Initial Study to Support the Conclusion of a Categorical Exemption Under Class 1 for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California

AUGUST 2025

PREPARED FOR

City of Half Moon Bay

PREPARED BY

SWCA Environmental Consultants

INITIAL STUDY TO SUPPORT THE CONCLUSION OF A CATEGORICAL EXEMPTION UNDER CLASS 1 FOR THE SAFEWAY FENCING PROJECT, HALF MOON BAY, SAN MATEO COUNTY, CALIFORNIA

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1 INTRODUCTION

The City of Half Moon Bay (City) is proposing to construct the Safeway Fencing Project (project), which involves the installation of approximately 1,000 feet of chain-link fence along a portion of the edge of the riparian corridor associated with Pilarcitos Creek in the city of Half Moon Bay, San Mateo County, California. The project is located within the Coastal Zone and is subject to the City's Local Coastal Program and California Coastal Commission (CCC) appeals jurisdiction.

1.1 Project Location

The project is located between the Strawflower Shopping Center (located at the junction of Highways 1 and 92) and Pilarcitos Creek in the city of Half Moon Bay, within the westernmost portion of San Mateo County (Assessor's Parcel Numbers [APNs] 056-300-150, 056-300-140, and 056-300-230) (Figure 1). The project site is located at the interface of a commercial shopping center and Pilarcitos Creek, which is a perennial stream. The northern bank of Pilarcitos Creek is adjacent to the back of Safeway and an entrance road to the shopping center. The southern bank is adjacent to Oak Avenue Park and a residential neighborhood. Pilarcitos Creek is spanned by a footbridge between the neighborhood and the shopping center. A segment of Pilarcitos Creek Trail extends from the northeastern terminus of the Oak Avenue footbridge and continues southeast until it underpasses Highway 1 approximately 440 feet south of the intersection of Highways 1 and 92. Pilarcitos Creek extends northwest and drains into the Pacific Ocean approximately 0.75 mile northwest of the project site on the southern end of Venice Beach (Figure 2).

1.2 Project Description

The project includes the installation of approximately 1,000 feet of a 6- to 8-foot-tall chain-link fence between the outer edge of the Pilarcitos Creek riparian corridor and adjacent paved walkways and parking areas. The purpose of the proposed fence is to replace existing dilapidated fencing and inhibit the movement and dumping of anthropogenic debris into the riparian area, facilitate habitat restoration, and allow for ongoing debris maintenance within the riparian habitat. The original fence extended from the intersection of the Safeway parking lot in Strawflower Shopping Center and 345 Belleville Avenue, south and east to approximately the junction with the Oak Avenue Bridge. The new fence replaces the existing fence, which was located approximately 20 feet into the riparian corridor, and was closer to the creek and farther from roadways. The existing fence is badly damaged and deteriorated. Approximately 200 to 300 feet of it remains and is largely overgrown with vegetation (see Figure 2) and the the proposed project includes keeping this segment of fencing in place to avoid damage to riparian vegetation. The new fence adjacent to the shopping center directly replaces the existing fencing and is located along the reach of Pilarcitos Creek that extends from the Oak Avenue Bridge, where it intersects with the access road to Safeway parking lot in Strawflower Shopping Center, to 345 Belleville Avenue at the rear of the Safeway store.



Figure 1. Project vicinity map.



Figure 2. Project location map.

At all installation locations, fencing will be installed along the edge of riparian vegetation adjacent to an existing roadway or sidewalk. Fencing will include locked pedestrian gates to provide access to utility infrastructure. All gates would be provided with a Knox padlock for emergency responder access. Project implementation may require removal of four trees (three willows [*Salix* species] and one non-native Monterey cypress [*Cupressus macrocarpa*]), limbing of two trees (willow and ornamental myoporum), and minor trimming of vegetation (including willows, myoporum, and both riparian and non-native understory vegetation), in order to access and conduct the fence installations and provide access for future maintenance or repairs. Vegetation clearance would be minimized to the extent possible but would not exceed 5 feet from the pavement.

The work will occur within up to 5 feet of the existing curb and paved areas to minimize impacts to surrounding vegetation. Construction of the chain-link fence may include tree removal and tree limbing, and will include trimming of adjacent vegetation, digging post holes, installing fence posts, and attaching chain-link fence material. A tree protection plan would be implemented for all trees to be retained. Non-native vegetation would be removed and the project area would be revegetated with native vegetation under a restoration plan. Ground-disturbing activities will be limited, and all equipment will be kept within 5 feet of the paved surfaces. A staging and materials storage area would be located in the paved area behind Safeway.

Construction materials and equipment would be delivered on flatbed trucks. Post holes would be auger-drilled with a hand-held auger to a depth of approximately 36 inches. Concrete would be mixed using portable equipment, and foundations for posts would be 10 inches in diameter and 36 inches deep. Posts would be spaced approximately 10 feet apart, for a total of up to approximately 101 posts. The project would not require grading or the use of heavy equipment.

In summary, the project includes the following:

- Trim and remove vegetation, including the possible removal of four trees – 3 willows and 1 cypress - to create up to a 5-foot-wide strip adjacent to paved areas as necessary to access the fence line (Figure 7, Section 3.4, Biological Resources);
- Drill up to 101 post holes that are 10 inches wide by 36 inches deep using a skid steer with auger or a hand-held auger and spread displaced soil in the vicinity of the post holes;
- Install 10-inch (width) by 36-inch (depth) concrete foundations with 2 3/8-inch-diameter steel fence posts; and
- Install approximately 1,000 linear feet of new chain-link fencing, either 6 or 8 feet in height. The taller 8-foot fence would be installed behind Safeway;
- Install several locked maintenance gates where necessary, with Knox padlocks to allow access to PG&E, water, and sewer facilities for maintenance workers as well as access for emergency personnel; and
- Implement the restoration plan including removal of non-native species and replacement with native vegetation.

Construction would likely commence in late Spring 2026 and would take approximately 6 to 8 weeks to complete. Construction would most likely be completed before the start of the rainy season (October 15th) and would occur during dry weather only. Construction hours would be limited to 8:00 a.m. to 5:00 p.m., Monday through Friday. Although the City allows construction from 8:00 a.m. to 6:00 p.m. on Saturdays and 10:00 a.m. to 6:00 p.m. on Sundays, weekend construction is not anticipated and would require

permission from the City.[1] Restoration would meet the requirements of the LCLUP. If riparian trees are removed, prior to the start of construction a restoration plan would be developed to meet the requirements of the Section 401 and Lake and Streambed Alteration Agreement (LSAA) permit conditions.

Access for construction would be from Strawflower Shopping Center. Construction staging and materials staging would occur behind Safeway in the Strawflower Shopping Center parking lot. All work would comply with the Regional Water Quality Control Board (RWQCB) Best Management Practices (BMPs). Construction equipment would likely include service trucks, a skid steer with auger, a hand-held auger, a concrete buggy, a cement mixer, and hand tools.

1.3 Project Restoration/Revegetation

Restoration activities are required within the coastal zone. The Local Coastal Land Use Plan (LCLUP) identifies riparian corridors as Environmentally Sensitive Habitat Areas (ESHA) and its policies include standards to guide construction work and restoration in riparian corridors. Policy 6-10 requires protection and enhancement of ESHAs. Policy 6-48 requires projects minimize removal of native vegetation as well as land exposure during construction, and use only native plant species when replanting, monitor replanted species, and replace as necessary to ensure establishment. Policy 6-67 encourages the removal of invasive species and replacement with native, non-invasive species. Policy 6-69 requires substantial restoration for permitted impacts to (ESHA). Policy 6-70 of the LCLUP states the mitigation ratio for permanent impacts to riparian habitat impacts is 3:1, and temporary riparian habitat impacts require a mitigation ratio of 1:1. The mitigation ratio for native tree replacement is 10:1. Policy 6-71 requires a mitigation monitoring and reporting plan for habitat mitigation. Under this policy, monitoring and reporting shall generally occur for a period of no less than 5 years.[2]

The mitigation area currently lacks contiguous riparian arroyo willow canopy. Much of the vegetation that would be trimmed or removed includes non-native and ornamental species. To meet the requirements of the LCLUP, the project would revegetate all disturbed areas with native vegetation. Restoration would include removal of highly invasive species and planting with container plantings and/or seeding with understory vegetation (California blackberry [*Rubus ursinus*] or other native species).

The project would attempt to avoid any tree removal, potentially by leaving gaps in the fence to accommodate the four trees. If the trees need to be removed, the project would likely require two permits triggered by the tree removal: a Section 1602 Lake and Streambed Alteration Agreement (LSAA) from the California Department of Fish and Wildlife, and a Section 401 Water Quality Certification from the Regional Water Quality Control Board. If permits are required, a restoration plan which includes tree replacement ratios would be developed to meet permit requirements.

The need for erosion control is expected to be minimal in the restoration area and will be implemented, if necessary, in compliance with the project Temporary Erosion and Sediment Control Plan. The loss of soil or sediment to erosion will be minimized with the use of silt fencing, fiber rolls, straw bales, and/or other erosion control measures, where necessary to protect the riparian corridor.

[1] City of Half Moon Bay. 2021. Noise Restrictions. Available at: https://www.half-moon-bay.ca.us/210/Noise-Restrictions. Accessed April 12, 2024.
[2] City of Half Moon Bay. 2020. *Half Moon Bay Local Coastal Land Use Plan. Chapter 6, Natural Resources.* Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed June 17, 2025.

1.4 Project Permitting and Required Discretionary Approvals

Due to the presence of and potential removal of riparian vegetation and connectivity to Pilarcitos Creek, which is tributary to the Pacific Ocean, the watercourse may be considered jurisdictional under the CDFW, and Regional Water Quality Control Board (RWQCB). As the project will not approach or disturb the definable bed, banks, or ordinary high-water marks of Pilarcitos Creek it would not be considered jurisdictional under the U.S. Army Corps of Engineers (USACE).

The following permit will be required for the project:

- City of Half Moon Bay/California Coastal Commission: Coastal Development Permit under the Half Moon Bay Local Coastal Land Use Plan

The following permits may be required if riparian trees are removed:

- California Department of Fish and Wildlife: Section 1602 Lake and Streambed Alteration Agreement
- Regional Water Quality Control Board: Section 401 Water Quality Certification under the Clean Water Act

1.5 Avoidance and Minimization Measures

The following avoidance and minimization measures (AMMs), which are either required or recommended by various agencies with regulatory authority in the project area, are included as part of the project to ensure that the project has no significant impacts on the environment. Agencies with regulatory authority may include the City, County of San Mateo (County), Bay Area Air District (BAAD) – formerly the Bay Area Air Quality Management District (BAAQMD), California Department of Fish and Wildlife (CDFW), San Francisco Bay RWQCB, and California Coastal Commission (CCC).

1.5.1 *Air Quality*

For a project to have a less-than-significant criteria air pollutant impact related to construction-related fugitive dust emissions, the following BAAD basic BMPs listed in Table 5-2 in the 2022 *California Environmental Quality Act Air Quality Guidelines*[3] (BAAQMD 2022 CEQA Guidelines) are incorporated into the proposed project:

B-1 All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

B-2 All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

B-3 All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

[3] Bay Area Air Quality Management District (BAAQMD). 2022. Chapter 5: Project-Level Air Quality Impacts. In *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en. Accessed August 13, 2025.

B-4 All vehicle speeds on unpaved roads shall be limited to 15 mph.

B-6 All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.

B-7 All trucks and equipment, including their tires, shall be washed off prior to leaving the site.

B-9 Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

1.5.2 *Biological Resources*

The following AMMs are proposed to reduce impacts to listed species during activities at the project site. In addition to the measures listed below, the project shall also adhere to the *City of Half Moon Bay Local Coastal Land Use Plan* (LCLUP)[4] policies and standard measures for General Environmentally Sensitive Habitat Areas (ESHA) Protection (Policies 6-14 and 6-15), Terrestrial ESHAs (Policies 6-16 through 6-18, 6-32, and 6-33), Watercourse ESHAs (Policies 6-46 through 6-49 and 6-51), and Development Standards (Policies 6-63 and 6-64). Implementation of these general and species-specific measures will minimize the potential for impacts to threatened and endangered species.

1. Prior to the start of the project, all construction crew members shall attend an environmental awareness training presented by a qualified biologist. A training brochure, including, at a minimum, a description of California red-legged frog and its habitat, San Francisco garter snake and its habitat, waters and wetlands, avoidance and minimization measures, key contacts, and potential consequences of impacts to special-status species and potentially jurisdictional features, will be distributed to the crew members during the training. Trainees will sign an environmental training attendance sheet.
2. Disturbance to vegetation shall be kept to the minimum necessary to complete the project activities. To minimize impacts to vegetation and habitat, the following measures shall be implemented:
    a. Prior to all project activities, a qualified biologist shall work with the contractor to designate the work area and any staging areas as well as delineate areas to be avoided (i.e., aquatic features, tree protection zones) with signage and tape or fencing.
    b. Access to project locations shall be via existing access roads to the maximum extent practicable. To the extent possible, construction equipment will be positioned on existing access roads above the top of bank and outside of the edge of riparian vegetation. The number of access routes, number and size of staging areas, and total area of the activity shall be limited to the minimum necessary to complete the project.
3. All project activities shall occur during daylight hours at least 0.5 hour after sunrise and stopping at least 0.5 hour before sunset to ensure that the biological monitor and crews are able to see any special-status wildlife that may occupy the project area.

[4] City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed August 13, 2025.

4. Construction activities (e.g., grubbing, auger drilling) shall occur during the dry season (generally June 1–October 15) to facilitate avoidance of California red-legged frog and San Francisco garter snake, to the maximum extent possible.
5. Within 24 hours of the planned start of project activities, a focused survey of the project area for California red-legged frog and San Francisco garter snake shall be conducted by a qualified biologist, including staging areas. Additionally, a nocturnal survey for California red-legged frog that includes eyeshine detection shall be conducted the night before construction begins. A survey for the above species shall be conducted just prior to work on the morning of the first day of construction. Construction activities shall not take place until the surveys are completed.
6. A qualified biologist shall be present during all project activities. Prior to the start of work each day, the biologist shall perform a sweep for special-status species that may be present in the project area, including the staging area. The biologist shall have the authority to halt any action that might result in impacts. If California red-legged frog or San Francisco garter snake are found at any time, work activities shall stop immediately. The construction crew shall coordinate directly with the on-site biologist if animals are found within the work area.
    a. Only USFWS-approved biologists shall participate in activities associated with capture, handling, and monitoring of California red-legged frog. The City shall request and receive approval from the USFWS of any other biologist it wishes to employ to conduct activities with California red-legged frog.
    b. If California red-legged frogs are found that are likely to be killed or injured by work activities, the approved biologist shall be allowed sufficient time to move the frogs from the work area before work activities resume. The approved biologist shall relocate the California red-legged frogs the shortest distance possible to suitable habitat that shall not be affected by activities associated with the project. Only California red-legged frogs that are at risk of injury or death by project activities shall be moved.
7. If project activities are conducted during the typical nesting bird season (typically February 15–September 15), preconstruction nest surveys shall be conducted in and near the project area (within 250 feet for raptors and 100 feet for all other birds) by a biologist within 7 days of the start of construction. If nesting birds are identified during the preconstruction survey, then the project shall be modified (i.e., a no-work exclusion buffer of appropriate size to be determined by the project biologist shall be erected around active nests) and/or delayed as necessary to avoid impacts to the identified nests, eggs, and/or young. Disturbing active nests must be avoided until young birds have fledged.
8. Potential tree removal and limbing and vegetation trimming within riparian areas shall be completed using hand tools (including mechanized hand tools such as chain saws).
9. No stockpiling of vegetation shall occur in the project area. Vegetation, to the maximum extent practicable, shall be placed directly, or as soon as possible, into a disposal container and removed from the work area. Vegetation shall not be piled on the ground unless it is later disposed of under the supervision of a qualified biologist.
10. The Contractor shall be required to submit a Tree Protection Plan to the City for all trees to be retained.
11. All spoils, such as dirt, excavated material, debris, and construction-related materials, generated during project activities shall be placed where they cannot enter the watercourse, culvert inlet, or nearby riparian areas. Spoils shall be covered or secured to prevent sediment from escaping. Once the spoil pile is no longer active, it shall be removed from the project area and disposed of lawfully at an appropriate facility.

12. To protect burrows that may provide refuge for protected animals, such as California red-legged frog and San Francisco garter snake, no soil or construction materials shall be stockpiled on the ground where burrows are present.
13. Construction shall adhere to San Mateo Countywide Pollution Prevention Program (SMCWPPP) Best Management Practices (BMPs), and no construction shall occur within 24 hours following a significant rain event (defined as greater than 0.25 inch in a 24-hour period). Following a significant rain event and the 24-hour drying-out period, a qualified biologist shall conduct a preconstruction survey for California red-legged frog and other sensitive species prior to the restart of any project activities.
14. During project activities, all trash that may attract predators shall be properly contained, removed, and disposed of regularly. Following construction, trash/construction debris shall be removed from the project area.
15. A qualified biologist shall ensure that the spread or introduction of invasive exotic plant species will be avoided to the maximum extent possible, and all construction-related tools are free of debris.
16. To prevent disease conveyance among the work area during project implementation, a qualified biologist will ensure that the decontamination protocols described in the *California Department of Fish and Wildlife Aquatic Invasive Species Decontamination Protocol* (CDFW 2022 or latest version) will be implemented prior to gear and equipment arriving at the project area and will be followed at all times. A copy of the code of practice must be available at the project site.
17. All fueling and maintenance of vehicles and other equipment and staging areas should occur at least 100 feet from any riparian area, riparian corridor, or other drainage feature. The City and/or its contractors shall ensure that contamination of habitat does not occur during such operations. Prior to the onset of work, the City or its contractors shall ensure that there is a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills, and of the appropriate measures to take should a spill occur.
18. All construction materials, including, but not limited to, wooden pallets, BMPs, equipment, or other materials, that are left on the ground overnight shall be inspected before and during moving of the materials to prevent potential impacts to animals that may have utilized the materials as a temporary refuge. Plastic pipes, if used, shall be covered with material at either end to prevent animals from entering the pipes.
19. All exposed soils in the project area shall be stabilized immediately following the completion of work to prevent erosion. Any exposed or disturbed surfaces shall be reseeded with a locally sourced native seed mix. Erosion and sediment control BMPs, such as silt fences and gravel or rock-lined drainages, can be used. BMPs shall be made of certified weed-free materials. Straw wattles, if used, shall be made of biodegradable fabric (e.g., burlap) and free of monofilament netting. At no time shall silt-laden runoff be allowed to enter any drainages or other sensitive areas.
20. Because the project may result in temporary and permanent impacts to riparian vegetation and willows within the work area, if tree removal is necessary a Project Restoration Plan will be prepared prior to the start of project construction to comply with requirements for CWA Section 401 and California Fish and Game Code Section 1600 permits, and will be implemented to restore impacted sensitive areas to their original condition and mitigate for permanent impacts. If tree removal is avoided, a restoration plan which meets the requirements of the LCLUP will be developed.

1.5.3 *Cultural Resources*

The project includes the following Standard Conditions of the City to avoid and/or minimize impacts to previously undiscovered cultural resources and/or human remains during activities at the project site:

> **City of Half Moon Bay Standard Condition:** If undiscovered cultural resources are encountered during project implementation, all work within 50 feet of the discovery shall be stopped. The project applicant will retain a qualified archaeologist to assess the finds to determine whether they qualify as an historical or unique archaeological resource as defined by CEQA Guidelines § 15064.5. If the find is determined to be an historical or unique archaeological resource, avoidance is preferred. However, if avoidance is not feasible, measures to avoid adverse effects shall be developed and mitigation implemented. No work shall proceed within 50 feet of the find until the qualified archaeologist, the project applicant, and the City are in written agreement that avoidance or mitigation measures have been satisfied.
>
> **City of Half Moon Bay Standard Condition:** Pursuant to Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code, in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The County Coroner shall be notified immediately and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission (NAHC) who shall attempt to identify descendants of the deceased Native American(s). If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the permittee shall reinter the human remains, and items associated with Native American burials on the property in a location not subject to further subsurface disturbance.

1.5.4 *Greenhouse Gases*

In order to minimize greenhouse gas (GHG) emissions and emissions of other air quality pollutants, the project includes the following BMPs for reducing GHG emissions from those listed in Table 6-1 of the BAAQMD 2022 CEQA Guidelines to reduce emissions from construction-related activities.[5] Although these BMPs are recommended, not required, by the BAAD, the following five BMPs from Table 6-1 will be implemented for the project:

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 2 minutes (A 5-minute limit is required by the state airborne toxics control measure [Title 13, Sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site and develop an enforceable mechanism to monitor idling time to ensure compliance with this measure.

- Prohibit off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.

[5] Bay Area Air Quality Management District (BAAQMD). 2022. Chapter 6: Project-Level Climate Impacts. In *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-6-project-climate-impacts_final-pdf.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc_lang=en. Accessed August 13, 2025.

- Require all construction equipment is maintained and properly tuned in accordance with manufacturer's specifications. Equipment should be checked and determined to be running in proper condition prior to operation.

- Develop a plan to efficiently use water for adequate dust control since substantial amounts of energy can be consumed during the pumping of water.

- Include all requirements in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant on- or off-road construction equipment for use prior to any ground-disturbing and construction activities.

1.5.5 *Hydrology and Water Quality*

During construction, the project would include all applicable BMPs in compliance with the *San Francisco Bay Basin (Region 2) Water Quality Control Plan* (Basin Plan) and San Francisco Bay National Pollutant Discharge Elimination System (NPDES) Permit,[6,7] and outlined in the *California Storm Water BMP Handbook*.[8] These BMPs would include, but not be limited to:

- Stockpiled materials shall be protected per section WM-3, Stockpile Management;
- Handling of all shrubs, trees and materials to be disposed of shall follow Section WM-5, Solid Waste Management;
- Exclusion fence shall follow Section SE-1, Silt Fence;
- Contractor shall limit soil disturbance in conformance with CASQA BMP EC-2;
- Contractor shall limit vegetation disturbance to the maximum extent possible, and in conformance with CASQA BMP EC-2;
- Contractor shall perform no vehicle maintenance, fueling or washing onsite;
- Spills shall be prevented and cleaned according to CASQA BMP WM-4; and
- No hazardous wastes shall be permitted on site.

1.5.6 *Noise*

Under Half Moon Bay Municipal Code Chapter 14.40, Hours of Construction, the project is required to adhere to construction work hours.[9] All construction work on the project shall occur only during the following hours:

- 7:00 a.m. to 6:00 p.m., Monday thought Friday;

[6] San Francisco Regional Water Quality Control Board (RWQCB). 2017. *San Francisco Bay Basin (Region 2) Water Quality Control Plan.* California Regional Water Quality Control Board, San Francisco Bay Region. May 4. Available at: https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/BP_all_chapters.pdf. Accessed August 13, 2025.

[7] San Francisco Regional Water Quality Control Board (RWQCB). 2022. *California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018; NPDES Permit No. CAS612008. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed August 13, 2025.

[8] California Stormwater Quality Association. 2024. *California Storm Water BMP Handbook.* Available at: https://www.casqa.org/resources/bmp-handbooks.

[9] City of Half Moon Bay. 20204. Chapter 14.40. Hours of Construction. In *Half Moon Bay Municipal Code.* Available at: https://www.codepublishing.com/CA/HalfMoonBay/#!/HalfMoonBay14/HalfMoonBay1440.html. Accessed August 13, 2025.

- 8:00 a.m. to 6:00 p.m., Saturdays; and
- 10:00 a.m. to 6:00 p.m., Sundays.

2 CATEGORICAL EXEMPTIONS UNDER CEQA

Article 19 of the California Environmental Quality Act (CEQA) (State CEQA Guidelines Sections 15300–15333) includes a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are categorically exempt from review under CEQA.

2.1 Applicable CEQA Exemptions

2.1.1 *Class 1 – Existing Facilities*

The City has reviewed the project and determined that it is categorically exempt and qualifies for a Class 1 exemption (Existing Facilities; State CEQA Guidelines Section 15301). The Class 1 Existing Facilities exemption consists of projects characterized as "the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use." The key consideration is whether the project involves negligible or no expansion of use. Section 15301(c)(16) includes "existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities," including installation of security gates and fencing. Section 15301(d) includes restoration or rehabilitation of deteriorated or damaged structures or facilities. Section 15301(e)(1) includes additions to existing structures, provided the addition will not result in an increase of more than 2,500 square feet.

The project would construct approximately 1,000 linear feet of new fencing to replace the damaged fence. Approximately 200 to 300 feet of the existing fencing would remain in place. The project would construct new fencing with considerably less than a 2,500-square-foot footprint and leave the existing fencing in place to avoid damage to riparian vegetation. Therefore, the Class 1 exemption is applicable to the entire project.

2.2 Exceptions to a Categorical Exemption

The subject of this Categorical Exemption (CatEx) under CEQA is the proposed project, which consists of the replacement of an existing damaged fence. This CatEx includes a description of the existing environmental setting of the proposed project and the environmental effects that may result from construction and operation of the proposed project.

The following analysis also presents substantial evidence that there are no exceptions that apply to the project or its site, that the project would not have a significant effect on the environment, and that the CatEx remains applicable. The project's consistency with CatEx criteria is summarized in Table 1.

Table 1. Consistency with Required Conditions for Categorical Exemption Under CEQA

Required Condition	Project Consistency
15300.2 Exceptions	
(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated,	**Consistent.** This exception is not applicable to the Class 1 exemption.

precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.	
(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.	**Consistent.** The project will replace an existing fence with the purpose of keeping anthropogenic debris out of the Pilarcitos Creek watershed and will not contribute to cumulatively to any impacts from similar projects in the vicinity. It will not increase population growth or intensity of use that would result in cumulative impacts.
(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.	**Consistent.** The project proponent has prepared an initial study to analyze potential impacts of the proposed project. The initial study determined that the project would have no significant effects on the environment. See Chapter 3, *Environmental Assessment in Support of Findings*, for a discussion of potential impacts.
(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.	**Consistent.** As discussed in Section 3.1, *Aesthetics*, Highway 1 and Highway 92 are both Eligible Scenic Highways. The project would construct a 6-foot-high chain link fence to approximately 240 feet west of the junction of Highway 1 and Highway 92. Although the new fence would be visible from the roadway, it would not damage scenic resources, including trees, historic buildings, rock outcroppings, or similar resources. The fence would be briefly visible from the intersection and part of an urban view adjacent to the access road for Strawflower Shopping Center. In addition, vegetation would quickly regrow and cover a majority of the fence, which would reduce its visibility. Therefore, the fence would not result in a significant impact to a scenic highway.
(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.	**Consistent.** As discussed in Section 3.9, *Hazards and Hazardous Materials*, the project site is not located in the vicinity of a hazardous materials site.
(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.	**Consistent.** As discussed in Section 3.5, *Cultural Resources*, the project would replace an existing damaged chain-link fence. It would not affect any other structures. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource.

2.3 Findings Supporting Applicable CEQA Exemptions

Following a preliminary evaluation of the project, the City has determined that the project would not result in any significant effects on the environment and would meet the requirements for a Class 1 CatEx. This determination is based on the following.

- The Class 1 CatEx allows for the repair, maintenance, or minor alteration of existing public or private structures. The project would replace an existing fence at the edge of the riparian corridor of Pilarcitos Creek.
- The key consideration for a Class 1 CatEx is whether the project involves negligible or no expansion of an existing use. Both the original and the new fence are intended to reduce the amount of anthropogenic debris entering the Pilarcitos Creek riparian corridor.
    - Under Example (d), the Class 1 CatEx applies to "restoration or rehabilitation of deteriorated or damaged structures, facilities . . . to meet current standards or public health and safety." The project would replace the existing damaged fence and move it closer to the street and sidewalks, which would take it out of the riparian habitat while still protecting that habitat.

      Under Example (e)(1), the Class 1 CatEx applies to additions to existing structures, provided that the addition will not result in an increase of more than 2,500 square feet.

The project would total approximately 1,000 feet of linear chain-link fence and, since the fence is only a few inches wide, the total increase would be less than 2,500 square feet.

3 ENVIRONMENTAL ASSESSMENT IN SUPPORT OF FINDINGS

The use of a CatEx requires evidence that the project would not result in a significant impact on the environment. The following chapter briefly analyzes all environmental resource topics located in Appendix G of the CEQA Guidelines in order to support the CEQA CatEx and determines that the project will not have any potentially significant impacts on the environment. In combination with the technical studies completed for this project (Appendix A - Biological Resources Evaluation), this Initial Study constitutes substantial evidence that the project will not have a significant effect on the environment.

