INITIAL STUDY

HILLSBOROUGH FIRE HAZARD MITIGATION AND FUEL REDUCTION PROGRAM

HILLSBOROUGH, CALIFORNIA

Prepared for
Town of Hillsborough
1600 Floribunda Avenue
Hillsborough, California 94010-6418

February 2011

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</tr>
<tr>
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<td>Project area – southern section</td>
</tr>
</tbody>
</table>

Appendix A  Vegetation Maps from Town of Hillsborough and May & Associates, Inc. 2006
1.1 Introduction and Project Location

The project area is located between Interstate 280 (I-280)/State Route (SR) 35 and SR 82 and north of SR 92 in the Town of Hillsborough (Hillsborough or Town) in San Mateo County, California (see Figure 1). The project area consists of eight Town-owned open-space areas (Sites A through G and Site I), all of which are adjacent to residential development (see Figures 2a and 2b). The open space areas total approximately 259 acres and contain canyons and hillsides in elevations from approximately 100 feet to 615 feet above sea level. The proposed project consists of fuel reduction and vegetation management activities on eight open spaces adjacent to residential development to reduce the fire hazard potential to residents and structures in the Town.

1.2 Project Background

Hillsborough is built into and around canyons, hills, and ravines. The Town owns nine open space areas within the incorporated limits which range in size from approximately 1.6 acres to approximately 53.8 acres, totaling approximately 259 acres. The open space areas are generally undeveloped with rugged, steep, and heavily vegetated terrain. A wildland/urban interface exists where these open space areas border residential properties.

Following the Oakland Hills Fire in 1991, the California Department of Forestry and Fire Protection created Fire Hazard Severity Zone Maps to assist in the identification of potential wildfire hazard areas throughout the state. Two-thirds of the Town is in a Fire Hazard Severity Zone and nearly half is an area designated “Very High Fire Hazard Severity Zone”. The wildfire risk in Hillsborough is due in part to the terrain and heavy vegetation (fuel load) contained within its open space areas.

Currently, the Town addresses the potential wildfire threat through preventative activities, such as the enforcement of building code requirements, through preparedness activities, such as active participation in wildland firefighting training, and through encouraging fuel reduction efforts on private properties. Through the guidance of the Town’s goals and policies of its 2005 General Plan, such as goals related to preservation of open space and preservation, protection, and restoration of natural resources, Hillsborough has initiated the process of comprehensive planning and management for its open space areas. This process has included the development of projects to mitigate the wildfire hazard in the Town.

In 2006, Hillsborough completed a vegetation/biological survey of its open space areas as an initial step in its open space area planning and management processes. This survey served the purpose of providing valuable baseline vegetation community data, data of habitat for sensitive species, and information about fuel load characteristics to guide future vegetation management and fire management planning. In 2008, Hillsborough completed the Vegetation Management Strategies and Guidelines report for its open space areas. This report provided goals, strategies, suggestions, and guidelines to facilitate future decision making regarding vegetation management in the open space areas; a list of 22 potential projects that could be implemented within the open space areas; a system for assessing and prioritizing potential projects; methods for building public awareness, support, and involvement with the open space areas; and a decision-making framework for the Town to form an Open Space Management Task Force (Task
SECTION ONE

Project Description

Force) to make project recommendations to the Town Council. In 2009, the Town Council approved the Task Force’s list of project priorities, which consisted of 10 of the 22 potential projects that were identified earlier. These 10 projects were organized into 6 groups: 1) Wildfire Mitigation, 2) Partnerships, 3) Outreach, 4) Acacia Stand Conversion, 5) High Priority Invasive Plants, and 6) Wildlife Management Plan.

The Town’s Wildfire Mitigation projects have been considered a top priority of activities to be implemented in the Town’s open space areas. In 2008, the Town applied for a Predisaster Mitigation grant from the Federal Emergency Management Agency (FEMA) to implement the Town’s proposed Wildfire Mitigation projects. FEMA has preapproved the Town’s grant, and grant obligation is pending completion of FEMA’s federal environmental compliance regulatory obligations, which includes compliance with the National Environmental Policy Act, Section 7 of the Federal Endangered Species Act, and Section 106 of the National Historic Preservation Act. FEMA is in the midst of completing these environmental compliance processes.

The grant from FEMA would fund approximately 75 percent of the total estimated cost to implement the Town’s Wildfire Mitigation projects.

1.3 Project Description

The Town’s Wildfire Mitigation projects were originally described as two projects in the Town’s 2008 Vegetation Management Strategies and Guidelines report, which focused on two types of areas within the open spaces: defensible space management zones (DSZs) and high-priority fire management areas. DSZs are defined as areas in the Town-owned open space areas that are within 100 feet of a residential structure or building. Treatment activities in the DSZ would not occur on private property. The Town is encouraging property owners to conduct treatment activities on private property adjacent to the DSZ, but the Town is not proposing to provide funding to conduct treatment activities on these private properties. High-priority fire management areas are outside the DSZ and do not include wetlands or waterbodies.

FEMA would fund these two projects under one grant and FEMA considers these projects as one “federal action” for the sake of its federal environmental compliance process. Due to these factors, the likelihood that the Town would implement these projects during the same timeframe, and that the activities of these projects are very similar, for the sake of its compliance with the California Environmental Quality Act (CEQA), the Town is evaluating these two projects as one “proposed project”.

The proposed project would include vegetation clearing (treatment) activities specific for DSZs or high-priority fire management areas. However, many treatment activities in both areas would share many similar characteristics. These activities are described in detail below.

1.3.1 General Treatment Activities

Treatment activities would focus on reducing the biomass of non-native vegetation through trimming or plant removal. Most of the treatment activities (80 to 90 percent) would concentrate on shrub and understory vegetation. Wherever possible, native grasses, shrubs, and trees would
be avoided. Native vegetation\(^1\) would be thinned or removed if it is the only reasonable means to meet the treatment objectives in specific areas. In forest and woodland areas, healthy native trees would be avoided to the extent possible to maximize shading and promote resistance to invasion by non-native vegetation. Herbicides would be painted onto stumps of cut vegetation, and no herbicide spraying would occur.

Sudden Oak Death (SOD) is known to occur in at least two of the open space areas: Sites E and I. As practicable and necessary for wildfire mitigation, SOD-infected trees would be felled and the plant matter would be left in-place. No additional treatment activities would be performed within 200 feet of infected trees, and staging, parking, and work areas would be located away from infected trees to the extent possible. All equipment, vehicles, and individuals would be inspected upon leaving project areas for soil, leaves, twigs, and branches. These items, if found, would be cleaned onsite to avoid the spread of SOD.

Treatment activities would involve minimal ground disturbance. No tree skidding would occur. Green waste would be transported in the treatment areas through bundling and carrying or through the use of a pulley system, and root balls would be left in place. Slopes in all treatment areas would be stabilized, and erosion control measures would be installed as needed. These measures include, but are not limited to, installing and maintaining silt fences immediately down-gradient of disturbed areas and installing and maintaining erosion control blankets on all sloped disturbed ground. Coconut coir matting or tackified hydroseeding compounds would likely be used for slope stabilization. Plastic monofilament netting (erosion control matting) or similar material would not be used for slope stabilization because of the potential that reptiles and amphibians, including federally listed species, could become entangled or trapped in these textiles.

Disturbance to existing vegetation would be limited to the actual site of the proposed project and necessary access routes. Staging and access would take place on paved and dirt access roads. Placement of all staging areas would avoid and limit disturbance to native vegetation as well as threatened/endangered species and their habitat to the maximum extent practicable. Sensitive biological resources to be avoided would be flagged, and ingress/egress routes and green waste disposal sites would be marked. Existing ingress or egress points would be used wherever possible.

A 200-foot buffer around wetlands or waterbodies would be flagged or staked at the commencement of project activities. Work in the 200-foot buffer zones would adhere to the following:

- No work within 50 feet of a wetland or waterbody

\(^1\) Native plants are considered to be plants that belong to the following vegetation communities: chaparral, coastal scrub, Douglas fir/redwood forest, grassland, herbaceous wetland, hardwood forest, riparian forest/scrub. These communities were classified in the project area in 2006 when Hillsborough mapped the vegetation resources of its open space areas.
Modified procedures in areas between 50 and 200 feet of a wetland or waterbody, as follows:

- Herbicides restricted to glyphosate-based herbicides that are EPA-approved for use around water (e.g., Rodeo);
- Use of manual equipment (chainsaws, brush cutters, and hand tools) to remove approximately 1/2 of the height of tallest vegetation and 1/3 of the height of medium-height vegetation; and
- No equipment fueling in the 200-foot buffer area.

The use or storage of petroleum-powered equipment would be accomplished in a manner to prevent the potential release of petroleum materials into wetlands or waterbodies. The following precautionary measures would be employed:

- Vehicles and equipment would be inspected and approved by an inspector before use to ensure that they would not leak any type of hazardous materials such as oil, hydraulic fluid, or fuel.
- Fueling would take place in designated staging areas, outside of any native vegetation or wetland areas.
- The contractor would have emergency spill clean-up gear (spill containment and absorption materials) and fire equipment available onsite at all times. These items would be reviewed by an inspector before construction begins.
- Leaks, drips, and other spills would be cleaned up immediately to avoid soil or groundwater contamination.
- Major vehicle maintenance and washing would be done offsite.
- All spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries would be collected, stored, and recycled as hazardous waste offsite.
- Spilled dry materials would be swept up immediately.

Green waste would be processed and disposed of onsite to the full extent possible while retaining the overall objective of reduced fire risk and fuel load reduction. As a last resort for areas where removal of green waste is necessary for fuel load reduction, green waste would be collected, chipped, and then transported offsite to a green waste processing facility. Logs and large branches that are free of smaller branches and leaves would be cut into 4-6 foot-long sections and placed in stacks no larger than 3 feet high, 5 feet long, and 4 feet wide. Leaves, branches, bark, and duff would be collected, chipped or shredded, and compressed into flat piles no more than 2 feet high, 5 feet long, and 5 feet wide. The distance between piles would depend on the slope steepness, and would be as follows: 0-20 percent slopes – 10 feet, 21-40 percent slope – 15 feet, 40 percent and greater – 20 feet.
The Town would employ noise control techniques to reduce the intrusion of noise from the mechanical equipment that would be used to implement the proposed project. Control techniques would include the use of mufflers, use of quieter machinery, and other techniques that would not require equipment redesign. Unnecessary idling of internal combustion engines would be prohibited.

The treatment areas would be maintained on an annual basis to preserve low fuel loads. Follow-up work may include the following activities, depending on the location, to maintain the prescribed vegetation density and structure: cutting or mowing brush and grasses; removing brush piles, accumulated green waste, downed wood, logs, and other woody debris; removing dead trees; thinning and pruning shrubs and trees; and installing necessary erosion control.

