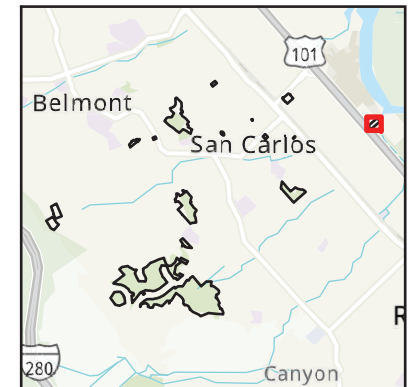
Figure 2. Soils

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

-  117: Novato clay, 0 to 1 percent slopes
-  134: Urban land-Orthents, reclaimed complex, 0 to 2 percent slopes



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

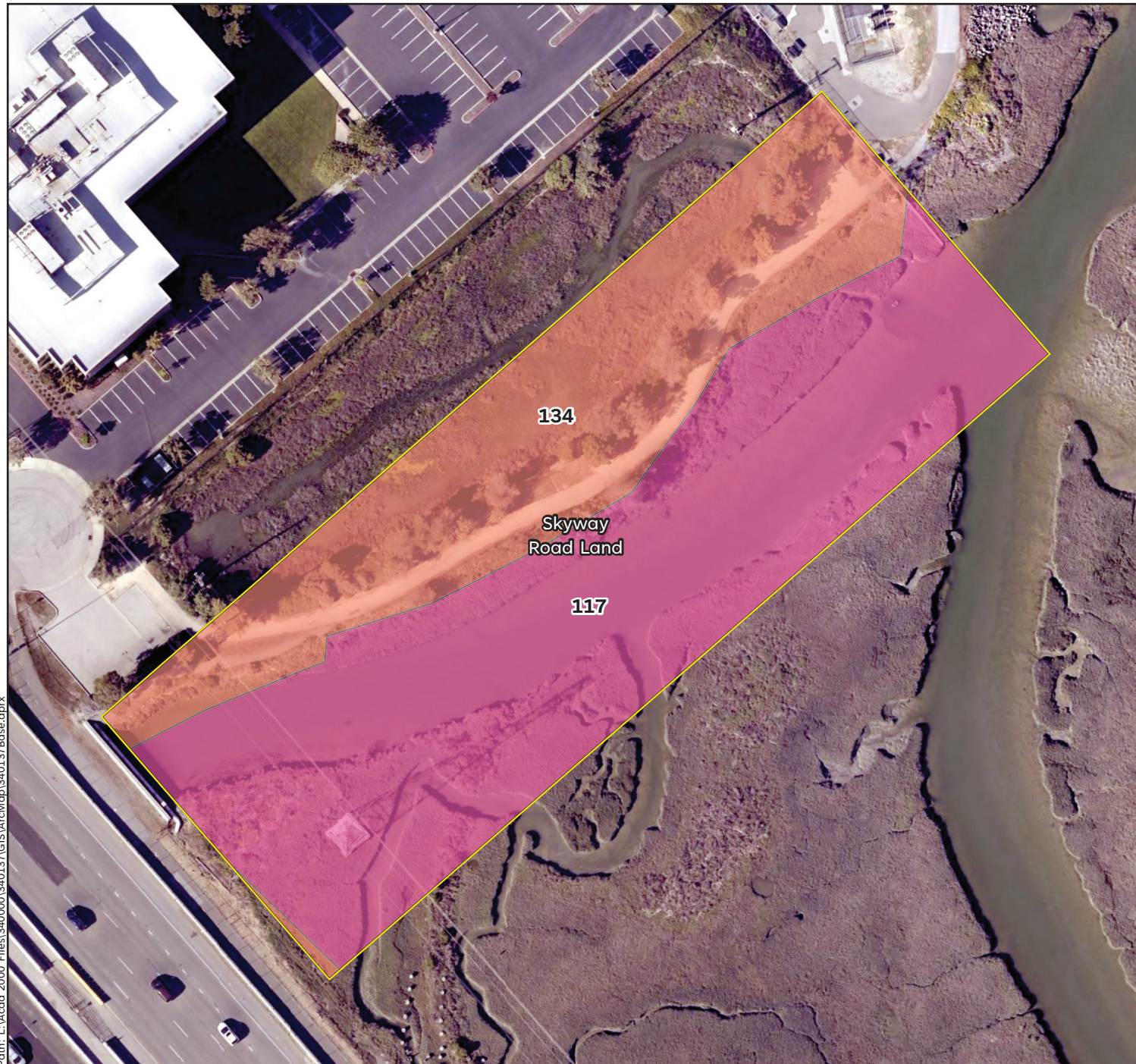


Figure 2. Soils

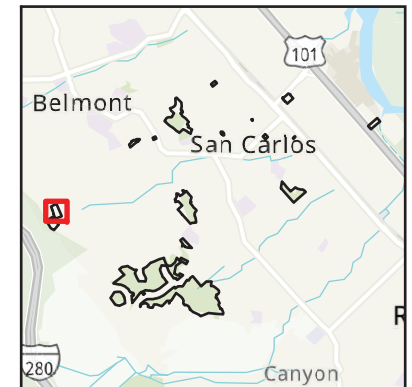
San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Soils

116: Maymen gravelly
loam, 30 to 50 percent
slopes

133: Urban land-Orthents,
cut and fill complex, 5 to
75 percent slopes



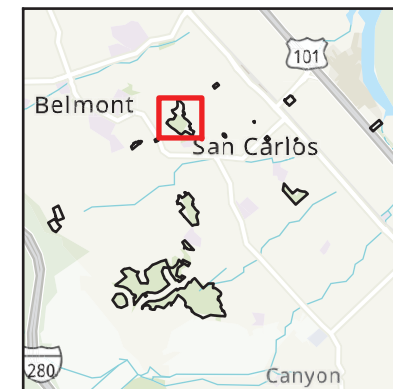
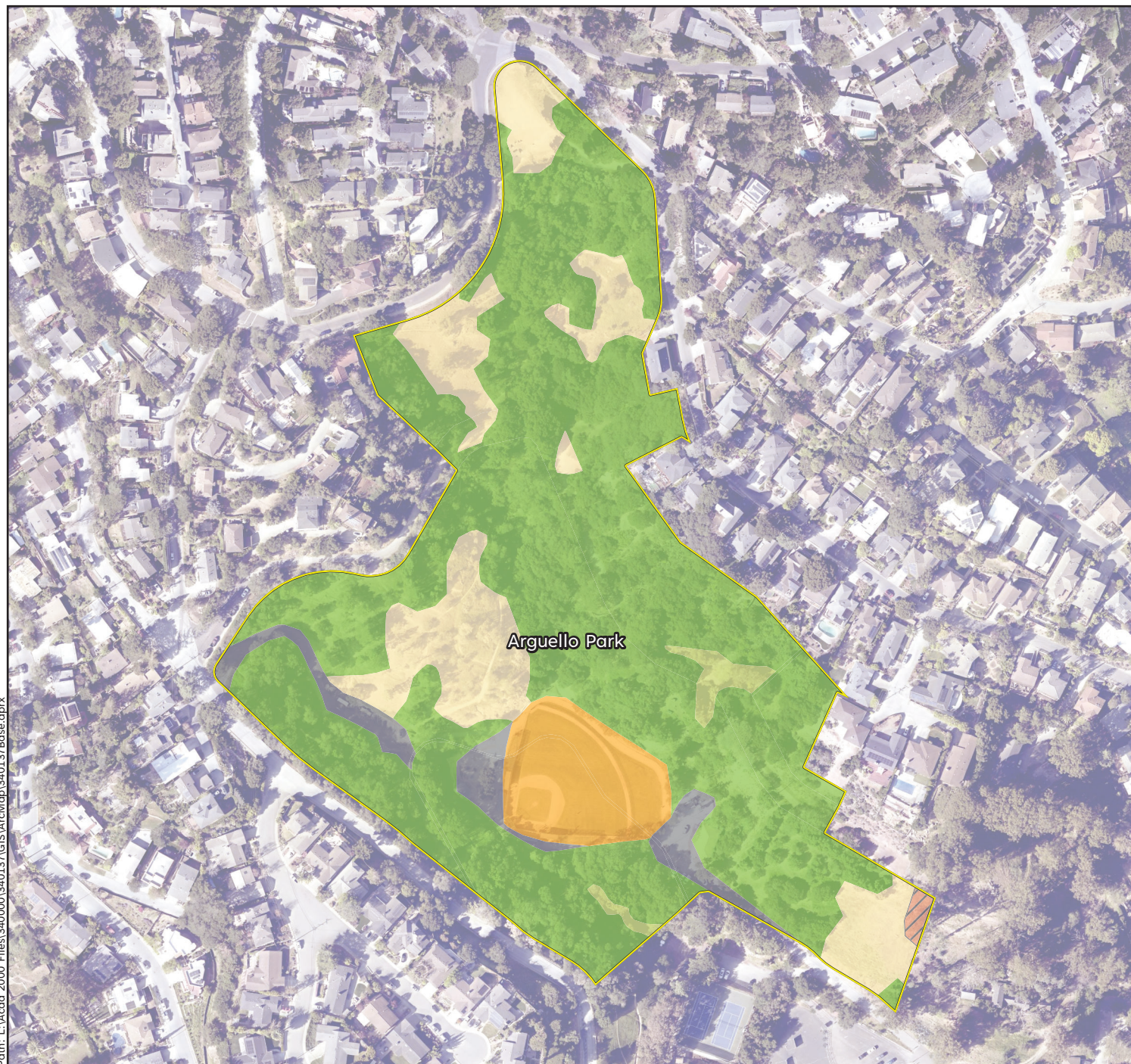
Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