3.1 Aesthetics

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
(a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage 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 Evaluation

(a) Would the project have a substantial adverse effect on a scenic vista?

The project is located in an urbanized area of Half Moon Bay and would include the installation of a chain-link fence adjacent to roads and sidewalks (Figures 3 through 6). Although the project would interrupt some views of riparian vegetation, it is part of an urban landscape adjacent to a road and parking lot. Therefore, the project is not located in an area that would interrupt views of a scenic vista; therefore, no impact would occur.



Figure 3. View of the riparian vegetation behind Safeway.



Figure 3. View of the fenceline vegetation with Safeway receiving area on the right.



Figure 5. View of fenceline vegetation on access road with Oak Avenue Bridge on the left.



Figure 6. View of Oak Avenue Bridge from highways 1 and 92 intersection with shopping center in the distance.

(b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is located west of the junction of Highways 1 and 92, which are both Eligible Scenic Highways.[10] The project would construct a fence to within approximately 240 feet of the junction of Highway 1 and Highway 92 (see Figure 6). While the fence would be visible from the junction, it would be adjacent to the access road and part of an urban landscape, therefore it would not damage scenic resources, including trees, historic buildings, rock outcroppings, or similar resources. Some vegetation trimming would be required during construction and four trees may be removed; however, no trees that are visible from either scenic highway would be removed. Much of the vegetation to be removed are nonnative species, and disturbed areas would be restored and replanted with native vegetation. The vegetation would be allowed to regrow after installation, which would partially obscure the fence and further reduce its visibility from Highway 1 and Highway 92. Therefore, the fence would not result in a significant impact to a scenic highway, and this impact would be less than significant.

(c) In non-urbanized areas, would the project 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?

The project site is located in the vicinity of the junction of Highways 1 and 92. Highway 1 and Highway 92 are considered Town Boulevard Scenic Corridors, and this intersection is a Community Gateway according to the LCLUP.[11] Under Policy 9-10 of the LCLUP, in designated Scenic Corridors, fences shall not block public views of or from scenic and visual resource areas, including along scenic corridors, at parks and beaches, and at other scenic public viewing areas. Under Policy 9-12, new development in close proximity to, or easily visible from, the Town Boulevard Scenic Corridor must be visually compatible with the surrounding land or development.

The project would construct a fence to within approximately 240 feet of the junction of Highway 1 and Highway 92 (see Figure 6). The views from this segment of Highway 1 and Highway 92 include overhead power lines and views of the shopping center, as well as views of the Pilarcitos Creek riparian corridor (see Figures 5 and 6). While the fence would be visible in the distance from the junction, it would be adjacent to the access road and part of an urban landscape, therefore it would not damage scenic resources, including trees, historic buildings, rock outcroppings, or similar resources. Some vegetation trimming would be required during construction, but no trees that are visible from either highway would be removed. Much of the vegetation to be removed are nonnative species, and disturbed areas would be restored and replanted with native vegetation. The vegetation would be allowed to regrow after installation, which would partially obscure the fence and further reduce its visibility from Highway 1 and Highway 92. Although the new fence would be visible from the roadway, it would not be out of keeping with the surrounding urban development and would not block public views of a scenic corridor. Therefore, the fence would not result in a significant impact to a scenic corridor or scenic public view, and this impact would be less than significant.

[10] California Department of Transportation (Caltrans). 2025. *California State Scenic Highways.* Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed August 13, 2025.

[11] City of Half Moon Bay. 2020. Chapter 9. Scenic and Visual Resources. In *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed August 13, 2025.

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

The project is a chain-link fence. It would not include night lighting and would be constructed with non-glare materials; therefore, no impact would occur.

3.2 Agriculture and Forest Resources

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

Environmental Evaluation

(a) Would the project 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?

The land is designated as Urban and Built Up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[12] Therefore, the project would have no impact on the conversion of farmland to non-agricultural uses, and no impact would occur.

[12] California Department of Conservation (CDOC). 2018. California Important Farmland Finder Interactive Viewer, San Mateo County. CDOC Farmland Mapping Monitoring Program. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed August 13, 2025.

(b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The land is not under Williamson Act contract. Under the City's LCLUP, the land is designated as General Commercial (C-G).[13] Therefore, the project would not conflict with existing agricultural zoning or a Williamson Act contract, and no impact would occur.

(c) Would the project 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))?

The project does not include forest land or timberland and is not zoned for Timber Production; therefore, no impact would occur.

(d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project is not located in forest land; therefore, no impact would occur.

(e) Would the project 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?

The project would replace an existing fence and would not result in conversion of farmland or forest land to other uses; therefore, no impact would occur.

3.3 Air Quality

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

[13] City of Half Moon Bay. 2020. *City of Half Moon Bay Local Coastal Program and Land Use Plan, Figure 2-1: Land Use Map.* Available at: https://www.half-moon-bay.ca.us/DocumentCenter/View/3766/2020-LCLUP-Land-Use-Map-Figure-2-1. Accessed August 13, 2025.

Setting

The project is located within the San Francisco Bay Area Air Basin under the jurisdiction of the BAAD, formerly the BAAQMD.[14] The BAAD regulates air pollutant emissions, enforces regulations, administers permits governing stationary sources, inspects stationary sources, monitors air quality and meteorological conditions, and assists local governments in addressing climate change. This analysis relies on the screening criteria established by the BAAD to make the significance determinations below.

Environmental Evaluation

(a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

The *BAAQMD 2022 CEQA Guidelines* establish screening criteria for analyzing projects.[15] If a project meets the screening criteria, then its air quality impacts may be considered less than significant. Under Table 3-1, Operational Related Criteria Air Pollutant and Precursor Screening Level Sizes, from the *BAAQMD 2022 CEQA Guidelines*, the closest screening category to the fence would be "City Park" and the construction-related screening size for work in a city park is 10 acres. The project would replace an existing fence, impacting less than a quarter acre of land during construction. Therefore, replacement of the fence would have less-than-significant impacts related to construction, and the fence would have no operational emissions.

(b) Would the project 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?

According to the *BAAQMD 2022 CEQA Guidelines*:

> No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.[16]

A project would have a cumulative significant impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000-foot radius (or beyond where appropriate) from the fence line of a source, or from the location of a receptor, plus the contribution from the project, exceeds the following:

- An excess cancer risk level of more than 100 in one million or a chronic hazard index greater than 10 for TACs; or

[14] Bay Area Air Quality Management District (BAAQMD). 2022. *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en. Accessed August 13, 2025.
[15] Bay Area Air Quality Management District (BAAQMD). 2022. *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en. Accessed August 13, 2054.
[16] Bay Area Air Quality Management District (BAAQMD). 2022. *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en. Accessed August 13, 2025.

- 0.8 micrograms per cubic meter annual average $PM_{2.5}$.[17]

Under the *BAAQMD 2022 CEQA Guidelines*, if a project meets the screening criteria in Table 3-1, then the project would not result in the generation of criteria air pollutants and/or precursors that exceed the Thresholds of Significance.

The construction-related screening size for park facilities is 10 acres. The project is relatively small (the disturbance area is less than a quarter acre) and falls under the screening threshold for generating significant construction emissions. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant, and this impact would be less than significant.

(c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The *BAAQMD 2022 CEQA Guidelines* recommend assessment of risks and hazards on sensitive receptors within 1,000 feet of the project. Existing sensitive receptors within this radius include users of Oak Avenue Park and Pilarcitos Creek Trail and residences on Oak Avenue, Pilarcitos Avenue, Cypress Avenue, Willow Avenue, Laurel Avenue, Jenna Lane, Belleville Boulevard, Grand Boulevard, Chesterfield Avenue, and St. James Avenue. Construction of the project would generate emissions that could expose existing sensitive receptors to substantial pollutant concentrations. However, as discussed under *Threshold Discussion 3.3(a)*, the project would not generate criteria air pollutants in excess of threshold levels. The project would replace an existing fence adjacent to the Pilarcitos Creek riparian area. The project would be under the 10-acre screening threshold for construction emissions; therefore, the project would not produce construction emissions that would exceed the BAAD's recommended localized standards of significance for reactive organic gases (ROG), nitrogen oxides (NO_x), particulate matter with a diameter of 10 micrometers or less (PM_{10}), or particulate matter with a diameter of 2.5 micrometers or less ($PM_{2.5}$) during the construction phase.

The project does not include the use of heavy offroad grading equipment or other activities that typically generate localized emissions. Emissions generated by fence construction or vegetation trimming would be substantially less than a typical construction project. Nearby residential receptors could be exposed to small amounts of localized pollutants from construction of the project. Given the relatively small size of the project and the temporary nature of construction, the project would not generate substantial levels of air emissions. Sensitive receptors within 1,000 feet of the project would not be adversely affected based on implementation of standard City conditions of approval, requiring implementation of BAAD air quality BMPs. Since the project size is relatively small, potential construction impacts to sensitive receptors would be less than significant.

The fence would have no operational emissions. Occasional maintenance could expose residents to localize pollutants from maintenance vehicles; however, this would not change appreciably from existing conditions. Therefore, no operational impacts would occur.

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

Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The project would replace an existing fence adjacent to the Pilarcitos

[17] Bay Area Air Quality Management District (BAAQMD). 2022. *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en. Accessed August 13, 2025.

Creek riparian area. The project would not include any land uses typically associated with unpleasant odors or local nuisances (e.g., rendering facilities, dry cleaners); therefore, no impact would occur.

3.4 Biological Resources

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

Environmental Evaluation

The biological evaluation is based on the *Biological Resources Evaluation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California* (BRE),[18] which was completed in September 2023 (Appendix A). The BRE included a field survey of the project area and a 200-foot buffer, referred to as the biological survey area (BSA).

[18] SWCA Environmental Consultants (SWCA). 2023. *Biological Resources Evaluation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. September.

(a) Would the project 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?

Arroyo willow riparian habitat within the BSA may provide suitable non-breeding, foraging, and dispersal habitat for California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*). In addition, this community has the potential to support nesting and foraging birds protected under the Migratory Bird Treaty Act (MBTA), including the saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*) and white-tailed kite (*Elanus leucurus*).

There is no federally listed critical habitat within the project area. However, there is federally designated critical habitat for two fish species in Pilarcitos Creek—Central California Coast steelhead (*Oncorhynchus mykiss*; federally threatened species and CDFW Species of Special Concern [SSC]) and Central California Coast coho salmon (*Oncorhynchus kisutch*; federally endangered species). These critical habitats are localized to the aquatic habitat provided by Pilarcitos Creek and do not fall within the project area. Project activities will not impact critical habitat within Pilarcitos Creek and therefore will not impact steelhead or coho salmon within the creek. In addition, there is critical habitat for two species within 1 mile of the project area: California red-legged frog, located approximately 0.8 mile east of the project area, and western snowy plover (*Charadrius alexandrinus nivosus*; federally threatened species and CDFW SSC), located approximately 0.5 mile west of the project area. Critical habitat will be avoided during project activities and no significant impacts to steelhead, coho salmon, California red-legged frog, or western snowy plover habitat will occur.

Of the six plant species and 13 wildlife species evaluated for potential to occur, no special-status plants were determined to have a high or moderate potential to occur within the project area, one special-status animal species was determined to have high potential to occur, and three special-status animals were determined to have moderate potential to occur within the project area. These species include California red-legged frog (federally threatened species and CDFW SSC; high potential to occur), saltmarsh common yellowthroat (CDFW SSC; moderate potential to occur), San Francisco garter snake (federally and state endangered and CDFW fully protected species; moderate potential to occur), and white-tailed kite (CDFW fully protected species; moderate potential to occur).

Suitable breeding habitat for California red-legged frog does not occur within the project area or BSA, and therefore impacts to California red-legged frog eggs or larvae are not anticipated. In addition, no in-water work will occur as part of the project, and therefore Pilarcitos Creek will not be impacted by project activities. This species is unlikely to occur in the project area due to a lack of suitable cover and the high level of disturbance resulting from adjacent developed and urban land uses, including the existing Pilarcitos Creek Trail and Safeway parking lot. California red-legged frog is more likely to utilize higher-quality suitable foraging and dispersal habitat within the dense riparian corridor along Pilarcitos Creek. However, non-breeding, foraging, and aquatic dispersal habitat for California red-legged frog is present within the BSA in Pilarcitos Creek. Project activities, including vegetation trimming and fence installation, are unlikely to impact individual California red-legged frogs with implementation of AMMs included in Section 1.5.2, *Biological Resources,* of the project description, and as outlined in Section 5 of the BRE for this project (see Appendix A).

Temporary impacts caused by construction activities, including equipment operation and noise generation, may cause this species to avoid the project area. However, given the short duration and temporary nature of these activities, impacts are not anticipated to California red-legged frog. The existing fence will remain in place to avoid impacts associated with its removal. AMMs to prevent

impacts to California red-legged frog such as a worker environmental training, preconstruction clearance surveys, full-time biological monitoring, and work restrictions during rain events are included in Section 1.5.2, *Biological Resources.* Therefore, impacts to California red-legged frog would be less than significant.

Saltmarsh common yellowthroat occurs year-round in coastal riparian and wetland areas in San Mateo County. Arroyo willow habitat within the BSA may provide suitable foraging and nesting habitat for this species. In addition, this species may utilize the BSA as a route to and from marsh habitat present at the lower reaches of Pilarcitos Creek. Saltmarsh common yellowthroat was not observed on-site during the field survey and is unlikely to occur in the project area. However, based on the information above, there is moderate potential for this species to occur within the BSA. No impacts to saltmarsh common yellowthroat are anticipated. Nesting bird surveys will be conducted prior to the start of construction activities. AMMs to prevent impacts to saltmarsh common yellowthroat are included in Section 1.5.2, *Biological Resources.*

San Francisco garter snake was not observed on-site during the field survey and is unlikely to utilize the project area due to a lack of suitable cover and the high level of disturbance resulting from adjacent developed and urban land uses, including the existing Pilarcitos Creek Trail and Safeway parking lot; however, there is moderate potential for this species to occur in adjacent portions of the BSA due to the presence of Pilarcitos Creek and associated dense riparian vegetation.

Project activities may cause San Francisco garter snake to temporarily alter activity patterns to avoid the area. In addition, potential disruptions in activity of prey species such as California red-legged frogs may temporarily decrease the suitability of the immediate BSA for San Francisco garter snake foraging. However, impacts will be temporary and short in duration. This species is more likely to utilize higher-quality suitable foraging and dispersal habitat within the dense riparian corridor along Pilarcitos Creek during construction activities. Therefore, minimal disturbance during fence installation is not anticipated to impact San Francisco garter snake. AMMs to prevent impacts to San Francisco garter snake such as fulltime biological monitoring and preconstruction clearance surveys are included in Section 1.5.2*, Biological Resources*.

One white-tailed kite was observed foraging over grassland habitat southwest of the BSA. This species is unlikely to occur in the project area; however, established trees and other vegetated areas within the BSA may provide suitable nesting habitat for this species. Foraging activities are more likely to occur in open grasslands adjacent to and outside of the BSA. Noise generated during construction activities would be temporary and limited to hand tools (including chain saws), vehicles, and the construction crew. Noise generated by the project is unlikely to affect nearby white-tailed kites. Four trees may be removed as part of the project (Figure 7). All four trees are adjacent to or overhang the roadway and parking lot. Nesting bird surveys will be conducted prior to the start of construction activities and no impacts to white-tailed kites are anticipated. AMMs to prevent impacts to white-tailed kite are included in Section 1.5.2, *Biological Resources*

(b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

The project site contains both urban and landscaped areas and riparian arroyo willow thickets. Within the arroyo willow community, arroyo willow (*Salix lasiolepis*) is dominant in the shrub and tree canopy with an understory dominated by cape ivy (*Delairea odorata)*. In addition, arroyo willow thickets are a designated CDFW sensitive community and have multiple coastal resource area (CRA) designations as

defined by Section 18.38.020 of the City Code.[19] This habitat occurs along the entire length of the riparian corridor north and south of Pilarcitos Creek and along the perimeter of the project area (see Appendix A: Figures 3 and 4).

Impacts to riparian vegetation would be limited to the possible removal of four trees (one Monterey cypress and three arroyo willows), limbing of two trees, and trimming overhanging and understory vegetation up to five feet from the pavement edge to allow room for fence installation. Ground disturbance during the project will be limited to digging fence post holes and installing a chain-link fence. The existing fence will remain in place to avoid impacts associated with its removal. Much of the vegetation to be removed are non-native species, and all disturbed areas would be restored and replanted with native vegetation. This permanent impact is extremely small and would be offset by habitat restoration that would meet the requirements of the LCLUP. Therefore, the impacts of removing riparian vegetation, including the potential removal of three willows, adjacent to the parking lot are not anticipated to significantly impact the riparian corridor. If it is necessary to remove the four trees, the project would likely require CWA Section 401 and California Fish and Game Code Section 1600 permits and habitat would be mitigated through habitat restoration/enhancement within the Pilarcitos Creek watershed in compliance with requirements for the project CWA Section 401 and California Fish and Game Code Section 1600 permits. With the implementation of standard practices for riparian corridor ESHAs and their associated buffer zones, and with implementation of avoidance and minimization measures included as part of the project, described in Section 1.7.2, *Biological Resources*, impacts to riparian habitat and ESHAs would be less than significant.

(c) Would the project 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?

The BSA includes Pilarcitos Creek on the west side of Highway 1, which is potentially under the jurisdiction of the RWQCB, CDFW, and CCC.

The proposed project will avoid all potential USACE jurisdictional features, including Pilarcitos Creek (Figure 7). All work will be done within 5 feet of existing roads and sidewalks and will avoid riparian vegetation to the extent feasible. No impacts to potential USACE jurisdictional features are anticipated. AMMs to prevent impacts to Pilarcitos Creek are included in Section 1.5.2*, Biological Resources.*

The project would serve to inhibit the movement and dumping of anthropogenic debris into Pilarcitos Creek and its riparian area and allow for ongoing debris maintenance within the riparian habitat, which would protect Pilarcitos Creek. Disturbed areas would be restored and replanted with native vegetation. Therefore, the project would not have an adverse effect on a protected wetland and this impact would be less than significant.

(d) Would the project 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?

The BSA contains suitable nesting and foraging habitat for avian species protected under the MBTA and California Fish and Game Code (CFGC) Sections 3503 and 3513 during the typical nesting season

[19] City of Half Moon Bay. 2022. Title 18: Zoning. Available at: https://www.codepublishing.com/CA/HalfMoonBay/#!/HalfMoonBay18/HalfMoonBay1838.html#18.38.020. Accessed August 13 13, 2025.

(February 15–September 15). Suitable nesting and forging habitat would include shrubs and trees within and adjacent to the project area. Nesting is unlikely outside of the typical nesting season, although some avian species may forage year-round near the site. Avian species protected by the MBTA and CFGC observed in the BSA during the March 2023 field survey included Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), house finch (*Carpodacus cassinii*), song sparrow (*Melospiza melodia*), red-winged blackbird (*Agelaius phoeniceus*), red-tailed hawk (*Buteo jamaicensis*), California towhee (*Melozone crissalis*), purple finch (*Haemorhous purpureus*), dark-eyed junco (*Junco hyemalis*), western gull (*Larus occidentalis*), spotted towhee (*Pipilo maculatus*), violet-green swallow (*Tachycineta thalassina*), American robin (*Turdus migratorius*), mourning dove (*Zenaida macroura*), and white-crowned sparrow (*Zonotrichia leucophrys*). No nesting birds were observed during the field survey, which occurred just prior to the start of the typical nesting season.

Construction of the project has the potential to impact nesting birds, including their eggs or young, covered under the MBTA and CFGC. However, with implementation of AMMs provided in Section 1.5.2, *Biological Resources*, no impacts to these avian species or their nests are anticipated, and this impact would be less than significant.

The riparian corridor along Pilarcitos Creek provides suitable wildlife and migration habitat for amphibians, reptiles, birds, and mammals. However, the temporary disturbance and short duration of construction activities and the permanent fence installation are unlikely to substantially disrupt the migration of animals through the project area and BSA. The existing fence would remain in place to avoid disruption. Therefore, with implementation of the AMMs in Section 1.5.2, *Biological Resources,* the project is not expected to interfere substantially with the movement of any native resident or migratory wildlife, and this impact would be less than significant.

(a) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Pilarcitos Creek riparian corridor is a designated Environmentally Sensitive Habitat Area (ESHA) under the LCLUP. Within the riparian corridor, "the intent of the LCP is to protect the ecosystem and any wildlife species it supports as whole, including the understory and emergent vegetation, the soil microbiology, and the water itself".[20] The adjacent Pilarcitos Creek has a land use overlay as a Greenbelt Stream Corridor, which is intended to further ensure preservation and protection of riparian ESHA consistent with California Coastal Act requirements.[21] The project would replace a fence at the edge of the riparian corridor that would serve to reduce uncontrolled access and the resulting anthropogenic debris that enters Pilarcitos Creek. This would help to protect the riparian ESHA and Pilarcitos Creek. The existing fence would be left in placeto avoid damage to riparian vegetation. Project construction would remain within 5 feet of existing roadways and sidewalks and would not impact the riparian zone. The project may remove four trees, but would restore and revegetate all disturbed areas with native species. None of the trees that may be removed are heritage trees. The project would comply with all policies in the LCLUP to protect ESHA's and Pilarcitos Creek (see Section 1.5.2, *Biological Resources*); therefore, the project would not conflict with any land use plan, policy, or regulation, and no impact would occur.

[20] City of Half Moon Bay. 2020. Chapter 6. Natural Resources. In *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed April 14, 2025.

[21] City of Half Moon Bay. 2020. Chapter 2. Development. In *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed April 15, 2024.



Figure 7. Jurisdictional features.

The project would have a significant impact if it would conflict with the City's Heritage Tree Ordinance under Half Moon Bay Municipal Code Chapter 7.40, Heritage Trees,[22] the City's Coastal Resource Conservation Standards under Half Moon Bay Municipal Code Chapter 18.38, Coastal Resource Conservation Standards,[23] or the LCLUP.[24] Four trees may be removed as part of the project. These include the following:

- 3 willows (Salix species) – one 12 inches in diameter at breast height (dbh) and two 6 inches dbh; and
- 1 Monterey cypress – 8 inches dbh;

In addition, two trees (1 willow, 1 myoporum) would require limbing and several trees would be trimmed back. Other vegetation trimming would occur up to 5 feet from the paved areas. Disturbed areas would be restored and replanted with native vegetation. None of the trees that may be removed are heritage trees; therefore, no impact to heritage trees would occur. The willow trees, if removed, would be replaced at a 3:1 ratio to adhere to LCLUP Policy 6-70(c) for riparian vegetation. As detailed under Section 1.5.2, *Biological Resources*, the project would implement all AMMs required by the LCLUP; therefore, the project would not conflict with any local policies and this impact would be less than significant.

(b) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no Habitat Conservation Plans or Natural Community Conservation Plans that apply to the project; therefore, no impact would occur.

3.5 Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

[22] City of Half Moon Bay. 2019. Chapter 7.40. Heritage Trees. In *Half Moon Bay Municipal Code.* Available at: https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay07/HalfMoonBay0740.html. Accessed April 15, 2024.
[23] City of Half Moon Bay. 2019. Chapter 18.38. Coastal Resource Conservation Standards. In *Half Moon Bay Municipal Code.* Available at: https://www.codepublishing.com/CA/HalfMoonBay/html/HalfMoonBay18/HalfMoonBay1838.html. Accessed August 13, 2025.
[24] City of Half Moon Bay. 2020. Chapter 6. Natural Resources. In *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed August 13, 2025.

Environmental Evaluation

(a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

The *Cultural Resources Investigation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*[25] was prepared in September 2023 and included a records survey and intensive archaeological field survey. As no buildings, structures, or other standing features were constructed in the project area, the potential for historical cultural resources is low. Further, the potential for encountering unknown cultural resources is reduced by the localized extent and limited depth of the earth disturbances required to excavate the fence post holes. Based on these indicators, there is a low potential for unknown Native American and/or historic-era cultural resources to occur within the project area. Therefore, the project would have no impact on historic resources.

(b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Based on the Cultural Resources Investigation,[26] there are no known archaeological resources in the vicinity of the project area. Most of the project area is situated in the historical meander belt of Pilarcitos Creek; consequently, the potential for intact Native American sites to occur in the project area appears to be low because the meander belt was active throughout the historical era. Based on the available information, the potential for unknown Native American and/or historic-era cultural resources to occur within the project area is low.

The project would construct approximately 1,000 feet of new fence. Environmental impacts may result from project implementation due to discovery of previously unrecorded archaeological resources. The likelihood of finding archaeological resources on-site is considered low; however, it is possible that discoveries of previously unrecorded archaeological resources may occur during ground-disturbing activities associated with project construction. Potential impacts to archaeological resources would be considered less than significant with the implementation of the City's Standard Condition for previously undiscovered resources, which are included as part of the project, described in Section 1.5.3, *Cultural Resources*.

(c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

The disposition of burials falls first under the general prohibition on disturbing or removing human remains under California Health and Safety Code Section 7050.5. More specifically, remains suspected to be Native American are treated under State CEQA Guidelines Section 15064.5, and California Public Resources Code (PRC) Section 5097.98 illustrates the process to be followed in the event that remains are discovered. If human remains are discovered during construction, no further disturbance to the project site shall occur, and the County Coroner must be notified (California Code of Regulations [CCR] 15064.5; PRC 5097.98).

The records search conducted for the project did not reveal any known Native American burial sites; however, the absence of known Native American sacred places does not preclude their existence at the subsurface level. Project activities include limited excavation of postholes. Environmental impacts may

[25] SWCA Environmental Consultants (SWCA). 2023. *Cultural Resources Investigation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. September 15.
[26] SWCA Environmental Consultants (SWCA). 2023. *Cultural Resources Investigation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California*. Prepared for City of Half Moon Bay. September 15.

result from project discovery of unrecorded human remains during excavation. Although not anticipated, it is possible that discoveries of human remains may occur during ground-disturbing activities associated with project construction. Disturbance of unanticipated human remains would be a potentially significant impact. In the event that previously undiscovered human remains are encountered during the project, the project would be required to implement the City's Standard Condition for the discovery of human remains, included as part of the project, described in Section 1.5.3, *Cultural Resources*, that is applicable to all Coastal Development Permits. With implementation of this Standard Condition, impacts related to undiscovered human remains would be less than significant.

3.6 Energy

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Result in a 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 Evaluation

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

Energy use during project construction would be short term and temporary. Construction of the project would require the limited use of construction equipment and worker vehicles that would use energy. There are no established thresholds of significance for construction-related energy use; therefore, energy use during construction activities was not estimated. It should be noted that this is a simple fence project, it does not include activities associated with typical construction projects such as grading or paving. No heavy equipment would be required. As discussed in Section 1.5.4, *Greenhouse Gases*, and Section 3.8, *Greenhouse Gas Emissions*, the project would implement BMPs, as recommended by the BAAD, to reduce construction-related GHG emissions, which would also improve energy efficiency. Reducing idling time, ensuring engines meet emissions requirements, and recycling construction waste would reduce the amount of energy used by construction equipment and in the production of new materials.

Due to the relatively small scale and short duration of construction activities, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and construction impacts would be less than significant.

(b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Operation of the fence would have no energy use, and energy use during project construction would be short term and temporary. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impact would occur.

3.7 Geology and Soils

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

Environmental Evaluation

(a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

The project site is in an area of high seismic activity—it sits between the San Gregorio-Seal Cove Fault Zone, approximately 3 miles northwest, and the San Andreas Fault Zone, approximately 5 miles northeast. No known active faults cross the project site, and the project site is not located within a

currently designated Alquist-Priolo Earthquake Fault Zone. [27] Based on these considerations, the potential for surface rupture at the project site is considered low, and no impact related to surface rupture would occur.

(a-ii) Strong seismic ground shaking?

The project site is located in a seismically active region that has experienced generally moderate to high levels of shaking during past earthquakes. The site is in relatively close proximity to two active faults (3 miles to the San Gregorio-Seal Cove Fault and 5 miles to the San Andreas Fault Zone), which means it would likely experience similar moderate-to-occasionally high ground shaking from future earthquakes. However, the project is limited to installation of approximately 1,000 feet of fence, which would not expose people to the risk of loss, injury or death in the event of failure during an earthquake. Therefore, this impact would be less than significant.

(a-iii) Seismic-related ground failure, including liquefaction?

The project would replace an existing fence at the edge of the Pilarcitos Creek riparian zone.