### 1.3.2 Treatment Activities Specific to DSZs

Work to be performed in the DSZs would encompass a total of approximately 88 acres in eight of the Town’s nine open space areas. Initial treatment activities would take place over the course of 3 years. Work crews would use a combination of hand and machine tools, incorporating the use of chainsaws, brush cutters, flail mowers or rotary mowers, chippers, and other hand tools to remove approximately 1/3 to 1/2 of the existing understory vegetation, mow grasses to a maximum of 6 to 8 inches above ground level, and prune and thin trees. Native shrubs and trees would be avoided when possible.

Most or all tree branches from ground level to approximately 10 feet above ground level would be pruned to create a canopy opening and separation between the tree limbs and foliage and the shrub and groundcover understory. Native trees would be retained to the extent possible. Large-scale tree removal is not anticipated, however, some trees may be thinned to create spaces between trees in dense forested areas. Native trees would be removed if it is the only reasonable means to meet the treatment objectives in specific areas. Hazard and diseased trees would also be felled as necessary.

<table>
<thead>
<tr>
<th>Percent Slope</th>
<th>Approximate Brush and Shrub Clump Spacing</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-10 percent</td>
<td>2 ½ x shrub height</td>
</tr>
<tr>
<td>11-20 percent</td>
<td>3 x shrub height</td>
</tr>
<tr>
<td>21-40 percent</td>
<td>4 x shrub height</td>
</tr>
<tr>
<td>&gt;40 percent</td>
<td>6 x shrub height</td>
</tr>
</tbody>
</table>

Non-native shrubs, particularly invasive shrubs, would be removed. Native shrubs would be selectively thinned and removed, if necessary, from under tree canopies to facilitate the creation of breaks in vegetation ladder fuels between the shrub understory and the tree overstory. Spacing between brush clumps and/or shrubs would be approximately 2 1/2 times the height of the vegetation or greater (see Table 1). The maximum diameter of clumps would be 2 times the...
height of the vegetation. The diameter of shrub clumps would not exceed 12 feet as measured from the edges of the crowns, and branches would be pruned to a height of 3 feet.

Green waste within the DSZs would be collected and relocated out of the DSZ and onto nearby open space lands, preferably lands included for treatment as high priority fire management areas under the proposed project. As a last resort, except for SOD-infested plant material, for areas where removal is necessary for fuel reduction, green waste would be collected, chipped, and transported offsite to a green waste processing facility.

The specified treatment methods described above would be implemented over a 3-year timeframe. The third year would also include follow-up treatment of resprouts and seedlings, as well as re-treatment of invasive species.

1.3.3 Treatment Activities Specific to High Priority Fire Management Areas

In high priority fire management areas, work would be performed on approximately 62 acres contained in 4 open space areas, which consist of Site C, Site E, Site G, and Site I. Both hand and machine tools would be utilized, and pruning and thinning activities would generally be focused on the removal of non-native shrubs. The removal of invasive plants would be prioritized, with the highest priority given to French broom. Green waste within the high priority fire management areas would be processed and stored within the treatment area. The first year of treatment would incorporate brush removal, tree limbing, minimal (selected) tree removal, and grass mowing. The second and third years of work would incorporate brush removal, grass mowing, and treatment of resprouts and seedlings of invasive species.

Both Sites C and E would be treated similarly, with the intention of reducing fuel loads and opening the canopy between the bush understory and tree overstory. Work would include selectively pruning and thinning approximately 1/4 to 1/3 of the understory. Grasses and herbaceous vegetation would be mowed to near ground level especially along fire roads. Large logs and woody debris would be stored out of sight in small piles near ground level, and vegetation would be chipped and spread onsite. Tools would include chainsaws, forestry mulchers (Fecon-type cutting head), flail mowers or rotary mowers, and a heavy-duty chipper, which would be located on an existing access road.

Work in Site G would be performed with the objective of creating a large, graded management area extending from the top of the hills of Site G downward approximately 200-500 feet to the mid-slope of the hillside. This would be accomplished by conducting progressively aggressive shrub pruning and thinning from the lower fire risk mid-slope area to the greater fire risk upper-slope area. Clearings between shrubs would be created and vegetation would be removed at an intensity of 2/3 from the highest elevation, 1/2 of the middle elevation, and 1/3 of the lower edge of the treatment area. Vegetation would be chipped and spread onsite. Tools would include chainsaws, brush cutters, flail mowers, and a small lightweight chipper, which would be lowered onto the steep work site using a winch or pulley system.
Treatment activities in Site I would focus on thinning and creating breaks between vegetation types to reduce fuel loads between the shrub understory and tree overstory. Approximately 1/4 of the native trees and shrubs would be selectively pruned and thinned using an equivalent treatment and tools as that described above for Sites C and E.

1.3.4 Project Schedule

Primary treatment activities would occur over 3 years. Additional follow-up work, such as maintenance clearance, would take place during the fourth and fifth years, after which long-term maintenance would be conducted biennially.

The Town proposes to conduct work during the non-nesting season for birds, between August 15 and January 15. However, if it is not possible to maintain this limited schedule and meet the 3-year fuel reduction treatment objectives, the Town would conduct treatment activities during the nesting season. If treatment activities would occur during the nesting season, a qualified biologist would be retained to conduct bird nesting surveys, and work would be prohibited within 200 feet of any active nests until nesting is complete and young birds have fledged.

1.4 Future Foreseeable Projects in Open Space Areas

The Town approved the prioritization of 10 projects categorized into 6 groups to occur in its open space areas: 1) Wildfire Mitigation, 2) Partnerships, 3) Outreach, 4) Acacia Stand Conversion, 5) High Priority Invasive Plants, and 6) Wildlife Management Plan. Of the 22 projects initially provided to the Task Force, these 10 projects were the only ones considered by the Town Council. The other 12 projects of the 22 originally described in the 2008 Vegetation Management Strategies and Guidelines report could potentially be considered by the Town Council at some time in the future.

The projects categorized as “Wildfire Mitigation” would consist of the proposed project. The project categorized as “High Priority Invasive Plants” was implemented in 2009 and focused on the removal of high priority invasive plants such as egg-leaved spurge and star thistle. Activities under this project category may continue in the future as needed and as funding is available. The projects categorized as “Partnerships” could include the use of the open space areas for formal education, the development of Memorandums of Understanding with learning institutions, and activities such as habitat restoration and trail planning and use. The projects categorized as “Outreach” would focus on public outreach and education about issues and activities in the open space areas. The “Acacia Stand Conversion” project category would involve forest stand conversion and vegetation management activities that would focus on changing existing stands of acacia to mixed oak woodlands. The “Wildlife Management Plan” project category would involve the development of a wildlife management plan, program, and policy.

Of the 10 projects considered by the Town Council, only the High Priority Invasive Plants project has been implemented, and only the two Wildfire Mitigation projects evaluated in this document as the proposed project have the potential for funding in the near-term. The grant from FEMA would fund approximately 75 percent of the total estimated cost to implement the Town’s Wildfire Mitigation projects. The Town Council has not considered funding any of the other 7 projects prioritized by the Task Force, and the Town has not sought outside funding sources,
such as grants, for any of these projects. Thus, the likelihood of implementing these other projects in the near-term (next five years) is minimal.

### 1.5 Consistency with General Plan, Zoning, and Applicable Land Use Controls

The project areas are subject to the 2005 Town of Hillsborough General Plan, the Hillsborough Zoning Ordinance (Title 17 of the Hillsborough Municipal Code), and restrictions set forth in Grant Deeds that were established when the titles of the open spaces areas were transferred to the Town.

The Town of Hillsborough General Plan land use designation for the project site is Open Space and Conservation which allows for unimproved open space and public facilities. The zoning designation for the project areas is Residence District, which allows for property owned by the Town to be used for open space with the intent of being kept unimproved. The proposed project would maintain the unimproved state of the open space areas, and thus, the proposed project is consistent with the land use designation and zoning for the project site.

There are several Grant Deeds that restrict land uses in these areas. Most of these restrictions are related to granting easements for public utilities use and restrictions to use of the areas for open space uses. Specific for Site E, which contains Crocker Lake, the Burlingame Country Club has exclusive water rights to Crocker Lake and the groundwater in the surrounding adjacent property. Since the proposed project would result in continued use of the project site as open space, the proposed project would be consistent with these Grant Deed-based land use restrictions.

### 1.6 Other Required Approvals

Major permits or approvals that would likely be required for the proposed project include the following:

**Federal Endangered Species Act:** As a federal lead agency, FEMA would comply with Section 7 of the Endangered Species Act. The Town of Hillsborough would be responsible for implementing all measures developed by FEMA and the U.S. Fish and Wildlife Service. No additional compliance or approval process would be necessary.

**California Endangered Species Act:** CDFG has reviewing authority over the proposed project for its potential to impact state-listed species and Species of Special Concern, and their habitat. CDFG will have the opportunity to comment on the project’s potential effects to species protected under the California Endangered Species Act during the public and agency comment process required under CEQA. If necessary, the Town would respond to and coordinate with CDFG to further minimize impacts.

**Migratory Bird Treaty Act:** The Town would ensure that implementation of the proposed project would not result in “take” of migratory birds. CDFG has been delegated authority to determine the project’s potential effects to migratory birds during the public and agency comment process required under CEQA.
## INITIAL STUDY AND ENVIRONMENTAL CHECKLIST FORM

<table>
<thead>
<tr>
<th><strong>Project Title:</strong></th>
<th>Hillsborough Fire Hazard Mitigation and Fuel Reduction Program</th>
</tr>
</thead>
</table>
| **Lead Agency’s Name and Address:** | Town of Hillsborough  
1600 Floribunda Avenue  
Hillsborough, California 94010-6418 |
| **Lead Agency Contact:** | Edmund B. Cooney, Senior Program Analyst |
| **Project Location:** | The project area is located between Interstate 280 (I-280)/State Route (SR) 35 and SR 82 and north of SR 92 in the Town of Hillsborough in San Mateo County, California (see Figure 1). The project area consists of eight Town-owned open-space areas (Sites A through G and Site I), all of which are adjacent to residential development (see Figures 2a and 2b). |
| **General Plan Land Use Designation:** | Open Space and Conservation |
| **Zoning:** | Residence District (RD) |
| **Description:** | See Project Description, Section 1.3 |
| **Agencies Whose Approval Is Required:** | Town of Hillsborough, USFWS, FEMA |
| **Surrounding Land Uses:** | majority Residential; also Private Schools, Private Recreational, Open Space and Conservation |

### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- [ ] Aesthetics
- [ ] Agricultural and Forestry Resources
- [ ] Air Quality
- [ ] Biological Resources
- [ ] Cultural Resources
- [ ] Geology/Soils
- [ ] Greenhouse Gas Emissions
- [ ] Hazards & Hazardous Materials
- [ ] Hydrology/Water Quality
- [ ] Land Use/Planning
- [ ] Mineral Resources
- [ ] Noise
- [ ] Population/Housing
- [ ] Public Services
- [ ] Recreation
- [ ] Transportation/Traffic
- [ ] Utilities /Service Systems
- [ ] Mandatory Findings of Significance

### Determination

On the basis of this initial evaluation:

- [ ] I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- [x] I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
SECTION TWO

Initial Study/Determination

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

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

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

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Have a substantial adverse effect on a scenic vista?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>11, 14, 15, 18</td>
</tr>
<tr>
<td>b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>11, 14, 15, 18</td>
</tr>
<tr>
<td>c. Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>11, 14, 15, 18</td>
</tr>
<tr>
<td>d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>14, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a, b, and c) Less Than Significant Impact**

The visual character of the landscape within the project area consists mainly of vegetated areas including hardwood forest, chaparral, coastal scrub, grasslands, riparian forest, and scrub. The proposed project areas are adjacent to single-family residential neighborhoods. Primary viewers of the proposed project areas include residents of homes surrounding the project areas. Because all of the proposed project areas are on lands that are closed to the public, viewpoints of the project areas would be from outside the project area and often from a distance.

