



ADDENDUM 1 TO MITIGATED NEGATIVE DECLARATION

<i>Date of Publication of Addendum:</i>	September 16, 2024
<i>Date of Publication of Final MND:</i>	July 24, 2019
<i>Case No.:</i>	2014.1228ENV-02
<i>Modified Project Title:</i>	Montara Mountain North Peak Scenic Overlook Trail
<i>Original Project Title:</i>	Montara Mountain Rainfall Prediction and Radio Replacement Project
<i>Location:</i>	SFPUC Peninsula Watershed
<i>Project Sponsor:</i>	San Francisco Public Utilities Commission (SFPUC) Kim Stern-Liddell (415) 554-2472
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Background

A final mitigated negative declaration (MND), San Francisco Planning Department case number 2014.1228E, for the subject project was adopted and issued on July 24, 2019.¹ The project analyzed in the MND (the “original project”) is the installation of two components at the Montara North Peak site: an advanced quantitative precipitation information system consisting of X-band radar data collection/monitoring equipment to improve the accuracy of rainfall forecasts for the Bay Area region, and a 45-foot-tall radio tower to replace an existing low band land mobile radio system with a modern, high band digital system. In addition to the radar and radio systems, the project includes a 150-foot-long access road, grading to level the site, backup generator, propane tank, security fencing, and power lines.

Proposed Modifications to the Project

Subsequent to the issuance of the final MND, the site grading, access road improvements, and installation of concrete pads for the backup generator and propane tank components of the original project were completed. However, in December 2020 the SFPUC halted construction due to public concerns about a restored SFPUC gate that precluded the continuation of historic, informal and unauthorized access that had been occurring to the Montara Mountain North Peak site. The project site currently consists of a bare, graded area approximately 3,900 square feet in size with concrete footings and an approximately 10- to 15-foot-wide access road.

The SFPUC proposes to modify the original project. The modified project differs from the original project analyzed in the MND as it would create a publicly accessible scenic overlook and trail to the Montara

¹ San Francisco Planning Department, *Montara Mountain Rainfall Prediction and Radio Replacement Project Final Mitigated Negative Declaration*, Planning Department Case No. 2014.1228E, State Clearinghouse No. 2019069050, adopted July 24, 2019. Available online at: <https://tinyurl.com/MontaraMountainMND>.

Mountain North Peak instead of installing new radar and radio facilities at the site. Should the need arise,² however, the possibility remains for the radar and radio facilities to be installed at the site in the future. The modified project would include the following components, as shown on **Figure 1**:

Scenic Overlook: The proposed scenic overlook at the top of the peak would be approximately 30 feet by 50 feet (1,500 square feet) and bordered by a rustic, split rail fence. The overlook would include interpretive displays as discussed below, and the San Mateo County survey monument removed during prior construction would be replaced. The previously graded area at the peak surrounding the smaller footprint of the proposed overlook would be recontoured and restored to natural habitat through seeding and revegetation the area with native species and possible addition of several boulders.

Access Trail: The public would be allowed limited (from dawn to dusk), authorized access to the North Peak scenic overlook from the West Side Road along the Golden Gate National Recreation Area boundary. The western portion of the West Side Road would continue to serve as an access route to the existing County Radio Site and as an alternate emergency access route to the overlook. The upper section of the trail to the overlook would be reduced to 6 feet wide by revegetating the edges of the road to restore the areas to natural habitat. Rolling dips would be installed as needed to direct water off the road and trail into the surrounding vegetation to prevent erosion.

Gates: A new 12-foot-wide vehicle gate and, potentially, a 4-foot-wide chain link pedestrian gate would be installed on the West Side Road at the Golden Gate National Recreation Area/SFPUC watershed boundary. A new 16-foot-wide vehicle gate would also be installed at the eastern end of the site at the SFPUC's unnamed internal access road.

Signage: Welcome signs would be installed at the new access gate with rules and a QR code to the SFPUC's website for current conditions and possible closures. Up to three interpretive signs would be installed along the trail and/or at the overlook to provide information about the Peninsula and Pilarcitos Watersheds, including the water system, local peaks and radio communications systems in line-of-sight, and local ecology (i.e., regionally significant local plants, butterflies, etc.).

Security Fencing: A new 5-foot-tall, 6-wire strand security fence would be installed around the site to prevent trespassing onto the watershed. Portions of the existing western boundary fence may also be repaired.