0 200
Feet



Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

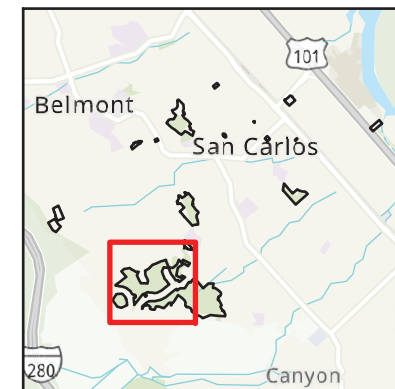
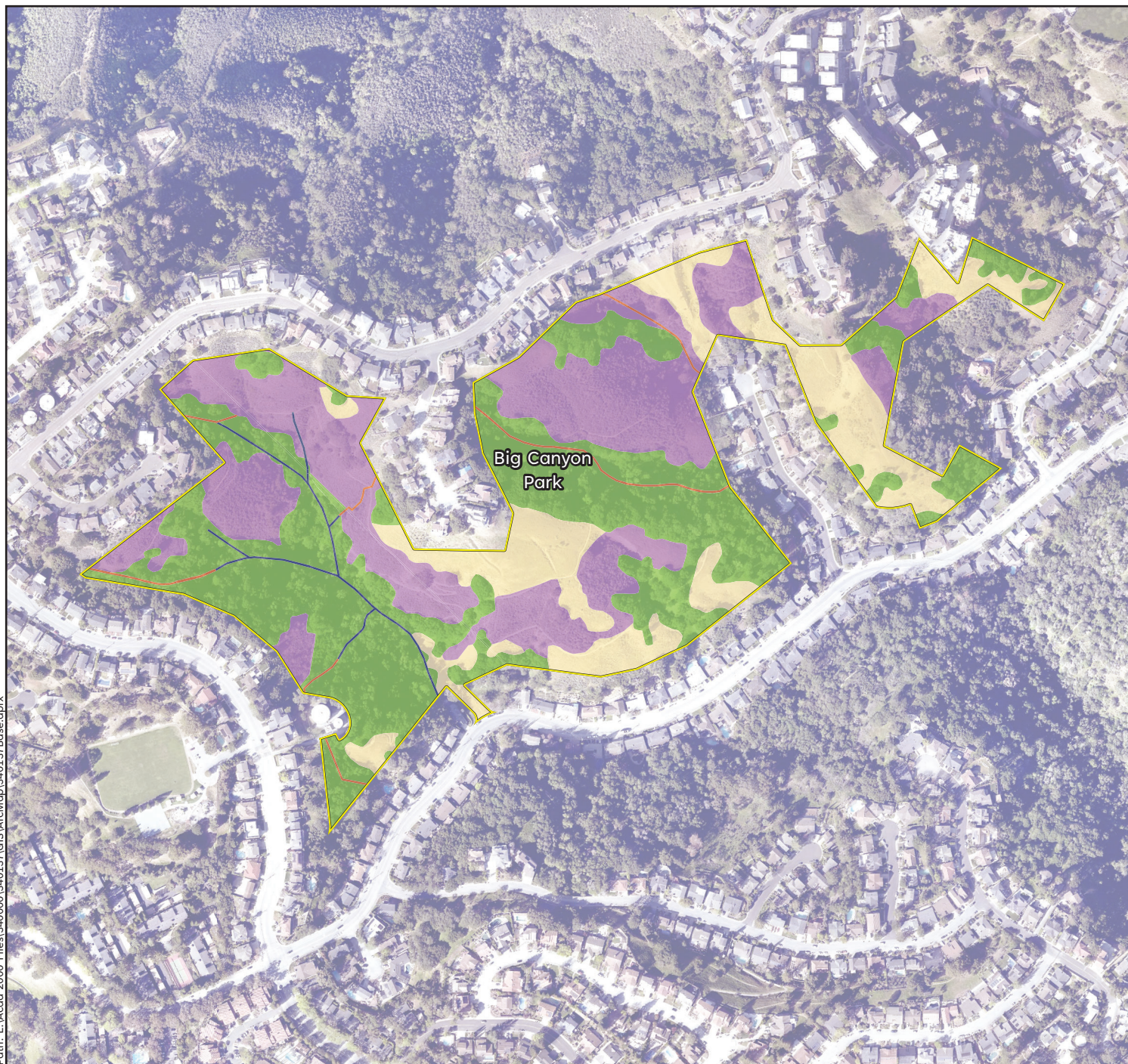


Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Coastal Oak Woodland
 -  Developed
 -  Annual Grassland
 -  Coastal Scrub / Chaparral
 -  Ephemeral Stream
 -  Intermittent Stream

Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 3. Land Cover

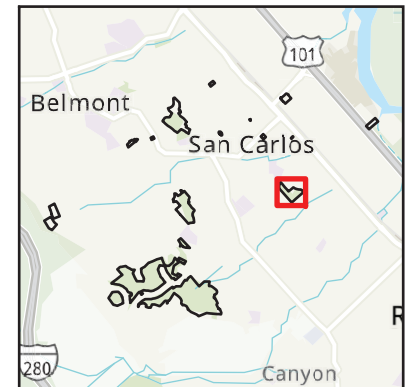
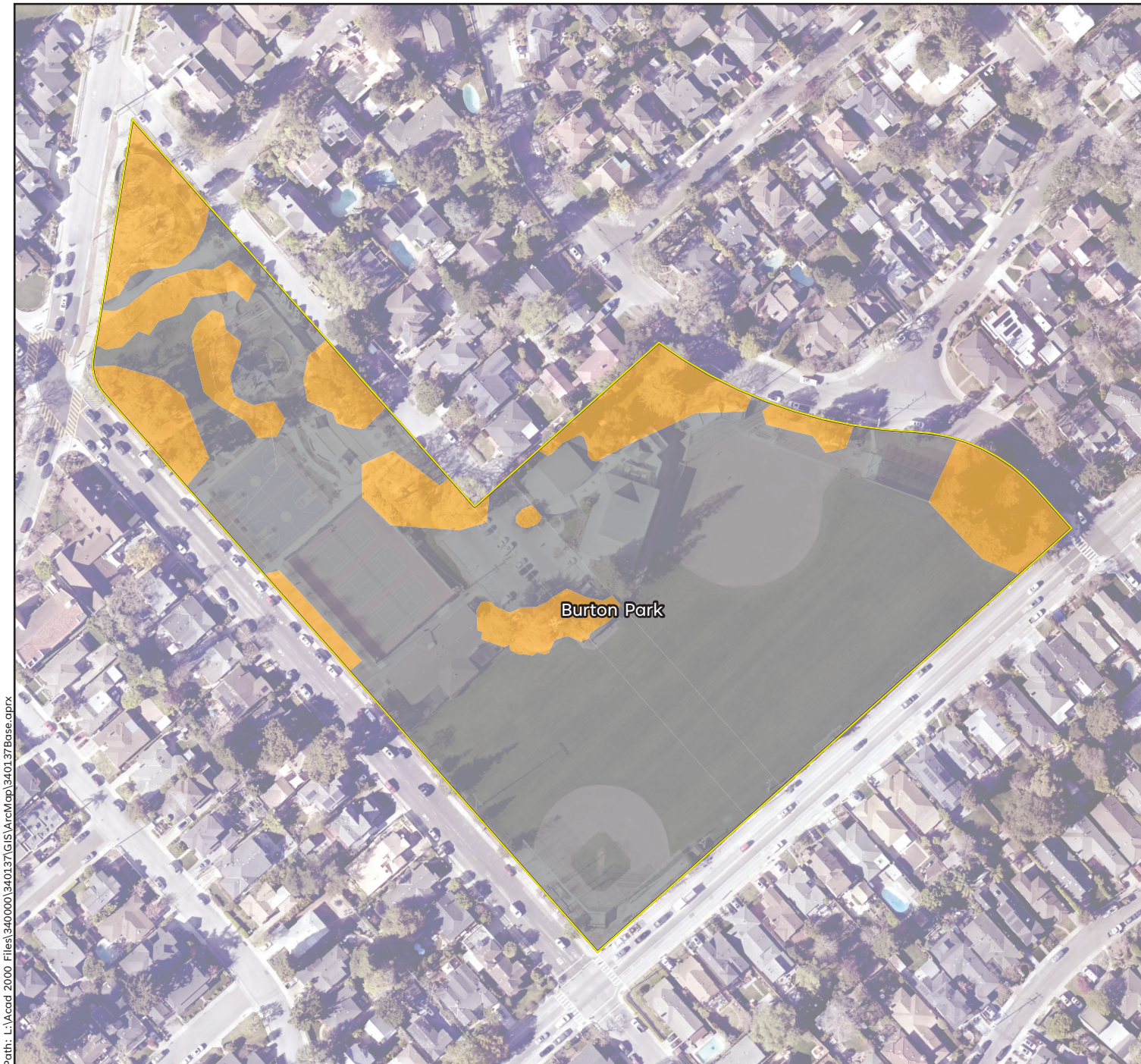
San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Land Cover Types

 Ornamental

 Developed



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

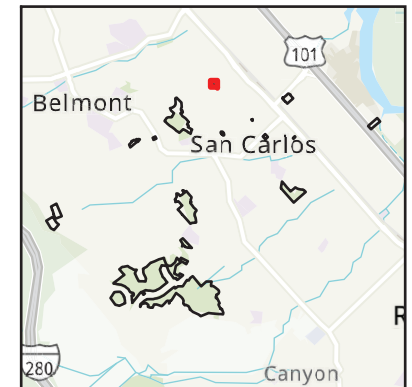
 Park Boundary

Land Cover Types

 Ornamental

 Developed

Cedar
Street
Park



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

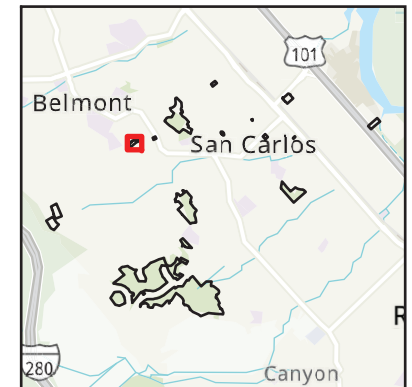
Feet



Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Coastal Oak Woodland
 -  Ornamental
 -  Annual Grassland