Most of the treatment activities (80 to 90 percent) would concentrate on shrub and understory vegetation reduction. In forest and woodland areas, healthy native trees would be avoided to the maximum extent possible. Native trees would be removed if it is the only reasonable means to meet the treatment objectives in specific areas. Some trees may be selectively thinned, removing limbs and branches, to increase spacing between trees.

The proposed project would change the existing visual quality of the landscape within the proposed project area but would not change the existing visual character. Vegetation in the proposed project area is currently very dense, and removal of shrubs and groundcover understory would decrease the volume of the vegetation, creating more openings between the shrub layer and the overstory layer, reducing fuel ladders that can carry fire from the ground into the tree layer. Furthermore, the limbing of trees and the pruning of tree limbs would potentially open new viewsheds within the project area. The change in the visual quality of the landscape would be most observable within the defensible space management zones, which are closest to residences surrounding the project area.

The proposed project would not have a substantial adverse effect on a scenic vista, nor would it substantially damage scenic resources. After the proposed project has been implemented, the
visual character of the project area would continue to consist mainly of vegetated areas including hardwood forest, chaparral, coastal scrub, grasslands, riparian forest, and scrub. Thus, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.

d) No Impact

No new source of substantial light or glare would adversely affect day or nighttime views within or in the vicinity of the project area.
### 3.2 Agriculture and Forest Resources

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>4, 8, 11</td>
</tr>
<tr>
<td>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
<td>8, 10</td>
</tr>
<tr>
<td>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 sections 51104(g)?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>10, 15, 18</td>
</tr>
<tr>
<td>d. Result in the loss of forest land or conversion of non-forest land to non-forest use?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>10, 15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>10, 15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a and b) No Impact**

The proposed project would not convert any farmland to non-agricultural use. According to the Farmland Mapping and Monitoring Program San Mateo Important Farmland Map (2008) (Farmland Map), the proposed project area does not contain any farm land. The Farmland Map delineates the location of the proposed project areas as land either classified as “Urban and Built-Up Land” or “Other Land.” According to the Agricultural Preserves (Land under Williamson Act Contract) map (2001) no land within the proposed project area is under Williamson Act Contract. The proposed project would not be located on farmland of any kind and would not involve any changes that could result in the conversion of farmland to non-agricultural use. Therefore, the project would have no impact to agricultural resources.

**c, d, and e) Less Than Significant Impact**
“Forest land” is defined in Public Resources Code section 12220(g) as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” Most of the project area would be considered forest land by this definition. The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land [as defined in Public Resources Code section 12220(g)]. The proposed project area does not qualify as timberland under Public Resources Code section 4526 or Government Code section 51104 (g). The proposed project would not change the existing land use (Open Space and Conservation) at the proposed project site and would continue to allow for the project area to considered forest land [as defined in Public Resources Code section 12220(g)]. Therefore, the proposed project would not result in the conversion of forest land to non-forest use. As such, the proposed project would have less-than-significant impacts to forest resources.
### 3.3 Air Quality

<table>
<thead>
<tr>
<th>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td>1, 15, 18</td>
</tr>
<tr>
<td>b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td></td>
<td>✔️</td>
<td></td>
<td></td>
<td>1, 2, 3, 15, 18, 20</td>
</tr>
<tr>
<td>c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</td>
<td></td>
<td></td>
<td>✔️</td>
<td></td>
<td>10, 15, 18</td>
</tr>
<tr>
<td>d. Expose sensitive receptors to substantial pollutant concentrations?</td>
<td></td>
<td></td>
<td>✔️</td>
<td></td>
<td>2, 15, 18</td>
</tr>
<tr>
<td>e. Create objectionable odors affecting a substantial number of people?</td>
<td></td>
<td></td>
<td></td>
<td>✔️</td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

The Federal Clean Air Act of 1970 resulted in the adoption of federal air pollutant standards, known as National Ambient Air Quality Standards (NAAQS), for pollutants including carbon monoxide (CO), ozone (O₃), sulfur dioxide (SO₂), nitrogen oxides (NOₓ), and particulate matter less than 10 microns in diameter (PM₁₀), and fine particulate matter (PM₂.₅). The state air pollutant standards are known as the California Ambient Air Quality Standards (CAAQS), and are generally more stringent than the NAAQS.

The proposed project is within the San Francisco Bay Area Air Basin (SFBAB) and is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The Bay Area 2005 Ozone Strategy is the most recent regional air quality plan. With respect to NAAQS, SFBAB is currently designated non-attainment for O₃, 24-hour PM₂.₅, and unclassified for 24-hour PM₁₀. With respect to California standards, the SFBAB is currently designated non-attainment for O₃, PM₂.₅, and PM₁₀.

**a) No Impact**

The proposed project would include temporary vegetation clearing (treatment) activities specific for DSZs or high-priority fire management areas that would be maintained on an annual basis to preserve low wildfire fuel loads. Project-related emissions would be temporary, and the proposed project would not create any operational sources of air pollutant emissions. As described in more detail in part b) below, the emissions from implementing the proposed project would not exceed any project-specific emissions threshold established by the BAAQMD. BAAQMD does not have specific emissions thresholds for vegetation clearing projects. As the proposed project would
result in temporary emissions over a short period (three years), would involve the temporary use of mechanical equipment, and would not result in long term operational emissions, the project-related emissions would be similar in nature to those of a construction project. Thus, the BAAQMD construction emission thresholds are the appropriate emission-type to use for analyzing air quality impacts of the proposed project. The BAAQMD’s emissions thresholds are determined by BAAQMD to allow for the SFBAB to meet the CAAQS and NAAQS. As such, with emissions below BAAQMD’s project-specific emissions threshold, the proposed project would not conflict with or obstruct the implementation of the applicable SFBAB air quality plan, the Bay Area 2005 Ozone Strategy.

b) Less Than Significant Impact

Exhaust from mechanical equipment, including chain saws, other hand-operated mechanical equipment, mowers, chipping equipment, and transport of green waste would generate small amounts of air pollutant emissions. These emissions would be temporary and would not exceed any air quality standard because they are below significant emissions thresholds established by the BAAQMD.

The proposed project includes vegetation clearing (treatment) activities for eight Town-owned open-space areas (Sites A through G and Site I), consisting of eight DSZs and four high-priority fire management areas. Daily criteria pollutant emissions generated by the project are summarized in Table 2 below. Calculations were made under the conservative assumption that treatment activities at each site would be performed by a team of four to six workers, with each team using up to two brush chippers/trimmers, two diesel chainsaws, one riding mower, and one diesel stump grinder in addition to non-motorized hand tools. As described in the mitigation measures of the Biological Resources section, below, the Town may choose to impose a seasonal restriction for treatment activities to occur from May 1 to October 15. This would allow for treatment activities to occur over approximately 165 days per year over the course of three years, which would be a reasonable conservative estimate for calculating the average daily emissions. Thus, the daily emissions calculations described in Table 2 are based on 165 activity days per year over the course of three years. If the Town chooses to conduct treatment activities outside of the seasonal restriction (see the mitigation measures of the Biological Resources section for more details), average daily emissions would be lower than under the 165-day scenario because the total amount of work and the subsequent emissions over the course of a year would not change but the average daily intensity of work, i.e. the number of pieces of equipment or number of work crews, would decrease. Regardless of the number of days per year that treatment activities would occur, annual emissions would remain the same.

<table>
<thead>
<tr>
<th>Equipment Description</th>
<th>Horse-power</th>
<th># of pieces of equipment</th>
<th>hours/day</th>
<th>Emission (lb/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>VOC</td>
</tr>
<tr>
<td>Chain Saws</td>
<td>6</td>
<td>16</td>
<td>4</td>
<td>0.64</td>
</tr>
<tr>
<td>Trimmers/Edgers/Brush Cutter</td>
<td>6</td>
<td>16</td>
<td>4</td>
<td>0.64</td>
</tr>
<tr>
<td>Rear Engine Riding Mowers</td>
<td>25</td>
<td>8</td>
<td>4</td>
<td>1.34</td>
</tr>
<tr>
<td>Chippers/Stump Grinders</td>
<td>33</td>
<td>5</td>
<td>4</td>
<td>0.74</td>
</tr>
</tbody>
</table>
### Table 2: Construction Related Daily Criteria Pollutant Emissions

<table>
<thead>
<tr>
<th>Equipment Description</th>
<th>Horse-power</th>
<th># of pieces of equipment</th>
<th>hours/day</th>
<th>VOC</th>
<th>CO</th>
<th>NOX</th>
<th>SO2</th>
<th>PM10</th>
<th>PM2.5</th>
<th>CO2</th>
</tr>
</thead>
<tbody>
<tr>
<td>HD Chippers/Stump Grinders</td>
<td>103</td>
<td>3</td>
<td>4</td>
<td>1.23</td>
<td>4.53</td>
<td>14.54</td>
<td>0.03</td>
<td>0.91</td>
<td>0.88</td>
<td>1,442.02</td>
</tr>
<tr>
<td><strong>Total Equipment Emission, lb/day</strong></td>
<td><strong>4.59</strong></td>
<td><strong>18.02</strong></td>
<td><strong>40.34</strong></td>
<td><strong>0.08</strong></td>
<td><strong>3.16</strong></td>
<td><strong>3.06</strong></td>
<td><strong>4,329.07</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Green Waste Truck Emission, lb/day</strong></td>
<td>0.01</td>
<td>0.10</td>
<td>0.44</td>
<td>0.00</td>
<td>0.02</td>
<td>0.01</td>
<td>99.38</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Project Emission, lb/day</strong></td>
<td><strong>4.60</strong></td>
<td><strong>18.12</strong></td>
<td><strong>40.77</strong></td>
<td><strong>0.09</strong></td>
<td><strong>3.17</strong></td>
<td><strong>3.08</strong></td>
<td><strong>4,428.46</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note:
- Emission factors for all equipment is based on Commercial Lawn and Garden Equipment emission factor from NONROAD 2008 EPA model for San Francisco county (year 2011) (U.S. Environmental Protection Agency 2009).
- Daily emissions were calculated assuming 50 percent equipment operation load on an 8 hours/day working schedule.
- Emission factors for on-road, medium-heavy-duty trucks are based on results from Emfac Emissions Model 2007 Version 2.3 for San Francisco County at year 2011 (California Air Resources Board 2006). The number of trucks was assumed based on the number of sites that may need to transport the green waste (site with heavy duty chipper) to the processing facility (assumed to be within 5 miles of the project area).
- Green waste from DSZs and High Priority Fire Treatment areas would be processed and disposed of onsite to the full extent possible while retaining the overall objective of reduced fire risk and fuel load reduction. As a last resort for areas where removal of green waste is necessary for fuel load reduction, green waste would be collected, chipped, and then transported offsite to a green waste processing facility.
- Workers are expected to commute locally. Emissions from local commute are expected to be very small/ negligible.