Construction

Construction would occur in late 2024 or early 2025 and is estimated to take approximately six weeks. Construction would primarily occur Monday through Friday, 7 a.m. to 5 p.m. but could extend into evening hours or weekends. Construction would require a crew of four to six workers and include

² The SFPUC is installing a radar system at a lower elevation within the watershed at Sawyer Ridge (San Francisco Planning Department *Categorical Exemption, SFPUC Water Radio Replacement West Bay Region Network*, Planning Department Case No. 2022-010348ENV, February 16, 2023). The SFPUC will evaluate the performance of this radar system and, if it does not function adequately and another suitable location cannot be found, the radar facility as approved in the original project may be constructed at some future time on the Montara Mountain project site.

equipment such as flat-bed or box delivery trucks, pickup trucks, dump trucks, backhoe, brush cutters, grader, compactor/vibrators, and a small excavator.

Construction activities would include the following: removing the previously installed concrete footings and fence poles as needed; recontouring the previously graded area to a more natural, rounded landform; installing erosion control features to the road/trail; installing new fencing and gates; and restoring vegetation. Vegetation trimming to install the security fencing would be by hand cutting. Some grubbing and excavation may need to occur in locations to provide footings for fence posts in rockier areas. Any excess soil from regrading would be spread within the site and any cut vegetation would be stockpiled at the site and allowed to dry out and turn into mulch. Regraded areas would be seeded with a native seed mix.

Operation

The trail and scenic overlook would be open to the public from dawn to dusk. SFPUC watershed staff would provide routine inspections of the site and security fencing approximately once a week, and perform repairs as needed to maintain integrity and discourage trespass and off-trail use.

Analysis of Potential Environmental Effects

San Francisco Administrative Code section 31.19(c)(1) states that a modified project must be reevaluated and that, “If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of the California Environmental Quality Act (CEQA), that no additional environmental review is necessary, this determination and the reasons therefor shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.” CEQA Guidelines section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a subsequent EIR or negative declaration for a project that is already adequately covered in a previous negative declaration. An addendum to a negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

This addendum to the MND documents the environmental effects of the proposed modifications to the Montara Mountain Rainfall Prediction and Radio Replacement Project described above and explains why the proposed modifications would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified environmental impacts, and would not require the adoption of any new or considerably different mitigation measures.

The MND evaluated potential physical environmental impacts of the original project and found that implementation of the original project would result in project-specific significant environmental effects that could be mitigated to a less-than-significant level with implementation of mitigation measures. A Mitigation Monitoring and Reporting Program was required for the original project and adopted by the SFPUC on August 13, 2019,³ and the measures applicable to the modified project as discussed below would continue to be required for the modified project.

3 San Francisco Public Utilities Commission Resolution No. 19-0160, August 13, 2019.

Because the original project's vegetation clearing and grading has already occurred, and the modified project is located within the original project site and would install fewer facilities, it can be reasonably concluded that environmental impacts from modified project construction would be reduced as compared to the original project evaluated in the MND. Therefore, only those environmental topics with significant impacts or otherwise requiring additional analysis or new analysis are discussed in detail below.

Biological Resources

The MND found that the original project could have significant impacts on sensitive biological resources during construction, but that those impacts would be reduced to a less-than-significant level with implementation of mitigation measures. The construction activities with the greatest potential to affect sensitive biological resources – vegetation clearing and site grading – have already been completed. The potential remains; however, for construction activities to build the modified project components (regrading to restore previously impacted areas to more natural ground contours, installation of fencing, interpretive panels, erosion controls, and revegetation activities) to adversely affect biological resources, including the endangered San Bruno elfin butterfly host plant (*Sedum spathulifolium*), rare Montara mountain manzanita, woodrats, bats, and nesting birds. The modified project would not remove any larval butterfly host plants, manzanita, or trees or buildings that could have nesting birds and/or bats. Potential impacts to biological species would be reduced to a less-than-significant level with the same mitigation measures as required in the MND: M-BI-1a, General Mitigation Measures during Construction; M-BI-1b, Rare Plant Avoidance and Minimization of Impacts to Sensitive Communities during Construction; M-BI-1c, Nesting Bird Survey and Protection during Construction; M-BI-1d, Avoidance and Protection for Special-Status Butterflies; M-BI-1e, Preconstruction Survey and Midden Relocation for San Francisco Dusky-Footed Woodrat during Construction; M-BI-1f, Avoidance of Bat Roosts during Construction; M-BI-1g, Worker Environmental Awareness Program (WEAP) Training for Construction; and M-BI-1h, Onsite Biological Monitoring during Construction Activities. Additionally, implementation of dust control measures pursuant to SFPUC's Standard Construction Measures would prevent dust from construction activities settling on host plants of the endangered San Bruno elfin butterfly.