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

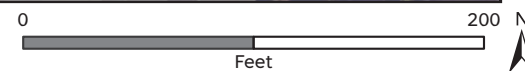


Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

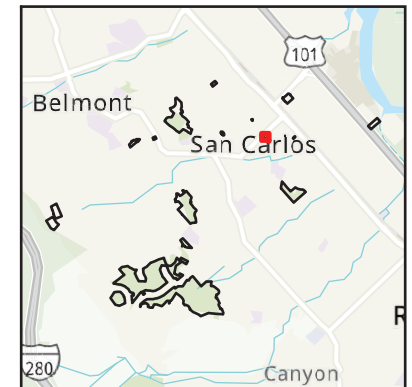
 Park Boundary

Land Cover Types

 Ornamental

 Developed

City
Hall Dog
Park



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Feet



Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

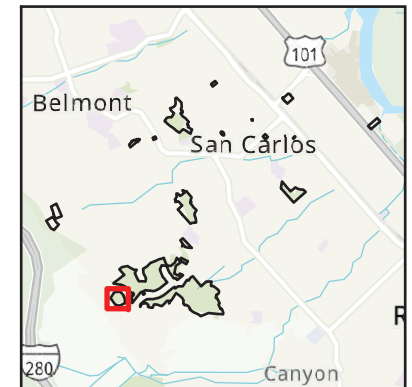
 Park Boundary

Land Cover Types

 Closed-cone Pine-cypress

 Developed

 Annual Grassland



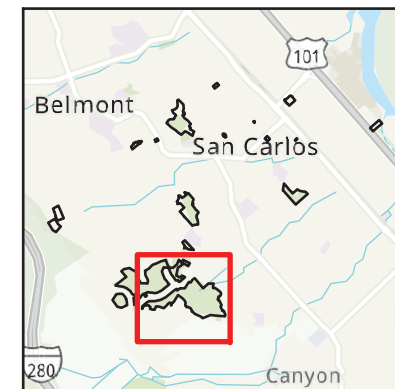
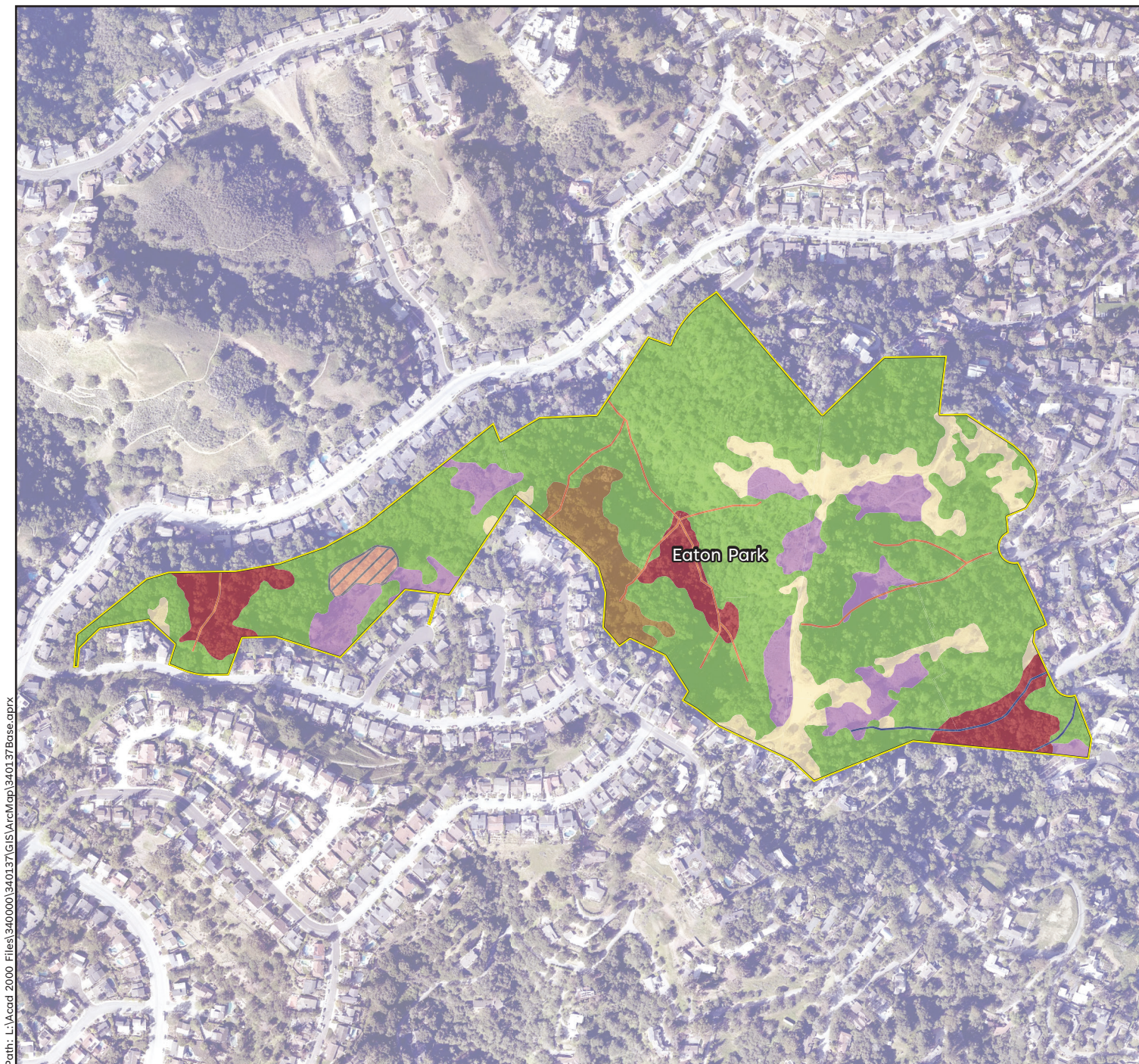
Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Coastal Oak Woodland
-  Eucalyptus Grove
-  Annual Grassland
-  Coastal Scrub / Chaparral
-  California Bay Woodland
-  California Buckeye Grove
-  Ephemeral Stream
-  Intermittent Stream



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 3. Land Cover

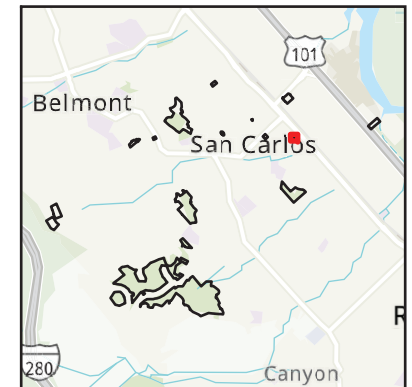
San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Land Cover Types

 Developed

Frank D.
Harrington
Park



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

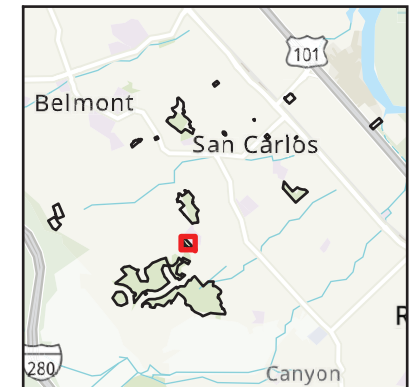
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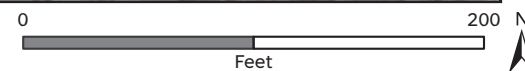
Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Coastal Oak Woodland
 -  Eucalyptus Grove
 -  Annual Grassland



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



**Figure 3.
Land Cover**

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Closed-cone Pine-cypress
-  Ornamental
-  Developed
-  Annual Grassland



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

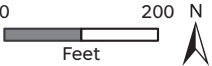


Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

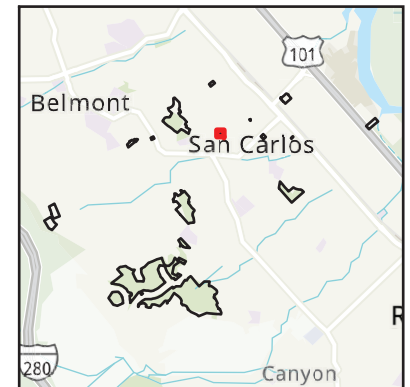
 Park Boundary

Land Cover Types

 Developed



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Feet



**Figure 3.
Land Cover**

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Ornamental
-  Developed



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

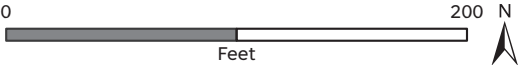
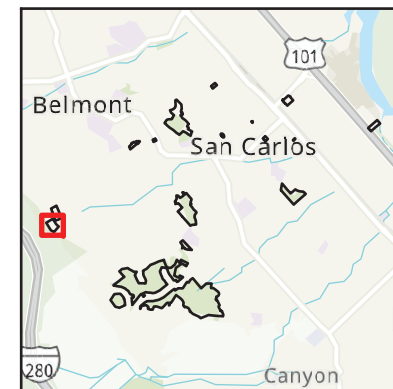


Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Closed-cone Pine-cypress
 -  Coastal Oak Woodland
 -  Annual Grassland
 -  Coastal Scrub / Chaparral



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Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



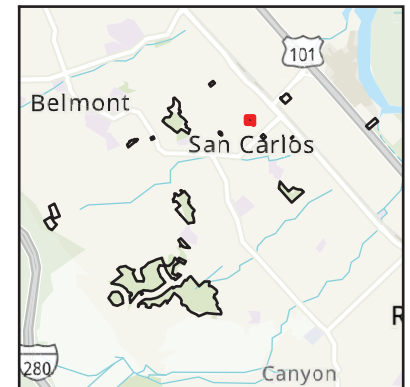
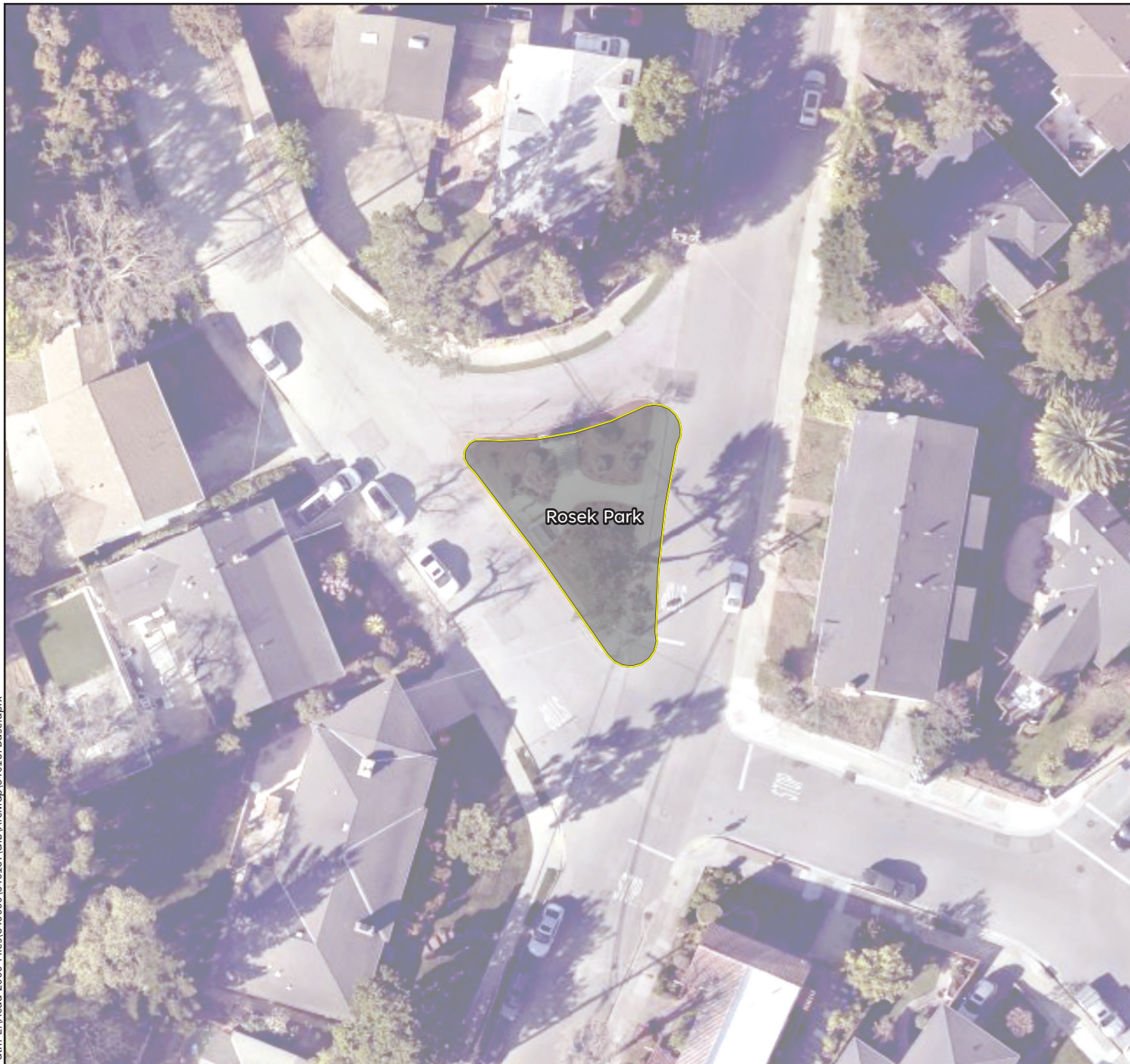
Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Land Cover Types