The BAAQMD CEQA Guidelines provide emission thresholds for construction-related criteria air pollutants and air pollutant precursors. Under the BAAQMD CEQA Guidelines, the proposed project would be considered a construction-related project, as the proposed project would only result in temporary emissions and would not result in operational emissions. The thresholds are 54 lbs/day for NO\textsubscript{X}, VOC, and PM\textsubscript{2.5} exhaust; 82 lbs/day for PM\textsubscript{10} exhaust; 219 lbs/day for SO\textsubscript{2}; and 547 lbs/day for CO. There is no applicable threshold for CO\textsubscript{2} emissions for construction-related activities. Based on the above analysis, the project daily criteria pollutant emissions would be well below the aforementioned BAAQMD thresholds.

The proposed project would involve minimal ground disturbance and would not involve grading or earth-moving that would generate significant amounts of dust and would not create any permanent sources of air pollutant emissions. Therefore the proposed project would not result in air pollutant emissions in violation of air quality standards.

c) Less Than Significant Impact

The only sources of air pollutant emissions from the proposed project would be exhaust from mechanical equipment, including chain saws, other hand-operated mechanical equipment, mowers, and chipping equipment; and exhaust from green waste transportation trucks. These emissions would be temporary and would occur over the course of three years, with follow-up work occurring during the fourth and fifth year. The proposed project would involve minimal ground disturbance; would not involve grading or earth-moving, which would generate dust; and would not create any permanent sources of air pollutant emissions. All green waste generated by the project would be processed and disposed of onsite to the full extent possible while retaining the overall objective of reduced wildfire risk and fuel load reduction. As a last resort for areas where removal of green waste is necessary for fuel load reduction, green waste would be collected, chipped, and then transported offsite to a green waste processing facility.
With respect to cumulative considerable net increases in non-attainment criteria pollutants, BAAQMD’s current approach is to consider a proposed project to have a significant cumulative air quality impact if the project would individually result in a significant air quality impact. As described in part b) above, the proposed project does not individually result in significant air quality impacts.

Another method to analyze cumulative air quality impacts, especially for proposed projects that would not individually result in significant air quality impacts, is to evaluate the consistency of the proposed project with the local general plan and to evaluate the consistency of the general plan with the regional air quality plan. The Town’s General Plan is consistent with the air quality plan for the SFBAB and the proposed project is consistent with the Town’s General Plan (Open Space and Conservation Element Policy OCS-2.1). Therefore, the proposed project would not result in significant cumulative considerable net increases of any criteria pollutants, and no further analysis regarding cumulative impacts is necessary.

d) Less Than Significant Impact

Occupants of land uses such as schools, children’s day care centers, and hospitals are considered to be more sensitive to poor air quality than the general public because they have increased susceptibility to the effects of air pollutants on the respiratory system. The project area is within open space areas that are closed to the public; thus, no sensitive receptors are present in the project area. Though, the project area is generally surrounded by residential development (i.e., the Town) that includes schools and recreational areas. Due to the small size, limited emissions (Table 2), and the short duration of treatment activities (3 years), operation of internal combustion equipment such as chainsaws, chippers, brush cutters, and mowers would not expose sensitive receptors to significant air pollutant levels, as defined in the BAAQMD CEQA guidelines. Similarly, emissions from project workers commuting to-and-from the proposed project sites would be negligible and would not be expected to expose any sensitive receptors to substantial pollutant concentrations.

e) No Impact

The proposed project would not create any sources of objectionable odors that would impact substantial numbers of people. Sources of exhaust associated with the proposed project, such as chippers and mowers, would be temporary and mobile, and would operate in open space areas that are closed to the public.
### 3.4 Biological Resources

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>✗</td>
<td></td>
<td></td>
<td>✗</td>
<td>5, 6, 14, 15, 16, 17, 18, 19</td>
</tr>
<tr>
<td>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
<td></td>
<td>✗</td>
<td></td>
<td></td>
<td>5, 6, 14, 15, 16, 17, 18, 19</td>
</tr>
<tr>
<td>c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</td>
<td></td>
<td>✗</td>
<td></td>
<td></td>
<td>14, 15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>✗</td>
<td></td>
<td></td>
<td>5, 6, 14, 15, 16, 17, 18, 19</td>
</tr>
<tr>
<td>e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
<td></td>
<td>✗</td>
<td></td>
<td></td>
<td>13, 15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td></td>
<td>✗</td>
<td>5</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

Database research, habitat assessment, and intensive surveys for plant and wildlife species were conducted to identify candidate, sensitive, and special status species with potential to occur in the project area. The California Native Plant Society’s RAREFIND database and California Natural Diversity Database (CNDDB) were searched and a species list was obtained from the U.S. Fish and Wildlife Service to identify the protected species that have the potential to occur in the project area and its vicinity. Reconnaissance-level habitat and vegetation mapping surveys
SECTION THREE

Environmental Checklist Form

occurred over the course of several days in 2006 and 2009. Intensive botanical surveys for special status plants were conducted on May 25, 26, 27, and 28; June 4; July 16 and 17, 2007; and on March 24, 2008. These surveys followed CDFG survey guidelines and were conducted during the reported blooming periods for targeted special-status species with potential to occur in the area. Wildlife surveys were conducted on May 25, 26, 27, and 28, 2007, at various times of the day. The intensive surveys identified more than 314 plant and 57 wildlife species. Focused surveys for California red-legged frog (*Rana draytonii*) (CRLF) were conducted in 2008 and 2009 around Crocker Lake. No CRLF were detected during these focused surveys.

The eight open-space areas in the project area are composed primarily of hardwood forest. Each also contains other vegetation communities which include eucalyptus forest and other non-native forests, chaparral, coastal scrub, grassland, and riparian forest/scrub. Botanical surveys conducted in 2007-2008 identified two special-status species: California bottlebrush (*Elymus californicus*) (Sites B, C, D, E, F, G, and I) and San Francisco collinsia (*Collinsia multicolor*) (Sites C, D, E, F, and I). No other targeted special-status species with potential to occur in the area were identified during the 2007 and 2008 surveys. Because the surveys were conducted in 2007 and 2008, it is possible that additional candidate, sensitive, or special-status plant species may have established in the project area. Several special-status species known from the region are associated with serpentine or other ultramafic soils. Though known to occur in the general vicinity, serpentine or other ultramafic soils were not observed to be present in the project area. Since the habitat for serpentine endemic plant species is not found in the project area, it is very unlikely that these species would be found in the project area.

Wildlife surveys conducted in 2007-2008 identified several active raptor nests (Sites A and C); wood rat nests, which could belong to the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) (all sites); a great blue heron (*Ardea herodias*) rookery (Site E); foraging double-crested cormorants (*Phalacrocorax auritus*) (Site E); and acorn woodpecker (*Melanerpes formicivorous*) granary trees (Site E). Based on the types of habitats and the geographic location of the open space areas, the U.S Fish and Wildlife Service could generally assume potential for occurrence of the federally-listed San Francisco garter snake (*Thamnophis sirtalis tetrataenia*). However the potential for occurrence of this species in the project area would be considered low because the project area would not include aquatic habitats favored by the species.

No habitat for bay checkerspot butterfly (*Euphydryas editha bayensis*) or Mission blue butterfly (*Icaricia icarioides missionensis*) was noted in the project area, however, based on the range of these species and the undeveloped nature of the project area, both have potential to occur in the project area. However, both of these species favor open and sparse ridgetop grassland areas, which are generally outside of the project area.

Intensive surveys following the U.S. Fish and Wildlife Service protocols outlined in the 2005 U.S. Fish and Wildlife Service Revised Guidance on Site Assessments and Field Surveys for the CRLF were conducted in the vicinity of Crocker Lake (Site E of the project area). No CRLF were detected. Further, several species that are known to prey on the CRLF, including fish and bullfrogs (*Rana catesbeiana*), were observed in the lake. Due to these factors, it is reasonable to conclude that it is unlikely for CRLF to breed in Crocker Lake. However, CRLF are known from the general region, and it is possible that some CRLF may forage, aestivate, or disperse at the site. Based on the small size and isolated nature of most of the open space preserves (i.e. surrounded by dense residential development and roads and lack of, or limited amount of wetlands onsite that could provide breeding and foraging habitat), and on the presence of
predator species known to feed on CRLF larvae, potential for occurrence is considered low. However, it cannot be completely ruled out that CRFL could attempt to occupy open space lands in the future.

Some of the open space preserves contain wetlands or waterbodies. No specific delineation of wetlands and other waters of the State or U.S have been conducted in the project area, however, May and Associates mapped vegetation communities in the treatment areas. Mapped habitat included waterbodies and wetland community types such as herbaceous wetland and riparian forest/scrub (see Appendix A). Work will be prohibited with 50 feet of wetlands or waterbodies, and conducted with modified procedures from 50-200 feet of these features.

The Town of Hillsborough Municipal Code, 14.04.050, requires that the city engineer, or their authorized representative, must approve all tree removal on vacant, unimproved land in the Town. The project area does not fall under the purview of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The project area lacks any other habitat that is designated by Federal, State, regional, or local agency for protection.

a) Less Than Significant With Mitigation Incorporated

FEMA would need to comply with Section 7 of the Federal Endangered Species Act prior to obligating its grant to the Town. As a part of this compliance process, FEMA would likely consult with the U.S. Fish and Wildlife Service to determine the effects of the proposed project to federally-listed species and their critical habitat and develop measures that could be implemented by the Town to avoid or minimize these effects. It is anticipated that the U.S. Fish and Wildlife Service would provide FEMA with a Biological Opinion and Incidental Take Statement for the proposed project, which would include measures and conditions that must be implemented and met to minimize project-related impacts. As a stipulation in FEMA’s grant, the Town would be obligated to implement the measures and conditions stipulated by U.S. Fish and Wildlife Service.

Direct effects to candidate, sensitive, or special status species would include proposed project activities that could result in injury or mortality, forced dispersal, or modifications in behavior to these species. Implementation of the proposed project, as described in the Project Description, would eliminate or minimize potential for direct effects to species that could occur as a result of fuel reduction and vegetation management activities.

