ADDENDUM TO THE ALPINE ROAD IMPROVEMENTS PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

SLIDE REPAIR ADJACENT TO ALPINE ROAD SITE #21

SAN MATEO COUNTY, CALIFORNIA

LSA

September 2023

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SLIDE REPAIR ADJACENT TO ALPINE ROAD SITE #21

SAN MATEO COUNTY, CALIFORNIA

Submitted to:

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September 2023

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TABLE OF CONTENTS

FIGURES AND TABLES

FIGURES

INTRODUCTION

This document, prepared pursuant to the California Environmental Quality Act (CEQA) and the regulations and policies of the Midpeninsula Regional Open Space District (District), is an Addendum to the Alpine Road Improvements Project (approved project) Initial Study/Mitigated Negative Declaration (2021 IS/MND)[1] which was adopted by the District on January 13, 2021. The 2021 IS/MND evaluated the potential environmental impacts anticipated to result from the approved project, which included grading, drainage, and erosion control repairs and maintenance activities along approximately 7,400 linear feet of the existing Alpine Road Trail alignment in Coal Creek Open Space Preserve. In Winter 2022-2023, storms which passed throughout the region resulted in a slope failure along the existing Alpine Road Trail alignment. The District subsequently determined that an additional slide repair would be necessary immediately upstream of the Site #21 project site. Per CEQA Section 15164, this Addendum evaluates whether implementation of the Slide Repair Adjacent to Alpine Road Site #21 (revised project) would result in new or substantially more severe significant effects or require new mitigation measures not identified in the 2021 IS/MND. The District is the CEQA Lead Agency for environmental review of the revised project.

For purposes of this review, the District has identified the revised project evaluated in this Addendum as an additional slide repair immediately upstream of the Site #21 project site. Section 2.0 of this Addendum provides a detailed project description and summary of the project history, background, location, and existing site characteristics.

As discussed in this Addendum, implementation of the revised project would not cause new significant environmental effects not identified in the 2021 IS/MND, nor would impacts associated with the project revisions be substantially more severe. The analyses in this Addendum also show that no substantive changes have occurred with respect to current circumstances under which the project would be undertaken that would cause new or substantially more severe significant environmental effects than were identified in the 2021 IS/MND. In addition, no new information has become available that shows that the project would cause new or substantially more severe significant environmental effects which have not already been analyzed in the 2021 IS/MND.

PURPOSE OF THIS ADDENDUM

The purpose of this Addendum is to evaluate whether the proposed revisions to the approved project would result in any new or substantially more severe significant environmental effects or require any new mitigation measures not identified in the 2021 IS/MND. This Addendum, together with the 2021 IS/MND, will be used by the District when considering approval of the revised project. The 2021 IS/MND is hereby incorporated by reference.

[1] Midpeninsula Regional Open Space District. 2020. *Alpine Road Trail Improvements Project Initial Study/Mitigated Negative Declaration*. Prepared by LSA Associates, Inc. December.

CEQA FRAMEWORK FOR USE OF AN ADDENDUM

CEQA Guidelines Section 15164 allows for the preparation of an Addendum to an adopted MND "if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR [or MND] have occurred." CEQA Guidelines Section 15164 identifies the following conditions that would require preparation of a subsequent MND:

- Substantial changes in the project are proposed which require major revisions to the MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes occur with respect to the circumstances under which the project is undertaken which require major revisions to the MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of MND adoption, shows any of the following:

    - The project will have one or more significant effects not discussed in the MND,

    - The project will result in impacts substantially more severe than those disclosed in the MND,

    - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measure or alternative, or

    - Mitigation measures or alternatives that are considerably different from those analyzed in the MND would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

Pursuant to CEQA Guidelines Section 15164(e), this Addendum summarizes the revisions to the approved project, any impacts associated with the revised project, and the reasons for the District's conclusion that proposed changes to the project and associated environmental effects do not meet the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR or MND. The following chapters provide a description of the proposed revised project and provide substantial evidence to confirm that the proposed revisions to the project do not result in any new or more severe significant impacts and the mitigation measures included in the 2021 IS/MND are adequate for the current project, per CEQA Guidelines Section 15164, and that no further CEQA review is required.

PROJECT DESCRIPTION

The following describes the proposed Slide Repair Adjacent to Alpine Road Site #21 Project (revised project). The Midpeninsula Regional Open Space District (District) is the Lead Agency for environmental review.

PROJECT BACKGROUND

Within the project area, Alpine Road was formerly used as a paved, County-maintained public road and was drained by numerous ditch relief and stream crossing culverts. The County closed the road to vehicles at the southern end of Portola Valley in 1979 in response to neighbor concerns over illegal uses. The District purchased what is now the Coal Creek Open Space Preserve (Coal Creek OSP), in 1982 and used Alpine Road Trail for patrol, maintenance, and emergency access until the mid-1990s when a large slide closed a portion of the road. The County ceased maintenance of the road at this time. Since then, the road has been used only by pedestrians, bicyclists, and maintenance vehicles.