Since publication of the MND, the western bumble bee (*Bombus occidentalis*) has been identified as a candidate for listing under the California Endangered Species Act. The western bumble bee's current distribution is approximately 100 miles north of the site. Given its current range and the limited scope of the project, no impacts are expected.

Operation of the modified project would allow visitors authorized limited access to the North Peak of Montara Mountain in the SFPUC's Peninsula Watershed. It is not anticipated that the proposed scenic overlook trail would increase visitor use of the area beyond historical levels prior to gate installation in 2019 or current levels on nearby trails to the Middle Peak and South Peak. The modified project includes interpretive signage describing sensitive resources such as the San Bruno elfin butterfly and security fencing to discourage trespassing off the trail into the watershed and to protect sensitive species. Project operations would include routine patrols by existing SFPUC operations staff to inspect the integrity of the fencing and make repairs, if needed, to discourage public trespassing. For these reasons, the project is not anticipated to result in significant impacts from poaching of San Bruno elfin butterfly larval host plants, which are among a group of popular plants known as succulents, or trampling of butterfly habitat and special-status plants adjacent to the project site if visitors were to access these areas.

For these reasons, the modified project would not result in new or substantially more severe impacts on biological resources than the original project.

Cultural Resources

The MND found that the area of potential effect for the original project has a low sensitivity for cultural resources, however, the potential to inadvertently expose – and therefore affect – cultural resources during earthmoving activities could not be dismissed. As discussed above, earthmoving for site grading and road installation has been completed such that the highest potential to expose cultural resources has passed and no resources were exposed. The potential for proposed construction activities for the modified project, including minor regrading and fence post installation, to affect cultural resources would be low. Any potential impacts on archaeological resources, human remains, and tribal cultural resources during the limited construction activities for the modified project would be reduced to a less-than significant level with the implementation of the following mitigation measures in the MND: M-CR-2, Accidental Discovery Measures; M-CR-3, Accidental Discovery of Human Remains and Associated or Unassociated Funerary Objects; and M-CR-4, Tribal Cultural Resources Interpretive Program. Therefore, the modified project would not result in new or substantially more severe impacts on cultural resources than the original project.

Other Environmental Topics

The MND found that environmental impacts for all other topics would be less than significant. Relevant topics are discussed briefly here. The MND found that the originally proposed radar and radio facilities would not have a substantial adverse effect on a scenic vista, substantially damage scenic resources or substantially degrade the existing visual character of the site and, therefore, aesthetics impacts would be less than significant. The modified project structures would be limited to 5-foot-tall, 6-wire fencing and rustic, split rail wooden fencing that would be smaller than original project structures and the existing structures in the vicinity such that aesthetics impacts would remain less than significant. Because the modified project would result in less construction and operations activities than the original project, like the original project, the modified project would not result in a substantial permanent or temporary increase in ambient noise levels, criteria air pollutants, or greenhouse gas emissions such that noise, air quality, and greenhouse gas emissions impacts would continue to be less than significant. The modified project's new scenic overlook, trail access, and signage would enhance the site vicinity's existing hiking network, and would not physically degrade existing recreational resources such that impacts on recreational resources would continue to be less than significant. The modified project would have similar, less-than-significant impacts related to geology and soils, hydrology and water quality, hazards and hazardous materials, and traffic because it would entail similar types of, but reduced, construction activities, and would comply with regulatory requirements for stormwater pollution prevention, hazardous materials management, and the SFPUC's required standard construction measures. The SFPUC's existing watershed staff would provide routine inspections of the site and security fencing approximately once a week and the public would be expected to park at existing trail heads such that operational transportation impacts would continue to be less than significant, like the original project.

Conclusion

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the final mitigated negative declaration adopted and issued on July 24, 2019 remain valid and that no

supplemental environmental review is required. The proposed modifications to the project would not cause new significant impacts not identified in the final mitigated negative declaration and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

I do hereby certify that the above determination as been made pursuant to State and local requirements.