The project site is located in an identified liquefaction zone.[28] However, the project would reduce the potential for damage in a seismic event by replacing the existing fence and increasing its stability. If damage were to occur, it would be limited to the fence line and would not expose people or other facilities to seismic risks. Therefore, this impact would be less than significant.

(a-iv) Landslides?

The project is not located in an identified landslide zone;[29] therefore, no impact would occur.

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

The project would replace an existing fence at the edge of the Pilarcitos Creek riparian zone. The project would cover a relatively small footprint (approximately 265 square feet) in and adjacent to an area covered by riparian vegetation and all exposed areas would either be stabilized or revegetated with native species prior to the end of construction. Therefore, the project would have minimal impacts related to soil erosion, and this impact would be less than significant.

(c) Would the project 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?

The project is located adjacent to and in the edge of the riparian area surrounding Pilarcitos Creek. The project is located in Farallone loam and Farallone coarse sandy loam soils that are unstable and have a tendency to erode.[30] However, the project would replace a chain-link fence with minimal ground

[27] California Department of Conservation (CDOC). 2017. *Earthquake Zones of Required Investigation Map Viewer*. CDOC California Geological Survey. Available at: https://maps.conservation.ca.gov/cgs/eqzapp/app/. AccessedAugust 13, 2025.
[28] California Department of Conservation (CDOC). 2017. *Earthquake Zones of Required Investigation Map Viewer*. CDOC California Geological Survey. Available at: https://maps.conservation.ca.gov/cgs/eqzapp/app/. Accessed August 13, 2025.
[29] California Department of Conservation (CDOC). 2017. *Earthquake Zones of Required Investigation Map Viewer*. CDOC California Geological Survey. Available at: https://maps.conservation.ca.gov/cgs/eqzapp/app/. Accessed August 13, 2025.
[30] U.S. Department of Agriculture (USDA). 2025. Web Soil Survey. Available at https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed August 13, 2025.

disturbance and would not cause soil to become unstable or result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse; therefore, this impact would be less than significant.

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

The project is not located on expansive soils. Farallone loam and Farallone coarse sandy loam have relatively low clay contents (10%–18% clay). Soils with over 30% clay are considered expansive soils; therefore, the project soils are not considered expansive,[31] and no impact would occur.

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

The project does not include septic tanks or an alternative wastewater disposal system, and no impact would occur.

(f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

According to the LCLUP, no paleontological resources of known significance have been identified in Half Moon Bay, and they are extremely limited throughout the San Mateo County coastal zone. The project would install a fence and would have limited ground disturbance. Post holes would be auger drilled to a width of approximately 10 inches and a depth of approximately 36 inches. Therefore, the project would be unlikely to impact a paleontological resource, and no impact would occur.

3.8 Greenhouse Gas Emissions

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

[31] U.S. Department of Agriculture. Natural Resources Conservation Service. 2025. *Web Soil Survey.* Available at: https://websoilsurvey.nrcs.usda.gov/app/. Accessed August 13, 2025.

Environmental Evaluation

(a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The project would replace a chain-link fence. Based on the size of the project, there would be minimal construction-related GHG emissions. Construction of the project would require the use of minimal construction equipment and worker vehicles that would generate GHG emissions. As previously described in *Threshold Discussion 3.3(a)*, the BAAD has established screening thresholds for construction-related GHG emissions for parks at 10 acres. The project is relatively small compared with the screening criteria and would result in approximately 265 square feet of ground disturbance. To reduce emissions, the BAAD encourages all project applicants to use off-road vehicles and equipment that comply with Tier 3 or Tier 4 standards.[32,33] The project would comply with the measures recommended by the *BAAQMD 2022 CEQA Guidelines* and listed in Section 1.5.4, *Greenhouse Gases*.[34]

Compliance with the recommended BAAD measures combined with the size of the project would ensure that impacts are less than significant. In addition, as discussed in Section 3.19, *Utilities and Service Systems*, the project contractor would prepare and submit a Construction and Demolition Waste Management Plan to further reduce construction-related GHG emissions by recycling construction debris, as required by the California Green Building Standards Code (CALGreen). With implementation of the BMPs recommended by the BAAD and required by CALGreen, construction-related GHG emissions would be less than significant.

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

The project would construct a new fence, which would create minimal construction-related GHG emissions and would have no operational GHG emissions. Therefore, the project would not conflict with an applicable plan, policy, or regulation related to GHGs, and no impact would occur.

3.9 Hazards and Hazardous Materials

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒

[32] The U.S. Environmental Protection Agency and California Air Resources Board established emission standards for new engines found in off-road equipment. There are four tiers of emission standards, which become increasingly more stringent the higher the tier. Tier 3 and 4 emission standards are met through advanced engine design with no or minimal use of exhaust gas after combustion.

[33] Bay Area Air Quality Management District (BAAQMD). 2017. *2017 Clean Air Plan: Spare the Air, Cool the Climate.* Available at: https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed August 13, 2025.

[34] Bay Area Air Quality Management District (BAAQMD). 2022. *California Environmental Quality Act Air Quality Guidelines.* Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed August 13, 2025.

	Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Environmental Evaluation

(a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction of the project would involve the transport, use, and disposal of small amounts of potentially hazardous materials. These materials include engine fuels, and oils that are typically associated with development of any project and in this case would be less than required for most projects. As described in Section 1.2, *Project Description*, construction activities would be temporary, lasting approximately 1 month. These temporary construction activities involving the use, transport, storage, and disposal of hazardous materials would be conducted in compliance with all health and safety requirements, such as County and City General Plan policies, CCR Sections 337 through 340, Chapter 6.95 of California Health and Safety Code Article 1, and CCR Title 19, Public Safety, Division 2. Because the project Applicant would comply with applicable regulations and laws pertaining to the transport, storage, use, and disposal of potentially hazardous materials, the exposure of the public, construction workers, and environment to hazardous materials would be less than significant.

The project includes the construction of a fence to reduce the amount of anthropogenic debris entering Pilarcitos Creek. Operation of the fence would not involve the use of potentially hazardous materials; therefore, no impact would occur.

(b) Would the project 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?

A significant impact may occur if a project could create an upset or accident condition involving hazardous materials. No known hazardous contamination sites are located within the vicinity of the project site.[35,36] Construction of the project would use small amounts of hazardous materials such as fuels and oils for hand tools and other portable equipment. The BMPs implemented for the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) (discussed further in Section 3.10, *Hydrology and Water Quality*) would contain minor spills during construction. Operation of the fence would not use hazardous materials. Therefore, the project would not 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, and the impact would be less than significant.

(c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

A project-related significant adverse effect may occur if a project site is within 0.25 mile of an existing or proposed school site, and the project is projected to release hazardous emissions that would exceed regulatory thresholds and pose a health hazard. The project site is located approximately 0.20 mile north of Pilarcitos High School and approximately 0.25 mile north of Hatch Elementary School. As discussed above, project construction and operation would not release hazardous emissions that would exceed regulatory thresholds or pose a health hazard; therefore, this impact would be less than significant.

(d) Would the project 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?

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and to submit such information to the Secretary for Environmental Protection on at least an annual basis. In meeting the provisions in California Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources such as EnviroStor and GeoTracker provide information regarding identified facilities. According to EnviroStor and GeoTracker, no hazardous contamination sites are located in the vicinity of the project site.[37,38] Therefore, no impact would occur.

[35] State Water Resources Control Board (California Water Boards). 2025. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/map/. Accessed on August 13, 2025.
[36] California Department of Toxics Substances Control (DTSC). 2018. EnviroStor. Available at: https://www.envirostor.dtsc.ca.gov/public/map. Accessed on August 13, 2025.
[37] State Water Resources Control Board (California Water Boards). 2025. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/map/. Accessed on August 13, 2025.
[38] California Department of Toxics Substances Control (DTSC). 2025. EnviroStor. Available at: https://www.envirostor.dtsc.ca.gov/public/map. Accessed on August 13, 2025.

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

The project site is not located within an airport land use plan or within 2 miles of a public airport. Therefore, the project would not result in an aviation safety hazard for people using the project area, and no impact would occur.

(f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. The nearest emergency evacuation routes are Highway 1 and Highway 92,[39] which provide the only evacuation routes into and out of the city. Construction of the new fence would result in minimal amounts of traffic related to worker trips and the delivery of materials. The fence would be constructed adjacent to the access road and parking lot for the Strawflower Shopping Center and access would be from the Strawflower Shopping Center. Construction traffic would not impede public access and would not interfere with any adopted emergency response plan or emergency evacuation plan. The proposed replacement fence would not generate additional traffic and therefore would not interfere with any emergency response and/or evacuation plan. During the construction phase, the City would require a traffic control plan for any temporary activities that would affect the public right-of-way. The traffic control plan would include temporary procedures for emergency access. Therefore, the project would not impair the implementation of or physically interfere with an emergency response plan or emergency evacuation plan, and this impact would be less than significant.

(g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The project is served by the Coastside Fire Protection District (CFPD) and is located in a Moderate Fire Hazard Severity Zone in a Local Responsibility Area.[40] The Half Moon Bay Fire Station is approximately 1.1 miles south of the project area.

The replacement of the existing fence would not appreciably change public use or increase the risk of wildland fire. It may decrease the risk of fire by limiting human access to a section of the riparian zone. Locked pedestrian gates would allow access for maintenance workers and emergency personnel to the riparian zone. Therefore, the project would not expose more people or infrastructure to danger from wildland fires, and no impact would occur.

[39] City of Half Moon Bay. 2013. *Half Moon Bay Circulation Element.* November 19. Available at: https://www.half-moon-bay.ca.us/DocumentCenter/View/187/2013-Circulation-Element-PDF. Accessed August 13, 2025.
[40] California Department of Forestry and Fire Protection (CAL FIRE). 2025. *Local Responsibility Area Fire Hazard Severity Zones*. Available at: https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/folder/308445234395. Accessed March 20, 2025.

3.10 Hydrology and Water Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(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 which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
(iv) Impede or redirect flood flows?	☐	☐	☒	☐
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Environmental Evaluation

(a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Activities associated with construction of the project could have a significant impact if they resulted in violation of waste discharge requirements under the San Francisco Bay RWQCB's Municipal Regional Stormwater NPDES Permit from contaminated runoff entering the stormwater system or Pilarcitos Creek.

The SMCWPPP is a partnership of the City/County Association of Governments of San Mateo County (C/CAG), each incorporated city and town in the county, and the County, which share a common NPDES permit. The Municipal Regional Stormwater NPDES Permit was issued by the San Francisco Bay

RWQCB[41] in compliance with the San Francisco Bay Basin Plan[42] and the NPDES Program. Participating agencies (including the County and City) must comply with the provisions of the countywide permit by ensuring that new development and redevelopment mitigate, to the maximum extent practicable, water quality impacts from stormwater runoff during both construction and operational periods of projects.

Construction

As described in Section 1.5.5, *Hydrology and Water Quality*, construction of the fence would be required to implement an erosion/pollution control plan under the Municipal Regional Stormwater NPDES Permit[43] and SMCWPPP.[44] The erosion/pollution control plan must include site-specific BMPs that are designed to prevent runoff from construction areas to reduce potential impacts to surface water quality, including Pilarcitos Creek, during project construction. The erosion/pollution control plan would also include design elements and BMPs for construction areas, such as fueling and equipment washing areas and trash and hazardous material storage areas. No construction would occur during major rain events, minimizing any chance of runoff from the site. Major rain events would be considered as a prediction of 0.25 inch or more in 24 hours.

Construction of the fence would include the possible removal of four trees, limbing two trees, trimming or clearing vegetation up to 5 feet from the road and sidewalk and auger drilling holes for fenceposts using a handheld auger. This minor ground disturbance could result in an increase in erosion and sedimentation from the project area near Pilarcitos Creek.

Construction activities associated with the fence would require the presence of a limited number of construction vehicles, materials, and construction crews. Ground disturbance would be limited to vegetation clearance on less than 0.2 acre, digging approximately 101 postholes, pouring concrete footings, and setting posts. Construction activities for the fence would last approximately one month and only occur during dry weather conditions to the extent feasible. Excess soils excavated from the postholes would be spread in the vicinity of each posthole and revegetated. In addition to limited stormwater runoff and potential resulting water quality and sedimentation impacts, there is the potential for release of small amounts of hazardous materials, including petroleum products associated with diesel vehicle and equipment use and contaminants from concrete mixing, pouring and washout, and sanitary facilities, to enter the existing drainage system and Pilarcitos Creek.. As described in Section 1.5.5, *Hydrology and Water Quality*, the project contractor would be required to comply with the Stormwater Checklist for Small Projects, as required by the SMCWPPP. Section 1.5.5 identifies stormwater BMPs that the City proposes to implement under the Stormwater Checklist for Small Projects.

Implementation of the erosion/pollution control plan, as required by law, would prevent construction of the proposed fence from violating any water quality standards or waste discharge requirements or

[41] San Francisco Regional Water Quality Control Board (RWQCB). 2022. *California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018; NPDES Permit No. CAS612008. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed August 13, 2025.

[42] San Francisco Regional Water Quality Control Board (RWQCB). 2021. *San Francisco Bay Basin Water Quality Control Plan.* California Regional Water Quality Control Board, San Francisco Bay Region. May 4. Available at: https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/BP_all_chapters.pdf. Accessed August 13, 2025.

[43] San Francisco Regional Water Quality Control Board (RWQCB). 2022. *California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018; NPDES Permit No. CAS612008. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed August 13, 2025.

[44] County of San Mateo. 2020. San Mateo Countywide Water Pollution Prevention Program: Construction. Available at: https://www.flowstobay.org/construction. Accessed August 13, 2025.

otherwise substantially degrading surface water or groundwater quality; therefore, this impact would be less than significant.

Operation

The project would add approximately 101 fenceposts with 10-inch round concrete foundations equaling less than 0.006 acre of impervious surface area over the 1,000-foot length of the project. This additional impervious surface area would have a minimal effect on stormwater runoff compared to existing conditions. Therefore, project operation would not violate any water quality standards or waste discharge requirements or degrade water quality, and the impact would be less than significant.

Erosion and sedimentation may temporarily increase post-construction because of soils that have been loosened and changes in drainage patterns. Installation of the fence could result in a temporary increase in the levels of urban pollutants and litter entering the stormwater system and Pilarcitos Creek immediately post-construction. Pollutants in post-construction runoff from the project would likely be minimal and consistent with the existing environment, including the streets and parking lot. However, project construction would start in late Spring 2026 and last a maximum of eight weeks and would not occur during the rainy season (October 15 through March 15) and would likely be complete by October 15, which is the start of the rainy season. In addition, the project site would be restored and revegetated with native species which would reduce erosion from runoff. If the project is not completed and stabilized by October 15, the contractor would employ the required erosion/pollution control plans, including site-specific BMPs that are designed to prevent runoff from construction areas (see Appendix A). Therefore, post-construction runoff from the fence would not result in a violation of any water quality standards or waste discharge requirements, and this impact would be less than significant.

During operation, the fence would reduce the amount of anthropogenic debris either being dumped into the riparian area and creek or entering through wind or stormwater runoff. This would result in a beneficial impact to the Pilarcitos Creek riparian area, therefore this impact would be less than significant.

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

A potentially significant impact would occur if a project included deep excavations resulting in the potential to interfere with groundwater movement, the withdrawal of groundwater, or paving of existing permeable surfaces important to groundwater recharge. The project would excavate to a depth of approximately 36 inches for postholes, which would not impact the groundwater table. Therefore, no impact would occur from excavation.

Project construction would be served by the Coastside County Water District (CCWD) water supply system. Project operation would not require water service. The project would replace an existing fence and therefore would not increase the density or population of the City, reduce water supply reliability, or impact groundwater withdrawal. Development of the project would not include any groundwater wells.

The project area is located within the State Water Resources Control Board (California Water Boards) San Francisco Bay Hydrologic Region. The project area is underlain by an alluvial aquifer referred to as the Half Moon Bay Terrace groundwater basin, which supplies limited water for domestic and municipal

uses (golf courses). Groundwater in the project area flows from east to west, discharging into the Pacific Ocean.[45,46]

The project would result in an increase in impervious surface area of less than 0.006 acre (265 square feet) over the entire length of the project. According to the CCWD,[47] there are no municipal water supply wells in the vicinity of the project. Runoff from the proposed fence line drains overland to Pilarcitos Creek, which allows for percolation into the groundwater table. Therefore, the project would not substantially interfere with groundwater recharge, and no impact would occur.

(c) Would the project 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:

(c-i) Result in substantial erosion or siltation on- or off-site?

The project would auger approximately 101 postholes (10 inches wide by 36 inches deep) on the project site and would spread the approximately 1.7 cubic feet of excavated earth at each posthole location. All disturbed areas would be restored and revegetated with native plants. All project components would be required to implement erosion control measures as discussed under Section 1.5.5, *Hydrology and Water Quality*.

As discussed in Section 1.5.5, construction of the project would include implementation of erosion and sediment control and pollution prevention BMPs under the SMCWPPP. As discussed under Section 1.5.2, *Biological Resources*, AMM No. 18, all exposed soils in the project area shall be stabilized immediately following the completion of work to prevent erosion. Any exposed or disturbed surfaces shall be reseeded with a locally sourced native seed mix. At no time shall silt-laden runoff be allowed to enter any drainages or other sensitive areas.

Operation of the project would result in a minimal increase of impervious surface compared to existing conditions; therefore, the project would not substantially alter the existing drainage pattern in a manner that would cause erosion. The project site would not alter the course of a stream or river. Therefore, the project would not substantially alter the existing drainage pattern of the site resulting in substantial erosion or siltation, and the impact would be less than significant.

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

The project would add a minimal amount of new impervious surface area over the length of the project. This minor increase in impervious surface area would not appreciably increase the rate or amount of surface runoff and would not increase the potential for flooding; therefore, no impact would occur.

[45] California Department of Water Resources (DWR). 2025. Groundwater Basin Boundary Assessment Tool. Available at: https://gis.water.ca.gov/app/bbat/. Accessed August 13, 2025.
[46] California Department of Water Resources (DWR). 2014. *Bulletin 118 – Half Moon Bay Terrace Groundwater Basin*. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/2_022_HalfMoonBayTerrace.pdf. Accessed August 13, 2025.
[47] Coastside County Water District (CCWD). 2020. District Maps. Available at: http://www.coastsidewater.org/distribution/district-maps.html. Accessed August 13, 2025.

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

The project would add a minimal amount of new impervious surface area over the length of the project. This minor increase in impervious surface area would not appreciably increase the rate or amount of surface runoff or exceed the capacity of existing or planned stormwater drainage systems. The fence is intended to decrease the amount of anthropogenic debris that enters Pilarcitos Creek and its associated riparian area, which would decrease the amount of polluted runoff entering Pilarcitos Creek. Therefore, the project would not provide additional sources of polluted runoff, and no impact would occur.

(c-iv) Impede or redirect flood flows?

The project would add approximately 1,000 feet of chain-link fence at the edge of the riparian zone for Pilarcitos Creek. The chain-link fence is not in an area of mapped flood hazard;[48] however, in January 2023, Pilarcitos Creek flooded much of the project area, homes, a homeless encampment, and access to the shopping center after heavy rains and a release from Pilarcitos Dam.[49] However, the chain-link fence is outside of the flood zone and would not effectively impede or redirect flood flows, and this impact would be less than significant.

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

The project is not in a seiche zone. The project area is in the inundation zone for Pilarcitos Dam and is located in an area vulnerable to tsunami.[50] However, the completed fence would not produce pollutants and therefore would not release pollutants in the event of a flood and is needed to reduce the amount of anthropogenic debris that enters Pilarcitos Creek; therefore, no impact would occur.

(e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project is located in the Lower Pilarcitos Creek Subbasin of the Half Moon Bay Terrace groundwater basin. The Half Moon Bay Terrace groundwater basin does not have a sustainable groundwater management plan and is on the list of groundwater basins with low priority for developing such a plan. The project would rely on municipal water sources for construction and would not obstruct groundwater recharge. Therefore, the project would not conflict with or obstruct implementation of a sustainable groundwater management plan, and no impact would occur.

[48] County of San Mateo. 2024. Multijurisdictional Local Hazard Mitigation Plan Resources: San Mateo County Hazard Mapping Tool. Available at: https://www.smcgov.org/ceo/multijurisdictional-local-hazard-mitigation-plan-resources. Accessed August 13, 2025.

[49] *Half Moon Bay Review*. 2023. *Storms pummel coast with heavy rain, floods.* January 11. Available at: https://www.hmbreview.com/news/storms-pummel-coast-with-heavy-rain-floods/article_74dd9d5c-91bf-11ed-8a68-3f4a18c495c0.html. Accessed August 13, 2025.

[50] County of San Mateo. 2025. Multijurisdictional Local Hazard Mitigation Plan Resources: San Mateo County Hazard Mapping Tool. Available at: https://www.smcgov.org/ceo/multijurisdictional-local-hazard-mitigation-plan-resources. Accessed August 13, 2025.

The project would abide by all requirements of the SMCWPPP and the San Francisco Bay RWQCB Municipal Regional Stormwater NPDES Permit.[51,52] The project would not conflict with the San Francisco Bay Basin Plan[53] because it would comply with all applicable requirements of both the Municipal Regional Stormwater NPDES Permit and the SMCWPPP permit, and no impact would occur.

3.11 Land Use and Planning

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Physically divide an established community?	☐	☐	☒	☐
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Environmental Evaluation

(a) Would the project physically divide an established community?

The project would replace a fence to protect part of the riparian buffer surrounding Pilarcitos Creek. The fence would allow access to remain between the Oak Avenue neighborhood and the Strawflower Shopping Center via the Oak Avenue Bridge, while reducing the amount of anthropogenic debris that enters Pilarcitos Creek. Therefore, the fence would not divide an established community, and this impact would be less than significant.

(b) Would the project 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?

A project would normally have a significant impact related to land use consistency if it would be inconsistent with the General Plan or its elements, a local coastal plan, or adopted environmental goals or policies, or if it would require a General Plan amendment or zone change.

The project is located within the California Coastal Zone and would replace an existing fence on property that has a land used designation of General Commercial and is zoned General Commercial (C-G). The adjacent Pilarcitos Creek has a land use overlay as a Greenbelt Stream Corridor, which is intended to

[51] County of San Mateo. 2025. Stormwater Treatment Requirements. Available at: https://www.smcgov.org/planning/stormwater-treatment-requirements. Accessed August 13, 2025.
[52] San Francisco Regional Water Quality Control Board (RWQCB). 2022. *California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018; NPDES Permit No. CAS612008. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed August 13, 2025.
[53] San Francisco Regional Water Quality Control Board (RWQCB). 2017. *San Francisco Bay Basin (Region 2) Water Quality Control Plan.* California Regional Water Quality Control Board, San Francisco Bay Region. May 4. Available at: https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/BP_all_chapters.pdf. Accessed August 13, 2025.

further ensure preservation and protection of riparian ESHA consistent with California Coastal Act requirements.[54]

There is currently a small unhoused population living in the riparian zone west of the Highway 1 overpass. A larger unhoused population currently lives east of the Highway 1 overpass. This population is vulnerable to health issues from poor sanitation and exposure, flooding during the rainy season, and increased risk of fire. In addition, the practice introduces anthropogenic trash and debris along with coliform and other bacteria into Pilarcitos Creek and its surrounding sensitive habitat, as well as into the Pacific Ocean and Venice Beach at the mouth of Pilarcitos Creek. The project would replace a fence at the edge of the riparian corridor that would serve to reduce uncontrolled access and the resulting anthropogenic debris that enters Pilarcitos Creek. Since this population is vulnerable to flood risk and health issues from poor sanitation and exposure, the fence would protect the unhoused population as well as the riparian

ESHA and Pilarcitos Creek. Project construction would remain within 5 feet of existing roadways and sidewalks and would not impact the riparian zone. The project may remove four trees, but would restore and revegetate all disturbed areas with native species. None of the trees that may be removed are heritage trees. The project would comply with all policies in the LCLUP to protect ESHA's and Pilarcitos Creek (see Section 1.5.2, *Biological Resources*); therefore, the project would not conflict with any land use plan, policy, or regulation, and no impact would occur.

3.12 Mineral Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(b) Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Evaluation

(a) Would the project 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?

A significant impact may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, if a project would convert an existing or future regionally important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally important mineral resource extraction.

[54] City of Half Moon Bay. 2020. Chapter 2. Development. In *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at: https://www.half-moon-bay.ca.us/154/Local-Coastal-Program-Land-Use-Plan. Accessed August 13, 2025.

The project is located in an area zoned Mineral Resource Zone (MRZ)-3 for aggregate mineral resources.[55] MRZ-3 is defined as areas containing mineral deposits, the significance of which cannot be evaluated from available data. Neither the project site nor the surrounding area is identified as an area containing mineral deposits of statewide or regional significance. Therefore, no impacts to mineral resources of statewide or regional significance would occur.

(b) Would the project 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?

A significant impact would occur if a project were located in an area used or available for extraction of a locally important mineral resource and the project converted an existing or potential future locally important mineral extraction use to another use, or if a project affected access to a site in use or potentially available for locally important mineral resource extraction.

Neither the project site nor the surrounding area is identified as an area containing mineral deposits of local significance;[56] therefore, no impacts to mineral resources of local significance would occur.

3.13 Noise

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or 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?	☐	☐	☐	☒

[55] California Department of Mines and Geology (CDMG). 1982. Mineral Resource Sectors. South San Francisco Bay Production-Consumption Region, Half Moon Bay Quadrangle, Special Report 143, Plate 2.73. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc. Accessed August 13, 2025.

[56] City of Half Moon Bay. 2014. *Plan Half Moon Bay: Existing Conditions, Trends, and Opportunities Assessment.* Revised July. Available at: https://www.half-moon-bay.ca.us/DocumentCenter/View/174/HMB-Existing-Conditions-Report-PDF. Accessed August 13, 2025.

Environmental Evaluation

(a) Would the project result in 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?

The residential uses north, south, and west of the project area and the recreational users of Pilarcitos Creek Trail represent the sensitive receptors in the vicinity of the project.

The City has established restrictions limiting construction and similar noise-generating activities from 7:00 a.m. to 6:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m., Saturdays; and 10:00 a.m. to 6:00 p.m., Sundays and holidays. The City Engineer may approve exceptions to these hours, if necessary, to facilitate the orderly completion of work and minimize disruption to the community.[57] The project contractor would be required to comply with construction hour restrictions.

Construction activities would generate noise that would vary over the approximately 1-month construction period and would include on-site equipment, such as a hand-held auger drill, cement mixer, and hand tools. There would be secondary noise from construction worker vehicles and vendor deliveries. During construction, noise-generating activities could occur at the project site from 7:00 a.m. to 6:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m., Saturdays; and 10:00 a.m. to 6:00 p.m., Sundays and holidays, in accordance with the City's noise ordinance. No nighttime construction will occur. Because construction noise would be short term, lasting approximately 1 month, and comply with local noise regulations, impacts related to construction noise would be less than significant.

The project would not generate stationary or operational noise in the long term, and no operational impacts would occur.

(b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities (e.g., ground-disturbing activities, including movement of construction equipment and auger drilling postholes) may generate localized groundborne vibration and noise. Blasting or pile-driving activities will not occur during construction of the project. Generally, construction-related groundborne vibration is not expected to extend beyond 25 feet from the generating source. The project would replace an existing fence. Construction equipment could include a skid steer with an auger or hand-held auger, cement mixing equipment, and hand tools. The closest sensitive receptors are users of Pilarcitos Creek Trail adjacent to the southern end of the project area and a residence approximately 45 feet from the fence at 345 Belleville Boulevard. Pilarcitos Creek Trail users would experience transitory noise and vibration as they move along the trail in the vicinity of the Oak Avenue Bridge. Based on the distance of more than 25 feet to sensitive receptors, groundborne vibration from on-site construction is not anticipated for residences. The project would be required to adhere to the City Noise Ordinance as a standard condition of approval. Therefore, any annoyance to residents would be short term and temporary, and impacts related to groundborne noise or vibration would be less than significant.

[57] City of Half Moon Bay. 2019. Chapter 14.40. Hours of Construction. In *Half Moon Bay Municipal Code.* Available at: https://www.codepublishing.com/CA/HalfMoonBay/#!/HalfMoonBay14/HalfMoonBay1440.html. Accessed August 13, 2025.

(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?

The project is located approximately 3.7 miles from the nearest airport, Half Moon Bay Airport. The project is not located within an airport land use plan or within 2 miles of an airport; therefore, no impact would occur.