 Developed



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Feet



Figure 3. Land Cover

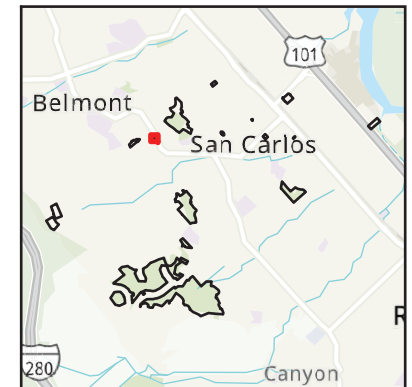
San Carlos Parks Master Plan
San Mateo County, California

 Park Boundary

Land Cover Types

 Ornamental

 Developed



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Feet

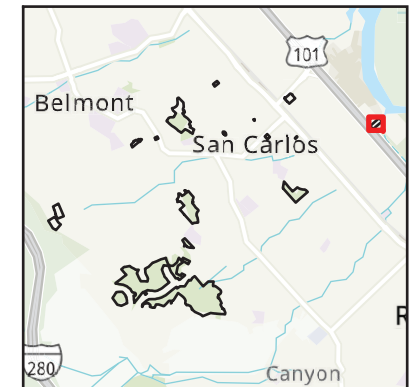
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N

Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Developed
-  Saline Emergent Wetland
-  Other Waters



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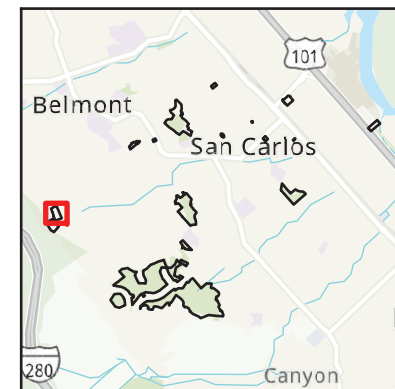
Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 3. Land Cover

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Coastal Oak Woodland
 -  Ornamental
 -  Annual Grassland
 -  Coastal Scrub / Chaparral



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



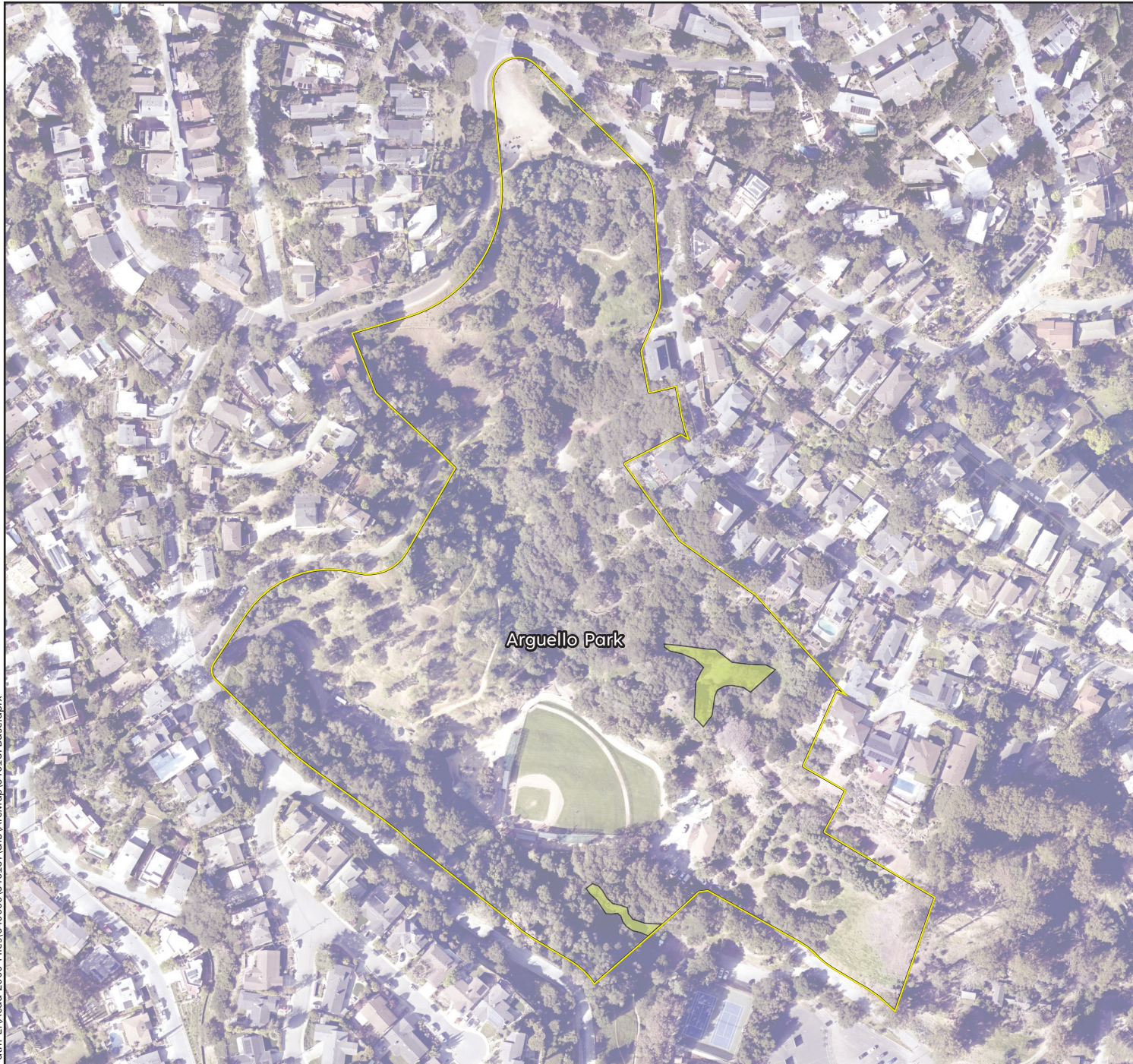
Figure 4. Aquatics

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Fresh Water Emergent
Wetland



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025



Figure 4. Aquatics

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Ephemeral Stream
-  Intermittent Stream



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

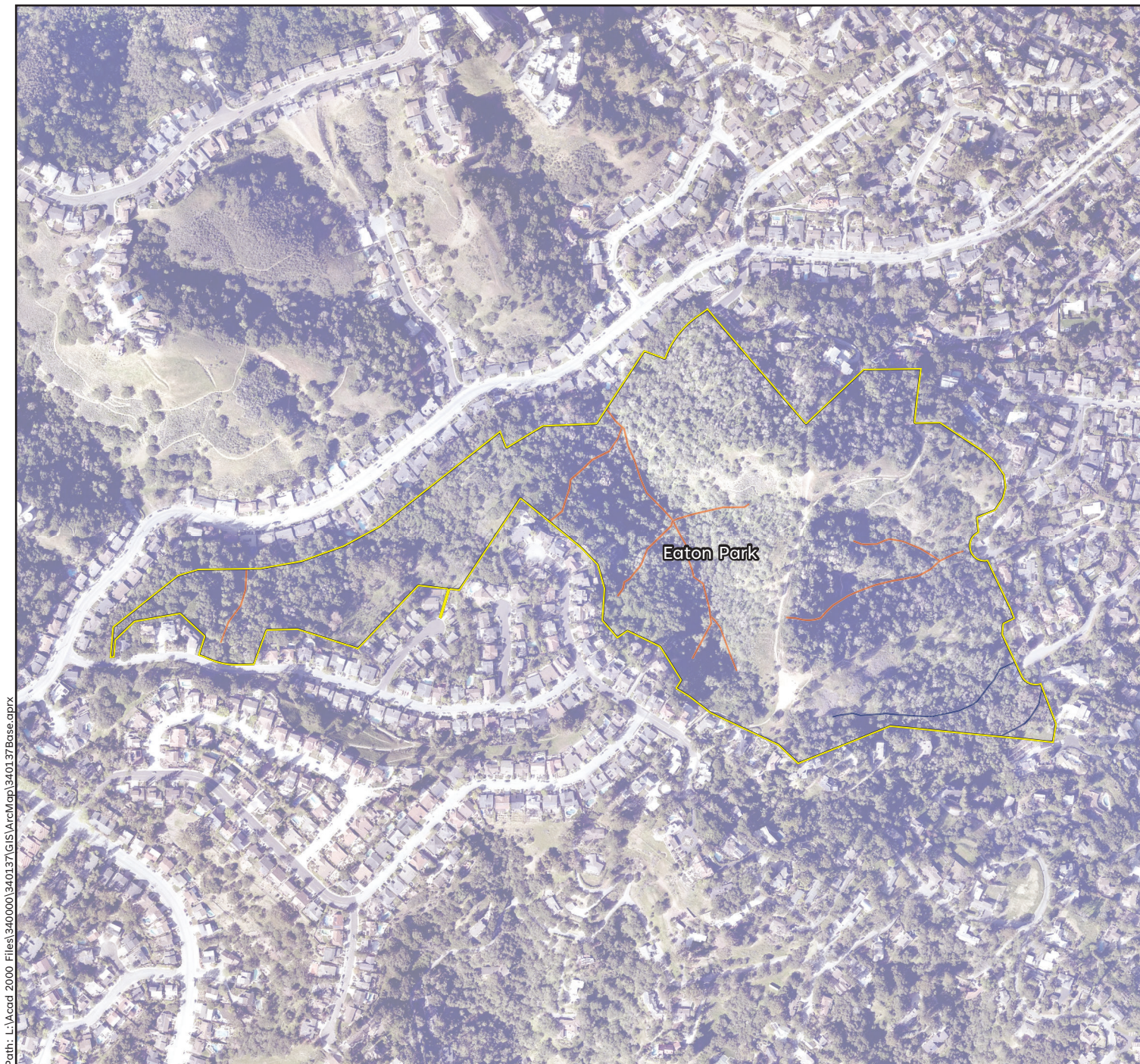


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Figure 4. Aquatics

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Ephemeral Stream
-  Intermittent Stream



Path: L:\Acad 2000 Files\340000\340137\GIS\ArcMap\340137Base.aprx

Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

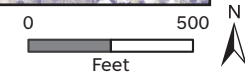
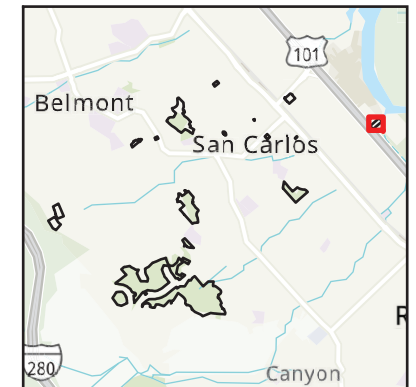


Figure 4. Aquatics

San Carlos Parks Master Plan
San Mateo County, California

-  Park Boundary
- Land Cover Types**
-  Saline Emergent Wetland
-  Other Waters



Sources: NRCS, San Mateo County Imagery 2022, WRA | Prepared By: rhona.mcchesney, 2/12/2025

Feet

500



Attachment C. Species Observed within the Study Area During the Site Visits on August 13 and 14, 2024.

PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Acacia dealbata</i>	Silver wattle	non-native (invasive)	tree, shrub	-	Moderate	-
<i>Acacia melanoxylon</i>	Blackwood acacia	non-native (invasive)	tree	-	Limited	-
<i>Achyrrachaena mollis</i>	Blow wives	native	annual herb	-	-	FAC
<i>Acmispon glaber</i> var. <i>glaber</i>	Deerweed	native	perennial herb	-	-	-
<i>Acmispon wrangelianus</i>	Chilean trefoil	native	annual herb	-	-	-
<i>Arbutus unedo</i>	Strawberry tree	non-native	tree	-	-	-
<i>Adiantum jordanii</i>	Maiden hair fern	Native	fern	-	-	FAC
<i>Aesculus californica</i>	Buckeye	native	tree	-	-	-
<i>Aira caryophyllea</i>	Silvery hairgrass	non-native	annual grass	-	-	FACU
<i>Arctostaphylos</i> sp.	Manzanita sp.	native	shrub	-	-	-
<i>Artemisia californica</i>	Coastal sage brush	native	shrub	-	-	-
<i>Asclepias fascicularis</i>	Narrow leaved milkweed	native	perennial herb	-	-	FAC
<i>Atriplex semibaccata</i>	Australian saltbush	non-native (invasive)	perennial herb	-	Moderate	FAC
<i>Avena barbata</i>	Slim oat	non-native (invasive)	annual, perennial grass	-	Moderate	-
<i>Baccharis pilularis</i>	Coyote brush	native	shrub	-	-	-
<i>Briza maxima</i>	Rattlesnake grass	non-native (invasive)	annual grass	-	Limited	-
<i>Bromus diandrus</i>	Ripgut brome	non-native (invasive)	annual grass	-	Moderate	-
<i>Bromus hordeaceus</i>	Soft chess	non-native (invasive)	annual grass	-	Limited	FACU



PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Bromus tectorum</i>	Cheat grass	non-native (invasive)	annual grass	-	High	-
<i>Carduus pycnocephalus</i> ssp. <i>pycnocephalus</i>	Italian thistle	non-native (invasive)	annual herb	-	Moderate	-
<i>Carpobrotus edulis</i>	Iceplant	non-native (invasive)	perennial herb	-	High	-
<i>Centaurea calcitrapa</i>	Purple star thistle	non-native (invasive)	annual, perennial herb	-	Moderate	-
<i>Centaurea solstitialis</i>	Yellow starthistle	non-native (invasive)	annual herb	-	High	-
<i>Chlorogalum pomeridianum</i>	Amole	native	perennial herb	-	-	-
<i>Cynosurus echinatus</i>	Dogtail grass	non-native (invasive)	annual grass	-	Moderate	-
<i>Cyperus eragrostis</i>	Tall cyperus	native	perennial grasslike herb	-	-	FACW
<i>Cyperus involucratus</i>	Umbrella plant	non-native	perennial grasslike herb	-	-	FACW
<i>Cytisus scoparius</i>	Scotch broom	non-native (invasive)	shrub	-	High	-
<i>Delairea odorata</i>	Cape ivy	non-native (invasive)	perennial herb	-	High	FAC
<i>Diplacus aurantiacus</i>	Sticky monkeyflower	native	shrub	-	-	FACU
<i>Dittrichia graveolens</i>	Stinkwort	non-native (invasive)	annual herb	-	Moderate	-
<i>Dryopteris arguta</i>	Wood fern	native	fern	-	-	-
<i>Epilobium ciliatum</i>	Slender willow herb	native	perennial herb	-	-	FACW
<i>Erigeron canadensis</i>	Horseweed	native	annual herb	-	-	FACU
<i>Erigeron glaucus</i>	Seaside daisy	native	perennial herb	-	-	FACU
<i>Eriodictyon californicum</i>	Yerba santa	native	shrub	-	-	-



PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Eriogonum nudum</i>	Naked buckwheat	native	shrub	-	-	-
<i>Lagerstroemia</i> sp.	Crape myrtle	non-native	tree			
<i>Eschscholzia californica</i>	California poppy	native	annual, perennial herb	-	-	-
<i>Eucalyptus globulus</i>	Blue gum	non-native (invasive)	tree	-	Limited	-
<i>Euphorbia</i> sp.	-	-	-	-	-	-
<i>Festuca bromoides</i>	Brome fescue	non-native	annual grass	-	-	FACU
<i>Festuca perennis</i>	Italian rye grass	non-native (invasive)	annual, perennial grass	-	Moderate	FAC
<i>Foeniculum vulgare</i>	Fennel	non-native (invasive)	perennial herb	-	High	-
<i>Frangula californica</i>	California coffeeberry	native	shrub	-	-	-
<i>Genista monosperma</i>	Bridal broom	non-native	shrub	-	-	-
<i>Grindelia stricta</i>	Gumweed	native	perennial herb	-	-	FACW
<i>Hedera helix</i>	English ivy	non-native (invasive)	vine, shrub	-	High	FACU
<i>Helminthotheca echioides</i>	Bristly ox-tongue	non-native (invasive)	annual, perennial herb	-	Limited	FAC
<i>Hemizonia congesta</i> ssp. <i>luzulifolia</i>	Woodrush tarweed	native	annual herb	-	-	-
<i>Heteromeles arbutifolia</i>	Toyon	native	shrub	-	-	-
<i>Holodiscus discolor</i>	Oceanspray	native	shrub	-	-	FACU
<i>Hordeum murinum</i>	Foxtail barley	non-native (invasive)	annual grass	-	Moderate	FACU
<i>Juglans</i> sp.	Walnut	-	Tree	-	-	-

PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Juncus patens</i>	Common rush	native	perennial grasslike herb	-	-	FACW
<i>Lavandula</i> sp.	Lavender	non-native	shrub	-	-	-
<i>Juniperus californica</i>	California juniper	native	shrub	-	-	-
<i>Limonium californicum</i>	Marsh rosemary	native	perennial herb	-	-	FACW
<i>Limonium</i> sp.	-	-	-	-	-	-
<i>Lotus corniculatus</i>	Bird's foot trefoil	non-native	perennial herb	-	-	FAC
<i>Lysimachia arvensis</i>	Scarlet pimpernel	non-native	annual herb	-	-	FAC
<i>Madia elegans</i>	Common madia	native	annual herb	-	-	-
<i>Magnolia grandiflora</i>	Southern magnolia	non-native	tree			
<i>Medicago polymorpha</i>	Bur clover	non-native (invasive)	annual herb	-	Limited	FACU
<i>Melica torreyana</i>	Torrey's melica	native	perennial grass	-	-	-
<i>Monardella villosa</i>	Coyote mint	native	perennial herb	-	-	-
<i>Morus</i> sp.	-	-	-	-	-	-
<i>Nerium oleander</i>	Oleander	non-native	tree	-	-	-
<i>Olea europaea</i>	Olive	non-native (invasive)	tree, shrub	-	Limited	-
<i>Opuntia ×occidentalis</i>	Western prickly pear	native	Shrub	-	-	-
<i>Pentagramma triangularis</i>	Gold back fern	native	fern	-	-	-
<i>Pittosporum eugenoides</i>	Lemonwood	non-native	tree			
<i>Phalaris aquatica</i>	Harding grass	non-native (invasive)	perennial grass	-	Moderate	FACU



PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Pinus halepensis</i>	Aleppo pine	non-native	tree	-	-	-
<i>Pinus muricata</i>	Bishop pine	native	tree	-	-	-
<i>Pinus ponderosa</i>	Ponderosa pine	native	tree	-	-	FACU
<i>Pinus radiata</i>	Monterey pine	native	tree	Rank 1B.1*	-	-
<i>Poaceae</i> sp.	grass family	non-native	annual grass			
<i>Pistacia chinensis</i>	Chinese pistache	non-native	tree	-	-	-
<i>Plantago major</i>	Common plantain	non-native	perennial herb	-	-	FAC
<i>Platanus ×hispanica</i>	London plane tree	non-native	tree	-	-	-
<i>Polygonum californicum</i>	California knotweed	native	annual herb	-	-	-
<i>Prunus dulcis</i>	Almond	non-native	tree	-	-	-
<i>Prunus emarginata</i>	Bitter cherry	native	tree, shrub	-	-	FACU
<i>Pseudognaphalium luteoalbum</i>	Jersey cudweed	non-native	annual herb	-	-	FAC
<i>Pyracantha</i> sp.	-	-	-	-	-	-
<i>Quercus agrifolia</i>	Coast live oak	native	tree	-	-	-
<i>Quercus kelloggii</i>	California black oak	native	tree	-	-	-
<i>Ribes sanguineum</i>	Flowering currant	native	shrub	-	-	UPL
<i>Ribes</i> sp.	Gooseberry	-	shrub	-	-	-
<i>Rosa</i> sp.	Rose	-	shrub	-	-	-
<i>Rubus armeniacus</i>	Himalayan blackberry	non-native (invasive)	shrub	-	High	FAC



PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Rubus ursinus</i>	Pacific blackberry	native	vine, shrub	-	-	FAC
<i>Salicornia pacifica</i>	Pickleweed	native	perennial herb	-	-	OBL
<i>Salvia</i> sp.	Sage	-	-	-	-	-
<i>Schinus molle</i>	Peruvian pepper tree	non-native (invasive)	tree	-	Limited	FACU
<i>Sequoia sempervirens</i>	Coast redwood	native	tree	-	-	-
<i>Silybum marianum</i>	Milk thistle	non-native (invasive)	annual, perennial herb	-	Limited	-
<i>Solanum</i> sp.	-	-	-	-	-	-
<i>Spartina</i> sp.	Cordgrass	-	-	-	-	-
<i>Symphoricarpos albus</i> var. <i>laevigatus</i>	Common snowberry	native	shrub	-	-	FACU
<i>Torilis arvensis</i>	Field hedge parsley	non-native (invasive)	annual herb	-	Moderate	-
<i>Toxicodendron diversilobum</i>	Poison oak	native	vine, shrub	-	-	FACU
<i>Trifolium hirtum</i>	Rose clover	non-native (invasive)	annual herb	-	Limited	-
<i>Trifolium repens</i>	White clover	non-native	perennial herb	-	-	FACU
<i>Umbellularia californica</i>	California bay	native	tree	-	-	FAC
<i>Vicia</i> sp.	Vetch	-	-	-	-	-
<i>Wyethia</i> sp.	Mule's ears	-	-	-	-	-

Note: All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2024]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2022] 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/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: September 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: 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

³ **U.S. Army Corps of Engineers. 2024. National Wetland Plant List, version 3.6. 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
C:	Second Priority Watch List. Plants occurring in ten to fifteen regions in Alameda and Contra Costa counties.