To the extent practicable, staging areas would be established on already disturbed road surfaces, and would avoid habitat for candidate, sensitive, or special status species. Sensitive biological resources would be flagged to facilitate worker avoidance during treatment activities. Flagged resources would include known populations of special-status plant species, wetlands and waterbodies near ingress/egress locations and other access routes, known bird nesting and roosting sites, woodrat nests, and woodpecker granary trees. Specific slope stabilization textiles with potential to entangle or trap wildlife species, such as plastic monofilament netting, would be prohibited from use.

As described in the Project Description, treatment activities would not occur within 50 feet of wetlands and waterbodies, and treatment activities would be modified between 50 and 200 feet from these habitats to minimize effects on these habitats as well as on special-status species that
could occur in and near them. The modified procedures between 50 and 200 feet of wetlands and waterbodies would include the use of herbicides onto stumps of cut vegetation that are EPA-approved for use around water, the use of hand tools and restricted vegetation treatment prescriptions to the least invasive methods. Equipment fueling and maintenance activities would follow standard practices that would minimize potential for direct effects to wetlands and waterbodies.

Effects to nesting migratory birds would be minimized by restricting all work possible to the non-nesting season, or, if full avoidance of bird nesting season cannot be achieved, by requiring preconstruction bird nesting surveys to established adequate buffers to active nests. Any active nests identified through preconstruction surveys would be avoided by establishing a 200-foot buffer area in which treatment activities would be prohibited until nesting is complete and young birds have fledged.

The proposed project activities fall within the range of known locations of CRLF and San Francisco garter snake. Effects to these species would be unlikely. The exclusion zones that would be established around wetlands and waterbodies would protect most onsite habitat from vegetation management activities. The small and isolated nature of most of the project area (i.e. small size, lack of wetlands at most open space areas, development on all sides of the open space areas, and limited connection with other open space lands) reduces potential for long term presence of CRLF or San Francisco garter snake populations onsite. The presence of predator species (fish and bullfrogs) in onsite wetlands and waterbodies may preclude use of the wetlands for breeding or foraging by CRLF and reduces prey base for San Francisco garter snake. Proposed treatment activities would avoid suitable breeding habitat, and impacts are not expected to frog larvae or expected to effect breeding activities. Because treatment activities would not affect wetlands and riparian habitat, where snakes and frogs would often congregate, potential for direct effects to these species in these habitats are also considered low. San Francisco garter snake and CRLF can also utilize habitats in the project area outside of wetlands and waterbodies for refugia and foraging and dispersing activities. Measures are listed below to reduce or avoid effects to individuals that may be present in other habitats in the project area.

The treatment areas, especially areas with hardwood forest, contain known woodrat nests that may belong to San Francisco dusky-footed woodrat. Active woodrat nests would be flagged and avoided, to the extent practicable, during project implementation. There is potential that woodrat nests cannot be avoided, in which case the nest would need to be dismantled. If these nests are being actively used by the San Francisco dusky-footed woodrat, dismantling activities could result in adverse effects to the species.

Though the general vicinity of the proposed project occurs in the range of the bay checkerspot butterfly or Mission blue butterfly, the proposed project would not occur in open and sparse ridgetop grassland habitat favored by these species. Therefore, the proposed project would not affect bay checkerspot butterfly or Mission blue butterfly habitat, and it would be unlikely for the proposed project to affect these species.

Potential effects on sensitive species, if they occurred, could include direct injury or mortality; forced dispersal due to noise or vibrations generated from equipment and vehicles; behavior modifications that could result in increased predation; or loss of potential prey (food source).

Known populations of San Francisco collinsia and California bottlebrush grass would be flagged and avoided. However, the proposed project could directly affect San Francisco collinsia,
California bottlebrush grass if it is not possible to fully avoid the known populations of these species during project implementation.

As the project area contains suitable habitat, other sensitive plant species may have become established in the proposed treatment areas after the 2007/2008 botanical surveys. If new populations of candidate, sensitive, or special status plant species have become established since the 2007/2008 botanical surveys, they could be directly affected during implementation of the proposed project. Measures are listed below to survey for and reduce or avoid effects to these sensitive plant species that may be present.

The proposed project would not result in habitat modification or habitat-type conversion. After project implementation, the habitats found in the project area would continue to be found at their current location, but in the treatment areas, the density of vegetation within selected forest and scrub habitats would be selectively thinned (reduced). Additionally, specific project activities would reduce the potential for habitat modification in both the short and long term. Follow-up treatment activities would reduce the potential for invasive plant species to spread and grow in treatment areas and thus minimize habitat modification through the uncontrolled propagation of invasive species. Some understory grassy areas will be mowed. Though grasses would be mowed, they would be allowed to regrow seasonally. Leaving large logs and woody debris on sight in small piles near ground level would improve or maintain foraging and shelter habitat for many sensitive wildlife species. Erosion control measures, leaving root balls in place, and the other activities intended to minimize ground disturbance would reduce the potential for changes in habitats due to erosion in the treatment areas and adjacent downstream locations after the proposed project has been implemented. The treatment procedures in areas affected by Sudden Oak Death (SOD) would reduce the potential of habitat modifications as a result of spreading SOD to uninfected areas. Buffers and modified treatment activities near wetlands and other waters would minimize potential changes to aquatic and riparian habitats. The general avoidance of native trees and shrubs when possible would result in maintaining the nesting and roosting habitat for many migratory birds.

Although the proposed project would be implemented in a manner that would minimize and avoid direct effects to candidate, sensitive, or special status species, as discussed above, there would still be some potential for effects on these species. Impacts to candidate, sensitive, or special status species would be considered potentially significant, but could be reduced to a less than significant level through implementation of the mitigation measures described below.

**Mitigation Measures:**

The following mitigation measures would reduce the extent of direct effects and limit impacts to candidate, sensitive, or special status species:

- During the appropriate blooming period and prior to the first year of project implementation, qualified botanists will conduct pretreatment surveys of the treatment areas to determine the presence or absence of sensitive plant species in any areas that have the potential to support the species. These surveys will include updating the mapping of known populations of San Francisco collinsia and California bottlebrush grass as well as conducting surveys for other special-status plants that could have established onsite since the 2007-2008 rare plant surveys. Surveys will include re-assessing the potential for suitable habitat (i.e. presence of host plant species) for the bay...
checkerspot butterfly and Mission blue butterfly within proposed work areas, fencing and flagging any potential habitat and avoidance.

- Any populations of sensitive plant species identified will be marked and work activities will be avoided in the area to the maximum extent possible. If full avoidance of sensitive plant species is not possible, work will be conducted after the plant species has bloomed and has set seed, allowing the species to re-seed itself naturally over time.

- If host plants for the bay checkerspot butterfly and Mission blue butterfly are identified within the project area, a 50-foot buffer around these populations will be marked and avoided by work activities conducted between February 15 and August 15. After this exclusion period, and if avoidance is not possible, host plants will be harvested by all available methods, including harvesting of seed, relocation of the plant taproot, and stockpiles and separating the topsoil to preserve the seed bank. A qualified biologist will direct the timing of the harvesting, germination, and top soil relocation. If possible, the plant material will be used to revegetate the areas after the construction activities have been conducted. This measure will be implemented to avoid any take of federally-listed plant or butterfly species.

- To the extent practicable, treatment activities will occur between May 1 and October 15 within any areas determined to be suitable San Francisco garter snake or CRLF habitat to avoid potential disturbance to breeding CRLF and hibernating San Francisco garter snake. Treatment activities that will occur between October 16 and April 30 in vegetation that is determined to be suitable hibernating habitat for San Francisco garter snake or suitable breeding habitat for CRLF will include the following measures:
  
  o Conduct pretreatment surveys for CRLF and San Francisco garter snake within 24 hours prior to treatment activities.
  o Vegetation will be cleared by hand equipment to a height of approximately 6 to 8 inches above ground level.
  o Cut vegetation will either be left in place or removed and hauled out by hand at the time of the cutting. No chipping and broadcasting of chipped material will occur in these areas between October 16 and April 30.
  o The area underneath vehicles that have been parked for 30 minutes or more will be inspected for snakes and frogs, immediately prior to moving the vehicle.
  o Personnel who detect any suspected San Francisco garter snake or CRLF on-site will immediately report their finding to a qualified biologist for positive identification. Non-permitted personnel will not attempt to capture or move any snake or frog detected. If the biologist determines that the animal is not a San Francisco garter snake or CRLF, the biologist may hand capture and move the animal to suitable habitat outside the construction area. If the biologist determines that the detected animal is a San Francisco garter snake or a CRLF, or is unable to positively identify the animal, then biologist will notify the USFWS for appropriate action.

- If a federally-listed species is injured during treatment activities, the USFWS will be notified within one working day. Notification within one day is also required if larvae or
adult bay checkerspot butterfly or Mission blue butterfly will be destroyed, harmed, or harassed during project implementation. CDFG will be notified within one working day if a state-protected species is injured.

- If a woodrat nests cannot be avoided, a qualified biologist will inspect the nest and carefully dismantle the nest by hand, allowing the occupant to relocate prior to treatment activities.
- A biological monitor will conduct environmental awareness training for all work crews and contractors.
- All work activities will begin no sooner than 15 minutes after sunrise and will be completed no later than 15 minutes after sunset to minimize potential adverse effects to the San Francisco garter snake foraging (if present).
- Speed limits in the work areas will not exceed 10 miles per hour.

With implementation of the above mitigation measures, the potentially significant impact of direct effects to candidate, sensitive, or special status species would be substantially reduced. With the implementation of the mitigation measures potentially significant impacts would be reduced to a less-than-significant level.