3.14 Population and Housing

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Environmental Evaluation

(a) Would the project 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)?

City and County General Plans develop growth plans and projections for the areas in their jurisdictions. A significant impact would occur if a project included a General Plan amendment, which could result in an increase in population over that projected in the adopted General Plan, or if a project would induce substantial growth on the project site or in the surrounding area.

Construction job opportunities created as a result of the project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe during which their specific skills are needed. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the project, and as such, significant housing or population impacts would not result from construction of the project. Therefore, there would be no construction-related population growth impacts, and no impact would occur.

The project would replace an existing fence; therefore, the project would not induce population growth or introduce new persons to the population, and no impact would occur.

(b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project would replace an existing fence at the edge of the Pilarcitos Creek riparian corridor. There is currently a small unhoused population living in the riparian zone west of the Highway 1 overpass. A larger unhoused population currently lives east of the Highway 1 overpass. This population is vulnerable to health issues from poor sanitation and exposure, flooding during the rainy season, and increased risk of fire. In addition, the practice introduces anthropogenic trash and debris along with coliform and other bacteria into Pilarcitos Creek and its surrounding sensitive habitat, as well as into the Pacific Ocean and Venice Beach at the mouth of Pilarcitos Creek. The fence would make it more difficult to access the riparian area south of Pilarcitos Creek and west of the Highway 1 underpass, thereby protecting the sensitive habitat. There are not substantial numbers of people currently living in this area, therefore; the project would not result in the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere and this impact would be less than significant.

3.15 Public Services

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(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 Evaluation

(a) Would the project 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?

A significant impact may occur if the Coastside Fire Protection District (CFPD) could not adequately serve a project, and a new or physically altered fire station would be necessary. The project area receives fire protection services from the CFPD, which has a cooperative agreement with the San Mateo-Santa Cruz (CZU) Unit of the California Department of Forestry and Fire Protection (CAL FIRE). The CFPD has three fire stations, the nearest of which (Fire Station 40) is at 1911 Main Street, Half Moon Bay, approximately 1 mile southeast of the project site. Fire Station 40 is staffed with one fire captain and two fire apparatus engineers and can provide a minimum response time of 2 minutes and maximum response time of 8 minutes to all portions of the city. [58,59] CALFIRE provides land use and pre-fire planning services as well as fire code inspection, prevention and enforcement services.[60] The fence would limit access to the riparian area behind Safeway, however, there it would include several locked pedestrian gates supplied with Knox padlocks, as required by CFPD and California Fire Code Section 506.1, to provide access to utility infrastructure. Emergency responders could use these gates to access the area.[61]. The CALFIRE CZU Fire Marshall's office would provide ordering information for Knox padlocks that meet CALFIRE and Coastside Fire Protection District standards.[62] The project would not increase population or cause an increase in recreational users, and no impact to fire protection services would occur.

Police protection?

A significant impact may occur if the San Mateo County Sheriff's Department could not adequately serve a project, and a new or physically altered sheriff or police station would be necessary. The project area receives law enforcement services from the Coastside Patrol Bureau of the Sheriff's Department. The Coastside Patrol Bureau provides law enforcement services for over 60% of San Mateo County, including Half Moon Bay; has two substations, located in Half Moon Bay and Moss Beach; and is staffed with 27 full-time Deputy Sheriffs, four Sergeants, and one Lieutenant, as well as two full-time Community

[58] Coastside Fire Protection District (CFPD). 2008. About Us. Available at: https://www.coastsidefire.org/about-us. Accessed August 13, 2025.
[59] City of Half Moon Bay. 2020. Chapter 7. Environmental Hazards. In *City of Half Moon Bay Local Coastal Land Use Plan.* Adopted October 20. Available at https://www.half-moon-bay.ca.us/DocumentCenter/View/3784/Full-Combined-2020-HMB-LCLUP. Accessed August 13, 2025.
[60] Coastside Fire Protection District. 2023. *Board Meeting Staff Report. January 25, 2023*. Available at: https://www.coastsidefire.org/files/abe86a769/012523+tab+6+Final+Staff+Report+CAL+FIRE+Contract.pdf. Accessed August 16, 2025.
[61] Coastside Fire Protection District. 2019. *Ordinance 2019-03. An Ordinance Adopting the California Fire Code 2019 Edition*. Available at: https://www.coastsidefire.org/fire-prevention-bureau-standards#docaccess-7a0e5b51b64c1b9ca3b45d15daf40ad116641b2f1d6d24721d87cc0c7d260b22. Accessed August 14, 2025.
[62] CALFIRE CZU Coastside Fire Marshall Office. Sturm, Tyler. Fire Captain/Deputy Fire Marshal. 2025. Email communication with Juliet Bolding, Associate Planner. SWCA Environmental Consultants re: CA:FIRE requirements for gate access. August 17, 2025.

Policing deputies.[63] The Half Moon Bay Substation is located approximately 0.13 mile southeast of the project site.

The project would replace an existing fence; therefore, it would not increase the population in the area or introduce a hazard. The fence would limit access to the riparian area behind Safeway, however, there it would include several locked pedestrian gates to provide access to utility infrastructure that emergency services could use to access the area. The project would not increase the demand for public services, including police protection, and no impacts to police protection would occur.

Schools?

The project area is served by the Cabrillo Unified School District (CUSD). A significant impact may occur if the CUSD could not adequately serve a project, and a new or physically altered school or schools would be necessary. The CUSD has four elementary schools, one middle school, one high school, one alternative high school, and an adult education program.[64]

The project would replace an existing fence; therefore, it would not increase the population in the area or cause an increase in students. The project would not increase the demand for public services, including schools, and no impact would occur.

Parks?

A significant impact may occur if the project would result in the need for new or improved parks. Parks and recreation facilities that could be used by the residents of the area include parks operated by the City (Coastal Trail, Frenchman's Creek Park, Kehoe Park, Carter Park, Fernandez Park, Mac Dutra Plaza, Oak Avenue Park, Ocean View Park, Skate Park, and Smith Field),[65] the County Parks Department (Pillar Point Bluff, Quarry Park, Mirada Surf, Moss Beach Park, Fitzgerald Marine Reserve, and Devil's Slide Trail are located between Half Moon Bay and Montara, and Tunitas Creek Beach, Memorial Park, Pescadero Creek Park, and Sam McDonald Park are located south of the city),[66] the California Department of Parks and Recreation (State Parks) (Half Moon Bay State Beach, including Dunes, Roosevelt, and Venice Beaches; Montara State Beach and Gray Whale Cove State Beach to the north; and Burleigh H. Murray Ranch, Cowell Ranch State Beach, Año Nuevo State Park, and Big Basin Redwoods State Park to the south),[67] and Mid-Peninsula Open Space District (Purisima Creek Redwoods, Skyline Ridge, and La Honda Creek Preserves and others on or near the coast).[68]

The project would replace an existing fence; therefore, it would not increase the population in the area or cause an increase in recreational users. The project would not increase the demand for public services, including parks, and no impact would occur.

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[63] San Mateo County Sheriff's Office. 2025. *Coastside Patrol Bureau.* Available at: https://www.smcsheriff.com/patrol-services/coastside-patrol-bureau. Accessed August 13, 2025.

[64] Cabrillo Unified School District (CUSD). 2025. About Us. Available at: https://www.cabrillo.k12.ca.us/about_us. Accessed August 13, 2025.

[65] City of Half Moon Bay. 2025. Parks and Trails. Available at: https://www.half-moon-bay.ca.us/228/Parks-Trails. Accessed August 13, 20245

[66] County of San Mateo Parks Department. 2025. County Parks by Location. Available at: https://parks.smcgov.org/county-parks. Accessed August 13, 2025.

[67] California Department of Parks and Recreation (State Parks). 2025. Find a California State Park. Available at: https://www.parks.ca.gov/Find-a-Park. Accessed August 13, 2025.

[68] Mid-Peninsula Open Space Trust. 2025. Find an Open Space Preserve. Available at: https://www.openspace.org/preserves. Accessed August 13. 2025.

Other public facilities?

A significant impact may occur if the project would result in the need for other new or improved public facilities. Other public facilities include the Half Moon Bay Library, which is part of the San Mateo County Libraries system. The Half Moon Bay Library, rebuilt in 2018, is a 22,000-square-foot facility that serves a 270-square-mile area on the Coastside. The new library provides both physical and digital collections from the San Mateo County Libraries system; technology services, including three-dimensional (3D) printing; free WiFi hotspots; multilingual collections; literacy services; online high school; and space for community programs and events.[69]

The project would replace an existing fence. It would not increase the population in the area or cause an increase in library users. Therefore, the project would not increase the demand for public services, including libraries, and no impact would occur.

3.16 Recreation

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project 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) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Environmental Evaluation

(a) Would the project 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?

A project would result in a significant impact to parks and recreation services if it would result in a significant increase in population from adding residential units. The project would replace an existing fence and would not increase the population in the area or cause an increase in recreational users. The fence would not impede access to designated recreation facilities and parks. Therefore, the project would not increase the use of existing parks, or cause physical deterioration to recreational facilities and no impact would occur.

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

The project does not include recreational facilities or require construction or expansion of recreational facilities, and no impact would occur.

[69] City of Half Moon Bay. 2025. Half Moon Bay Library. Available at: https://www.half-moon-bay.ca.us/322/Library. Accessed August 13, 2025.

3.17 Transportation

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
(b) Would the project 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 Evaluation

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

Project construction would result in limited vehicle worker trips, haul trips, and vendor trips. The increase in traffic as a result of worker and haul trips would negligibly increase traffic at nearby traffic intersections and roadway segments and would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness. In addition, haul and vendor trips would primarily occur during off-peak hours (9:00 a.m.–3:00 p.m.).

The project would not alter the circulation system. Equipment and materials staging and project access would be in and from the Strawflower Shopping Center parking lot and would have minimal effect on area roads and traffic.

During construction, pedestrian and bicycle traffic on the Oak Avenue Bridge and the access road and sidewalk could be temporarily interrupted. These access interruptions would be intermittent and traffic control could be required for short periods of time (up to a few hours) on the access road and sidewalk to allow construction equipment to access the portion of the fence near the Oak Avenue Bridge. The project contractor would be required to have a traffic control plan. A detour would be provided where possible for bicycle and pedestrian traffic. The interruption of pedestrian and bicycle traffic would be temporary and intermittent and the traffic control plan would ensure pedestrian and bicycle safety; therefore, construction impacts would be less than significant. There would be no operational impact to pedestrian and bicycle users.

(b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

State CEQA Guidelines Section 15064.3 includes criteria for analyzing transportation impacts. Section 15064.3(b)(1) states, for land use projects, “Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact” and “Projects that decrease vehicle miles traveled in the

project area compared to existing conditions should be presumed to have a less than significant transportation impact".

The project site provides pedestrian and bicycle access to the Oak Avenue Bridge and Pilarcitos Creek Trail, which provides opportunities for bicycle and pedestrian transit along the Highway 1 corridor. The project may include short-term, temporary closures of the sidewalk and Oak Avenue Bridge during construction but would not have any permanent impacts on trail access. The project would replace an existing fence and would not have any effect on vehicle miles traveled. Therefore, the project would be consistent with State CEQA Guidelines Section 15064.3, and no impact would occur.

(c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project does not include any design features that would increase hazards. The project would replace an existing fence and would not affect either trail or roadway safety; therefore, no impact would occur.

(d) Would the project result in inadequate emergency access?

The project would replace an existing fence in the vicinity of the Oak Avenue Bridge and Strawflower Shopping Center. The fence would limit access to the riparian area behind Safeway, however, there it would include several locked pedestrian gates to provide access to utility infrastructure that emergency services could use to access the area. All gates would be provided with a Knox padlock for emergency responder access. Therefore, the project does not have any elements that would result in inadequate emergency service, and impacts to emergency services would be less than significant.

3.18 Tribal Cultural Resources

	Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	(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), or	☐	☐	☒	☐
	(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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Environmental Evaluation

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

(a-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)?

(a-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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

As the project is exempt from CEQA, the project is also exempt from the formal Assembly Bill (AB) 52 process. As part of the cultural resources investigation, SWCA sent letters on September 5 to the tribal representatives that are known to have connections to the region, notified them of the project and requested input. No requests for consultation or comments on the project from the tribal representatives, have been received to date. A cultural resource records search was not conducted for the project because of the low potential to encounter tribal cultural resources given the scope of project activities and minimal ground disturbance. The project would remain within 5 feet of existing roadways and sidewalks in soils subject to previous disturbance. In addition, excavation would be limited to the digging of 10-inch-wide postholes using an auger, so the possibility of uncovering objects or artifacts that may be tribal cultural resources are minimal.

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of the project, construction activities would temporarily cease on the project site, as with the City's Standard Measure CUL-1 listed in Section 1.5.3, until the potential tribal cultural resources are properly assessed pursuant to PRC Section 21074 (a)(2). In addition, AMM BIO-1, included in Section 1.5.2s, *Biological Resources*, would include a description of potential cultural resources in the environmental awareness training. Compliance with these AMMs would ensure the project does not cause a substantial adverse change in the significance of a tribal cultural resource, and this potentially significant impact would be reduced to less than significant.

3.19 Utilities and Service Systems

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(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 Evaluation

(a) Would the project 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?

Water

Water for project construction is supplied by the CCWD, which obtains its water supply from four sources. Water contained in Pilarcitos Lake and Crystal Springs Reservoir is purchased from the San Francisco Public Utilities Commission (SFPUC), and local water supplies are drawn from Pilarcitos Well Field and the Denniston Project (well and surface water). The CCWD serves 18,839 people in a 14-square-mile area, which has an average demand of 1.58 million gallons per day (MGD).[70] The CCWD has an Individual Supply Guarantee of 2.175 MGD, or approximately 794 million gallons per year, from the SFPUC. In addition to the water from the SFPUC, CCWD obtains water from local sources. In 2020 CCWD obtained approximately 295 million gallons or 0.8 MGD from a combination of groundwater and

[70] Bay Area Water Supply and Conservation Agency. 2025. Coastside County Water District Service Area. Available at: http://bawsca.org/members/profiles/coastside. Accessed Augst 13, 2025.

surface water from Pilarcitos Reservoir.[71] Per capita use in the district in 2020 was approximately 97 gallons per capita per day.[72]

The project would replace an existing fence. Construction activities would require a minimal and temporary amount of water for dust control and cement mixing. Water would be delivered to the project site by water truck. Operation of the fence would not use water; therefore, the project would not result in the relocation or construction of new or expanded water treatment facilities, and no impact would occur.

Wastewater

Wastewater collection and treatment is provided by Sewer Authority Mid-Coastside (SAM), which receives average dry weather flow of approximately 1.5 MGD. The plant has capacity to treat up to 4 MGD in average dry weather flow and 15 MGD in peak wet weather flow (which includes infiltration of stormwater). The plant has not experienced flows that reached or exceeded maximum peak wet weather capacity since its expansion in the late 1990s.[73]

The project would replace an existing fence. Construction of the project would produce a minimal and temporary amount of wastewater from construction crew use of portable toilets. Operation of the project would not produce any permanent wastewater; therefore, the project would not result in the relocation or construction of wastewater treatment facilities, and no impact would occur.

Stormwater

The project would replace an existing fence and create less than 0.006 acre (265 square feet) of additional impervious surface area.

As shown in Section 1.5.5, *Hydrology and Water Quality*, the project would be required to implement an erosion/pollution control plan under the Municipal Regional Stormwater NPDES Permit[74] and the SMCWPPP.[75] The erosion/pollution control plan must include site-specific BMPs that are designed to prevent runoff from construction areas to reduce potential impacts to surface water quality during project construction. The plan would also include design elements and BMPs for construction areas, such as fueling and equipment washing areas, and trash and hazardous material storage areas. Therefore, construction impacts to stormwater facilities would be less than significant.

Gas and Electricity

The fence does not include lighting and would not require gas or electric services; therefore, no impact would occur.

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[71] Coastside County Water District (CCWD). 2021. Chapter 6: Water Supply Characterization. In *Coastside County Water District 2020 Urban Water Management Plan*, pp. 6-1–6-19. June. Available at: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed August 13, 2025.

[72] Coastside County Water District (CCWD). 2021. Chapter 5: SB X7-7 Baselines, Targets and 2020 Compliance. In *Coastside County Water District 2020 Urban Water Management Plan*, p. 5-4. June. Available at: https://www.coastsidewater.org/reports_and_studies/2020-Urban-Water-Management-Plan.pdf. Accessed August 13, 2025.

[73] Sewer Authority Mid-Coastside (SAM). 2019. *Sewer System Management Plan.* Available at: https://samcleanswater.org/sam_documents_cpt/sam-sanitary-sewer-management-plan-2019/. Accessed August 13, 2025.

[74] San Francisco Regional Water Quality Control Board (RWQCB). 2022. *California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit*. Order No. R2-2022-0018; NPDES Permit No. CAS612008. May 11. Available at: https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2022/R2-2022-0018.pdf. Accessed August 13, 2025.

[75] County of San Mateo. 2025. San Mateo Countywide Water Pollution Prevention Program: Construction. Available at: https://www.flowstobay.org/construction. Accessed August 13, 2025.

Telecommunications

The fence would not require telecommunication services; therefore, no impact would occur.

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

The project would replace an existing fence. Construction activities would require a minimal amount of water for dust control and cement mixing. Water would be delivered to the project site by water truck. Operation of the fence would not use water; therefore, the project would not result in the need for expanded water treatment facilities, and no impact would occur.

(c) Would the project 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?

As discussed under Wastewater, above

receives an average dry weather flow of approximately 1.5 MGD and has a wastewater treatment plant capacity of up to 4 MGD in average dry weather flow.[76] The replacement fence would not produce wastewater; therefore, no impact would occur.

(d) Would the project 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?

Solid waste pick-up is provided to the project area and the city by Republic Services, which provides pickup of residential and commercial garbage, recyclable material, and organic waste, as well as motor oil, oil filters, and batteries. Republic Services also has drop-off locations for electronic waste and hazardous materials, including medications and paint.[77]

Solid waste goes to the Corinda Los Trancos Ox Mountain Sanitary Landfill for disposal. The landfill is permitted to receive 3,598 tons of waste per day and has an anticipated closure date of 2034.[78]

Construction

Demolition may include the possible removal of four trees and would include clearing vegetation within up to 5 feet of the access road and parking lot where the new fencing would be installed. This would result in a minimal amount of vegetation to be hauled off-site for composting and likely a small amount of trash and debris to be hauled off-site for disposal. The remaining portions of the existing fence would be left in place. The project contractor would be required to prepare and submit a Construction and Demolition Waste Management Plan to the City for review and approval. Under the plan, the project

[76] Sewer Authority Mid-Coastside (SAM). 2019. *Sewer System Management Plan.* Available at: https://samcleanswater.org/sam_documents_cpt/sam-sanitary-sewer-management-plan-2019/. Accessed August 13, 2025.
[77] Republic Services. 2025. Republic Services of Half Moon Bay, CA. Available at: https://www.republicservices.com/municipality/half-moon-bay-ca#resi. Accessed August 13, 2025.
[78] California Department of Resources Recycling and Recovery (CalRecycle). 2025. SWIS Facility Detail. Corinda Los Trancos (Ox Mtn) (41-AA-0002). Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. Accessed August 13, 2025.

Contactor shall be required to identify types and amounts of materials, including green waste, that could feasibly be reused, salvaged, or recycled, and shall note the procedures intended to be used. The Waste Management Plan must be approved by the City prior to project construction.[79,80] Therefore, impacts related to construction would be less than significant.

The landfill has a remaining capacity of approximately 45 million cubic yards and is expected to operate until 2034.[81] The landfill would accept clean fill for daily cover and have adequate capacity to serve the construction phase of the project because the construction phase of the project would be temporary and would generate a limited amount of solid waste. Development of the required Waste Management Plan would further reduce this less-than-significant impact.

Operation

The project would replace an existing fence. The fence would not generate solid waste; therefore, no operational impact would occur.

(e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The City would be required to comply with all federal, state, and local ordinances for water, energy, and waste reduction and management, including, but not limited to, Half Moon Bay Municipal Code Chapter 14.50, Requirement for Construction and Demolition Waste Recycling; Waste Management Plan for construction debris; and SMCWPPP. Therefore, the project would comply with all federal, state, and local management and reduction statutes and regulations, and no impact would occur.

3.20 Wildfire

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
(c) Require the installation 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?	☐	☐	☐	☒

[79] City of Half Moon Bay. 2019. Chapter 14.50. Requirement for Construction and Demolition Waste Recycling. In *Half Moon Bay Municipal Code.* Available at: https://www.codepublishing.com/CA/HalfMoonBay/#!/HalfMoonBay14/HalfMoonBay1450.html. Accessed August 13, 2025.
[80] City of Half Moon Bay. 2025. *Construction and Debris Waste Management Plan Form.* Available at: https://www.half-moon-bay.ca.us/DocumentCenter/View/209/Construction-and-Demolition-Debris-Waste-Management-Plan-PDF. Accessed August 13, 2025.
[81] California Department of Resources Recycling and Recovery (CalRecycle). 2025. SWIS Facility Detail. Corinda Los Trancos (Ox Mtn) (41-AA-0002). Available at: https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/3223. Accessed August 13, 2025.

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 Evaluation

(a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is located in a Moderate Fire Hazard Severity Zone in a Local Responsibility Area and is approximately 700 feet from a Very High Fire Hazard Severity Zone (VHFHSZ).[82] The project would replace an existing fence. Project access during construction would be from Strawflower Shopping Center parking lots and driveways; therefore, the project would not cause road closures during construction. The project would not impair an adopted emergency response plan or evacuation plan, and no impact would occur.

(b) Due to slope, prevailing winds, and other factors, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project would replace an existing fence in a Moderate FHSZ, which would not exacerbate wildfire risks. The project is located in a Moderate Fire Hazard Severity Zone and is approximately 700 feet from lands classified as VHFHSZ. Therefore, the project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors, and no impact would occur.

(c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

The project would replace an existing fence in a moderate FHSZ. Project access during construction would be from Strawflower Shopping Center parking lots and driveways; therefore, the project would not require the installation of other infrastructure such as roads or utilities, and no impact would occur.

[82] California Department of Forestry and Fire Protection (CAL FIRE). 2025. *Local Responsibility Area Fire Hazard Severity Zones*. Available at: https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/folder/308445234395. Accessed March 20, 2025.

(d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

The project would replace an existing fence in a moderate FHSZ to protect Pilarcitos Creek and its associated riparian area from anthropogenic debris and would not change the existing risk of downstream flooding or landslides. The fence would include several pedestrian gates fitted with Knox padlocks for the use of emergency responders. Therefore, the project would not expose people or structures to risks associated with post-fire downstream flooding or landslides, and no impact would occur.

3.21 Mandatory Findings of Significance

	Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Environmental Evaluation

(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?

The project would replace an existing fence protecting the Pilarcitos Creek riparian corridor from dumping of anthropogenic debris. Construction would remain within 5 feet of existing roadways and sidewalks. The project would include the possible removal of four trees and a minimal amount of trimming of riparian vegetation but would not significantly affect the riparian community surrounding Pilarcitos Creek. Because the location is adjacent to heavily used areas, it would not degrade the quality

of the environment or cause impacts to fish and wildlife species for their environment. The project would include AMMs to prevent impacts to special status species, nesting birds, riparian habitat, and water quality

. The project would include auger drilling 10-inch-wide postholes in previously disturbed soils, which would not likely impact any cultural resources. Therefore, no impact would occur.

(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)?

The project would replace an existing fence and has a footprint of approximately 265 square feet. The project would have minor and temporary construction impacts which would be rendered less than significant by city conditions of approval, but no operational impacts; therefore, it would not include any impacts that would be cumulatively considerable.

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

The project would not have any substantial or significant impacts; therefore, it would not have a substantial, adverse impact on human beings, either directly or indirectly, and no impact would occur.

APPENDIX A

Biological Resources Evaluation

Biological Resources Evaluation for the Safeway Fencing Project, Half Moon Bay, San Mateo County, California

JULY 2024

PREPARED FOR

City of Half Moon Bay

PREPARED BY

SWCA Environmental Consultants

BIOLOGICAL RESOURCES EVALUATION FOR THE SAFEWAY FENCING PROJECT, HALF MOON BAY, SAN MATEO COUNTY, CALIFORNIA

Prepared for

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SWCA Project No. 71765

July 2024

EXECUTIVE SUMMARY

The City of Half Moon Bay (City) is proposing to construct the Safeway Fencing Project (project), which involves the installation of a chain-link fence along the edge of the riparian corridor associated with Pilarcitos Creek in the city of Half Moon Bay, San Mateo County, California. Chain-link fence will be installed at two locations—the first will start behind Safeway and continue along the sidewalk edge for approximately 1,200 feet to the corner of Highway 1 and San Mateo Road, and then turn south along the western edge of the paved Naomi Patridge Trail for another 400 feet. The second fence installation location will be installed along the eastern side of Pilarcitos Avenue starting at the intersection of Pilarcitos and Oak Avenues at the western end of the Pilarcitos Creek Bridge and continuing for approximately 400 feet to the south. There is an old existing chain-link fence along a portion of the new fence alignment, and some portions of the existing fencing and built-up debris may be removed as part of this project to make room for the new fence. Project implementation will require minor trimming of riparian vegetation in order to access and conduct the fence installations and provide access for future maintenance or repairs. Any vegetation clearance required will be minimized to the extent possible and not exceed 5 feet from the pavement.

The City retained SWCA Environmental Consultants (SWCA) to provide environmental support services, including conducting a biological resources survey and preparing a Biological Resources Evaluation (BRE), for the proposed project. The purpose of this BRE is to document the biological resources within the project biological study area (BSA). For the purposes of this BRE, the BSA consists of the project footprint (project areas) and an adjacent 200-foot buffer, collectively referred to as the BSA. SWCA conducted a literature review of existing sources of information regarding occurrences of special-status species and sensitive resources near the BSA. Field surveys were conducted within the BSA in March and May 2023 to document biological resources, including special-status plant and wildlife species, potentially jurisdictional wetlands and other waters, Coastal Resource Areas (CRAs), and Environmentally Sensitive Habitat Areas (ESHAs) as defined by the City of Half Moon Bay Zoning Code (City Code) and *City of Half Moon Bay Local Coastal Land Use Plan* (LCLUP).

Based on the results of the literature review and field survey, the BSA supports terrestrial and aquatic habitat for special-status and unique species. In addition, arroyo willow thickets, considered jurisdictional by the California Coastal Commission (CCC) and a sensitive CRA/ESHA per the LCLUP, are present throughout the Pilarcitos Creek riparian corridor.

The project area occurs adjacent to Pilarcitos Creek, a tributary to the Pacific Ocean and a feature that is considered jurisdictional under the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB). Additionally, an unnamed intermittent drainage ditch occurs within the eastern section of the BSA, which conveys stormwater runoff into the southeast portion of Pilarcitos Creek within the BSA. Although this feature lacked surface flow at the time of the site assessment, it has well-defined bed and bank morphology and is likely considered jurisdictional under the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB). Additionally, the project occurs within CCC jurisdiction and would require a Coastal Development Permit.

The project area has the potential to support four special-status wildlife species—white-tailed kite (*Elanus leucurus*), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), and saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*). In addition, there is U.S. Fish and Wildlife Service (USFWS)-designated coho salmon (*Oncorhynchus kisutch*) and steelhead (*Oncorhynchus mykiss*) critical habitat within the BSA in Pilarcitos Creek. Additionally, federally designated critical habitat for two species occurs within 1 mile of the project area—California red-legged

frog critical habitat is approximately 0.75 mile east of the project area, and western snowy plover (*Charadrius alexandrinus nivosus*) critical habitat is located approximately 0.54 mile west of the project area. Vegetation observed within the BSA also provides suitable nesting and foraging habitat for nesting birds covered under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC).

The project will avoid impacts to potentially jurisdictional aquatic features, including Pilarcitos Creek and the unnamed drainage ditch. At both fence installation locations, fencing will be installed along the edge of riparian vegetation adjacent to a previously developed roadway or sidewalk. Installation and maintenance activities may require minimal trimming of riparian vegetation. Riparian habitat within the project area provides marginal upland habitat for California red-legged frog and San Francisco garter snake; however, these species are more likely to utilize suitable foraging, dispersal, and refuge habitat within the riparian and aquatic habitat in adjacent portions of Pilarcitos Creek. The City will implement a suite of AMMs to prevent impacts to riparian habitat and special-status species. All project impacts will be temporary and will avoid aquatic features. No significant impacts to potentially jurisdictional features, riparian vegetation, or special-status species are anticipated as a result of project implementation.