WILDLIFE		
SCIENTIFIC NAME	COMMON NAME	STATUS ⁴
BIRDS		
<i>Poecile rufescens</i>	chestnut-backed chickadee	No status
<i>Melospiza crissalis</i>	California towhee	No status
<i>Spinus psaltria</i>	lesser goldfinch	No status
<i>Sialia mexicana</i>	western bluebird	No status
<i>Buteo jamaicensis</i>	red-tailed hawk	No status
<i>Corvus brachyrhynchos</i>	American crow	No status
<i>Calypte anna</i>	Anna's hummingbird	No status
<i>Junco hyemalis</i>	dark-eyed junco	No status
<i>Chamaea fasciata</i>	wrentit	No status
<i>Aphelocoma californica</i>	California scrub-jay	No status
<i>Baeolophus inornatus</i>	oak titmouse	No status
<i>Dryobates villosus</i>	hairy woodpecker	No status
<i>Dryobates nuttallii</i>	Nuttall's woodpecker	No status
<i>Pipilo maculatus</i>	spotted towhee	No status
<i>Vireo huttoni</i>	Hutton's vireo	No status
<i>Accipiter cooperii</i>	Cooper's hawk	No status
<i>Sayornis nigricans</i>	black phoebe	No status
<i>Haemorhous mexicanus</i>	house finch	No status
<i>Thryomanes bewickii</i>	Bewick's wren	No status
<i>Cathartes aura</i>	turkey vulture	No status
<i>Empidonax difficilis</i>	pacific slope flycatcher	No status
<i>Zenaidura macroura</i>	mourning dove	No status
<i>Certhia americana</i>	brown creeper	No status
<i>Psaltiriparus minimus</i>	bushtit	No status
<i>Poliophtila caerulea</i>	blue-gray gnatcatcher	No status
<i>Sitta pygmaea</i>	pygmy nuthatch	No status
REPTILES AND AMPHIBIANS		
<i>Plestiodon skiltonianus</i>	western skink	No status
<i>Sceloporus occidentalis</i>	western fence lizard	No status



WILDLIFE		
MAMMALS		
<i>Thomomys bottae</i>	Botta's pocket gopher	No status
CDFW = California Department of Fish and Wildlife.		
⁴ Status		
FD:	Federal Delisted	
FE:	Federal Endangered	
FT:	Federal Threatened	
SD:	State Delisted	
SE:	State Endangered	
SSC:	Species of Special Concern	
ST:	State Threatened	
SR:	State Rare	
CFP:	California Fully Protected	



Attachment D. Special Status Plant and Wildlife Species Documented in the Vicinity of the Study Area.

List compiled from the California Department of Fish and Wildlife Natural Diversity Database (CDFW 2025), U.S. Fish and Wildlife Service Information for Planning and Consultation Species Lists (USFWS 2025), and California Native Plant Society Rare Plant Inventory (CNPS 2025) search of the San Mateo, Redwood Point, Woodside, and Palo Alto USGS 7.5' quadrangles.

SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
PLANTS			
San Mateo thorn-mint <i>Acanthomintha duttonii</i>	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 Study Area does not contain suitable serpentine substrates to support this species.
Franciscan onion <i>Allium peninsulare</i> var. <i>franciscanum</i>	Rank 1B.2	Cismontane woodland, valley and foothill grassland. Elevation ranges from 170 to 1000 feet (52 to 305 meters). Blooms (Apr)May-Jun.	Known to Occur. This species has been documented within the Study Area. Two CNDDDB occurrences of this species are located within Eaton Park, dated from 2013.
bent-flowered fiddleneck <i>Amsinckia lunaris</i>	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.	Moderate Potential. The Study Area contains suitable cismontane woodland, and valley and foothill grassland to support this species. The nearest modern occurrence is 2.3 miles northwest near Crystal Springs Reservoir.
California androsace <i>Androsace elongata</i> ssp. <i>acuta</i>	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.	Unlikely. The Study Area contains suitable chaparral, cismontane woodland, and valley and foothill grassland to support this species. However, there are no documented occurrences within 5 miles.
Anderson's manzanita <i>Arctostaphylos andersonii</i>	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 Study Area does not contain suitable redwood forest habitat to support this species.
Kings Mountain manzanita <i>Arctostaphylos regismontana</i>	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 Study Area is well outside the known elevation range of this species.
coastal marsh milk-vetch <i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	Rank 1B.2	Coastal dunes (mesic), coastal scrub, marshes and swamps (coastal salt, streamsides). Elevation ranges from 0 to 180	No Potential. The Study Area does not contain suitable coastal dunes or marshes and swamps to support this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
		feet (0 to 55 meters). Blooms (Apr-May) Jun-Oct.	
Brewer's calandrinia <i>Calandrinia breweri</i>	Rank 4.2	Chaparral, coastal scrub. Elevation ranges from 35 to 4005 feet (10 to 1220 meters). Blooms (Jan)Mar-Jun.	High Potential. The Study Area contains suitable chaparral and coastal scrub to support this species. The nearest documented occurrence of this species is 5 miles within San Carlos at Malabar Road and Melendy Drive.
Oakland star-tulip <i>Calochortus umbellatus</i>	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 Study Area does not contain suitable serpentine substrates to support this species.
pink star-tulip <i>Calochortus uniflorus</i>	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.	Unlikely. The Study Area contains suitable coastal scrub to support this species. However, there are no documented occurrences within 5 miles.
johnny-nip <i>Castilleja ambigua</i> var. <i>ambigua</i>	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.	Unlikely. The Study Area contains suitable coastal scrub, and valley and foothill grassland to support this species. However, there are no documented occurrences within 5 miles.
Congdon's tarplant <i>Centromadia parryi</i> ssp. <i>congdonii</i>	Rank 1B.1	Valley and foothill grassland (alkaline). Elevation ranges from 0 to 755 feet (0 to 230 meters). Blooms (Apr)May-Oct(Nov).	Unlikely. The Study Area contains suitable valley and foothill grassland to support this species. However, there are no documented occurrences within 5 miles.
Point Reyes salty bird's-beak <i>Chloropyron maritimum</i> ssp. <i>palustre</i>	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 Study Area does not contain suitable marshes or swamps to support this species.
Mt. Hamilton thistle <i>Cirsium fontinale</i> var. <i>campylon</i>	Rank 1B.2	Chaparral, cismontane woodland, valley and foothill grassland. Elevation ranges from 330 to 2920 feet (100 to 890 meters). Blooms (Feb)Apr-Oct.	No Potential. The Study Area does not contain suitable serpentine substrates to support this species.
fountain thistle <i>Cirsium fontinale</i> var. <i>fontinale</i>	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 Study Area does not contain suitable serpentine substrates to support this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
lost thistle <i>Cirsium praeteriens</i>	Rank 1A	Known from only two collections from Palo Alto (last in 1901). This species is not in The Jepson Manual and previous collection locations have been developed. This species is presumed extinct.	No Potential. This species is presumed extinct.
Brewer's clarkia <i>Clarkia breweri</i>	Rank 4.2	Chaparral, cismontane woodland, coastal scrub. Elevation ranges from 705 to 3660 feet (215 to 1115 meters). Blooms Apr-Jun.	Unlikely. The Study Area contains suitable chaparral, cismontane woodland, and coastal scrub to support this species. However, there are no documented occurrences within 5 miles, and there is no suitable serpentine substrate.
round-headed collinsia <i>Collinsia corymbosa</i>	Rank 1B.2	Coastal dunes. Elevation ranges from 0 to 65 feet (0 to 20 meters). Blooms Apr-Jun.	No Potential. The Study Area does not contain suitable coastal dunes to support this species.
San Francisco collinsia <i>Collinsia multicolor</i>	Rank 1B.2	Closed-cone coniferous forest, coastal scrub. Elevation ranges from 100 to 900 feet (30 to 275 meters). Blooms (Feb)Mar-May.	Known to Occur. This species has been documented within the Study Area. Two occurrences of this species, dated from 2017, are located within Big Canyon Park, and three occurrences, also dated from 2017, within Eaton Park.
clustered lady's-slipper <i>Cypripedium fasciculatum</i>	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.	Unlikely. The Study Area does not contain suitable habitat to support this species, and there are no documented occurrences within 5 miles.
paniculate tarplant <i>Deinandra paniculata</i>	Rank 4.2	Coastal scrub, valley and foothill grassland, vernal pools. Elevation ranges from 80 to 3085 feet (25 to 940 meters). Blooms (Mar)Apr-Nov.	Known to Occur. This species has been documented within the Study Area. One occurrence of this species, dated from 2023, is located within North Crestview Park.
western leatherwood <i>Dirca occidentalis</i>	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).	Known to Occur. This species has been documented within the Study Area. One occurrence of this species, dated from 2015, is located within Eaton Park.
California bottle-brush grass <i>Elymus californicus</i>	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).	Moderate Potential. The Study Area contains suitable cismontane woodland to support this species. The nearest documented occurrence is 4.3 miles to the northwest in San Mateo Creek drainage.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
San Mateo woolly sunflower <i>Eriophyllum latilobum</i>	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.	Moderate Potential. The Study Area contains suitable cismontane woodland and coastal scrub to support this species. The nearest documented occurrence is 3.8 miles to the northwest along Crystal Springs Reservoir.
Hoover's button-celery <i>Eryngium aristulatum</i> var. <i>hooveri</i>	Rank 1B.1	Vernal pools. Elevation ranges from 10 to 150 feet (3 to 45 meters). Blooms (Jun)Jul(Aug).	Unlikely. The Study Area may contain suitable vernal pool habitat to support this species. However, the only documented occurrence within 5 miles of the Study Area is an historical occurrence, dated from 1907, approximately 5.0 miles to the southeast in the foothills and pastures near Stanford University.
Jepson's coyote-thistle <i>Eryngium jepsonii</i>	Rank 1B.2	Valley and foothill grassland, vernal pools. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr-Aug.	Unlikely. The Study Area contains suitable valley and foothill grassland to support this species. However, there are no documented occurrences within 5 miles.
San Francisco wallflower <i>Erysimum franciscanum</i>	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.	Unlikely. The Study Area does not contain suitable microhabitat (i.e., serpentine soils or outcrops) to support this species.
Hillsborough chocolate lily <i>Fritillaria biflora</i> var. <i>ineziana</i>	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 Study Area does not contain suitable serpentine substrates to support this species.
fragrant fritillary <i>Fritillaria liliacea</i>	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.	Moderate Potential. The Study Area contains suitable cismontane woodland, coastal scrub, and valley and foothill grassland to support this species. The nearest documented occurrence is 0.8 miles to the south within Edgewood Park.
short-leaved evax <i>Hesperervax sparsiflora</i> var. <i>brevifolia</i>	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 Study Area does not contain coastal bluff, coastal dunes, or coastal prairie to support this species.
Marin western flax <i>Hesperolinon congestum</i>	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 Study Area does not contain suitable serpentine substrates to support this species.
harlequin lotus <i>Hosackia gracilis</i>	Rank 4.2	Broadleafed upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal	Unlikely. The Study Area contains cismontane woodland, coastal scrub, and valley and foothill grassland to support this