As described above, to obtain its grant from FEMA, the Town would be obligated to implement the measures that would be stipulated by U.S. Fish and Wildlife Service through its consultation process with FEMA under Section 7 of the Federal Endangered Species Act. These measures would be intended to avoid and minimize effects to federally-listed species as much as feasibly possible and could exceed the reduction of effects beyond the mitigation measures described above. If the U.S. Fish and Wildlife Service measures specifically conflict with any of the above mitigation measures, the Town would implement the required the U.S. Fish and Wildlife Service measures instead of the specific mitigation measure, as the U.S. Fish and Wildlife Service measures would meet or exceed the effects of the mitigation measure.

b) Less Than Significant

The proposed project would include modified activities to ensure that no work would occur within 50 feet of wetlands and waterbodies. In addition, within 200 feet of wetlands and waterbodies, treatment procedures would be modified. These modified procedures would include the use of herbicides that are EPA-approved for use around water, the use of hand tools, a different vegetation treatment prescription, and prohibition of equipment fueling. Outside of 200 feet from wetlands and waterbodies (that may include associated riparian communities), spill containment and cleanup equipment would be kept on-site and trained personnel would implement measures in the event of an accidental spill while refueling. Because of these procedures, the proposed project would result in a less than significant impact to riparian communities. No other sensitive natural communities have been identified or are expected to occur within the project area.

c) Less Than Significant

As described above, the proposed project would protect wetlands by excluding treatment activities within 50 feet of wetlands and limiting treatment activities within 200 feet of wetlands. In addition, the Town would implement measures as part of the proposed project, such as installing erosion control when necessary and taking measures to reduce hazardous spills and
contamination, to avoid impacts to wetlands and waterbodies. The minimal ground disturbing activities as a part of the proposed project would result in no hydrological changes in any nearby wetland features.

d) Less Than Significant
No barriers to movement would be created as a result of this project. The project consists of clearing vegetation. No new permanent structures would be built. Creeks and water features would be avoided. No treatment activities would occur within 200 feet of a rookery or nursery site until after the fledglings have left the site.

e) Less Than Significant
This project does not conflict with any local policies or ordinances protecting biological resources. Section 14.04.050 of the Town of Hillsborough Municipal Code requires that the city engineer, or their authorized representative, approve all tree removal on vacant unimproved land in the Town. All tree removal activities would occur in compliance with the Town’s municipal code. The proposed project would not result in large-scale tree removal. Some trees may be thinned to create spaces between trees in dense forested areas. Native trees would be removed if it is the only reasonable means to meet the treatment objectives in specific areas. Hazard and diseased trees would also be felled as necessary. These treatment methods follow the criteria described in Section 14.04.050, that the city engineer would consider when authorizing tree removal activities.

f) No Impact
No Habitat Conservation Plan or Natural Community Conservation Plan has been adopted that encompasses the project area.
### 3.5 Cultural Resources

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?</td>
<td></td>
<td></td>
<td>✔</td>
<td>9, 15, 18</td>
<td></td>
</tr>
<tr>
<td>b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
<td></td>
</tr>
<tr>
<td>c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
<td></td>
</tr>
<tr>
<td>d. Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
<td></td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a, b, c, and d) No Impact**

Maureen Kick and Benjamin Elliot, both Registered Professional Archaeologists with URS Corporation (URS), conducted a records search at the Northwest Information Center of the California Historical Resources Information System on December 23, 2008 and a pedestrian archeological survey of the proposed project’s area of potential effects on August 19, and 20, 2009.

The Native American Heritage Commission (NAHC) was contacted by letter on November 13, 2008 and requested to search its Sacred Lands File to determine if any known sacred sites or other locations of importance to Native Americans are known to exist in the project area. A list of Native Americans that should be contacted concerning resources of importance to Native Americans was also requested. On November 14, 2008, the NAHC responded that the review of the Sacred Lands File did not show any sacred sites or other locations of importance to Native Americans in the project area. On November 2, 2009, letters were sent to the groups and individuals identified by the NAHC. To date, no responses have been received.

As a result of the records search, one previously recorded site, C-146/778, a small prehistoric shell mound or camping site, was identified. The site was recorded in 1936. No evidence of the site was found during the pedestrian survey. Either the site no longer exists or its location was plotted incorrectly.

Portions of the proposed project area are located on a property that was formerly part of the 700-acre Crocker Estate. The Crocker mansion and a remainder of the estate are located outside the project area. During the pedestrian survey a number of remnant landscape architecture features related to the Crocker Estate were observed, including Crocker Lake and Crocker Dam, several stone retaining walls, stone gate posts, unpaved carriage paths, and a downed trestle bridge, all of which are within the proposed project area. These may be contributing elements to the estate.
property and were recorded on Department of Parks and Recreation forms. The proposed project would not affect the identified historic properties. The landscape feature within the proposed project area will not be removed or altered by the proposed activities. No other cultural resources were identified within the project area.

The proposed project would not result in any substantial adverse changes in the significance of a historical or archaeological resource as defined in Section 15064.5.

The proposed activities would result in only minimal ground disturbance and would not involve grading or earth-moving. No tree skidding would occur. Green waste would be transported in the treatment areas through bundling and carrying or through the use of a pulley system, and root balls would be left in place. Slopes in all treatment areas would be stabilized, and erosion control measures would be installed as needed. As such, any rock formations that could contain paleontological resources would not directly or indirectly destroyed or affected through the implementation of the proposed project. The proposed project would not disturb any known human remains, including those interred outside of formal cemeteries. The Town would stop work in the event of an unexpected discovery of previously unidentified archeological resources.
## 3.6 Geology and Soils

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>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 Pub. 42.</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>ii. Strong seismic ground shaking?</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>iii. Seismic-related ground failure, including liquefaction?</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>iv. Landslides?</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>b. Result in substantial soil erosion or the loss of topsoil?</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>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?</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**DISCUSSION:**

### a. i, ii, iii, iv., b, c, and d) Less Than Significant Impact

The proposed project areas are within open spaces that are closed to the public. The proposed project would not expose people or structures to additional risks associated with a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure (including liquefaction).

The proposed project would involve minimal ground disturbance. To avoid the potential for landslides, erosion, loss of topsoil, and hazards associated with unstable or expansive soils—root...
balls of cut trees and vegetation would be left in place and no tree skidding would occur. With the exception of SOD-infected trees, to further avoid erosion due to ground disturbance, green waste and heavy equipment such as chippers and mulchers would be transported on steep slopes using a pulley system and chippers would be operated on existing access roads. SOD-infected trees would be felled and the plant matter would be left in-place. No additional treatment activities would be performed within 200 feet of infected trees.

During and after implementation of the proposed project, slopes in all treatment areas would be stabilized, and erosion control measures would be installed as needed to prevent hazards related to unstable and expansive soils. These measures include, but are not limited to, installing and maintaining silt fences immediately down-gradient of disturbed areas and installing and maintaining erosion control blankets on all disturbed sloped ground. Coconut coir matting or tackified hydroseeding compounds would likely be used for slope stabilization. Plastic monofilament netting (erosion control matting) or similar material would not be used for slope stabilization because of the potential that reptiles or amphibians, including federally listed species, could become entangled or trapped in these textiles. Follow up maintenance activities as part of the proposed project would include the installation of necessary erosion control measures.

e) No Impact

The proposed project would not include septic tanks or other alternative waste-water disposal systems.
### 3.7 Greenhouse Gas Emissions

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
<td></td>
<td>🔵</td>
<td></td>
<td></td>
<td>2, 3, 15, 18, 20</td>
</tr>
<tr>
<td>b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
<td></td>
<td>🔵</td>
<td></td>
<td></td>
<td>2, 3, 15, 18, 20</td>
</tr>
</tbody>
</table>

#### DISCUSSION:

**a and b) Less Than Significant**

The project-related emissions would be similar in nature to those of a construction project because the proposed project would result in temporary emissions over a short period (three years), would involve the temporary use of mechanical equipment, and would not result in long term operational emissions. Existing CEQA Guidelines do not include a threshold of significance for greenhouse gas emissions from a construction-related project\(^2\). Therefore, there is no greenhouse gas significance threshold that applies to the proposed project.

The proposed project includes treatment activities for eight Town-owned open-space areas (Sites A through G and Site I), consisting of eight DSZs and four high-priority fire management areas. Greenhouse gas emissions from the proposed project would be generated from combustion of fossil fuel in the equipment and trucks, as described in the Section 3.3 Air Quality. As presented in Table 2 (Section 3.3 Air Quality), maximum daily greenhouse gas emissions generated by the project were estimated at 4,428 lb/day as CO\(_2\). This daily emission translates to 331.44 metric tons/year of CO\(_2\), assuming 165 days of activity per year.

Although no applicable greenhouse gas emissions threshold currently exists, the projected short term emissions of greenhouse gases from the first year treatment scenario, which would include the majority of vegetation removal activities, would be well below 1,100 metric tons of CO\(_2\)/year, which is the most stringent greenhouse gas emissions threshold established by the BAAQMD and is intended for operational missions from projects emitting from non-stationary sources.

Because the projected short term emissions of greenhouse gas from the first year of project treatment would be well below the 1,100 metric tons of CO\(_2\)/year emissions threshold, during its entire duration, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

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\(^2\) BAAQMD. California Environmental Quality Act Air Quality Guidelines. June 2, 2010
### 3.8 Hazards and Hazardous Materials

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td></td>
<td>✅</td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>✅</td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
<td></td>
<td>✅</td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>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 create a significant hazard to the public or the environment.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7, 15, 18</td>
</tr>
<tr>
<td>e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</td>
<td></td>
<td>✅</td>
<td></td>
<td></td>
<td>11, 15, 18</td>
</tr>
<tr>
<td>f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</td>
<td></td>
<td>✅</td>
<td></td>
<td></td>
<td>11, 15, 18</td>
</tr>
<tr>
<td>g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
</tbody>
</table>
DISCUSSION:
a, b, and c) Less Than Significant Impact

To prevent re-sprouting of cut vegetation, an herbicide solution would be applied to the cambium layer of freshly cut tree stumps within a few minutes of felling. The herbicide mixture would likely consist of a combination of a glyphosate-based herbicide such as RoundUp® or Rodeo in a solution of esterified seed oil (a tackifier), water, and marking dye. As an alternative, Garlon® 4 (triclopyr) and/or Stalker® (imazapyr) may be used in a similar manner. A typical tree requires 1 to 2 ounces of diluted solution.

At certain times, including during work at Sites A, B, C, D, E, and F, the proposed project would involve the handling of hazardous materials (herbicides) within one-quarter mile of an existing school. During herbicide treatment, to the extent practicable, Integrated Pest Management guidelines and California Department of Agriculture pesticide regulations would be followed. All of the herbicides proposed are approved by the U.S. Department of Agriculture (USDA) and the main active ingredients are triclopyr, imazapyr and/or glyphosphate. Wherever possible, glyphosphate-based herbicides would be applied as they are deemed to be the least toxic alternative, safe for use in terrestrial habitats, and have the shortest residual life. The herbicide would be applied by a Chemical Applicator with a Qualified Applicator License or Certificate from the California Department of Agriculture in accordance with the manufacturer’s specifications and federal and state laws. Herbicides would not be applied directly within 50 feet of standing water, creeks, streams or other wetland habitats. No foliar herbicide application would occur, and herbicides would not be applied by spraying because all herbicides would be hand-painted on stumps.

It is unlikely that a hazardous materials release or accident would occur when implementing the proposed project and any accidental release would be relatively small. The use of herbicides would be relatively minimal: it would be painted on freshly cut stumps and no foliar application would occur. The use of herbicides in accordance with the manufacturer’s specifications and federal and state laws would minimize potential for accidental release. Finally, with the relatively small quantity of herbicide that would likely be used for the proposed project, an accidental release would be relatively small and localized.

The use or storage of petroleum-powered equipment would be accomplished in a manner to prevent the potential release of petroleum materials. The following precautionary measures would be employed:

- Vehicles and equipment would be inspected and approved by an inspector before use to ensure that they would not leak any type of hazardous materials such as oil, hydraulic fluid, or fuel.
- Fueling would take place in designated staging areas, outside of any native vegetation or wetland areas.
- The contractor would have emergency spill clean-up gear (spill containment and absorption materials) and fire equipment available onsite at all times. These items would be reviewed by an inspector before construction begins.
• Leaks, drips, and other spills would be cleaned up immediately to avoid soil or groundwater contamination.
• Major vehicle maintenance and washing would be done offsite.
• All spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries would be collected, stored, and recycled as hazardous waste offsite.
• Spilled dry materials would be swept up immediately.