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1 INTRODUCTION

1.1 Purpose of Biological Resources Evaluation

This Biological Resources Evaluation (BRE) has been prepared by SWCA Environmental Consultants (SWCA) at the request of the City of Half Moon Bay (City). The intent of this report is to identify sensitive biological resources, Coastal Resource Areas (CRAs) as defined by the City of Half Moon Bay Zoning Code (City Code; City of Half Moon Bay 2022b), and Environmentally Sensitive Habitat Areas (ESHAs) as defined in the *City of Half Moon Bay Local Coastal Land Use Plan* (LCLUP; City of Half Moon Bay 2020a), that may be impacted by the Safeway Fencing Project (project). This report includes the results from a desktop review, literature search, and two field surveys that were conducted within the project area, including a 200-foot buffer, referred to hereafter as the biological study area (BSA).

1.2 Project Location and Description

The project is located at approximately Latitude 37.473866° and Longitude -122.443347° in Half Moon Bay, San Mateo County, California (Figure 1) within the Half Moon Bay, California U.S. Geological Survey (USGS) 7.5-minute quadrangle. The project will occur at two locations—the first is located along a reach of Pilarcitos Creek that extends from Highway 1 approximately 1,200 feet northwest towards the intersection of Belleville Boulevard and the Safeway parking lot, and then turns south along the western edge of the paved Naomi Patridge Trail for another 400 feet. The second is located at the intersection of Pilarcitos and Oak Avenues and continues for approximately 400 feet south towards Willow Avenue and ends where residential homes are present (Figure 2). Arroyo Leon Creek, a tributary to Pilarcitos Creek, has been mapped throughout Half Moon Bay as a separate feature occurring immediately adjacent to Pilarcitos Creek. However, there is only one creek channel, Pilarcitos Creek, into which Arroyo Leon Creek flows. For consistency, the creek will be referred to as Pilarcitos Creek throughout the remainder of this report. In addition, the project is located within the Coastal Zone and is subject to the California Coastal Commission (CCC) appeals jurisdiction.

The project includes installation of a 6- to 8-foot-tall chain-link fence between the outer edge of the Pilarcitos Creek riparian corridor and adjacent paved walkways and parking areas. The City anticipates installation of three gates along the fence. One gate to allow closure of the flood prone portion of the Pilarcitos Creek Trail and two gates that provide access for City staff to perform maintenance on sewer systems and open space areas. The purpose of the proposed fence is to inhibit the dumping of anthropogenic debris into the riparian area, facilitate habitat restoration, and allow for ongoing debris maintenance within the riparian habitat. The work will occur within 5 feet of the existing curb and paved areas to minimize impacts to surrounding vegetation. Construction of the chain-link fence will include minimal trimming of adjacent vegetation, digging of post holes, installation of fence posts, and attaching chain-link fence material. Ground-disturbing activities will be limited, and all equipment will be kept within 5 feet of the paved surfaces.

Impacts to riparian vegetation will be limited to trimming overhanging vegetation to allow room for fence installation. Ground disturbance during the project will be limited to digging fence post holes and installing a chain-link fence. The project is anticipated to avoid all permanent impacts to riparian vegetation; however, if unavoidable impacts are encountered and riparian vegetation needs to be removed, the City will consult the appropriate agencies to implement a restoration plan, obtain necessary permits, and determine appropriate mitigation.

The City plans to implement this project through the use of City operating funds, in compliance with all necessary permits and approvals from the U.S. Army Corps of Engineers (USACE), California

Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and CCC, as well as the LCLUP. The City anticipates the Project will qualify for a Class 1 categorical exemption (Existing Facilities; State CEQ Guidelines Section 15301) under Article 19 of the California Environmental Quality Act (CEQA) .



Figure 1. Project Vicinity Map.



Figure 2. Project Location Map.

2 REGULATORY SETTING

2.1 Federal

2.1.1 *Clean Water Act*

The Clean Water Act (CWA) is the primary federal law regulating water quality. The implementation of the CWA is the responsibility of the U.S. Environmental Protection Agency (USEPA). However, the USEPA depends on other agencies, such as the individual states and the USACE, to assist in implementing the CWA. The objective of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Sections 404 and 401 of the CWA apply to activities that would impact waters of the United States (WOTUS). The USACE enforces Section 404 of the CWA, and the California State Water Resources Control Board (State Water Board) enforces Section 401, as well as state water laws.

2.1.2 *Endangered Species Act*

The Federal Endangered Species Act (FESA) of 1973 is administered by the U.S. Fish and Wildlife Service (USFWS) and prevents the unlawful "take" of listed fish, wildlife, and plant species. Section 9(a)(1)(B) specifically states take of species listed as threatened or endangered is unlawful. Take is defined as any action that would harass, harm, pursue, hunt, wound, shoot, kill, trap, capture, or collect any threatened or endangered species. Section 10 of the FESA allows the USFWS to issue incidental take permits if take of a listed species may occur during otherwise lawful activities. Section 10(a)(1)(B) requires a Habitat Conservation Plan for an incidental take permit on non-federal lands.

2.1.3 *Migratory Bird Treaty Act*

The Migratory Bird Treaty Act (MBTA) of 1918 (16 United States Code [USC] 703–711) prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the U.S. Department of the Interior. As used in the MBTA, the term "take" is defined as meaning "to pursue, hunt, capture, collect, kill or attempt to pursue, hunt, shoot, capture, collect or kill, unless the context otherwise requires." An April 11, 2018, memorandum from the USFWS, which enforces the MBTA, provided guidance to "clarify what constitutes prohibited take" (USFWS 2018). The USFWS memo stated that the "take of birds, eggs or nests" was prohibited only when the purpose of the activity was to conduct take but was not prohibited when the purpose of the activity was not to conduct take. On January 7, 2021, the USFWS published the final rule formalizing this interpretation of the MBTA (USFWS 2021a). As a result, the MBTA is currently limited to purposeful actions, such as directly and knowingly removing a nest to construct a project, hunting, and poaching and not to actions resulting in incidental take. However, on May 7, 2021, the USFWS proposed to revoke that rule and return to implementing the MBTA as prohibiting incidental take and applying enforcement discretion, consistent with judicial precedent (USFWS 2021b).

2.2 State

2.2.1 *California Endangered Species Act*

The California Endangered Species Act (CESA) of 1970 generally parallels the main provisions of the FESA, but unlike its federal counterpart, the CESA applies the take prohibitions to species proposed for listing (called "candidates" by the state). Section 2080 of the California Fish and Game Code (CFGC)

prohibits the take, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in CFGC Section 86 as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows for take incidental to otherwise lawful activities under CFGC Section 2081. Project proponents wishing to obtain incidental take permits are able to do so through a permitting process outlined in California Code of Regulations (CCR) Section 783.

2.2.2 *California Fish and Game Code*

2.2.2.1 FULLY PROTECTED SPECIES

The State of California first began to designate species as "Fully Protected" before the creation of the FESA and CESA. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction, and included fish, mammals, amphibians, reptiles, and birds. Most fully protected species have since been listed as threatened or endangered under the FESA and/or CESA. The Fully Protected Species Statute (CFGC Section 4700) provides that fully protected species may not be taken or possessed at any time. Furthermore, the CDFW may authorize take of fully protected species only in very limited circumstances, such as for necessary scientific research.

2.2.2.2 PROTECTION FOR BIRDS

According to CFGC Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird (with limited exceptions). Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds of prey). Section 3513 essentially overlaps with the MBTA, prohibiting the take or possession of any migratory non-game bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by the CDFW.

2.2.2.3 PROTECTION FOR PLANTS

The Native Plant Protection Act (NPPA) of 1977 (CFGC Sections 1900–1913) includes provisions that prohibit the take of endangered or rare native plants. The CDFW administers the NPPA and generally regards as rare many plant species with a California Rare Plant Rank (CRPR) of 1A, 1B, 2A, and 2B in the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California (CNPS 2023). In addition, sometimes CRPR 3 and 4 plants are considered if the population has local significance in the area and is impacted by the project. CFGC Section 191(b) includes a specific provision to allow for the incidental removal of endangered or rare plant species, if not otherwise salvaged by CDFW, within a right-of-way to allow a public utility to fulfill its obligation to provide service to the public.

2.2.2.4 LAKE AND STREAMBED ALTERATION AGREEMENT

Section 1602 of the CFGC requires that a Lake and Streambed Alteration Application be submitted to CDFW for the following: "An entity may not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake." Evaluation of CDFW jurisdiction followed guidance in the CFGC and *A Review of Stream Processes and Forms in Dryland Watersheds* (CDFW 2010). In general, under CFGC Section 1602, CDFW jurisdiction extends to the maximum extent or expression of a stream on the landscape (CDFW 2010).

2.2.3 *California Species of Special Concern*

Species of Special Concern (SSC) is a category conferred by the CDFW to fish and wildlife species that meet the state definition of threatened or endangered, but have not been formally listed (e.g., federally or state-listed species), or are considered at risk of qualifying for threatened or endangered status in the future based on known threats. SSC is an administrative classification only, but these species should be considered "special-status" for the purposes of the California Environmental Quality Act (CEQA) analysis (see Section 3.1.1, *Special-Status Plant Species*, and Section 3.1.2, *Special-Status Animal Species*).

2.2.4 *Porter-Cologne Water Quality Control Act*

The RWQCB regulates activities pursuant to Section 401(a)(1) of the CWA. Section 401 specifies that certification from the state is required for any applicant requesting a federal license or permit to conduct any activity, including, but not limited to, the construction or operation of facilities that may result in any discharge into navigable waters. Through the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), the RWQCB asserts jurisdiction over waters of the state (WOTS), which are generally identical in extent to WOTUS, but may also include waterbodies not currently under federal jurisdiction, such as isolated, intrastate waters. The Porter-Cologne Act defines WOTS as "surface water or ground water, including saline waters, within the boundaries of the state."

2.3 Local

2.3.1 *California Coastal Act and City of Half Moon Bay Local Coastal Program*

The California Coastal Act (CCA) of 1976 governs the decisions made by the CCC regarding coastal issues, such as shoreline public access and recreation, terrestrial and marine habitat protection, water quality, commercial fisheries, and development within the California Coastal Zone. Development within the Coastal Zone would require either a Coastal Development Permit (CDP) or CDP Exemption from the CCC or from a local government with a CCC-certified LCLUP.

The LCLUP has been developed and certified in compliance with the CCA on April 15, 2021 (Local Coastal Program [LCP] Amendment Number LCP-2-HMB-20-0081-2) and includes the LCLUP (City of Half Moon Bay 2020a) and City Code (City of Half Moon Bay 2022a). In accordance with City Code Section 18.38, Coastal Resource Conservation Standards, SWCA conducted the biological resource survey and prepared this BRE to assess whether the project would impact ESHAs, as defined by the LCLUP. Chapter 6, Policy 6-1 of the LCLUP defines ESHAs as follows:

> **ESHA Definition.** An ESHA is any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments, including the following:
>
> a. Any habitat area that is rare or especially valuable from a local, regional, or statewide basis.
>
> b. Areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State or Federal law.
>
> c. Areas that contribute to the viability of species designated as Fully Protected or Species of Special Concern under State law or regulations.

d. Areas that contribute to the viability of plant species for which there is compelling evidence of rarity, for example, those designated 1b (Rare or endangered in California and elsewhere) or 2 (rare, threatened or endangered in California but more common elsewhere) by the California Native Plant Society.

The City LCLUP establishes a method for identifying and designating ESHAs and provides policies to preserve and protect the resources in these areas as consistent with the CCA. ESHAs are categorized into three types: terrestrial, wetlands, and watercourses. In Half Moon Bay, these areas include, but are not limited to, terrestrial ESHAs (marine environment, sea cliffs, dunes, coastal terrace prairie, and non-aquatic habitat for special-status or unique species), wetlands, and watercourses similar to sensitive resources described as CRAs in City Code Title 18.

The City regulates activities in wetlands and other ESHAs through its LCLUP as consistent with the CCA. Unlike the federal government, the CCA uses the one-parameter Cowardin et al. (1979) definition of wetlands:

> Wetlands are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface of the land or is covered by shallow water. For purposes of this classification, wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes (at least 50 percent of the aerial vegetative cover); (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year.

The project would be subject to permitted uses, buffer zones, and standards for terrestrial, wetland, and watercourse ESHAs as defined in the LCLUP.

3 METHODOLOGY

3.1 Literature and Records Review

SWCA performed an extensive literature review, including a review of nearby biological reports, to gain familiarity with the project and identify potential sensitive biological features, including CRAs, ESHAs, target flora and fauna species, and wetlands or other waters that have the potential to occur in the BSA. The review consisted of a record search of current versions of the USFWS online Information for Planning and Consultation (IPaC) species list system (USFWS 2023b) (Appendix A), CDFW California Natural Diversity Database (CNDDB 2023) (Appendix B), and CNPS online Inventory of Rare and Endangered Plants (CNPS 2023) within the Half Moon Bay, California USGS 7.5-minute quadrangle (USGS 2023b). The CNDDB search was further refined to a 2-mile search surrounding the project area (see Appendix B). The USFWS Critical Habitat Mapper (USFWS 2023a) was queried to identify critical habitat for terrestrial and aquatic species near the BSA (Appendix C). All of the special-status species and sensitive habitats found in the literature review also included those shown in Figure 6-3, Special Status Species of ESHAs from the LCLUP (City of Half Moon Bay 2020b). Plant and animal species were then compiled into a table (Appendix D) for use during the field survey and to facilitate potential to occur status, as described in Section 3.2, *Field Survey*, below.

The National Wetlands Inventory (NWI) Database (USFWS 2023c) and USGS National Hydrography Dataset (NHD) (USGS 2023a) (Appendix E), U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Soil Survey for San Mateo County (NRCS 2023) (Appendix F), and aerial

imagery were also reviewed to provide additional information for soils and potential wetland features known to occur in the BSA.

3.1.1 *Special-Status Plant Species*

For the purposes of this BRE, special-status plant species are defined as the following:

- Plants listed or proposed for listing as threatened or endangered under the FESA (50 Code of Federal Regulations [CFR] 17.12 for listed plants and various notices in the *Federal Register* for proposed species)
- Plants that are candidates for possible future listing as threatened or endangered under the FESA
- Plants considered by the CNPS to be "rare, threatened, or endangered" in California (CRPR 1A, 1B, 2A, and 2B)
- Plants listed or proposed for listing by the State of California as threatened or endangered under the CESA (14 CCR 670.5)
- Plants listed under the California NPPA (CFGC Section 1900 et seq.)
- Plants considered sensitive by other federal agencies (e.g., U.S. Forest Service, U.S. Bureau of Land Management), state and local agencies, or jurisdictions

3.1.2 *Special-Status Animal Species*

For the purposes of this BRE, special-status animal species are defined as the following:

- Animals listed or proposed for listing as threatened or endangered under the FESA (50 CFR 17.11 for listed animals and various notices in the *Federal Register* for proposed species)
- Animals that are candidates for possible future listing as threatened or endangered under the FESA
- Animals listed or proposed for listing by the State of California as threatened and endangered under the CESA (14 CCR 670.5)
- Animals considered SSC to the CDFW
- Animal species that are fully protected in California (CFGC Sections 3511 [birds], 4700 [mammals], and 5050 [reptiles and amphibians])

3.2 Field Survey

On March 30, 2023, SWCA biologists Erich Schickenberg and Kayla Souza conducted reconnaissance-level surveys of the project areas, including a 200-foot buffer around each fencing location, collectively referred to as the BSA. On May 25, 2023, SWCA biologist Paris Krause conducted an additional reconnaissance-level survey of the 400-foot segment of fencing along Pilarcitos Avenue, which was later added to the project description. The field surveys evaluated the presence or absence of suitable habitat for special-status species determined to have the potential to occur in the project area, sensitive habitats with potential to occur, and potentially jurisdictional wetland features. The surveys included walking meandering transects throughout the BSA (Figures 3 and 4). All vegetation communities within the survey area were classified using the naming conventions of *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009), when feasible. Plant species were identified using the Jepson eFlora (Jepson Flora Project 2023).

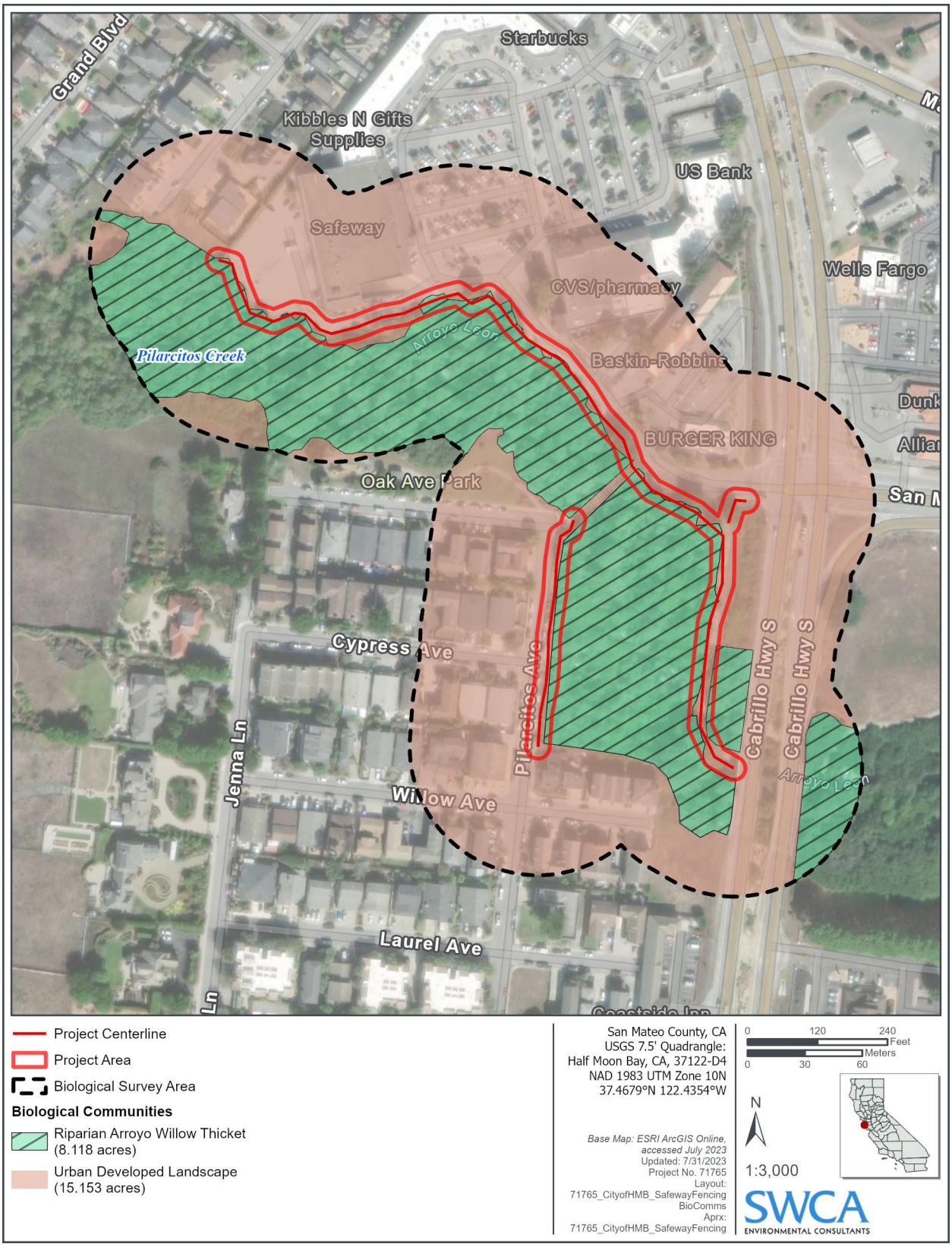


Figure 3. Biological Communities Map.

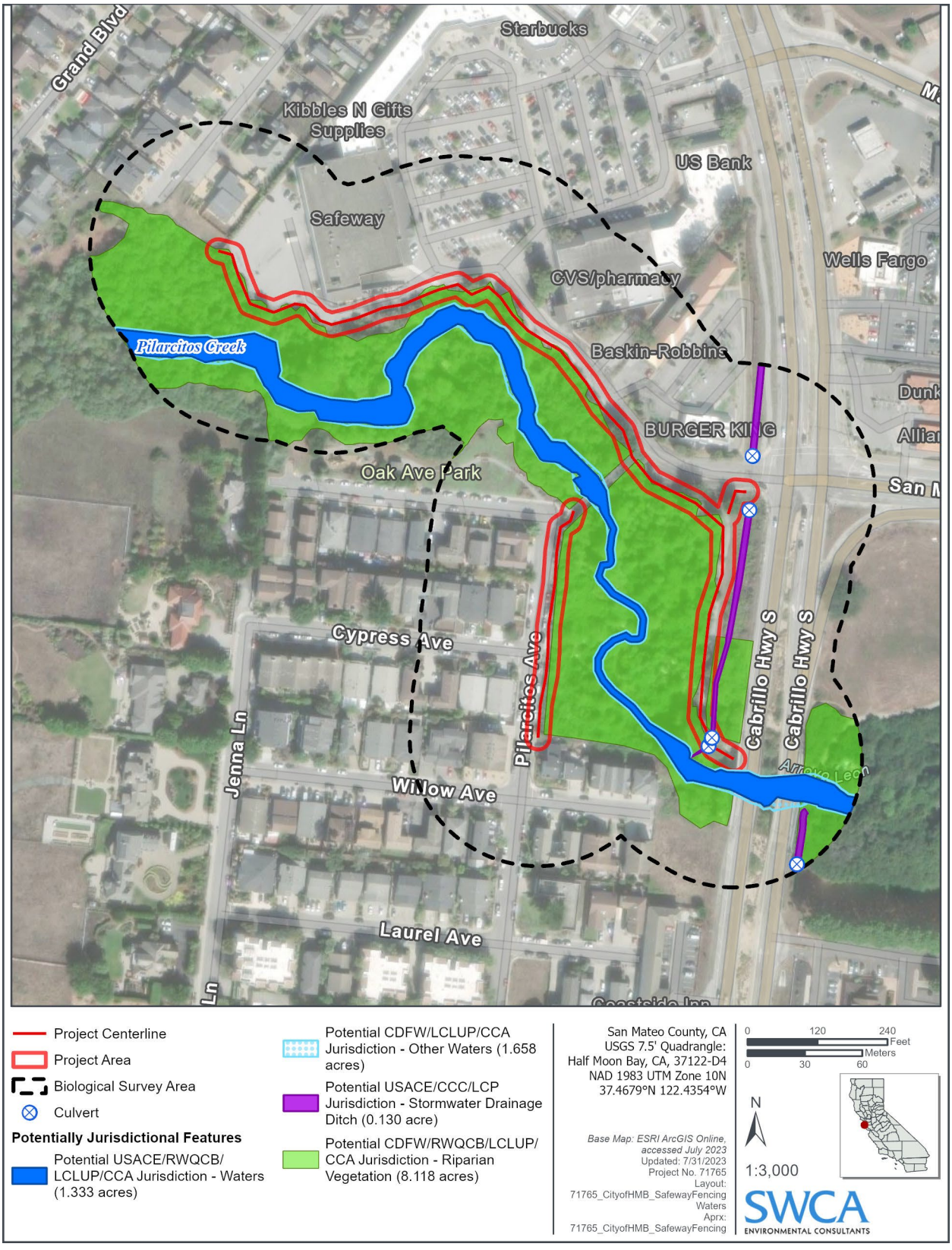


Figure 4. Potential Jurisdictional Features Map.

A complete list of plant and wildlife species observed within the BSA during the field surveys is included in Appendix G. When necessary, the biologists referred to *The Jepson Manual* (Baldwin et al. 2012) to identify plant species. Representative photographs depicting existing conditions are included in Appendix H.

4 RESULTS

4.1 Soils, Topography, and Elevation

The topography within the BSA is generally flat and gently slopes westward towards the Pacific Ocean. The banks of Pilarcitos Creek within the riparian canopy are steep with loose soil and erosion, and the elevation is approximately 27 feet above mean sea level. According to the NRCS Web Soil Survey (NRCS 2023), soils in the BSA consist of one soil type—Denison clay loam. The Denison soils occur on low terraces adjacent to the coast in central California and are moderately well drained with slow to medium runoff and slow permeability (see Appendix F).

4.2 Vegetation Communities and Other Land Covers

The BSA consists of asphalted roadways and bike paths, commercial buildings, residential housing, and undeveloped land with various vegetation communities. Arroyo willow thickets (*Salix lasiolepis* Shrubland Alliance) vegetation community and urban development/landscaped land cover (see Figure 3) were mapped in the BSA.

Photographs included in Appendix H and mapping (see Figure 3) depict the characteristics and locations of the arroyo willow thickets vegetation communities and urban development/landscaped land cover within the BSA.

4.2.1 *Arroyo Willow Thickets*

Arroyo willow thickets are characterized by a dense, low, closed-canopy broadleaf winter-deciduous riparian forest, with arroyo willow (*Salix lasiolepis*) dominant or co-dominant in the tall shrub or low tree canopy. Species characteristic of this vegetation alliance include bigleaf maple (*Acer macrophyllum*), coyote brush (*Baccharis pilularis*), mule fat (*Baccharis salicifolia*), common buttonbush (*Cephalanthus occidentalis*), American dogwood (*Cornus sericea*), California wax myrtle (*Morella californica*), California sycamore (*Platanus racemosa*), Fremont cottonwood (*Populus fremontii*), black cottonwood (*Populus trichocarpa*), willows (*Salix* spp.), and black elderberry (*Sambucus nigra*). As a shrubland, emergent trees may be present at low cover. Arroyo willow thickets typically occur on stream banks, slope seeps, and stringers along drainages (Sawyer et al. 2009).

The BSA contains approximately 8.1 acres of dense arroyo willow thickets. This habitat occurs along the entire length of the BSA along the riparian corridor north and south of Pilarcitos Creek and along the perimeter of the project area (see Figures 3 and 4). Within this community, arroyo willow is dominant in the shrub and tree canopy with an understory dominated by cape ivy (*Delairea odorata)*. Other species observed include salmon berry (*Rubus spectabilis*), garden nasturtium (*Tropaeolum majus*), California blackberry (*Rubus ursinus*), elm leaf blackberry (*Rubus ulmifolius*), thimbleberry (*Rubus parviflorus*), and stinging nettle (*Urtica dioica*). Arroyo willow riparian habitat within the BSA may provide suitable non-breeding, foraging, and dispersal habitat for California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*). In addition, this community has the potential to support nesting and foraging birds protected under the MBTA, including the saltmarsh common

yellowthroat (*Geothlypis trichas sinuosa*) and white-tailed kite (*Elanus leucurus*). In addition, arroyo willow thickets are a designated CDFW sensitive community and have multiple CRA designations as defined by Section 18.38.020 of the City Code (City of Half Moon Bay 2022b).

4.2.2 *Urban Development/Landscaped*

Urban/developed/landscaped areas are generally characterized by residential or commercial development dominated by a mix of exotic ornamental and native plant species. Vegetation density, canopy cover, and species composition will vary based on purpose and/or design.

The BSA contains approximately 15.2 acres of urban development and landscaped areas. This land cover type occurs on the outer perimeters of the Pilarcitos Creek riparian corridor and includes pedestrian pathways, regularly mowed parks, commercial buildings and parking lots, and single-family homes. These areas are characterized by commercial and residential areas as well as public roadways and parking areas that are adjacent to and within the project area. Vegetation in these areas include, but are not limited to, manicured lawns, ruderal disturbed grassland, cypress tree stands, and ornamental trees and shrubs. These areas are dominated by blackwood acacia (*Acacia melanoxylon*), Monterey cypress (*Hesperocyparis macrocarpa*), and cottonwood (*Populus fremontii* ssp. *fremontii*) and ruderal areas consisting of ripgut brome (*Bromus diandrus*), wild oat (*Avena barbata*), spring vetch (*Vicia sativa*), French broom (*Genista monspessulana*), and big heron bill (*Erodium botrys*). This land cover is not likely to support special-status species due to the high level of disturbance and human activity; however, residential structures, cypress tree stands, and ornamental trees have the potential to support nesting birds protected under the MBTA.