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
		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.	species. However, the only documented occurrences within 5 miles of the Study Area are historical occurrences, dated from 1902, approximately 3.3 miles to the northwest at Lower Crystal Springs Reservoir.
coast iris <i>Iris longipetala</i>	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 Study Area does not contain suitable coastal prairie, montane coniferous forest, or meadows and seeps to support this species.
serpentine leptosiphon <i>Leptosiphon ambiguus</i>	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 Study Area does not contain suitable serpentine substrates for this species.
bristly leptosiphon <i>Leptosiphon aureus</i>	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.	Unlikely. The Study Area contains suitable chaparral, woodland, and valley and foothill grassland to support this species. However, there are no documented occurrences within 5 miles.
broad-lobed leptosiphon <i>Leptosiphon latisectus</i>	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 Study Area is well outside the known elevation range of this species.
Crystal Springs lessingia <i>Lessingia arachnoidea</i>	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 Study Area does not contain suitable serpentine substrates to support this species.
woolly-headed lessingia <i>Lessingia hololeuca</i>	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 Study Area does not contain suitable serpentine substrates to support this species.
spring lessingia <i>Lessingia tenuis</i>	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 Study Area is well outside the known elevation range of this species.
arcuate bushmallow <i>Malacothamnus arcuatus</i> var. <i>arcuatus</i>	Rank 1B.2	Chaparral, cismontane woodland. Elevation ranges from 50 to 1165 feet (15 to 355 meters). Blooms Apr-Sep.	High Potential. The Study Area contains suitable chaparral and cismontane woodland to support this species. The nearest documented occurrence of this



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
			species is 0.25 miles from Big Canyon Park and Highlands Park, along Canyon Vista Way.
woodland woollythreads <i>Monolopia gracilens</i>	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.	Moderate Potential. The Study Area contains suitable chaparral, cismontane woodland, and valley and foothill grassland to support this species. The nearest documented occurrence is 0.8 miles to the east along the west side of Edgewood Park in San Carlos north of Malabar Rd. and Melendy Dr.
white-rayed pentachaeta <i>Pentachaeta bellidiflora</i>	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.	Unlikely. The Study Area contains suitable, cismontane woodland, and valley and foothill grassland to support this species, but no suitable serpentine substrates. However, the only documented occurrences within 5 miles of the Study Area are historical occurrences, dated from 1967, approximately 1.25 miles east at Crystal Springs Reservoir and approximately 1.0 mile southeast within the serpentine native grassland at Edgewood Dr. and Canada Dr.
Michael's rein orchid <i>Piperia michaelii</i>	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.	Unlikely. The Study Area contains suitable chaparral, cismontane woodland, and coastal scrub to support this species. However, there are no documented occurrences within 5 miles.
Choris' popcornflower <i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	Rank 1B.2	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 10 to 525 feet (3 to 160 meters). Blooms Mar-Jun.	Moderate Potential. The Study Area contains suitable chaparral and coastal scrub to support this species. The nearest documented occurrence of this species is 1.7 miles to the southwest along Old Canada Rd.
Hickman's popcornflower <i>Plagiobothrys chorisianus</i> var. <i>hickmanii</i>	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.	Unlikely. The Study Area contains suitable chaparral and coastal scrub to support this species. However, there are no documented occurrences within 5 miles.
Lobb's aquatic buttercup <i>Ranunculus lobbii</i>	Rank 4.2	Cismontane woodland, north coast coniferous forest, valley and foothill grassland, vernal pools. Elevation ranges	Unlikely. The Study Area contains suitable cismontane woodland, and valley and foothill grassland to support this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
		from 50 to 1540 feet (15 to 470 meters). Blooms Feb-May.	However, the only documented occurrences within 5 miles of the Study Area are historical occurrences, dated from 1972, approximately 2 miles east along Old Canada Rd.
Sanford's arrowhead <i>Sagittaria sanfordii</i>	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 Study Area does not contain suitable marshes and swamps to support this species.
chaparral ragwort <i>Senecio aphanactis</i>	Rank 2B.2	Chaparral, cismontane woodland, coastal scrub. Elevation ranges from 50 to 2625 feet (15 to 800 meters). Blooms Jan-Apr(May).	Unlikely. The Study Area contains suitable chaparral and cismontane woodland to support this species. However, the only documented occurrence within 5 miles of the Study Area is an historical occurrence dated from 1973, approximately 0.25 miles from Big Canyon Park and Highlands Park at Malabar Rd. and Melendy Dr. in San Carlos.
San Francisco campion <i>Silene verecunda</i> ssp. <i>verecunda</i>	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).	Unlikely. The Study Area contains suitable chaparral, coastal scrub, and valley and foothill grassland to support this species. However, the only documented occurrence within 5 miles of the Study Area is an historical occurrence, dated from 1988, approximately 1.1 miles south in Edgewood County Park.
northern slender pondweed <i>Stuckenia filiformis</i> ssp. <i>alpina</i>	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 Study Area does not contain suitable marshes and swamps to support this species.
two-fork clover <i>Trifolium amoenum</i>	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.	Unlikely. The Study Area contains suitable valley and foothill grassland to support this species. However, the only documented occurrence within 5 miles of the Study Area is an historical occurrence, dated from 1950, approximately 4.8 miles south along San Francisquito Creek near Searsville Lake.
saline clover <i>Trifolium hydrophilum</i>	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 Study Area does not contain suitable marshes and swamps, or mesic/alkaline valley and foothill grasslands to support this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
San Francisco owl's-clover <i>Triphysaria floribunda</i>	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.	Unlikely. The Study Area contains suitable coastal scrub, valley and foothill grassland to support this species, but no suitable serpentine substrates. However, the only documented occurrences within 5 miles of the Study Area are historical occurrences, dated from 1932 and 1991, approximately 3.2 miles northwest on grasslands opposite of Lower Crystal Springs Reservoir.
Methuselah's beard lichen <i>Usnea longissima</i>	Rank 4.2	Broadleaved upland forest, north coast coniferous forest. Elevation ranges from 165 to 4790 feet (50 to 1460 meters).	No potential. The Study Area does not contain suitable upland or coniferous forest to support this species.
WILDLIFE			
MAMMALS			
Pallid bat <i>Antrozous pallidus</i>	CDFW Species of Special Concern WBWG High Priority	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, 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.	Moderate Potential. Rock outcrops and large tree snags observed within the Study Area may provide suitable roosting sites for this species. Open grassland and woodlands provide suitable foraging habitats.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	CDFW Species of Special Concern WBWG High Priority	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. Suitable roosting sites including caves, mines, and (unoccupied) man-made structures are not present within the Study Area.
Hoary bat <i>Lasiurus cinereus</i>	WBWG Medium Priority	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. Forested habitat within the Study Area may provide suitable roosting and foraging habitat for this species.
San Francisco dusky-footed woodrat <i>Neotoma fuscipes annectens</i>	CDFW Species of Special Concern	Forest habitats of moderate canopy and moderate to dense understory. Also in chaparral habitats. Constructs nests of shredded grass, leaves, and other material.	Known to Occur. Numerous woodrat structures were observed during 2024 site visits, in the understory of Big Canyon and Eaton Park. This species is assumed to be



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
		May be limited by availability of nest-building materials.	present in woodlands throughout the Study Area.
Salt-marsh harvest mouse <i>Reithrodontomys raviventris</i>	Federal Endangered California Endangered CDFW Fully Protected	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.	Unlikely. Marsh habitat is present immediate adjacent to the San Carlos Airport, along the outer margins of Bair Island. This species has been documented within the interior of Bair Island, approximately 2 miles east. However, it's less likely that this species would occur at the margins of tidal marsh habitat and development, particularly where pickleweed (<i>Salicornia spp</i>) is sparsely present.
Salt-marsh wandering shrew <i>Sorex vagrans halicoetes</i>	CDFW Species of Special Concern	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.	Unlikely. Marsh habitat is present immediate adjacent to the San Carlos Airport. However, marsh vegetation in the vicinity is not densely populated with pickleweed (<i>Salicornia spp.</i>) and did not appear to provide abundant driftwood to support this species. This species is known to occur within the interior of Bair Island, approximately 2.4 miles east of the airport.
American badger <i>Taxidea taxus</i>	CDFW Species of Special Concern	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.	Moderate Potential. Higher elevation areas within the Study Area provide shrub and herbaceous habitats with friable soils that could allow for denning by this species.
Steller (=Northern) sea lion <i>Eumetopias jubatus</i>	CDFW Species of Special Concern	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. The Study Area does not contain any coastal beaches.
Mountain lion <i>Puma concolor</i>	CDFW Candidate Species	Ranging from Chile to British Columbia and adapting to virtually any habitat that contains its primary prey sources of deer and other large mammals. Widespread, yet uncommon in much of its range, and rarely seen.	Unlikely. Highway 280 represents a major barrier to dispersal from more suitable habitat in the Santa Cruz mountains, and areas to the west are very densely populated. While some mountain lions may occasionally pass through the Planning Area, it is likely that most mountain lions would not traverse into this area due to