Thus, the effects to the public or the environment should an accidental release occur would be relatively minimal and would be a less-than-significant impact.

d) No Impact

The list of hazardous materials sites compiled pursuant to Government Code Section 6562.5 was consulted, and no sites are listed within the project area.

e) Less Than Significant Impact

A portion of the project area is within 2 miles of the San Francisco International Airport and within the San Carlos Airport’s Area of Influence Boundary A. The proposed project would not expose people that reside or work in the project area to any new safety hazards related to the nearby airport, such as a potential hazard to workers in a new tall building near an established flight path. Additionally, the proposed project would not create new hazards for birds and would thus not result in a potential increase in bird strikes by nearby airplanes.

f) No Impact

The proposed project would not be located in the vicinity of a private airstrip.

g and h) No Impact

The proposed project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Vehicle staging would be located off the Town’s streets. Work crews would be small and they may park their vehicles on Town streets, but would park their vehicles at allowable locations which would thus not impair the movement of emergency vehicles or other vehicles implementing an emergency evacuation plan. The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The proposed project would reduce fuel load and aide firefighting efforts in the vicinity of the proposed project area.
### 3.9 Hydrology and Water Quality

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Violate any water quality standards or waste discharge requirements?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>f. Otherwise substantially degrade water quality?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
<tr>
<td>j. Inundation by seiche, tsunami, or mudflow?</td>
<td></td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
</tbody>
</table>
**DISCUSSION:**

a) **No Impact**

The proposed project would not involve any discharges to a water body and therefore would not violate any water quality standards or waste discharge requirements.

b) **No Impact**

No groundwater would be used as part of the proposed project and the project does not involve the creation of impervious surfaces. The proposed project would require a minimal amount of water to be used for washing work vehicles and equipment, which may, depending on its source, be groundwater, and would not involve any paving or grading. Therefore, the proposed project would not substantially deplete groundwater supplies or interfere with ground water recharge.

c) **No Impact**

The proposed project would not alter the existing drainage pattern of the project area or its vicinity. The proposed project would not alter the course of any existing stream or river. The proposed project would cause minor ground disturbance in areas where vegetation would be trimmed or removed. Slopes in all treatment areas would be stabilized, and erosion control measures would be installed as needed. These measures include, but are not limited to, installing and maintaining silt fences immediately down-gradient of disturbed areas and installing and maintaining erosion control blankets on all sloped disturbed ground. Coconut coir matting or tackified hydoseeding compounds would likely be used for slope stabilization. Plastic monofilament netting (erosion control matting) or similar material would not be used for slope stabilization because of the potential that reptiles and amphibians, including federally listed species, could become entangled or trapped in these textiles.

d) **No Impact**

The proposed project would result in no flooding on or off-site as it would not occur in any designated floodplain and would not alter or change the movement of surface water.

e and f) **No Impact**

Herbicides, when used, would not be applied directly within 50 feet of standing water, creeks, streams or other wetland habitats. The proposed project would, therefore, not create or contribute any runoff water or polluted runoff. The proposed project would not degrade water-quality.

g and h) **No Impact**

The proposed project would involve no new housing or structures.

i and j) **No Impact**

The proposed project would not involve any exposures to significant risks related to flooding or inundation by seiche, tsunami, or mudflow as the project would not involve changing public access to the project site, would not take place in seiche or tsunami hazard areas, and would not involve construction of any structures in a hazard area.
### 3.10 Land Use and Planning

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Physically divide an established community?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>10, 11, 15, 18</td>
</tr>
<tr>
<td>c. Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>5, 15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

a) **No Impact**

The proposed project would not result in any new construction or changes in land use and would not physically divide an established community.

b) **No Impact**

The proposed project would not change the land uses at the project sites or conflict with the Hillsborough Zoning Ordinance. The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

c) **No Impact**

There are no known habitat conservation plans or natural community conservation plans that apply to the project area. Therefore, proposed project would not conflict with any applicable habitat conservation plans or natural community conservation plans.
### 3.11 Mineral Resources

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
<td>11, 15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
<td>11, 15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a) No Impact**

Mining activities in California are regulated by the Surface Mining and Reclamation Act (SMARA) of 1975. Based on guidelines adopted by the California Geological Survey, areas known as Mineral Resource Zones (MRZs) are classified according to the presence or absence of significant deposits.

There are no known mineral resources within the vicinity of the proposed project site. If any unknown mineral resources exist within the proposed project site, the proposed project would not result in the loss of their availability.

**b) No Impact**

No known mineral resource recovery site is located within the proposed project area or is delineated in the Town of Hillsborough General Plan or any other known land use or specific plan.
### 3.12 Noise

<table>
<thead>
<tr>
<th>Would the project result in:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</td>
<td></td>
<td>✔</td>
<td></td>
<td></td>
<td>10, 15, 18</td>
</tr>
<tr>
<td>b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</td>
<td></td>
<td></td>
<td>✔</td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td></td>
<td></td>
<td>✔</td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td></td>
<td></td>
<td>✔</td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>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 expose people residing or working in the project area to excessive noise levels?</td>
<td></td>
<td></td>
<td>✔</td>
<td></td>
<td>11, 15, 18</td>
</tr>
<tr>
<td>f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</td>
<td></td>
<td></td>
<td>✔</td>
<td></td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

a) **Less Than Significant Impact**

According to the Town of Hillsborough Noise Ordinance, equipment may be operated for construction activities that do not produce a total combined noise level in excess of 100 A-weighted decibels (dBA) when measured from a distance of 25 feet between 9 A.M. and 5 P.M., Monday through Friday. Noise-generating project activities, such as the operation of equipment, would only take place between 9 A.M. and 5 P.M., Monday through Friday.

Activities and noise levels associated with the proposed project include chainsaw operation (approximately 82 dBA at 25 feet), chipping logs (91 dBA at 25 feet), and the operation of loader-type equipment (86 dBA at 25 feet) such as flail mowers (California Department of Forestry and Fire Protection 2000). For the purpose of this analysis, it was assumed that ten chainsaws, two chippers, and two pieces of loader-type equipment would be in operation at any one time. Decibels are measured on a logarithmic scale and when adding decibels, decibels must
first be converted to a linear scale, then added, and then a log must be taken of the sum. Using this calculation, the combined operation of these ten pieces of equipment would generate a combined noise level of 96.5 dBA at a distance of 25 feet, which would be below the 100 dBA level established in the Town Noise Ordinance. All noise-producing equipment and vehicles using internal combustion engines would be equipped with properly operating mufflers and air-inlet silencers, where appropriate, that meet or exceed factory specifications. Idling of vehicles and other equipment would be minimized when not in use to prevent unnecessary noise.

Noise sources associated with the proposed project would move throughout the action area, and no single noise-sensitive receptor would be subject to elevated project-related noise levels for more than a few days or weeks. Propagation through trees and vegetation and the effects large-scale terrain features would mitigate noise created by the proposed project. Noise insulation provided by buildings would partially reduce project-related noise. When windows are closed, residential structures typically abate noise by approximately 20 dBA.

b) No Impact

The type of equipment to be used and the nature of the proposed project would not result in the creation of groundborne vibration or groundborne noise. Thus, the proposed project would not expose people to any groundborne vibration or noise levels.

c) No Impact

The proposed project would not result in any permanent or stationary noise-generating facilities that would increase or change the ambient noise levels of the project area. The proposed project would result in no permanent increase in noise levels. Once initial treatment activities have occurred in a certain area, the area would be occasionally revisited for maintenance treatment activities.

d) Less Than Significant Impact

During implementation of the proposed project, noise levels would be increased above levels existing without the proposed project but this impact would only be temporary and during hours of project activity. Additionally, activities would be compliant with the Town's noise ordinance.

e and f) No Impact

A portion of the project area is within 2 miles of the San Francisco International Airport and the San Carlos Airport’s Area of Influence Boundary A. The proposed project would not expose people that reside or work in the project area to any noise levels related to the nearby airports. The proposed project is not located within two miles of a private airstrip.
### 3.13 Population and Housing

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Induce substantial 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)?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a) through c) No Impact**

The nature of the project would not result in changes in the population or housing of the Town. The proposed project would not induce substantial population growth either directly or indirectly. The proposed project would not displace any existing housing. The proposed project would not provide for or create any additional roads or road capacity. The proposed project would not displace any people or necessitate any new construction. Implementing the proposed project would result in a reduction of an existing hazard to the existing housing and population of the Town and would not result in the reduction of the hazard in undeveloped areas where housing, roads, or other infrastructure could be built. The project area would continue to be used and designated by the Town as Open Space. Therefore, the project would not directly or indirectly induce population growth.
### 3.14 Public Services

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 following public services:

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Fire Protection?</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>b. Police Protection?</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>c. Schools?</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>d. Parks?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>e. Other public facilities?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a through e) No Impact**

The proposed project would not result in the provision of or need for new or physically altered governmental facilities. The proposed project would not result in the need for additional public services. The open space areas would remain closed to the general public. Thus, there would be no need to change or add public facilities or other public services as a result of implementing the proposed project. The purpose of the proposed project is to reduce fire hazards within 8 of the Town’s open space areas that would have a beneficial affect on local fire protection services.
### 3.15 Recreation

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?</td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a) No Impact**

The proposed project would be implemented within the Town of Hillsborough Open Space areas, which are closed to the public and are not accessible for recreational use. Therefore, the proposed project would have no impact on recreation.

**b) No Impact**

The proposed project does not include recreational facilities nor does it require the construction or expansion of recreational facilities.
### 3.16 Transportation/Traffic

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
<td>✓</td>
</tr>
<tr>
<td>b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
<td>✓</td>
</tr>
<tr>
<td>c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</td>
<td></td>
<td></td>
<td></td>
<td>15, 18</td>
<td>✓</td>
</tr>
<tr>
<td>d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</td>
<td>✓</td>
<td></td>
<td></td>
<td>15, 18</td>
<td></td>
</tr>
<tr>
<td>e. Result in inadequate emergency access?</td>
<td>✓</td>
<td></td>
<td></td>
<td>15, 18</td>
<td></td>
</tr>
<tr>
<td>f. Result in inadequate parking capacity?</td>
<td>✓</td>
<td></td>
<td></td>
<td>15, 18</td>
<td></td>
</tr>
<tr>
<td>g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?</td>
<td>✓</td>
<td></td>
<td></td>
<td>15, 18</td>
<td></td>
</tr>
</tbody>
</table>

**DISCUSSION:**

*a through c) No Impact*

Aside from the temporary minimal traffic increase generated by work crews traveling to and from the proposed project area during project implementation, the proposed project would not create any increase in traffic levels. Furthermore, the proposed project would not affect level of service standards or air traffic patterns.