4.3 Critical Habitat

There is no federally listed critical habitat within the project area (Appendix C). However, there is federally designated critical habitat for two fish species within the BSA in Pilarcitos Creek for Central California Coast steelhead (*Oncorhynchus mykiss*; a federally threatened species and CDFW SSC) and Central California Coast coho salmon (*Oncorhynchus kisutch*; a federally endangered species). These critical habitats are localized to the aquatic habitat provided by Pilarcitos Creek and do not fall within the project area. Project activities will not impact critical habitat within Pilarcitos Creek and therefore will not impact steelhead or coho salmon within the creek. In addition, there is critical habitat for two species within 1 mile of the BSA: California red-legged frog (a federally threatened species and CDFW SSC), located approximately 0.8 mile east of the project area, and western snowy plover (*Charadrius alexandrinus nivosus*; a federally threatened species and CDFW SSC), located approximately 0.5 mile west of the project area. Critical habitat will be avoided during project activities and no significant impacts to steelhead, coho salmon, California red-legged frog, or western snowy plover habitat will occur.

4.4 Special-Status Species with Potential to Occur

Based on the existing biological conditions in and adjacent to the BSA, a review of relevant literature, the known occurrences of special-status species in the area, and SWCA biologists' local knowledge of the region, SWCA evaluated the potential for six special-status plant species and 13 special-status wildlife species with potential to occur within the Half Moon Bay, California USGS 7.5-minute quadrangle. Of the species evaluated for potential to occur, no special-status plants were determined to have a high or moderate potential to occur within the BSA, one special-status animal species was determined to have high potential to occur, and three special-status animals were determined to have moderate potential to occur within the BSA. Summary descriptions are provided below for species with moderate or high

potential to occur within the BSA, and descriptions of other plant and animal species that were evaluated for potential occurrence are provided in Appendix D.

4.4.1 *Special-Status Plant Species*

Based on CNDDB and CNPS queries, six special-status plant species were identified with potential to occur in the Half Moon Bay, California USGS 7.5-minute quadrangle (CNDDB 2023; CNPS 2023). SWCA further evaluated the species and their habitat requirements to identify which special-status plant species have the potential to occur within the BSA. This analysis compared the known habitat requirements of the six species to the BSA's existing conditions, elevation, and soils. The evaluation also took into consideration which species were known to occur within 2 miles of the BSA (see Appendix B).

No special-status plant species identified during the desktop review were observed during the field survey, which was conducted during the appropriate bloom periods for these species. No known populations of rare plant occurrences have been documented in the CNDDB within the BSA (CNDDB 2023). Of the six species considered for potential occurrence (see Appendix D: Table D-1), five were determined to have no potential to occur due to either a lack of suitable habitat, soils, or elevation requirements. Choris' popcorn flower (*Plagiobothrys chorisianus* var. *chorisianus*; CRPR 1B.2) was determined to have low potential to occur in the project area and BSA but was not observed in the BSA during the appropriate bloom period.

Species that were determined to have low potential to occur or be absent from the BSA are not discussed further in this BRE. Special-status plant species habitat descriptions and rationale for potential to occur in the BSA and project area are provided in Appendix D (see Table D-1). No impacts to special-status plants are anticipated. Avoidance and minimization measures (AMMs) to protect special-status plant species are provided in Section 5, *Avoidance and Minimization Measures*.

4.4.2 *Special-Status Animal Species*

Based on a CNDDB query and a review of existing literature, 12 special-status animal species were identified in the Half Moon Bay, California USGS 7.5-minute quadrangle. None of the 12 special-status wildlife species identified during the desktop review were observed during the field survey; however, one special-status animal not identified in the records search—white-tailed kite (a CDFW fully protected species)—was observed adjacent to the BSA during the field surveys. Therefore, 13 special-status animal species were evaluated, which included the 12 species identified during the desktop review and the white-tailed kite observed in the field.

SWCA evaluated the 13 species to identify which special-status animal species have the potential to occur within the BSA. This analysis compared the known habitat requirements of those species to the BSA's existing conditions. The evaluation also took into consideration which species have been recorded in the CNDDB within 2 miles of the BSA (see Appendix B).

Of the 13 species considered for potential occurrence, one was determined to have high potential to occur within the BSA, three were determined to have moderate potential to occur within the BSA, four were determined to have low potential to occur in the BSA, and the remaining five species were determined to have no potential to occur or be absent from the BSA due to a lack of suitable foraging and/or breeding habitat, aestivating habitat, life history, and/or other biotic considerations.

The following four special-status animal species have moderate to high potential to occur within the BSA:

- California red-legged frog (federally threatened and CDFW SSC; high potential)

- Saltmarsh common yellowthroat (CDFW SSC; moderate potential)
- San Francisco garter snake (federally and state endangered and CDFW fully protected species; moderate potential)
- White tailed kite (CDFW fully protected species; moderate potential)

Special-status wildlife species that were determined to have high to moderate potential to occur are discussed in the sections below. Species that were determined to have low potential to occur or be absent from the BSA (see Appendix D: Table D-1) are not discussed further in this BRE. Special-status animal species habitat descriptions and rationale for potential to occur in the BSA and project area are provided below and in Appendix D.

4.4.2.1 CALIFORNIA RED-LEGGED FROG

California red-legged frog, a federally threatened species and CDFW SSC, occurs in various habitat types depending on its life cycle stage. Breeding areas include aquatic habitats, such as lagoons, streams, and natural and manmade ponds. This species prefers aquatic habitats with little or no flow, the presence of surface water to at least early June, surface water depths to approximately 2 feet, and the presence of emergent vegetation (e.g., cattails [*Typha* spp.], bulrushes [*Scirpus* spp.]). During periods of wet weather, some individuals may make overland dispersals through adjacent upland habitats of distances up to 1 mile (USFWS 2002). Upland habitats, including small mammal burrows and woody debris, can also be used as refuge during the summer if water is scarce or unavailable (Jennings and Hayes 1994). California red-legged frogs typically travel between sites and are unaffected by topography and vegetation types during migration. Dispersal habitat makes it possible for California red-legged frogs to locate new breeding and non-breeding sites and is crucial for conservation of the species.

Seven California red-legged frog occurrences have been recorded within 2 miles of the BSA between 2004 and 2019 (CNDDB 2023). The closest CNDDB occurrence (2006) recorded two adults within the BSA. Other CNDDB records indicates egg masses, juveniles, and adult California red-legged frogs observed approximately 0.4 mile north–northwest of the project in 2017 in the vicinity of Pilarcitos Creek and at the nearby California Department of Transportation mitigation site. Adults were also observed approximately 1.3 miles east of the project area in 2019 within Madonna Creek (see Appendix B). In addition, this species is known to occur within the BSA. Furthermore, marsh habitat is located at the lower reaches of Pilarcitos Creek approximately 600 feet west of the project.

Suitable breeding habitat for California red-legged frog does not occur within the BSA and therefore impacts to California red-legged frog eggs or larvae are not anticipated. In addition, no in-water work will occur as part of the project, and therefore Pilarcitos Creek will not be impacted by project activities. This species is unlikely to occur in the project area, due to a lack of suitable cover and due to the high level of disturbance resulting from adjacent developed and urban land uses including the existing bike path and Safeway parking lot. California red-legged frog is more likely to utilize higher-quality suitable foraging and dispersal habitat within the dense riparian corridor along Pilarcitos Creek. However, non-breeding, foraging, and aquatic dispersal habitat for California red-legged frog is present within the BSA in Pilarcitos Creek. Project activities, including vegetation trimming and fence installation, are unlikely to impact individual California red-legged frogs with implementation of AMMs included in this BRE. Temporary impacts caused by construction activities, including equipment operation and noise generation, may cause this species to avoid the project area. However, given the short duration and temporary nature of these activities, impacts are not anticipated to California red-legged frog. AMMs to prevent impacts to California red-legged frog such as a worker environmental training, preconstruction clearance surveys, fulltime biological monitoring, and work restrictions during rain events are included in Section 5, *Avoidance and Minimization Measures*.

4.4.2.2 SALTMARSH COMMON YELLOWTHROAT

Saltmarsh common yellowthroat, a CDFW SSC that is protected under the MBTA, occurs year-round in most of its western California range, which includes four main areas: coastal riparian and wetland areas of western Marin County, the tidal marsh system of San Pablo Bay, the tidal marsh system of southern San Francisco Bay, and coastal riparian and wetland areas in San Mateo County (Shuford and Gardali 2008). Breeding habitat of this species falls into three broad types: woody swamp, brackish marsh, and freshwater marsh. Yellowthroats build open-cup nests that are well concealed and typically near the ground in grasses, herbaceous vegetation (e.g., poison hemlock), cattails, tules, and some shrubs (e.g., coyote brush). Yellowthroats forage on or near the ground, eating insects and spiders from leaves, bark, branches, flowers, or fruit in low vegetation.

There are two CNDDB occurrences recorded within 2 miles of the BSA, both dating back to 1990. The closest occurrence was documented at the mouth of Pilarcitos Creek between Elmar and Francis Beaches in the vicinity of the sewage treatment plant. The habitat consists of coyote brush, anise (*Pimpinella anisum*), mustard, willows, and annual grasses surrounding a brackish-water marsh (CNDDB 2023). While the BSA lacks brackish water and marsh habitat, arroyo willow habitat within the BSA may provide suitable foraging and nesting habitat for this species. In addition, this species may utilize the BSA as a route to and from marsh habitat present at the lower reaches of Pilarcitos Creek. Saltmarsh common yellowthroat was not observed on-site during the field survey and is unlikely to occur in the project area. However, based on the information above, there is moderate potential for this species to occur within the BSA. No impacts to saltmarsh common yellowthroat are anticipated. Nesting bird surveys will be conducted prior to the start of construction activities. AMMs to prevent impacts to saltmarsh common yellowthroat are included in Section 5, *Avoidance and Minimization Measures*.

4.4.2.3 SAN FRANCISCO GARTER SNAKE

The historical range of the San Francisco garter snake, a federally and state endangered and CDFW fully protected species, is entirely within San Mateo County. The two main components of San Francisco garter snake habitat are: (1) wetlands supporting its prey species (e.g., California red-legged frog and Pacific chorus frog [*Pseudacris regilla*]), and (2) surrounding uplands that are adjacent to waterways and that support small mammal burrows used by the snakes for escape cover (USFWS 2006). San Francisco garter snake inhabits various aquatic habitats, including reservoirs, freshwater marshes, creeks, drainage ditches, ponds, and lakes. Less ideal habitats can also be used by San Francisco garter snake, such as ditches and other waterways or floating algal or rush mats. Suitable breeding habitat includes shallow marshlands with an abundance of emergent vegetation. Grasslands and low ground cover are also an important upland habitat for this species, as they provide areas for thermoregulation and cover. Small mammal burrows are used by San Francisco garter snake during hibernation. During the warm days of summer, most activity occurs during the morning and afternoon. Preferred nocturnal retreats are thought to be holes, especially mammal burrows, crevices, and surface objects (USFWS 2007).

There is one CNDDB record for San Francisco garter snake within 2 miles of the BSA recorded in 1980 (CNDDB 2023). The USFWS IPaC resource list identified San Francisco garter snake as a species that is known or expected to be within or near the BSA (see Appendix A). While aquatic habitats with an abundance of dense vegetation typically associated with San Francisco garter snake (e.g., cattails, bulrushes) are absent in the BSA, connectivity from the lower reaches of Pilarcitos Creek and its associated riparian corridor to the BSA may support dispersal and foraging activity. Additionally, small mammal burrows that may provide shelter were not observed within the BSA and surrounding landscape does not provide suitable foraging, dispersal, or breeding habitat. This species was not observed on-site during the field survey and is unlikely to utilize the project area due to a lack of suitable cover and due to the high level of disturbance resulting from adjacent developed and urban land uses, including the existing bike path and Safeway parking lot; however, there is moderate potential for this species to occur

in adjacent portions of the BSA due to the presence of Pilarcitos Creek and associated dense riparian vegetation.

Project activities may cause San Francisco garter snake to temporarily alter activity patterns to avoid the area. In addition, potential disruptions in activity of prey species such as California red-legged frogs may temporarily decrease the suitability of the immediate BSA for San Francisco garter snake foraging. However, impacts will be temporary and short in duration. This species is more likely to utilize higher-quality suitable foraging and dispersal habitat within the dense riparian corridor along Pilarcitos Creek during construction activities. Therefore, minimal disturbance during fence installation is not anticipated to impact San Francisco garter snake. AMMs to prevent impacts to San Francisco garter snake such as fulltime biological monitoring and preconstruction clearance surveys are included in Section 5, *Avoidance and Minimization Measures*.

4.4.2.4 WHITE-TAILED KITE

White-tailed kite, a CDFW fully protected species, is a yearlong resident in coastal and valley lowlands that inhabits herbaceous and open stages of most habitats mostly in cismontane California. This species forages in undisturbed, open grasslands, meadows, farmlands, and emergent wetlands on small mammals, birds, lizards, or insects. Individual nests are placed near the top of dense tree stands, usually 20 to 100 feet aboveground and near foraging habitat.

One white-tailed kite was observed foraging over grassland habitat southwest of the BSA. This species is unlikely to occur in the project area; however, established trees and other vegetated areas within the BSA may provide suitable nesting habitat for this species. Foraging activities are more likely to occur in open grasslands adjacent to and outside of the BSA. Noise generated during construction activities would be temporary and limited to hand tools (including chain saws), vehicles, and the construction crew. Noise generated by the project is unlikely to affect nearby white-tailed kites. In addition, no vegetation (e.g., suitable perching or nesting trees) would be removed as part of project activities. No impacts to white-tailed kites are anticipated. Nesting bird surveys will be conducted prior to the start of construction activities. AMMs to prevent impacts to white-tailed kite are included in Section 5, *Avoidance and Minimization Measures*.

4.5 Nesting Migratory Passerine Birds and Raptors

The BSA contains suitable nesting and foraging habitat for avian species protected under the MBTA and CFGC Sections 3503 and 3513 during the typical nesting season (February 15–September 15). Suitable nesting and forging habitat would include the grassland areas, shrubs, and trees within and adjacent to the project laydown area. Nesting is unlikely outside of the typical nesting season, although some avian species may forage year-round near the site. Avian species protected by the MBTA and CFGC observed in the BSA during the March 2023 field survey included Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), house finch (*Carpodacus cassinii*), song sparrow (*Melospiza melodia*), red-winged blackbird (*Agelaius phoeniceus*), red-tailed hawk (*Buteo jamaicensis*), California towhee (*Melozone crissalis*), purple finch (*Haemorhous purpureus*), dark-eyed junco (*Junco hyemalis*), western gull (*Larus occidentalis*), spotted towhee (*Pipilo maculatus*), Violet-green swallow (*Tachycineta thalassina*), American robin (*Turdus migratorius*), mourning dove (*Zenaida macroura*), and white-crowned sparrow (*Zonotrichia leucophrys*). No nesting birds were observed during the field survey, which occurred just prior to the start of the typical nesting season.

The project has the potential to impact nesting birds, including their eggs or young, covered under the MBTA and CFGC. However, with implementation of AMMs provided in Section 5, *Avoidance and Minimization Measures*, no impacts to these avian species or their nests are anticipated.

4.6 Wildlife Habitat and Movement Corridors

The riparian corridor along the Pilarcitos Creek provides suitable wildlife and migration habitat for amphibians, reptiles, birds, and mammals. However, the temporary disturbance and short duration of construction activities are unlikely to substantially disrupt the migration of animals through the project area and BSA. Therefore, with implementation of the AMMs in Section 5, *Avoidance and Minimization Measures*, the project is not expected to interfere substantially with the movement of any native resident or migratory wildlife.

4.7 Environmentally Sensitive Habitat Areas

ESHA are defined in LCLUP Chapter 6: Natural Resources, Policy 6-1 (City of Half Moon Bay 2020b) as " . . . any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments . . . " (see Section 2.3.1, *California Coastal Act and City of Half Moon Bay Local Coastal Program*, for the complete definition).

Because the project occurs within or adjacent to terrestrial, non-aquatic habitat for special-status and unique species, and watercourse ESHAs, it may be subject to permitted uses, buffer zones, and standards for terrestrial and watercourse ESHAs, as defined in the LCLUP.

4.7.1 *Terrestrial Environmentally Sensitive Habitat Areas*

Regarding terrestrial ESHAs, Policy 6-16 of the LCLUP states that non-aquatic habitat associated with special-status or unique species shall be protected against significant disruption of habitat values, which is discussed further below in Section 4.7.2, *Watercourse Environmentally Sensitive Habitat Areas*. Regarding work within a terrestrial ESHA, Policy 6-16 also states "Temporary disruption (e.g., less than six months) for the construction, alteration, repair, and maintenance of existing or newly permitted facilities or structures is allowed if there are no feasible alternatives and the disruption is repaired and restored to at least an equivalent condition within one year." While Policy 6-17 describes required buffer zones for work occurring next to a terrestrial ESHA, which "shall have a minimum buffer width of 100 feet," the project is not considered new development as it involves installation of a chain-link fence and minor vegetation trimming and would be permitted under Policies 6-47 and 6-51 – *Permitted Uses in (within) Riparian Corridors* (*Buffer Zones*) described in Section 4.7.2. However, to avoid adverse impacts to habitat associated with special-status or unique species or other sensitive resources, construction best management practices would be implemented such as Policy 6-63, which states the following regarding construction and ESHA:

> Ensure that construction does not adversely impact sensitive bird or other animal species in on-site or nearby ESHA, wetlands, or watercourses by requiring construction projects to implement best management practices (e.g. pre-construction surveys, construction and/or tree removal timing restrictions, exclusionary fencing), and, as appropriate based on project scope and site conditions, noise and vibration reduction measures and monitoring by a qualified biologist during construction.

The BSA contains habitat associated with special-status or unique species, including but not limited to, California red-legged frog, saltmarsh common yellowthroat, and San Francisco garter snake. The BSA is depicted as a mapped ESHA in Figure 6-3 of the LCLUP for California red-legged frog upland, foraging, and dispersal habitat and San Francisco garter snake habitat. The project will result in temporary impacts (i.e., vegetation trimming) to terrestrial ESHAs. AMMs to prevent impacts to terrestrial ESHAs are included in Section 5, *Avoidance and Minimization Measures*.

4.7.2 *Non-Aquatic Habitat for Special-Status and Unique Species*

Policy 6-32 of the LCLUP requires that special-status species must be defined as species that are listed or are proposed for listing as rare, threatened, endangered, or of special concern by the federal and/or state government; a list of special-status species with potential to be found in the Planning Area must be maintained and guidelines must be developed for their protection and management. Additionally, Policy 6-33 defines unique species as an organism or group of organisms that has scientific or historic value, few indigenous habitats, some characteristic(s) that draw attention or are locally uncommon, or that are common only locally or are of limited range.

As previously discussed in Section 4.4.2, *Special-Status Animal Species*, habitat for special-status or unique species, including, but not limited to, California red-legged frog, saltmarsh common yellowthroat, San Francisco garter snake, and white-tailed kite, has been documented within the BSA, which is mapped as an ESHA in Figure 6-3 of the LCLUP. However, with implementation of the AMMs in Section 5, *Avoidance and Minimization Measures*, no significant impacts to special-status and unique species are anticipated.

4.7.3 *Watercourse Environmentally Sensitive Habitat Areas*

The LCLUP discusses the hydrology and water quality of Half Moon Bay as it relates to the larger watershed areas, surface waters (i.e., watercourses), and groundwater. Surface water features are highly seasonal, especially in the lesser drainages. Surface waters in the region provide a variety of beneficial uses ranging from drinking and irrigation and supply for agricultural uses and livestock grazing to supporting avian, terrestrial, and aquatic wildlife resources; providing recreational opportunities; transporting sediment; and mitigating flood disasters by storing water (City of Half Moon Bay 2020b). The LCLUP defines Pilarcitos Creek as a watercourse—features generally may support diverse resources and uses, contribute to flora and fauna habitat, wetlands, groundwater recharge, stormwater conveyance, and local flood management. These features are also subject to potential erosion and flood hazard.

Per Policy 6-46 of the LCLUP, City policies associated with watercourse ESHAs include a definition of riparian corridors as follows:

> Riparian corridors are defined on the ground by an association of native, and in some cases non-native, plant and animal species within or adjacent to a watercourse that contribute to the function or distinction of the riparian habitat. Boundaries of riparian corridors are determined by the limit of riparian vegetation or top of bank, or other confining topography, whichever is greater. The limit of riparian vegetation is determined by the drip line of riparian canopy trees or the limit of riparian shrubs or herbaceous vegetation.

Per Figure 6-2 of the LCLUP, the project area is mapped as occurring within a riparian corridor ESHA based on an "estimate of top of bank or extent of riparian vegetation, whichever is greater."

Per Policy 6-47 of the LCLUP, permitted uses in riparian corridors include "Flood, sedimentation, or erosion control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development," and also "Pipelines and stormwater runoff facilities." As such, the project would likely be a permitted use under Policy 6-47 of the LCLUP.

Policy 6-48 of the LCLUP establishes that work within or adjacent to a watercourse/riparian corridor ESHA must conform to a set of standard practices, which include minimizing removal of native vegetation, land exposure during construction, and erosion, sedimentation, and runoff; using only native

plant species when replanting; providing sufficient passage upstream and downstream for native and anadromous fish; minimizing the adverse effects of any waste water discharges; preventing depletion of groundwater supplies and substantial interference with surface and subsurface waters; encouraging wastewater reclamation maintaining natural vegetation buffer areas; minimizing alternation of natural streams; minimizing risks and avoiding contribution to flood and erosion hazards; maintaining hydrologic function and sediment transport function of drainage; and providing mitigation and long-term monitoring and reporting for any adverse impacts incurred upstream or downstream.

Furthermore, Policy 6-49 of the LCLUP states that perennial watercourses, including Pilarcitos Creek, shall require that a buffer zone extend a minimum of 35 feet from the outer limit of the riparian vegetation or from the top of bank, whichever is greater.

Additionally, Policy 6-51 of the LCLUP allows for "Temporary disruption (e.g., less than six months) for the construction, alteration, repair and maintenance of existing or newly permitted facilities or structures if there are no feasible alternatives and the disruption is repaired and restored to at least an equivalent condition . . . "

The project includes temporary impacts to the Pilarcitos Creek riparian corridor through vegetation trimming for crews to safely access the project site, perform fence installation activities, and establish a gated entrance for future maintenance access. Project activities will avoid impacts to Pilarcitos Creek. No impacts to watercourses as defined by the LCLUP are anticipated. AMMs to prevent impacts to Pilarcitos Creek and its associated riparian corridor are included in Section 5, *Avoidance and Minimization Measures*.

4.7.4 *Wetlands, Floodplains, and Waters of the United States and State*

4.7.4.1 U.S. ARMY CORPS OF ENGINEERS

USACE typically considers any waterbody displaying an ordinary high water mark (OHWM) for designation as WOTUS, subject to guidance derived from Supreme Court decisions. USACE jurisdiction over nontidal WOTUS extends laterally to or beyond the OHWM to the limit of any adjacent wetlands, if present (33 CFR 328.4). The Navigable Waters Protection Rule (NWPR) defines four categories of federally regulated waters and wetlands (and 12 categories of exclusions that are not subject to regulation under the CWA). The four categories of WOTUS and wetlands are: (1) the territorial seas and traditional navigable waters; (2) perennial and intermittent tributaries to those waters; (3) certain lakes, ponds, and impoundments; and (4) wetlands adjacent to jurisdictional waters.

The portion of Pilarcitos Creek that falls within the BSA is a naturally occurring watercourse (see Figure 4). The unnamed stormwater ditch is an intermittent drainage, located on the west side of Highway 1, that receives runoff from the surrounding residential and upland areas. The intermittent drainage has a clearly defined bed, banks, and an OHWM. The OHWMs on either side of the channel spanned between approximately 1.5 and 10 feet wide, and were indicated by the presence of standing water, scour, and wracking, and a dominance of hydrophytic vegetation growing in the wetted portion of the channel.

Riparian vegetation was dominated by dense arroyo willow thickets in the tree and shrub canopy, with an understory dominated by cape ivy, California blackberry, stinging nettle, and garden nasturtium in the herbaceous layer. The riparian corridor is approximately 210 feet wide and provides shaded aquatic habitat within Pilarcitos Creek. The intermittent drainage channel has direct downstream connectivity to the Pilarcitos Creek and therefore the Pacific Ocean, a traditional navigable water. Based on the presence of defined bed and banks, OHWMs, and connectivity to a traditionally navigable water, Pilarcitos Creek is likely considered jurisdictional under the USACE. The proposed project will avoid all potential

USACE jurisdictional features, including Pilarcitos Creek and the unnamed stormwater ditch. No impacts to potential USACE jurisdictional features are anticipated. AMMs to prevent impacts to Pilarcitos Creek and the stormwater ditch are included in Section 5, *Avoidance and Minimization Measures*.

4.7.4.2 REGIONAL WATER QUALITY CONTROL BOARD

The RWQCB regulates activities pursuant to Section 401(a)(1) of the CWA. Section 401 specifies that certification from the State of California is required for any applicant requesting a federal license or permit to conduct any activity, including, but not limited to, the construction or operation of facilities that may result in any discharge into navigable waters. Through the Porter-Cologne Act, the RWQCB asserts jurisdiction over WOTS, which are generally identical in extent to WOTUS, but may also include waterbodies not currently under federal jurisdiction such as isolated, intrastate waters. The Porter-Cologne Act defines WOTS as "surface water or ground water, including saline waters, within the boundaries of the state." The project will include minor work within the outer extent of riparian habitat associated with Pilarcitos Creek.

The proposed project would not impact RWQCB jurisdictional features. Within the BSA, Pilarcitos Creek would likely be considered an RWQCB jurisdictional feature regulated under CWA Section 404/401 (State Water Board 2019). Project activities will avoid Pilarcitos Creek. No significant impacts to potential RWQCB jurisdictional features are anticipated. AMMs to prevent impacts to Pilarcitos Creek are included in Section 5, *Avoidance and Minimization Measures*.

4.7.4.3 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Section 1602 of the CFGC states that it is unlawful for an entity to "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake" without first notifying CDFW of that activity. "Stream" is not defined in the CFGC, and the CDFW has not endorsed any regulation that defines "stream." However, the California Fish and Game Commission has defined "stream" in 14 CCR 1.72 as follows (California Fish and Game Commission 2021):

> [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.

The proposed project includes installation of a chain-link fence and minor vegetation trimming. No impacts to CDFW jurisdictional features, including the bed or bank of Pilarcitos Creek, will occur (see Figure 4). The creek supports unique and/or special-status species, including California red-legged frog and San Francisco garter snake, both of which are dependent on aquatic resources. The project will avoid Pilarcitos Creek and implement AMMs to prevent impacts to unique and/or special-status species with potential to occur on-site. If unavoidable impacts to riparian vegetation occur, the project will be mitigated through habitat restoration within the Pilarcitos Creek watershed and acquisition of appropriate permitting through the CDFW. AMMs to prevent impacts to Pilarcitos Creek, California red-legged frog, and San Francisco garter snake are included in Section 5, *Avoidance and Minimization Measures.*

4.7.4.4 CALIFORNIA COASTAL COMMISSION

The project is located within the Coastal Zone. The LCLUP (City of Half Moon Bay 2020a) together with the City Code (City of Half Moon Bay 2022a), Subdivision Ordinance, and zoning map constitute the LCP for the City's Coastal Zone. A CDP is required for construction of the project, and the City would be the designated agency responsible for CDP approval of the project.

The proposed project will temporarily impact riparian vegetation during trimming activities. However, impacts to potential CCC jurisdictional features would be avoided to the maximum extent practical. If unavoidable impacts occur, the project would be mitigated through habitat restoration within the Pilarcitos Creek watershed. No significant impacts to potential CCC jurisdictional features are anticipated. AMMs to prevent potential impacts to CCC jurisdictional features are included in Section 5, *Avoidance and Minimization Measures*.

5 AVOIDANCE AND MINIMIZATION MEASURES

The following AMMs are designed to prevent potential impacts to biological resources. In addition to the measures listed below, the project shall also adhere to the LCLUP policies and standard measures for General ESHA Protection (Policies 6-14 and 6-15), Terrestrial ESHAs (Policies 6-16 through 6-18, 6-32, and 6-33), Watercourse ESHAs (Policies 6-46 through 6-49 and 6-51), and Development Standards (Policies 6-63 and 6-64).