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
			offsite barriers and onsite recreational activities that are currently present
BIRDS			
great blue heron <i>Ardea herodias</i>	none (breeding sites protected by CDFW)	Year-round resident. Nests colonially or semi-colonially in tall trees and on cliffs, also sequestered terrestrial substrates. Breeding sites usually in close proximity to foraging areas: marshes, lake margins, tidal flats, and rivers. Forages primarily on fishes and other aquatic prey, also smaller terrestrial vertebrates.	Unlikely. No breeding sites located in the vicinity of the Study Area.
Short-eared owl <i>Asio flammeus</i>	CDFW Species of Special Concern	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. This species is not known to breed in the region. Open grasslands that would support this species are generally absent within the Study Area. This species may forage or disperse through marsh habitat near San Carlos Airport.
Burrowing owl <i>Athene cunicularia</i>	CDFW Species of Special Concern	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.	Known to Occur. Wintering owls are known to occur at the San Carlos Airport and have been sighted as recently as December 2021. No suitably sized mammal burrows or surrogate burrows were observed throughout parks or open space areas during the site visits. Grasslands within the Study Area are regularly disturbed for fire control purposes and scrub habitats contain dense ground vegetation that likely precludes this species.
tricolored blackbird <i>Agelaius tricolor</i>	California Threatened CDFW Species of Special Concern	Nearly endemic to California, where it is most numerous in the Central Valley and vicinity. Highly colonial, nesting in dense aggregations over or near freshwater in emergent growth or riparian thickets. Also uses flooded agricultural fields. Abundant insect prey near breeding areas essential.	Unlikely. Aquatic features with dense stands of emergent vegetation are absent.
Marbled murrelet <i>Brachyramphus marmoratus</i>	Federal Threatened	Predominantly coastal marine. Nests in old-growth coniferous forests up to 30 miles inland along the Pacific coast, from Eureka	No Potential. The Study Area does not contain old-growth coniferous forest habitat.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
	California Endangered	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.	
Western snowy plover <i>Charadrius nivosus nivosus</i>	Federal Threatened CDFW Species of Special Concern	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. The Study Area does not contain sandy beaches or alkali lakes for nesting.
Northern harrier <i>Circus hudsonius</i>	CDFW Species of Special Concern	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.	Moderate Potential. Marsh habitat in the vicinity of the San Carlos Airport has potential to support nesting. Otherwise, suitable nesting habitat is absent within the Study Area.
Olive-sided flycatcher <i>Contopus cooperi</i>	CDFW Species of Special Concern	Summer resident. Typical breeding habitat is montane coniferous forests. At lower elevations, also occurs in wooded canyons and mixed forests and woodlands. Often associated with forest edges. Arboreal nest sites located well off the ground.	Moderate Potential. This species is known to occur immediately west of the Study Area in Pulgas Ridge Open Space Preserve. Mixed woodland habitat within Big Canyon and Eaton Park may be suitable for this species.
Yellow rail <i>Coturnicops noveboracensis</i>	CDFW Species of Special Concern	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. This species historically occurred in San Mateo County and was documented in Redwood Slough in 1912. However, the Study Area is outside of this species current breeding range.
white-tailed kite <i>Elanus leucurus</i>	CDFW Fully Protected	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.	Known to Occur. This species has regularly observed in San Carlos (eBird 2024). Areas characterized by small to medium trees interspersed with grasses and low shrubs likely provide suitable nesting and foraging habitat for this species.
American peregrine falcon <i>Falco peregrinus anatum</i>	Federal Delisted	Year-round resident and winter visitor. Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes	Unlikely. Cliffs or tall manmade structures that could support nesting by this species are absent within the Study Area. May be



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
	California Delisted CDFW Fully Protected	and other bodies of water. Nests on protected cliffs and also on man-made structures including buildings and bridges. Preys on birds, especially waterbirds. Forages widely.	observed flying over or foraging within the Study Area.
Saltmarsh common yellowthroat <i>Geothlypis trichas sinuosa</i>	CDFW Species of Special Concern	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.	Moderate Potential. Marsh habitat within the San Carlos Airport and immediate vicinity has potential to support nesting. Otherwise, suitable nesting habitat is absent within the Study Area.
Bald eagle <i>Haliaeetus leucocephalus</i>	Federal Delisted California Endangered CDFW Fully Protected	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 concentration of waterfowl or fish.	Unlikely. Large trees or structures directly adjacent to large water bodies are not present within the Study Area. May be seen flying over or foraging within the Study Area given the proximity of Crystal Springs Reservoir.
California black rail <i>Laterallus jamaicensis coturniculus</i>	California Threatened CDFW Fully Protected	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.	Unlikely. This species is known to occur within the inner portions of Bair Island, in the vicinity of the San Carlos Airport parcel. However, this species is particularly sensitive to anthropogenic disturbance and tidal marsh habitat within the Study Area is adjacent to existing development, a portion of the Bay Trail, and Highway 101. Furthermore, this parcel lacks an extensive upper zone preferred by this species. Due to the availability of more extensive and relatively undisturbed areas of tidal marsh within Bair Island, this species is unlikely to disperse into this parcel from surrounding habitat areas.
California Ridgway's rail <i>Rallus obsoletus obsoletus</i>	Federal Endangered California Endangered	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 mollusks and crustaceans.	Limited Potential. This species is known to occur in Bair Island State Marine Park, in the vicinity of the San Carlos Airport parcel. Tidal marsh habitat within the parcel provides some habitat features (i.e. exposed mudflats and pockets of cordgrass) that may provide foraging



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
	CDFW Fully Protected		habitat for this species. However, nesting is unlikely due to the proximity to disturbance and availability of more extensive habitat in the immediate vicinity.
Alameda song sparrow <i>Melospiza melodia pusillula</i>	CDFW Species of Special Concern	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.	Moderate Potential. Marsh habitat within the San Carlos Airport parcel has potential to support nesting. Otherwise, suitable nesting habitat is absent within the Study Area.
Double-crested cormorant <i>Nannopterum auritum</i>	None; Breeding sites protected by CDFW	(Rookery site) colonial nester on coastal cliffs, offshore islands, and along lake margins in the interior of the state. Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.	Unlikely. Suitable nesting habitat is not present. No breeding sites are documented in the vicinity of the Study Area.
Black-crowned night heron <i>Nycticorax nycticorax</i>	None; Breeding sites protected by CDFW	Year-round resident. Nests colonially, usually in trees but also in patches of emergent vegetation. Rookery sites are often on islands and usually located adjacent to foraging areas: margins of lakes and bays.	Unlikely. Suitable nesting habitat is not present. No breeding sites are documented in the vicinity of the Study Area.
California least tern <i>Sternula antillarum browni</i>	Federal Endangered California Endangered CDFW Fully Protected	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. The Study Area does not contain sandy or gravelly substrates suitable for nesting.
REPTILES AND AMPHIBIANS			
Northwestern pond turtle <i>Actinemys marmorata</i>	CDFW Species of Special Concern Proposed Federal Threatened	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.	Unlikely. Perennial aquatic habitat is not present within the Study Area. Streams observed within the Study Area are intermittent or ephemeral and do not have direct connectivity to larger perennial features. Furthermore, stream channels are fairly narrow and steep, provide limited suitability for basking, and are unlikely to provide flows sufficient to support this species.



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San Francisco gartersnake <i>Thamnophis sirtalis tetrataenia</i>	Federal Endangered California Endangered CDFW Fully Protected	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.	Unlikely. No ponds or perennial streams were observed within the Study Area to support this species. This species commonly co-occurs with CRLF, which are also unlikely to occur within the Study Area.
California tiger salamander - central California DPS <i>Ambystoma californiense</i> pop. 1	Federal Threatened California Threatened	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 Study Area does not provide ruderal or seasonal pool habitats suitable for this species. No local source populations have been documented within the vicinity of the Study Area.
Santa Cruz black salamander <i>Aneides niger</i>	CDFW Species of Special Concern	Climbing salamanders of the genus <i>Aneides</i> 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 Study Area is outside of the known range of this species.
California giant salamander <i>Dicamptodon ensatus</i>	CDFW Species of Special Concern	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 and terrestrial invertebrates.	Unlikely. The Study Area does not contain permanent or semi-permanent aquatic breeding habitat with cold temperatures to support this species.
Foothill yellow-legged frog <i>Rana boylei</i>	CDFW Species of Special Concern	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-	Unlikely. Ephemeral and intermittent drainages within the Study Area do not provide suitable rocky substrate and are unlikely to contain water or support flows



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
		sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis.	for long enough periods to support this species.
California red-legged frog <i>Rana draytonii</i>	Federal Threatened CDFW Species of Special Concern	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. Despite the presence of multiple occurrences around nearby Crystal Springs Reservoir, the Study Area is separated from these occurrences by Interstate 280 which constitutes a complete barrier to dispersal for CRLF. Additionally, no hydrologic connectivity appears to exist between potentially suitable habitats within the Study Area and known source populations.
FISH			
Green Sturgeon, southern Distinct Population Segment <i>Acipenser medirostris</i>	Federal Threatened CDFW Species of Special Concern	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. The Study Area does not contain suitable aquatic habitat for this species.
Steelhead - central California coast DPS <i>Oncorhynchus mykiss irideus pop. 8</i>	Federal Threatened	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.	Unlikely. Intermittent and ephemeral drainages within the Study Area are unlikely to contain sufficient flows to support spawning or rearing for this species during any portion of the year.
Longfin smelt <i>Spirinchus thaleichthys</i>	Federal Candidate California Threatened	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. Suitable open water habitat does not occur within the Study Area.
INVERTEBRATES			
Crotch bumble bee <i>Bombus crotchii</i>	California Candidate Endangered	Range largely restricted to California, favoring grassland and scrub habitats. Typical of bumble bees, nests are usually constructed underground.	Moderate Potential. The Study Area is within the current range of this species. This species may occur in grassland and scrub habitats where flowering resources and burrowing rodent activity are present.
Western bumble bee <i>Bombus occidentalis</i>	California Candidate Endangered	Formerly common throughout much of western North America; populations from southern British Columbia to central	Unlikely. The Study Area is outside of this species known current distribution. There are no recent documented occurrences of



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE
		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.	this species in the vicinity of the Study Area.
Bay checkerspot butterfly <i>Euphydryas editha bayensis</i>	Federal Threatened	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. <i>Plantago erecta</i> is the primary host plant; <i>Orthocarpus densiflorus</i> and <i>O. purpurascens</i> are the secondary host plants.	No Potential. The Study Area does not contain serpentine soils nor the appropriate host plants to support this species.
Myrtle's silverspot butterfly <i>Speyeria zerene myrtleae</i>	Federal Endangered	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 <i>Viola adunca</i> . Adult flight season may range from late June to early September.	No Potential. The Study Area occurs outside of this species current known range.

Note: All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2024]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2024] or Inventory of Rare and Endangered Plants (CNPS 2022). Sp.: "species", intended to indicate that the observer was confident in the identity of the genus but uncertain which species.

¹ **California Native Plant Society. 2024. Inventory of Rare and Endangered Plants (online edition, v9.5). Sacramento, California. Online at: <http://rareplants.cnps.org/>; most recently accessed: September 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: 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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