**d) Less Than Significant Impact**

The proposed project would not substantially increase transportation or traffic hazards due to design features or incompatible uses, though work crews would use existing public roads to transport equipment (chippers, forestry mulchers) to the project site to be used for project implementation. Transportation of this equipment would follow all traffic laws, would not require special permission from local governments, and would not require use of warning or
chase vehicles. All staging areas would be located off public streets. Additionally, the proposed project would not require the alteration of any roadways.

e and f) Less Than Significant Impact

The proposed project would not involve road closures or result in inadequate emergency access. All staging areas would be located off public streets and would not affect emergency access on public streets or parking on public streets. Work crews may park their personal vehicles on public streets in allowable locations. These personal vehicles would be parked in residential neighborhoods on weekdays, where street parking is generally not near capacity. Additionally, work crews would be relatively small and would not occupy very much of the available on-street parking in the project area.

g) No Impact

The proposed project would be temporary in nature and occur on open space properties. The use of public streets where alternative transportation methods would occur would be limited to accessing the project area and parking of work crew personal vehicles. These personal vehicles would be parked in a legal manner and would thus not inhibit the implementation of alternative transportation methods. The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation.
### 3.17 Utilities and Service Systems

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>e. 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?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
<tr>
<td>g. Comply with federal, state, and local statutes and regulations related to solid waste?</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a through e) No Impact**

The proposed project does not include or require any water treatment and would not involve the construction of any water treatment or drainage facilities. There are currently sufficient water sources for successful implementation of the proposed project.

**f and g) No Impact**

The proposed project would generate minimal waste that would need to be disposed of at a landfill. The large majority of waste generated by the proposed project would consist of cut vegetation, which would be disposed of within the proposed project sites to the fullest extent possible. In areas where removal of green waste from the proposed project sites is necessary for
fuel load reduction, green waste would be collected, chipped, and transported offsite to a permitted green waste processing facility. All spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries would be collected, stored, and recycled as hazardous waste at a permitted facility offsite.
### 3.18 Mandatory Findings of Significance

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Does the project have the potential to 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 wildlife community, reduce the number or restrict the range of an endangered, rare or threatened plant or wildlife, or eliminate important examples of the major periods of California history or prehistory?</td>
<td>✔</td>
<td></td>
<td></td>
<td>15, 18</td>
</tr>
<tr>
<td>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)?</td>
<td></td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td></td>
<td></td>
<td>✔</td>
<td>15, 18</td>
</tr>
</tbody>
</table>

**DISCUSSION:**

**a) Less Than Significant With Mitigation Incorporated**

With the incorporated mitigation, the proposed project would not have the potential to degrade the quality of the environment. To prevent potential significant impacts to federal- or state-listed species within the vicinity of the project area, implementation of the proposed project with mitigation measures would take into account the breeding season for the California red-legged frog (CRLF); hibernation period for the San Francisco garter snake; the bird nesting season; and woodrat nests. A qualified biologist would conduct pretreatment surveys for nesting birds during the bird nesting season, and pretreatment surveys for sensitive plant species and the host plant species for sensitive butterfly species. Sensitive biological resources would be avoided to the extent practicable with appropriate exclusion flagging and buffers in place (e.g. 200-foot exclusion buffer from active bird nests, and a 50-foot exclusion buffer from wetlands and waterbodies). Modified treatment methods would be implemented if treatment activities would occur in suitable hibernating habitat for the San Francisco garter snake or suitable breeding habitat for the CRLF to minimize potential for disturbance. The proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to
SECTION THREE

Environmental Checklist Form

drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, or reduce
the number or restrict the range of endangered, rare or threatened plants or wildlife.

As the proposed project would not result in impacts to cultural resources, the proposed project
would not result in the elimination of important examples of major periods of California history
or prehistory.

In the long term, the proposed project would result in improvements to the habitat of the project
area. The general removal of non-native plant species and retention of native plant species,
followed by maintenance activities to preserve low fuel loads, would provide for a managed
habitat of primarily native species that is more similar to the native natural environment.

b) Less Than Significant Impact

As the impacts associated with the proposed project would be minimal, primarily short term, and
localized to the open space areas in Hillsborough, the analysis of cumulative impacts is focused
on activities in the Town’s open space areas. The Town approved the prioritization of 10 projects
categorized into 6 groups to occur in its open space areas: 1) Wildfire Mitigation (the proposed
project), 2) Partnerships, 3) Outreach, 4) Acacia Stand Conversion, 5) High Priority Invasive
Plants, and 6) Wildlife Management Plan. Of the 6 project categories considered by the Town
Council, the High Priority Invasive Plants project has been implemented. As for the other 4
project categories, the Town Council has not considered any additional funding for projects in its
open space areas for these categories; the Town has not developed plans beyond the concepts
described in 2008 for implementing any of these projects; and the Town has not sought outside
funding sources, such as grants, for any of these projects. The likelihood of implementing these
other projects in the near-term (next five years) is minimal. As the Town has made efforts to
prioritize these projects over other potential projects that could occur in the open space areas, for
the sake of analyzing cumulatively considerable impacts, all 5 other project categories would be
considered foreseeable future projects. The Town would consider additional CEQA compliance
for an individual project or group of projects in the open space areas at the time the decision is
made to proceed with one of these projects in the future.

In June and July 2009, the Town implemented the “High Priority Invasive Plants” project. Using
a licensed herbicide applicator, egg-leaved spurge and star thistle were treated in the Site C and
Site I. These plant colonies were targeted as they were a relatively small infestation of newly
colonizing non-native invasive plants. If left untreated, these new infestations could likely
continue to spread in the open space areas, resulting in larger and much costlier control activities
in the future.

Past and future project activities in the open space areas that could have incremental effects
when cumulatively considered with the proposed project would include habitat restoration, trail
development and use, forest stand conversion, and removal of invasive plants. The impacts of the
proposed project after implementation of project-specific mitigation measures would not be
cumulatively considerable when accounting for the incremental cumulative effects of the
previous invasive plant removal activities and the future project activities in the open space
areas. Past and future projects that could occur in the open space areas would have similar
impacts to those described in this Initial Study. As such, these impacts would primarily be
temporary and would be expected to affect resource areas including air quality, biological
resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and
hazardous materials, and noise. Similar mitigation measures would be implemented to reduce the
temporary effects of project implementation to biological resources. If the proposed project areas were to be opened to the public for recreational and educational activities, changes to land use, and recreation would also be expected to result. These impacts would be minimal and would not be cumulatively considerable to any resource area. The visual character of the open space areas would change over time, due to a reduction in the overall density of vegetation, the removal of additional invasive species, and the conversion of stands of acacia to mixed oak woodlands. Overall, the implementation of all 6 project categories would not be expected to change the overall character of the Town open space areas; they would still remain as open space areas in their primarily native plant vegetated state. Additionally, as with the proposed project, these projects would be implemented in a manner that would minimize the temporary effects that could result from construction or treatment activities and seek to preserve sensitive resources. Additionally, no other projects would occur concurrently with the proposed project. Therefore, minimal, short-term impacts from the proposed project are not expected to combine with minimal, short-term impacts from other projects in the vicinity and create significant adverse cumulative impacts.

c) No Impact

Some methods of vegetation treatment to mitigate wildfire hazards, such as prescribed burning, extensive herbicide treatment, mechanical clearcutting, and complete plant removal (including rootballs), can result in adverse environmental effects such as the degradation of visual resources and water quality, exceedances of air quality standards, harm or destruction to biological resources, releases of hazardous materials, erosion and sedimentation, and exceedances of noise standards. The proposed project would not result in environmental effects that would cause substantial adverse effects on human beings, either indirectly or directly, as discussed in the Initial Study contained herein. The analysis of environmental impacts described in this Initial Study indicates that with mitigation, no CEQA-stipulated subject or resource areas would be significantly affected as a result of the implementation of the proposed project.

- The visual character of the project area would not substantially change and would continue to consist mainly of vegetated areas including hardwood forest, chaparral, coastal scrub, grasslands, riparian forest, and scrub.
- No exceedances of air quality standards would occur as a result of the proposed project.
- Through the design of the treatment activities and with the implementation of mitigation measures, no substantial effects would occur to biological resources and most, if not all, sensitive biological resources would be avoided.
- Though herbicides would be used, their use would be minimal, would follow manufacturer’s specifications and federal and state laws, and would have relatively minimal impacts should an accidental release occur.
- Through the design of the treatment activities, potential erosion and sedimentation would be minimized.
- Noise control techniques would reduce intrusion of noise from mechanical equipment, and noise levels would be below those established in the Town’s Noise Ordinance.

Additionally, the proposed project would result in a reduction of the current wildfire hazard and a reduction in the vulnerability of the built-out areas of the Town to a wildfire.


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Nathalia Prasetyo Jo, Air Quality Engineer
Figures
Figure 1
Vicinity map
San Mateo Creek Site I

Parrott Tartan
Crystal Springs
CSM
Tobin Clark
Rizal State Highway 92
Joyce Tournament Murphy
Woodbridge Southdown
Bairn Inverness
Yale Sugar Hill
Barneson Falkirk Yew Foothill Clydesdale Braemar Kingswood Belaire Black Mountain Shady Bridle Melissa Verbalee Avondale Glenbrook Lydia Lakeview Glenarry Verano Buckingham Woodside Mountain Wood Miranda Brandon Melrose Bel Aire Lohoma Bluebell Santa Felicia Mirasol Salmark Mervat Santa Gina Horseshoe Mountianwood Anson Wedgewood Mountainwood Melrose Belaire

Open space area
Defensible space area
(100-foot building buffer)
High-priority fire management area
Staging Areas
Open water
Seasonal stream
Perennial stream
Street

Figure 2b

Project area - southern section
Appendix A
Vegetation Maps from Town of Hillsborough and May & Associates, Inc. 2006
Figure 2A. Mapped Vegetation Communities

Open Space Areas, Town of Hillsborough (Northern Section)

Vegetation Management Classifications

- Chaparral
- Coastal Scrub
- Disturbed
- Cape Ivy
- Douglas Fir/Coast Redwood
- Eucalyptus
- Broom (French/Scotch)
- Grassland
- Harding Grass
- Hardwood
- Herbaceous Wetland
- Invasive Hardwood
- Monterey Cypress/Pine
- Other
- Pampas Grass
- Road
- Riparian Forest/Scrub
- Rock
- Water
- Yellow Star Thistle

Parcel Boundary
Stream
Drainage
5 foot contour
Street

May & Associates, Inc.
730 Clementina Street ~ San Francisco, CA 94103
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J. Zarnoch ~ 10/11/06
Figure 2B. Mapped Vegetation Communities

Vegetation Management Classifications

- Chaparral
- Coastal Scrub
- Disturbed
- Cape Ivy
- Douglas Fir/Coast Redwood
- Eucalyptus
- Broom (French/Scotch)
- Grassland
- Harding Grass
- Hardwood
- Herbaceous Wetland
- Invasive Hardwood
- Monterey Cypress/Pine
- Other
- Pampas Grass
- Road
- Riparian Forest/Scrub
- Rock
- Water
- Yellow Star Thistle

J. Zarnoch – 10/11/06