1. Prior to the start of the project, all construction crew members shall attend an environmental awareness training presented by a qualified biologist. A training brochure, including, at a minimum, a description of California red-legged frog and its habitat, San Francisco garter snake and its habitat, waters and wetlands, AMMs, key contacts, and potential consequences of impacts to special-status species and potentially jurisdictional features, will be distributed to the crew members during the training. Trainees will sign an environmental training attendance sheet.
2. Disturbance to vegetation shall be kept to the minimum necessary to complete the project activities. To minimize impacts to vegetation and habitat, the following measures shall be implemented:
    a. Prior to all project activities, a qualified biologist shall work with the contractor to designate the work area and any staging areas as well as delineate areas to be avoided (i.e., aquatic features) with signage and tape or fencing.
    b. Access to project locations shall be via existing access roads to the maximum extent practicable. To the extent possible, construction equipment will be positioned on existing access roads above the top of bank, and outside of the edge of riparian vegetation. The number of access routes, number and size of staging areas, and total area of the activity shall be limited to the minimum necessary to complete the project.
3. All project activities shall occur during daylight hours at least 0.5 hour after sunrise and stop at least 0.5 hour before sunset to ensure that the biological monitor and crews are able to see any special-status wildlife that may occupy the project area.
4. Construction activities (e.g., grubbing, grading) shall occur during the dry season (June 1–October 15) to facilitate avoidance of California red-legged frog and San Francisco garter snake.
5. Within 24 hours of the planned start of project activities, a focused survey of the project area for California red-legged frog and San Francisco garter snake shall be conducted by a qualified biologist, including staging areas. Additionally, a nocturnal survey for California red-legged frog that includes eyeshine detection shall be conducted the night before construction begins. A survey for the above species shall be conducted just prior to work on the morning of the first day of construction. Construction activities shall not take place until the surveys are completed.
6. A qualified biologist shall be present during all project activities. Prior to the start of work each day, the biologist shall perform a sweep for special-status species that may be present in the project area, including the staging area. The biologist shall have the authority to halt any action that might result in impacts. If California red-legged frog or San Francisco garter snake are

found at any time, work actives shall stop immediately. The construction crew shall coordinate directly with the on-site biologist if animals are found within the work area.

a. Only USFWS-approved biologists shall participate in activities associated with capture, handling, and monitoring of California red-legged frog. The City shall request and receive approval from the USFWS of any other biologist it wishes to employ to conduct activities with California red-legged frog.

b. If California red-legged frogs are found that are likely to be killed or injured by work activities, the approved biologist shall be allowed sufficient time to move the frogs from the work area before work activities resume. The approved biologist shall relocate the California red-legged frogs the shortest distance possible to suitable habitat that shall not be affected by activities associated with the project. Only California red-legged frogs that are at risk of injury or death by project activities shall be moved.

7. If project activities are conducted during the typical nesting bird season (typically February 15–September 15), preconstruction nest surveys shall be conducted in and near the project area (within 250 feet for raptors and 100 feet for all other birds) by a biologist within 7 days of the start of construction. If nesting birds are identified during the preconstruction survey, then the project shall be modified (i.e., a no-work exclusion buffer of appropriate size to be determined by the project biologist shall be erected around active nests) and/or delayed as necessary to avoid impacts to the identified nests, eggs, and/or young. Disturbing active nests must be avoided until young birds have fledged.
8. Vegetation trimming within riparian areas shall be completed using hand tools (including mechanized hand tools such as chain saws).
9. No stockpiling of vegetation shall occur at the project area. Vegetation, to the maximum extent practicable, shall be placed directly, or as soon as possible, into a disposal container and removed from the work area. Vegetation shall not be piled on the ground unless it is later disposed of under the supervision of a qualified biologist.
10. All spoils, such as dirt, excavated material, debris, and construction-related materials, generated during project activities shall be placed where they cannot enter the watercourse, culvert inlet, or nearby riparian areas. Spoils shall be covered or secured to prevent sediment from escaping. Once the spoil pile is no longer active, it shall be removed from the project area and disposed of lawfully at an appropriate facility.
11. To protect burrows that may provide refuge for protected animals, such as California red-legged frog and San Francisco garter snake, no soil or construction materials shall be stockpiled on the ground where burrows are present.
12. Construction shall adhere to San Mateo Countywide Pollution Prevention Program (SMCPPP) Best Management Practices (BMPs), and no construction shall occur within 24 hours following a significant rain event (defined as greater than 0.25 inch in a 24-hour period). Following a significant rain event and the 24-hour drying-out period, a qualified biologist shall conduct a preconstruction survey for California red-legged frog and other sensitive species prior to the restart of any project activities.
13. During project activities, all trash that may attract predators shall be properly contained, removed, and disposed of regularly. Following construction, trash/construction debris shall be removed from the project area.
14. A qualified biologist shall ensure that the spread or introduction of invasive exotic plant species will be avoided to the maximum extent possible, and all construction-related tools are free of debris.

15. To prevent disease conveyance among the work area during project implementation, a qualified biologist will ensure that the decontamination protocols described in the *California Department of Fish and Wildlife Aquatic Invasive Species Decontamination Protocol* (CDFW 2016 or latest version) will be implemented prior to gear and equipment arriving at the project area and will be followed at all times. A copy of the code of practice must be available at the project site.
16. All fueling and maintenance of vehicles and other equipment and staging areas should occur at least 100 feet from any riparian area, riparian corridor, or other drainage feature. The City and/or its contractors shall ensure that contamination of habitat does not occur during such operations. Prior to the onset of work, the City or its contractors shall ensure that there is a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills, and of the appropriate measures to take should a spill occur.
17. All construction materials, including, but not limited to, wooden pallets, BMPs, equipment, or other materials, that are left on the ground overnight shall be inspected before and during moving of the materials to prevent potential impacts to animals that may have utilized the materials as a temporary refuge. Plastic pipes, if used, shall be covered with material at either end to prevent animals from entering the pipes.
18. All exposed soils in the project area shall be stabilized immediately following the completion of work to prevent erosion. Any exposed or disturbed surfaces shall be reseeded with a locally sourced native seed mix. Erosion and sediment control BMPs, such as silt fences and gravel or rock-lined drainages, can be used. BMPs shall be made of certified weed-free materials. Straw wattles, if used, shall be made of biodegradable fabric (e.g., burlap) and free of monofilament netting. At no time shall silt-laden runoff be allowed to enter any drainages or other sensitive areas.

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APPENDIX A

USFWS Records Search Results

IPaC U.S. Fish & Wildlife Service

IPaC resource list

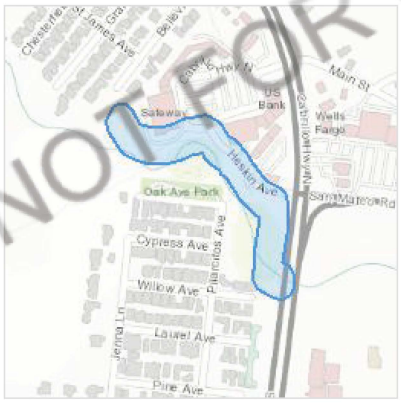
This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

NOT FOR CONSULTATION

Location

San Mateo County, California



Local office

Sacramento Fish And Wildlife Office

(916) 414-6600
(916) 414-6713

Federal Building

[redacted]
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can**only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

NOT FOR CONSULTATION

2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Least Tern Sterna antillarum browni Wherever found **No critical habitat has been designated for this species.** https://ecos.fws.gov/ecp/species/8104	Endangered
Marbled Murrelet Brachyramphus marmoratus **There is final critical habitat for this species.Your location does not overlap the critical habitat.** https://ecos.fws.gov/ecp/species/4467	Threatened
Western Snowy Plover Charadrius nivosus nivosus **There is final critical habitat for this species.Your location does not overlap the critical habitat.** https://ecos.fws.gov/ecp/species/8035	Threatened

Reptiles

NAME	STATUS
Green Sea Turtle Chelonia mydas **No critical habitat has been designated for this species.** https://ecos.fws.gov/ecp/species/6199	Threatened
San Francisco Garter Snake Thamnophis sirtalis tetrataenia Wherever found **No critical habitat has been designated for this species.** https://ecos.fws.gov/ecp/species/5956	Endangered

Amphibians

NAME	STATUS

NOT FOR CONSULTATION

California Red-legged Frog Rana draytonii Wherever found There is **final** critical habitat for this species.Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2891	**Threatened**
Foothill Yellow-legged Frog Rana boylii No critical habitat has been designated for this species.	**Proposed Threatened**

Fishes

NAME	STATUS
Tidewater Goby Eucyclogobius newberryi Wherever found There is **final** critical habitat for this species.Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/57	**Endangered**

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	**Candidate**

NOT FOR CONSULTATION

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Allen's Hummingbird Selasphorus sasin This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	**Breeds Feb 1 to Jul 15**

NOT FOR CONSULTATION

Bald Eagle Haliaeetus leucocephalus — **Breeds Jan 1 to Aug 31**
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Belding's Savannah Sparrow Passerculus sandwichensis beldingi — **Breeds Apr 1 to Aug 15**
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/8

Black Oystercatcher Haematopus bachmani — **Breeds Apr 15 to Oct 31**
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9591

Black Skimmer Rynchops niger — **Breeds May 20 to Sep 15**
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/5234

Black Swift Cypseloides niger — **Breeds Jun 15 to Sep 10**
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8878

Black Turnstone Arenaria melanocephala — **Breeds elsewhere**
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Black-chinned Sparrow Spizella atrogularis — **Breeds Apr 15 to Jul 31**
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9447

Bullock's Oriole Icterus bullockii — **Breeds Mar 21 to Jul 25**
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

NOT FOR CONSULTATION

California Gull Larus californicus — Breeds Mar 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

California Thrasher Toxostoma redivivum — Breeds Jan 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Clark's Grebe Aechmophorus clarkii — Breeds Jun 1 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Common Yellowthroat Geothlypis trichas sinuosa — Breeds May 20 to Jul 31
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/2084

Golden Eagle Aquila chrysaetos — Breeds Jan 1 to Aug 31
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
https://ecos.fws.gov/ecp/species/1680

Lawrence's Goldfinch Carduelis lawrencei — Breeds Mar 20 to Sep 20
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

Marbled Godwit Limosa fedoa — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Nuttall's Woodpecker Picoides nuttallii — Breeds Apr 1 to Jul 20
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9410

NOT FOR CONSULTATION

Oak Titmouse Baeolophus inornatus — Breeds Mar 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9656

Olive-sided Flycatcher Contopus cooperi — Breeds May 20 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3914

Scripps's Murrelet Synthliboramphus scrippsi — Breeds Feb 20 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Short-billed Dowitcher Limnodromus griseus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9480

Tricolored Blackbird Agelaius tricolor — Breeds Mar 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3910

Western Grebe aechmophorus occidentalis — Breeds Jun 1 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/6743

Willet Tringa semipalmata — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Wrentit Chamaea fasciata — Breeds Mar 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and

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understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence(▪)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort(|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

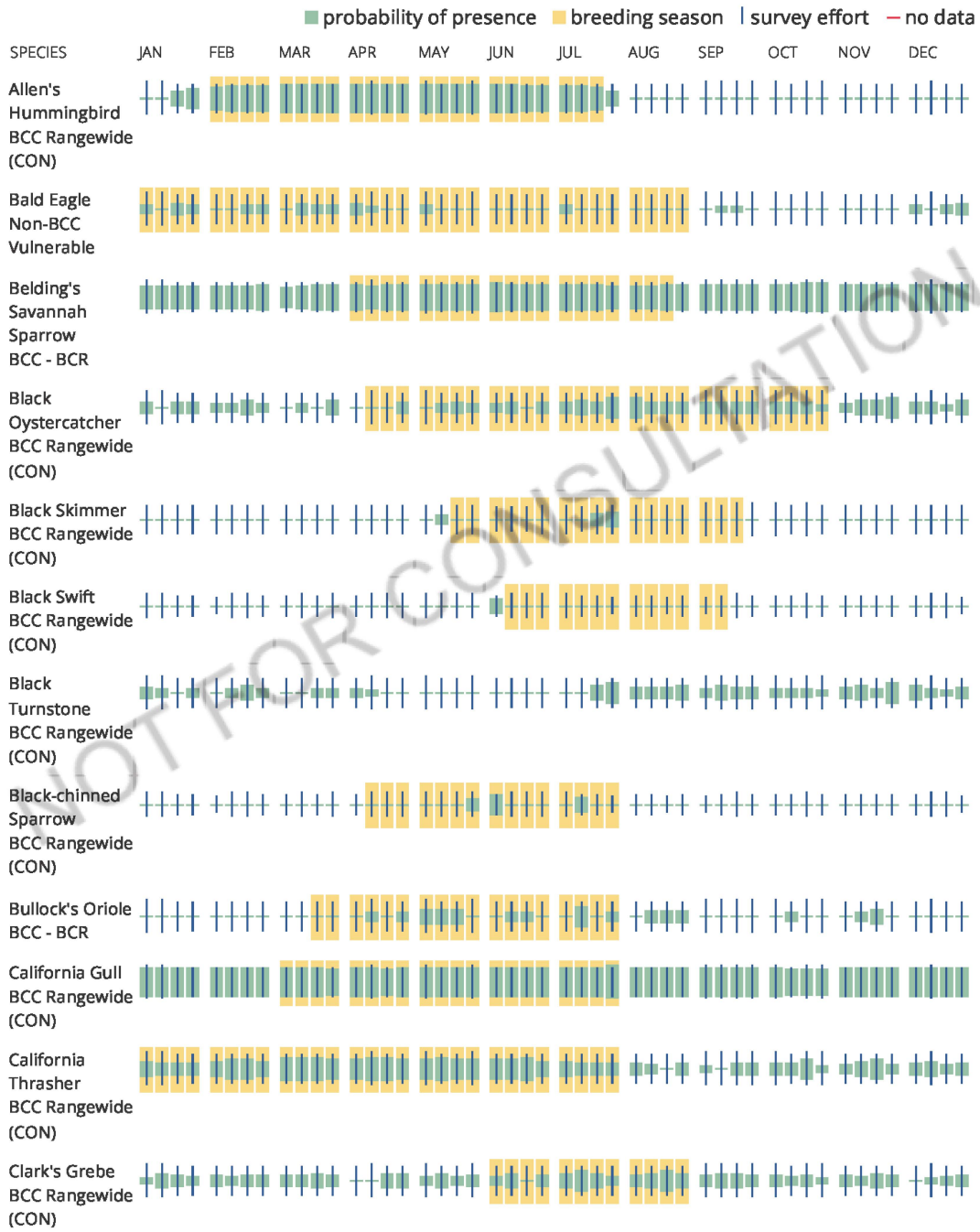
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

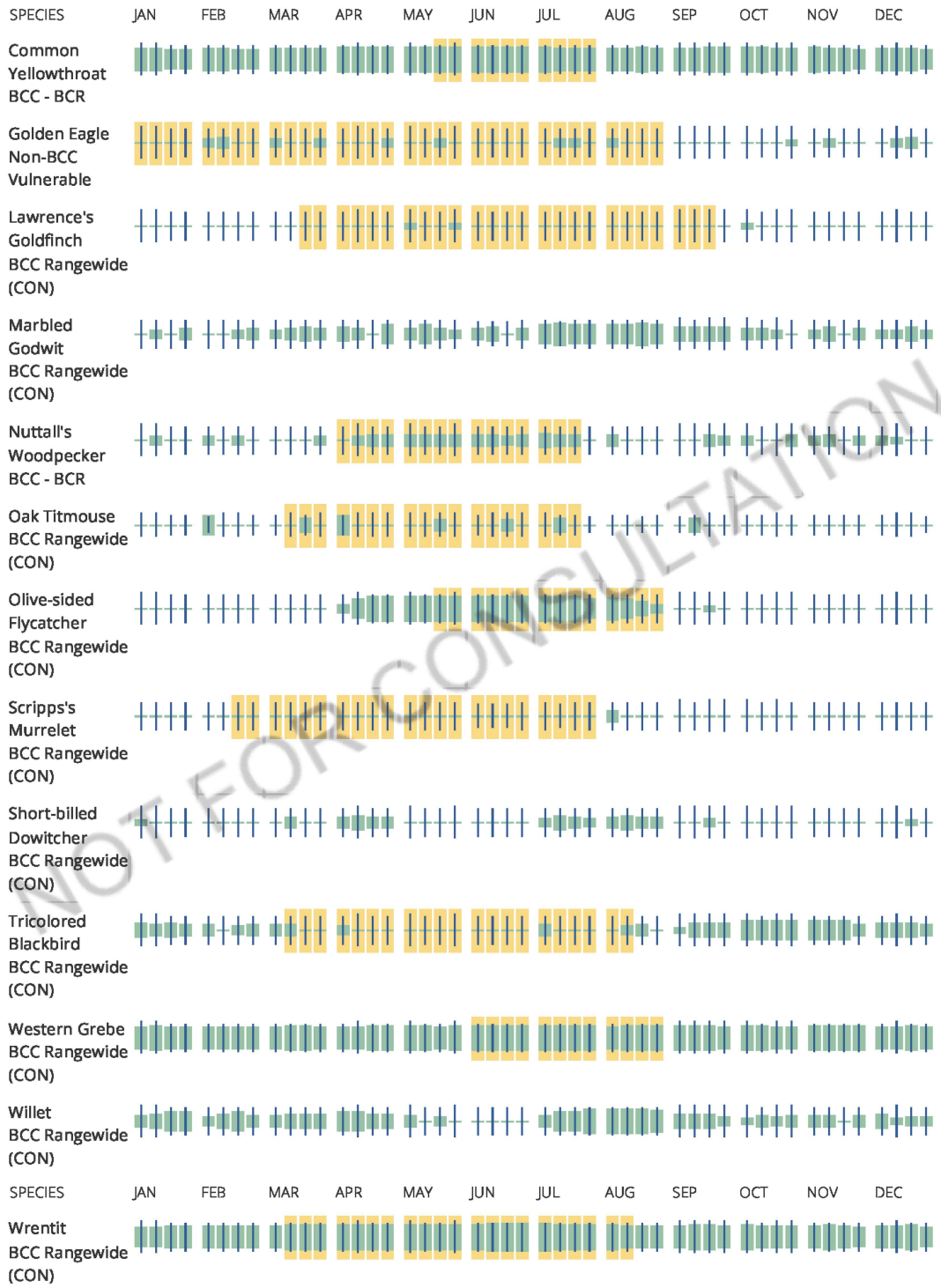
Survey Timeframe

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Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

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1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn

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more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Wetland information is not available at this time

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

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The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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APPENDIX B

CNDDB Occurrence Maps and Special-Status Species List

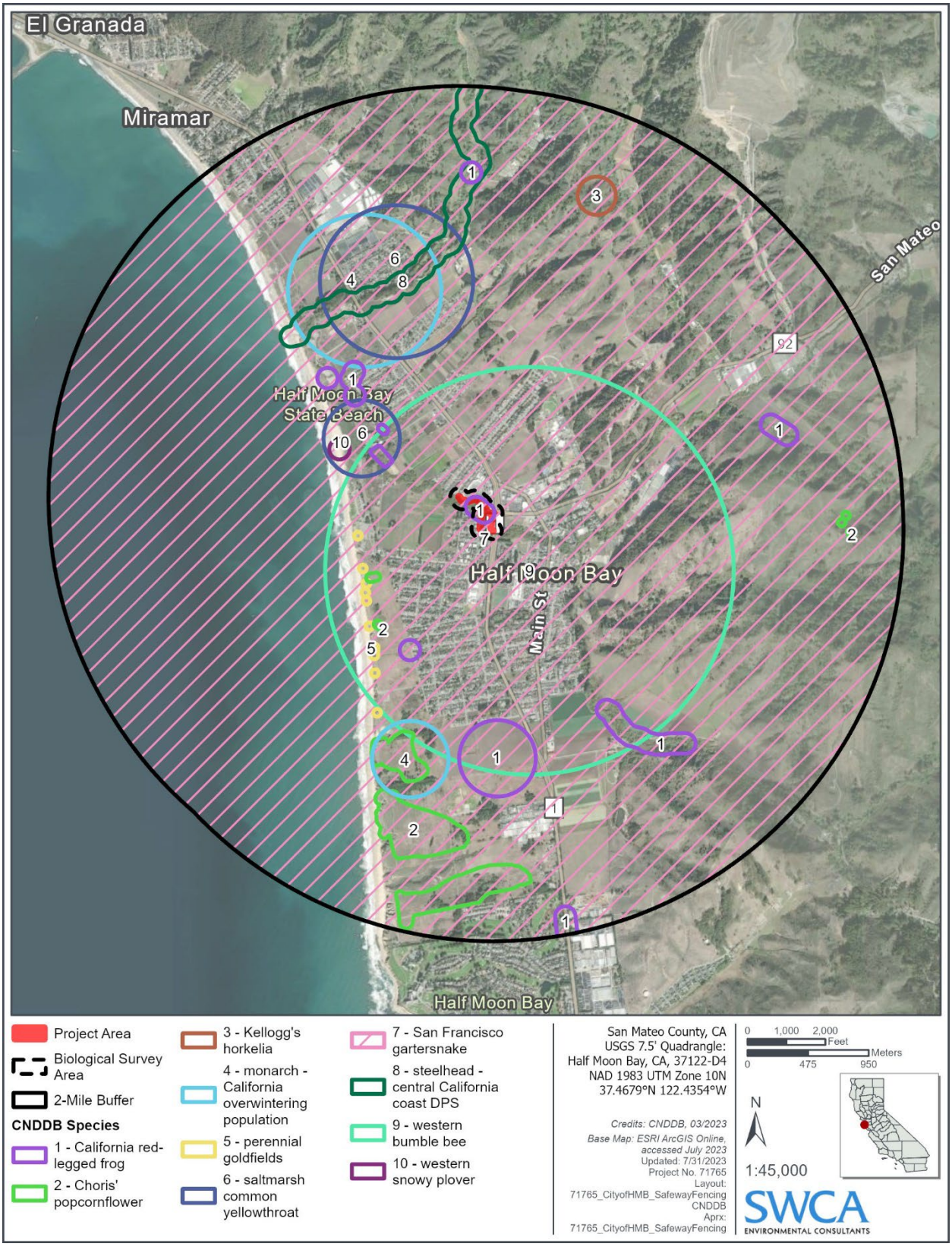


Figure B-1. Two-Mile CNDDB Sensitive Species Map.*

* Note that in order to keep locality data confidential for some species, CDFW suppresses coordinate data for San Francisco garter snake. As such, although this species is not shown in the 2-mile radius map in Figure B-1, it is understood that this species does occur within 2 miles of the project area.

Table B-1. California Natural Diversity Database 2-Mile Records Results

Scientific Name	Common Name	EONDX	ACCURACY	SITEDATE	FEDLIST	CALLIST	CRPR	CDFW STATUS
Bombus occidentalis	western bumble bee	100351	1 mile	19530328	None	Candidate Endangered		
Charadrius nivosus nivosus	western snowy plover	104890	80 meters	20160503	Threatened	None		SSC
Danaus plexippus pop. 1	monarch - California overwintering population	12310	2/5 mile	19980105	Candidate	None		
Danaus plexippus pop. 1	monarch - California overwintering population	99755	1/5 mile	19980105	Candidate	None		
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	59824	2/5 mile	19900620	None	None		SSC
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	13461	1/5 mile	19900602	None	None		SSC
Horkelia cuneata var. *sericea*	Kellogg's horkelia	64647	1/10 mile	20000425	None	None	1B.1	
Lasthenia californica ssp. *macrantha*	perennial goldfields	103072	specific area	20150409	None	None	1B.2	
Oncorhynchus mykiss irideus pop. 8	steelhead - Central California Coast Distinct Population Segment (DPS)	30141	specific area	19790920	Threatened	None		
Plagiobothrys chorisianus var. *chorisianus*	Choris' popcornflower	57049	specific area	20150328	None	None	1B.2	
Plagiobothrys chorisianus var. *chorisianus*	Choris' popcornflower	94292	specific area	20150409	None	None	1B.2	
Plagiobothrys chorisianus var. *chorisianus*	Choris' popcornflower	94290	specific area	20070424	None	None	1B.2	
Rana draytonii	California red-legged frog	56076	1/5 mile	20040607	Threatened	None		SSC
Rana draytonii	California red-legged frog	119807	specific area	200111XX	Threatened	None		SSC
Rana draytonii	California red-legged frog	42675	non-specific area	20170109	Threatened	None		SSC
Rana draytonii	California red-legged frog	119810	specific area	201901XX	Threatened	None		SSC
Rana draytonii	California red-legged frog	119799	specific area	20190313	Threatened	None		SSC
Rana draytonii	California red-legged frog	70285	specific area	20061011	Threatened	None		SSC
Rana draytonii	California red-legged frog	119794	80 meters	20201009	Threatened	None		SSC
Rana draytonii	California red-legged frog	68205	80 meters	20070111	Threatened	None		SSC
Thamnophis sirtalis tetrataenia	San Francisco gartersnake*	27485	1/5 mile	198XXXXX	Endangered	Endangered		FP

* Note that in order to keep locality data confidential for some species, CDFW suppresses coordinate data for San Francisco garter snake. As such, although this species is not shown in the 2-mile radius data in Table B-1, it is understood that this species does occur within 2 miles of the project area.

APPENDIX C

Critical Habitat Map

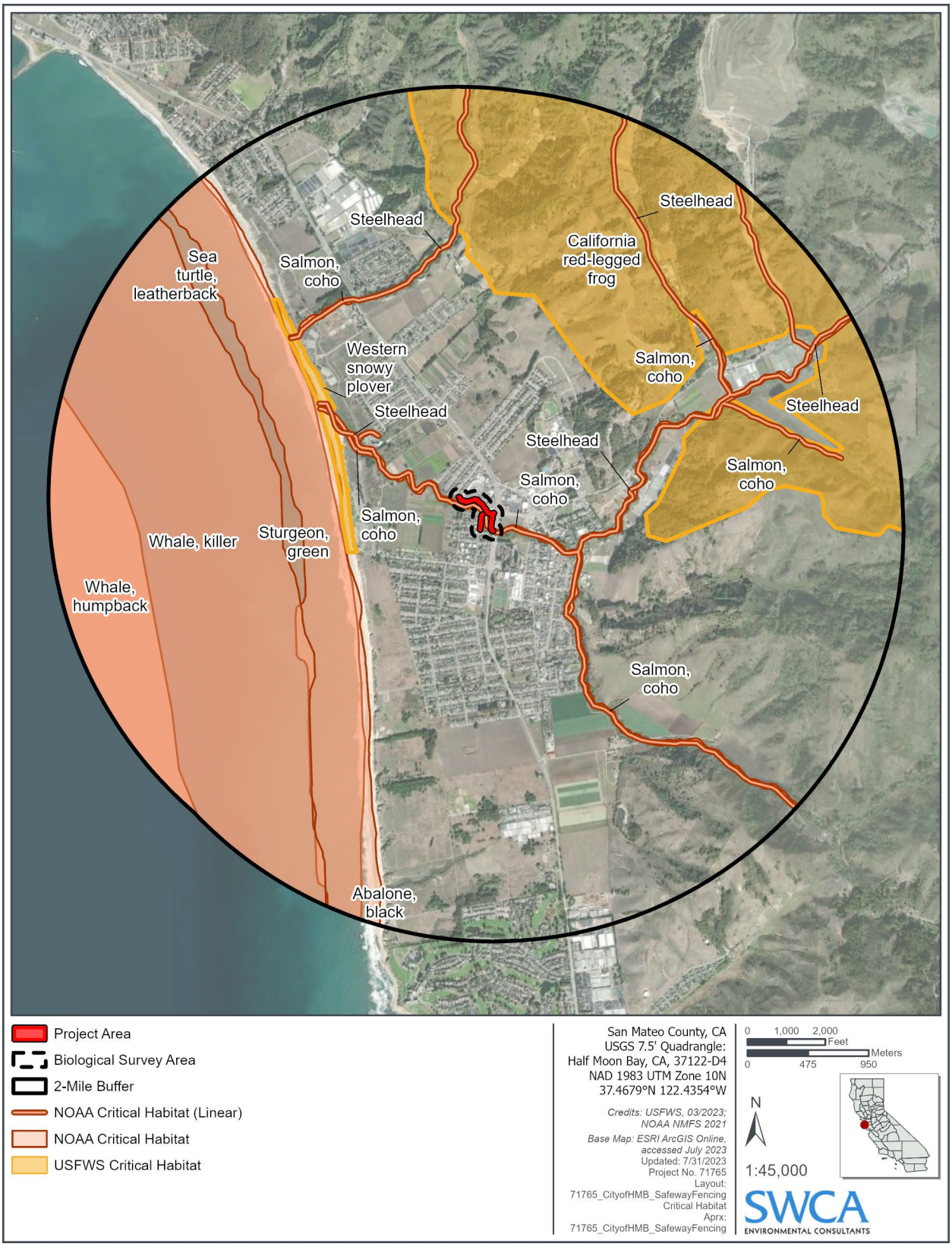


Figure C-1. Critical Habitat Map.