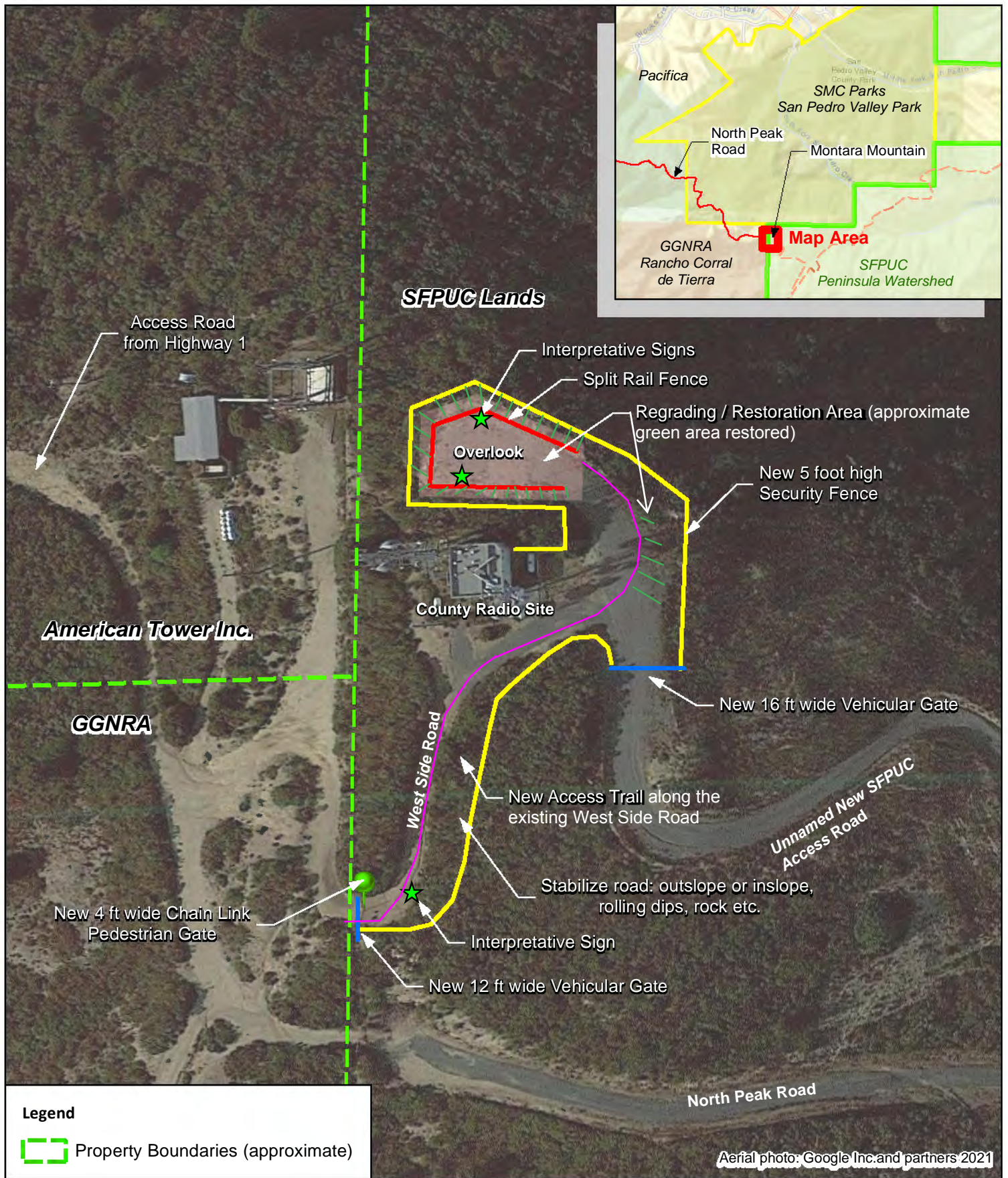
Lisa Gibson
Environmental Review Officer

September 16, 2024

Date of Determination

cc: Kim Stern Liddel, SFPUC
Tim Ramirez, SFPUC
Lisa Wayne, SFPUC
SFPUC Commission
Distribution List

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SFPUC Peninsula Watershed

Figure 1 - Montara Mountain North Peak Scenic Overlook Trail



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