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APPENDIX D

Special-Status Species Considered for Potential Occurrence in the Biological Study Area

Table D-1. Special-Status Species Considered for Potential Occurrence in the Biological Study Area and Project Area

Species Name	General Habitat Description	Legal Status Federal/State/ CNPS Status	Potential for Occurrence and Rationale
Plants			
Coastal marsh milkvetch (*Astragalus pycnostachyus* var. *pycnostachyus*)	Perennial herb that occurs in coastal marshes, seeps, and adjacent sand along the northern and central California coast. Elevation: 0–150 meters. Bloom Period: April–October.	--/--/1B.2	**None:** Suitable habitat is absent from the BSA. This species was not observed during the field survey, which was not conducted during the appropriate blooming period. No CNDDB occurrences have been recorded within 2 miles of the BSA.
Choris' popcorn-flower (*Plagiobothrys chorisianus* var. *chorisianus*)	Annual herb that occurs in chaparral, coastal prairie, and coastal scrub in wetland and riparian areas. Elevation: 15–160 meters. Bloom Period: March–June.	--/--/1B.2	**Low:** Suitable habitat exists within the BSA; however, no coyote brush scrub was observed in the project area. Riparian habitat within the project area consists of dense understory and high canopy cover. Suitable riparian habitat is of low quality and unlikely to support this species. This species was not observed during the field survey, which was conducted during the appropriate blooming period. Three CNDDB occurrences have been recorded (2015) within 2 miles of the BSA.
Kellogg's horkelia (*Horkelia cuneata* var. *sericea*)	Perennial herb that occurs in closed-cone coniferous forest, chaparral, coastal dunes, and coastal scrub. Elevation: 10–200 meters. Bloom Period: April–September.	--/--/1B.1	**None:** Suitable habitat is absent from the BSA. One CNDDB occurrence has been recorded (2000) approximately 0.45 mile southwest of the BSA in the coastal grassland adjacent to Poplar Beach.
Perennial goldfields (*Lasthenia californica* ssp. *macrantha*)	Perennial herb that occurs in coastal bluff scrub, coastal dunes, and coastal scrub. Elevation: 6–750 meters. Bloom Period: January–November.	--/--/1B.2	**None:** Suitable habitat is absent from the BSA. This species was not observed during the field survey, which was conducted during the appropriate blooming period. One CNDDB occurrence has been recorded (2015) along the coastal trail and the Seymour Bridge to Francis State Beach.
Rose leptosiphon (*Leptosiphon rosaceus*)	Annual herb that occurs in coastal bluff scrub. Elevation: 0–100 meters. Bloom Period: April–July.	--/--/1B.1	**None:** Suitable habitat is absent from the BSA. This species was not observed during the field survey, which was conducted during the appropriate blooming period. No CNDDB occurrences have been recorded within 2 miles of the BSA.
San Mateo tree lupine (*Lupinus arboreus* var. *eximius*)	Perennial shrub that occurs in chaparral and northern coastal scrub. Elevation: 90–550 meters. Bloom Period: April–July.	--/--/3.2	**None:** No suitable habitat is present within the BSA. This species was not observed during the field survey, which was conducted during the appropriate blooming period. No CNDDB occurrences have been recorded within 2 miles of the BSA.

Species Name	General Habitat Description	Legal Status Federal/State/ CNPS Status	Potential for Occurrence and Rationale
Animals			
Amphibians			
California red-legged frog (*Rana draytonii*)	Inhabits permanent and temporary pools, streams, freshwater seeps, and marshes in lowlands and foothills occurring from sea level to 6,500 feet. Long distance dispersal occurs during and after rain. Uses adjacent upland habitat for foraging and refuge. Breeds during wet season from December through March.	FT/SSC/--	**High:** Suitable non-breeding, foraging, and dispersal habitat is present within the BSA. Suitable breeding habitat is absent from the BSA. Six CNDDB occurrences have been recorded between 2006 and 2019. The closest CNDDB occurrence (2006) was recorded within the project area. Critical habitat is present approximately 0.71 mile east of the BSA.
Foothill yellow-legged frog (*Rana boylii*)	Occurs in rocky streams and river with open, sunny banks, in forest, woodland, and chaparral. Females lay eggs in still water of creeks and rivers from April to July, depending on when the water flow has slowed down sufficiently. Mostly active late winter through fall.	FC/SE/--	**None:** Suitable breeding, foraging, and dispersal habitat is absent from the BSA. This species is historically distributed in the San Francisco Bay Area but considered gone from most of this range; however, the species is still present in some outlying areas. No CNDDB occurrences have been recorded within the BSA.
Reptiles			
San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)	Uses wide range of habitats; prefers grassland or wetland near ponds, marshes, and sloughs. May overwinter in upland areas away from water.	FE/SE, FP/--	**Moderate:** While potentially suitable aquatic habitat for this species is present within the BSA, including dispersal and foraging habitat in Pilarcitos Creek, this species is unlikely to occur within the project area as the project occurs adjacent to developed roads and sidewalks where vegetation cover is thin and habitat lacks suitable aquatic features. This species has not been observed on-site during field surveys. No CNDDB occurrences have been recorded within 2 miles of the project area. This species could enter the project area if dispersing outside the watercourse.
Fishes			
Coho salmon – Central California Coast Evolutionarily Significant Unit (ESU) (*Oncorhynchus kisutch* pop. 4)	Anadromous fish found in freshwater habitat with slow-moving water with fine gravel.	FE/SE/--	**Low:** Marginal habitat is present within the BSA. This species is historically present 30 miles south within Pescadero Creek. There are no records of the species spawning in Pilarcitos Creek; however, potential critical habitat is present within the BSA in Pilarcitos Creek. No CNDDB occurrences have been recorded within 5 miles of the project area. The project will not include aquatic work, and therefore this species will not occur within the project footprint.

Species Name	General Habitat Description	Legal Status Federal/State/ CNPS Status	Potential for Occurrence and Rationale
Steelhead - Central California Coast Distinct Population Segment (DPS) (*Oncorhynchus mykiss irideus* pop. 8)	Occurs in well-oxygenated clear, cool water habitats with abundant in-stream cover, well-vegetated stream margins, relatively stable water flow, and 1:1 pool-to-riffle ratio.	FT/SSC/--	**Low:** Marginal habitat is present within the BSA. There are historic records of the species spawning in Pilarcitos Creek ; however, literature confirms that the lower Pilarcitos Creek lagoon does not provide steelhead winter and spring off-channel refuge habitat for spawning and returning kelts (Wetlands and Water Resources, Inc. 2010). One CNDDB occurrence has been recorded (1990) within 2 miles of the project area. In addition, critical habitat is present within the BSA in Pilarcitos Creek. The project will not include aquatic work; therefore, this species will not occur within the project footprint.
Tidewater goby (*Eucyclogobius newberryi*)	Occurs in brackish shallow lagoons and lower stream reaches where water is fairly still, but not stagnant.	FE/SSC/--	**None:** Suitable habitat is absent from the BSA. No CNDDB occurrences have been recorded within BSA.
Birds			
California least tern (*Sternula antillarum browni*)	Largely coastal species that feeds on fish and nests on sandy dunes or beaches. Once common in California; currently nesting colonies are isolated to southern California and scattered Bay Area beaches.	FE/SE/--	**None:** Suitable habitat is absent from the BSA. No CNDDB occurrences have been recorded within BSA.
Marbled murrelet (*Brachyramphus marmoratus marmoratus*)	Spends most of the non-breeding season in offshore or nearshore environments near coniferous forests. Only California alcid species to nest inland. Typically nests in upper branches of redwoods or Douglas fir forests. Builds its nests with lichens and mosses.	FT/SE/--	**None:** Suitable habitat is absent from the BSA. No CNDDB occurrences have been recorded within BSA.
Saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*)	Frequents low, dense vegetation near water, especially wet meadow, fresh emergent wetland, saline emergent wetland habitats, and valley foothill riparian. Nests usually placed on or within 8 centimeters (3 inches) of ground. May be over water, in emergent aquatic vegetation, dense shrubs, or other dense growth.	--/SSC/--	**Moderate:** The BSA does not contain marsh or wetland habitat; however, dense vegetation near water is present that may support nesting and foraging behaviors. Coastal scrub and marsh habitat is located at the lower reaches of Pilarcitos Creek located approximately 600 feet west of the project area. Two CNDDB occurrences have been recorded (1990) within 2 miles of the BSA, with one recorded near the mouth of Pilarcitos Creek in the vicinity of the sewage treatment plant.
Western snowy plover (*Charadrius alexandrinus nivosus*)	Found in shores, peninsulas, offshore islands, bays, estuaries, and rivers along Pacific Coast. Breeding sites entail coastal beaches above high-tide line, sand spits, dune-backed beaches, and river bars.	FT/SSC/--	**None:** The BSA does not contain suitable nesting or foraging habitat. One CNDDB occurrence has been recorded (2016) near the mouth of Pilarcitos Creek at Half Moon Bay State Beach.

Species Name	General Habitat Description	Legal Status Federal/State/ CNPS Status	Potential for Occurrence and Rationale
White-tailed kite *Elanus leucurus*	Occurs in open grasslands, meadows, or marshlands for foraging close to isolated trees for nesting and perching.	--/FP/--	**Moderate:** There are no CNDDB occurrences within 2 miles of the BSA. However, the riparian corridor at the southwestern reaches of Pilarcitos Creek may provide suitable nesting habitat. The proposed project will not remove vegetation or impact trees suitable for nesting. No raptor nests were observed within the BSA. Any occurrence during project activities would likely be a "flyby" and would not impact the individual. This species was observed flying overhead, adjacent to the BSA, during the March field survey.
Invertebrates			
Western bumble bee (*Bombus occidentalis*)	In California, populations currently restricted to high elevation sites in Sierra Nevada, though there have been few observations on northern California coast (Xerces Society 2021). Basic habitat requirements include suitable nesting sites for colonies, nectar and pollen from floral resources available throughout duration of colony period (spring, summer and fall), and suitable overwintering sites for queens (U.S. Forest Service [USFS] 2021).	--/SC/--	**Low:** The BSA contains marginal suitable habitat and impacts to this species are not expected. One historic CNDDB occurrence has been recorded (1953) in Half Moon Bay but the exact location is unknown.
Monarch butterfly (*Danaus plexippus*)	Occurs along coast from northern Mendocino to Baja California, Mexico. Winter roosts in wind-protected tree groves (eucalyptus [*Eucalyptus* spp.], Monterey pine [*Pinus radiata*], and Monterey cypress [Cupressus macrocarpa]), with nectar plants and water sources nearby (Xerces Society 2016).	FC/--/--	**Low:** The BSA contains low-quality overwintering habitat and is restricted to isolated Monterey cypress tree stands that are infrequently located along the proposed fence but will not be impacted by project activities. This windrow of trees may not have the structural integrity to support stable aggregations. Two CNDDB occurrences have been recorded (1998) within 2 miles of the project area, with the closest occurring at Frenchman Creek approximately 1 mile north of the BSA. Work will not occur during winter when this species could be present.

Sources: Baldwin et al. (2012), CNDDB (2022), USFWS (2023).

Status Codes:
-- = No status
Federal: FE = Federal Endangered; FT = Federal Threatened; FC = Federal Candidate
State: SE = State Endangered; SC = State Candidate; SSC = California Species of Special Concern; FP = Fully Protected

California Native Plant Society:
List 1B = Rare, threatened, or endangered in California and elsewhere
List 3 = Plants about which more information is needed

CNPS Threat Code:
_.1 = Seriously endangered in California (more than 80% of occurrences threatened / high degree and immediacy of threat)
_.2 = Fairly endangered in California (20–80% occurrences threatened)just

Potential for Occurrence Ratings:

None = No potential for the species or habitat to occur due to lack of suitable habitat in the BSA.
Low = Species has been mapped within 2 miles of the BSA, but record is old/unreliable, the appropriate habitat is not present, or the record is far from the project area.
Moderate = Records have been mapped near the project area and/or suitable habitat is present, but records are old or far from the project area.
High = Species has high likelihood of presence in the BSA, has been mapped in close proximity to the project area, and suitable habitat is present.

APPENDIX E

National Wetland Inventory / National Hydrography Dataset Records

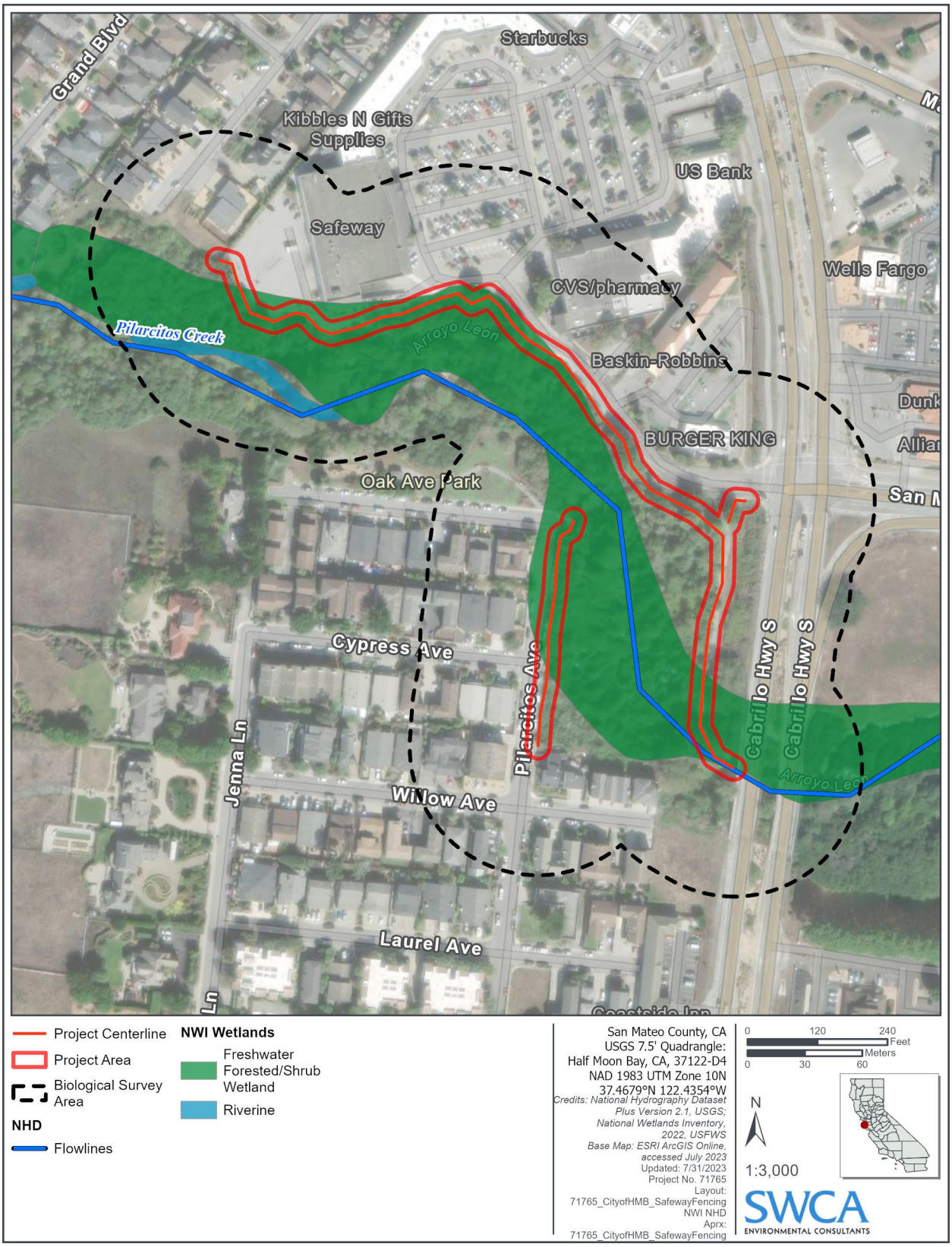


Figure E-1. National Wetland Inventory and National Hydrography Dataset Map.

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APPENDIX F

Soils Map

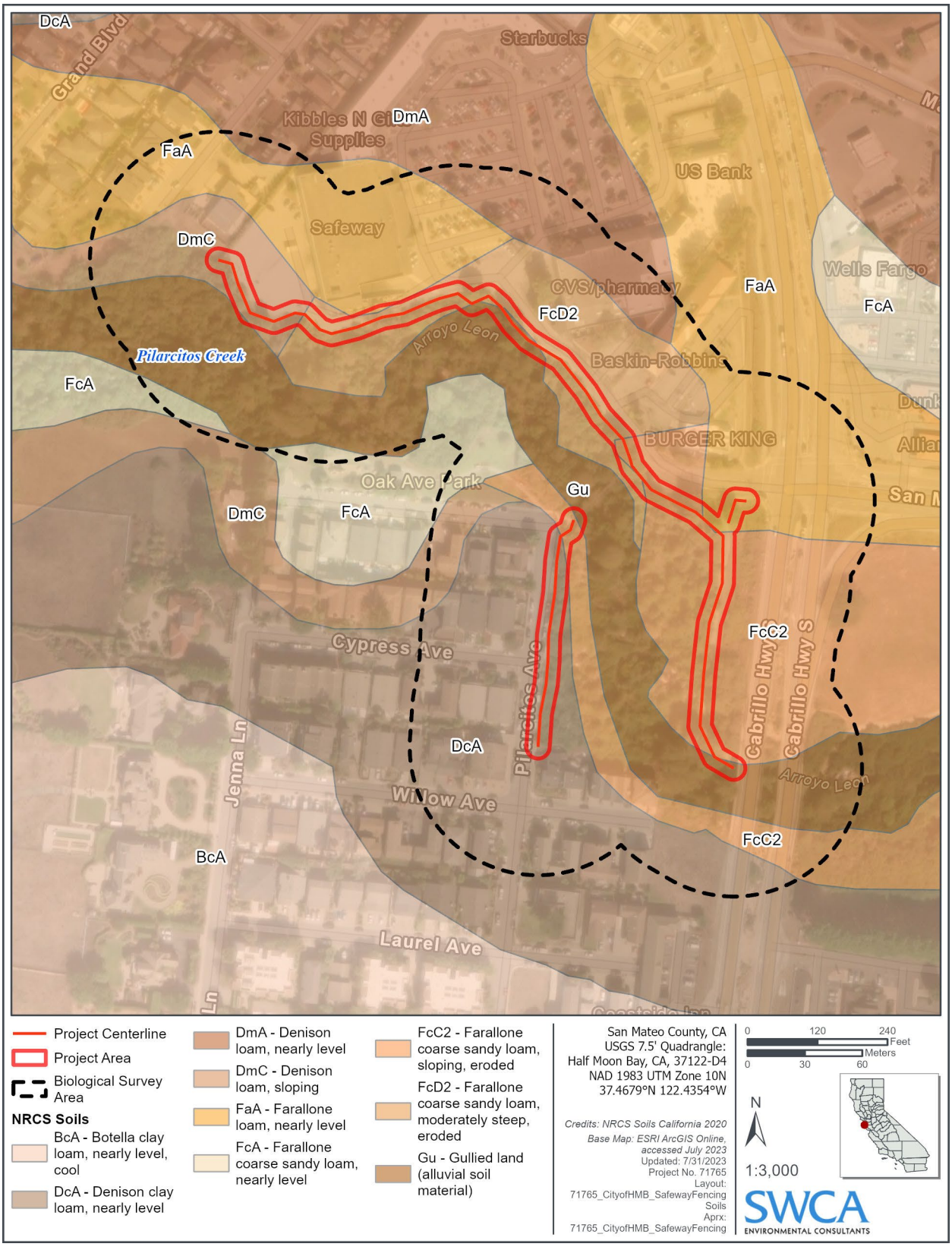


Figure F-1. USGS Soils Map (Soil Survey Geographic Database [SSURGO]).

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APPENDIX G

Species Observed During Field Survey

Table G-1. Plant Species Observed During the Field Survey

Scientific Name	Common Name	Origin	Form	Rarity Status[1]	CAL-IPC Status[2]	Wetland Status (AW 2016)[3]
Acacia melanoxylon	Blackwood acacia	non-native (invasive)	tree	-	Limited	-
Allium triquetrum	White flowered onion	non-native	perennial herb (bulb)	-	-	-
Alnus rubra	Red alder	native	tree, shrub	-	-	FACW
Artemisia douglasiana	California mugwort	native	perennial herb	-	-	FAC
Avena barbata	Slim oat	non-native (invasive)	annual, perennial grass	-	Moderate	-
Baccharis pilularis	Coyote brush	native	shrub	-	-	-
Bromus catharticus	Rescue grass	non-native	annual, perennial grass	-	-	-
Bromus diandrus	Ripgut brome	non-native (invasive)	annual grass	-	Moderate	-
Calendula arvensis	Field marigold	non-native	annual herb	-	-	-
Carduus pycnocephalus ssp. *pycnocephalus*	Italian thistle	non-native (invasive)	annual herb	-	Moderate	-
Conium maculatum	Poison hemlock	non-native (invasive)	perennial herb	-	Moderate	FACW
Cortaderia jubata	Andean pampas grass	non-native (invasive)	perennial grass	-	High	FACU
Delairea odorata	Cape ivy	non-native (invasive)	perennial herb	-	High	-
Echium candicans	Pride of madeira	non-native (invasive)	shrub	-	Limited	-
Ehrharta erecta	Upright veldt grass	non-native (invasive)	perennial grass	-	Moderate	-
Equisetum arvense	Common horsetail	native	fern	-	-	FAC
Erigeron canadensis	Canada horseweed	native	annual herb	-	-	FACU
Erodium botrys	Big heron bill	non-native	annual herb	-	-	FACU
Erodium cicutarium	Coastal heron's bill	non-native (invasive)	annual herb	-	Limited	-
Foeniculum vulgare	Fennel	non-native (invasive)	perennial herb	-	High	-
Frangula californica	California coffeeberry	native	shrub	-	-	-
Fumaria officinalis	Fumitory	non-native	annual herb	-	-	-
Galium aparine	Cleavers	native	annual herb	-	-	FACU
Genista monspessulana	French broom	non-native (invasive)	shrub	-	High	-
Geranium dissectum	Wild geranium	non-native (invasive)	annual herb	-	Limited	-
Geranium molle	Crane's bill geranium	non-native	annual, perennial herb	-	-	-

Scientific Name	Common Name	Origin	Form	Rarity Status[1]	CAL-IPC Status[2]	Wetland Status (AW 2016)[3]
Hedera canariensis	Canary ivy	non-native (invasive)	vine	-	High	-
Helminthotheca echioides	Bristly ox-tongue	non-native (invasive)	annual, perennial herb	-	Limited	FAC
Hesperocyparis macrocarpa	Monterey cypress	native	tree	Rank 1B.2	-	-
Hordeum murinum	Foxtail barley	non-native (invasive)	annual grass	-	Moderate	FACU
Lonicera involucrata	Coast twinberry	native	shrub	-	-	FAC
Lysimachia arvensis	Scarlet pimpernel	non-native	annual herb	-	-	FAC
Malva nicaeensis	Bull mallow	non-native	annual herb	-	-	-
Malva parviflora	Cheeseweed	non-native	annual herb	-	-	-
Marah fabacea	California man-root	native	perennial herb, vine	-	-	-
Medicago polymorpha	California burclover	non-native (invasive)	annual herb	-	Limited	FACU
Mercurialis annua	Annual mercury	non-native	annual herb	-	-	-
Morella californica	California wax myrtle	native	shrub	-	-	FACW
Myoporum laetum	Ngaio tree	non-native (invasive)	tree, shrub	-	Moderate	FACU
Oxalis pes-caprae	Bermuda buttercup	non-native (invasive)	perennial herb	-	Moderate	-
Pinus radiata	Monterey pine	native	tree	Rank 1B.1[4]	-	-
Poa annua	Annual blue grass	non-native	annual grass	-	-	FAC
Populus fremontii ssp. *fremontii*	Cottonwood	native	tree	-	-	FAC
Prunus cerasifera	Cherry plum	non-native (invasive)	tree	-	Limited	-
Raphanus raphanistrum	Jointed charlock	non-native	annual, perennial herb	-	-	-
Raphanus sativus	Radish	non-native (invasive)	annual, biennial herb	-	Limited	-
Rubus parviflorus	Thimbleberry	native	vine, shrub	-	-	FAC
Rubus spectabilis	Salmon berry	native	shrub	-	-	FAC
Rubus ulmifolius	Elmleaf blackberry	non-native	vine, shrub	-	-	-
Rubus ursinus	California blackberry	native	vine, shrub	-	-	FAC
Rumex crispus	Curly dock	non-native (invasive)	perennial herb	-	Limited	FAC
Rumex pulcher	Fiddleleaf dock	non-native	perennial herb	-	-	FAC
Salix lasiandra	Pacific willow	native	tree	-	-	FACW
Salix lasiolepis	Arroyo willow	native	tree, shrub	-	-	FACW

Scientific Name	Common Name	Origin	Form	Rarity Status[1]	CAL-IPC Status[2]	Wetland Status (AW 2016)[3]
Salix sitchensis	Coulter willow	native	tree, shrub	-	-	FACW
Sambucus racemosa	Red elderberry	native	shrub	-	-	FACU
Senecio vulgaris	Common groundsel	non-native	annual herb	-	-	FACU
Silybum marianum	Milk thistle	non-native (invasive)	annual, perennial herb	-	Limited	-

Source: Baldwin et al. (2012)

[1] **California Native Plant Society:**
List 1B = Rare, threatened, or endangered in California and elsewhere
CNPS Threat Code:
_.1 = Seriously endangered in California (more than 80% of occurrences threatened / high degree and immediacy of threat)
_.2 = Fairly endangered in California (20–80% occurrences threatened)just

[2] **California Invasive Plant Council (Cal-IPC) Ratings:**
High: These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.
Moderate: These species have substantial and apparent-but generally not severe-ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.
Limited: These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

[3] Wetland Status Indicators:
FACW: Facultative Wetland; Usually occur in wetland, but may occur in non-wetland.
FAC: Facultative; Occur in wetland and non-wetland.
FACU: Facultative Upland; Usually occur in non-wetland, but may occur in wetland.

[4] The state 1B.1 rank only applies to native/endemic stands found only in Monterey County and southern San Mateo County/northern Santa Cruz County. This species observation does not belong to a state rare/protected community.

Table G-2. Animal Species Observed During the Field Survey

Scientific Name	Common Name	Origin	Rarity Status
Agelaius phoeniceus	Red-winged blackbird	Native	MBTA / SSC
Buteo jamaicensis	Red-tailed Hawk	Native	MBTA
Calypte anna	Anna's hummingbird	Native	MBTA
Carpodacus mexicanus	House finch	Native	MBTA
Corvus brachyrhynchos	American crow	Native	MBTA
Melozone crissalis	California towhee	Native	MBTA
Melospiza melodia	Song sparrow	Native	MBTA
Haemorhous purpureus	Purple finch	Native	MBTA
Junco hyemalis	Dark-eyed junco	Native	MBTA
Larus occidentalis	Western gull	Native	MBTA
Passerculus domesticus	House sparrow	Non-native	--
Pipilo maculatus	Spotted towhee	Native	MBTA
Sturnus vulgaris	European starling	Non-native	--
Tachycineta thalassina	Violet-green Swallow	Native	MBTA
Turdus migratorius	American robin	Native	MBTA
Zenaida macroura	Mourning dove	Native	MBTA
Zonotrichia leucophrys	White-crowned sparrow	Native	MBTA

[1] **Status Codes:**
-- = No status
MBTA = Protected by Migratory Bird Treaty Act; SSC = California Species of Special Concern

APPENDIX H

Photo Documentation



Photo H-1. View facing northwest showing existing pedestrian pathway and adjacent intermittent drainage east of pathway. Photo taken March 30, 2023.



Photo H-2. View facing south of intermittent drainage located adjacent to project area on opposite side of pathway. Fence installation will occur within limit of existing paved pathway and riparian vegetation (arroyo willow thickets). Photo taken March 30, 2023.



Photo H-3. View facing northwest of urban and developed communities within project area along pedestrian pathway. Photo taken March 30, 2023.



Photo H-4. View facing east showing ruderal and ornamental vegetation surrounding paved portion of project area. Note: this is location of proposed gate across bike path. Photo taken March 30, 2023.



Photo H-5. View facing north of southwestern portion of BSA near Oak Avenue residential neighborhood. Note collapsed fence and sediment-laden above top of bank. Photo taken March 30, 2023.

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