In 2007, District staff completed drainage improvements to stabilize the northern section of Alpine Road Trail to prevent degradation and erosion along that segment. During the winter storms of 2013-2014, a sinkhole developed at the site of a 220-foot-long, 48-inch-wide culvert. Plans were developed to slip line the culvert; however, implementation of the repair was delayed and during the winter of 2016-2017, the road at the culvert site completely failed. The road failure at the culvert site along with another 60-foot failure of the road edge have further restricted District vehicle access on Alpine Road Trail, prohibiting access north of the junction with the Meadow Trail.

Other locations along the trail alignment also require repair stemming from a lack of maintenance over the past two decades. Existing asphalt paving has degraded in most locations to the point where it is no longer visible. Existing culvert crossings have been assessed and found to be in need of replacement due to inadequate capacity, cut or fill slope failures, pipe corrosion, or a combination of the above. A lack of maintenance has led to rutting of the road surface and poorly controlled drainage. In many locations, runoff is concentrated along the road or trail alignment due to inadequate drainage features, causing rutting of the traveled surface, and has led to excessive surface rilling, gullies, and/or fill slope failures. In its current condition, the road and trail alignment are rapidly degrading and cannot be fully accessed for required maintenance.

The approved project, evaluated in the 2021 IS/MND, includes grading, drainage, and erosion control repairs and maintenance activities along the existing Alpine Road Trail alignment to provide a safe, low maintenance pedestrian and bicycle trail that also allows for vehicular access where economically feasible, and to address ongoing or potential erosion and sediment sources to receiving waters. Implementation of these improvements are currently underway.

PRIOR ENVIRONMENTAL REVIEW

An Initial Study/Mitigated Negative Declaration (2021 IS/MND)[2] for the proposed Alpine Road Improvements Project (approved project) was prepared and subsequently adopted by the District on

[2] Midpeninsula Regional Open Space District. 2020. op. cit.

January 13, 2021. The 2021 IS/MND evaluated the potential environmental impacts anticipated to result from construction and operation of the Alpine Road Improvements Project (approved project), which included grading, drainage, and erosion control repairs and maintenance activities along approximately 7,400 linear feet of the existing Alpine Road Trail alignment. The approved project also included repair of fill slope failure at the northern end of the Coal Creek OSP, where Alpine Road meets Ciervos Street (Site #21). The purpose of the approved project is to provide a safe, low maintenance pedestrian and bicycle trail, that also allows for vehicle access where economically feasible, and to address ongoing and potential erosion and sediment sources to receiving waters. The approved project improvements are needed to provide year-round access while addressing existing drainage, erosion, and slope stability concerns.

In Winter 2022-2023, storms which passed throughout the region resulted in a slope failure along the existing Alpine Road Trail alignment. The District subsequently determined that an additional slide repair would be necessary immediately upstream of the Site #21 project site, within the San Francisquito Creek Watershed. The addition to the approved project of the proposed slide repair upstream of Site #21 constitutes the "revised project," which is further described below.

PROJECT SITE

The project site consists of approximately 6.51 acres of the existing Alpine Road Trail alignment located within the Coal Creek OSP, which is managed by the District. The Coal Creek OSP is located in unincorporated San Mateo County (County), approximately 4 miles east of the Town of La Honda and 6 miles southwest of the City of Los Altos. The project site is generally located north of Page Mill Road, about 0.7 miles north of its intersection with Skyline Boulevard (State Route [SR] 35). Figure 1 depicts the project site's local and regional context. The project area is depicted in Figure 2.

The site of the additional slide repair consists of an approximately 600-square-foot area along Alpine Road Trail immediately upstream of the Site #21 project site on Corte Madera Creek, within the San Francisquito Creek Watershed. The Alpine Road Trail alignment is located within the Coal Creek OSP, which is managed by the District. The site of the additional slide repair as well as the existing resources within the project area are shown on Figure 3.

REVISED PROJECT

The revised project includes one additional slide repair along Alpine Road Trail immediately upstream of the Site #21 project site on Corte Madera Creek, within the San Francisquito Creek Watershed. Grading activities would occur to establish construction access to the repair site, remove loose and soft debris from the scarp[3] footprint, and to establish minor benches. It is anticipated that an approximately 600-square-foot temporary impact area would be required for staging and access to the repair site and the area of excavation would be approximately 817 square feet. Excavation at the site would result in approximately 140 cubic yards of cut material and approximately 165 cubic yards of fill material, 6 cubic yards would be placed below the Ordinary High Water (OHW) line and 159 cubic yards above the OHW line. Rock slope protection would be placed in the scarp footprint, capped with native soils and erosion control protections. The proposed slide repair would also require the

[3] A scarp refers to a steep slope or cliff found at the margin of a flat or gently sloping area.

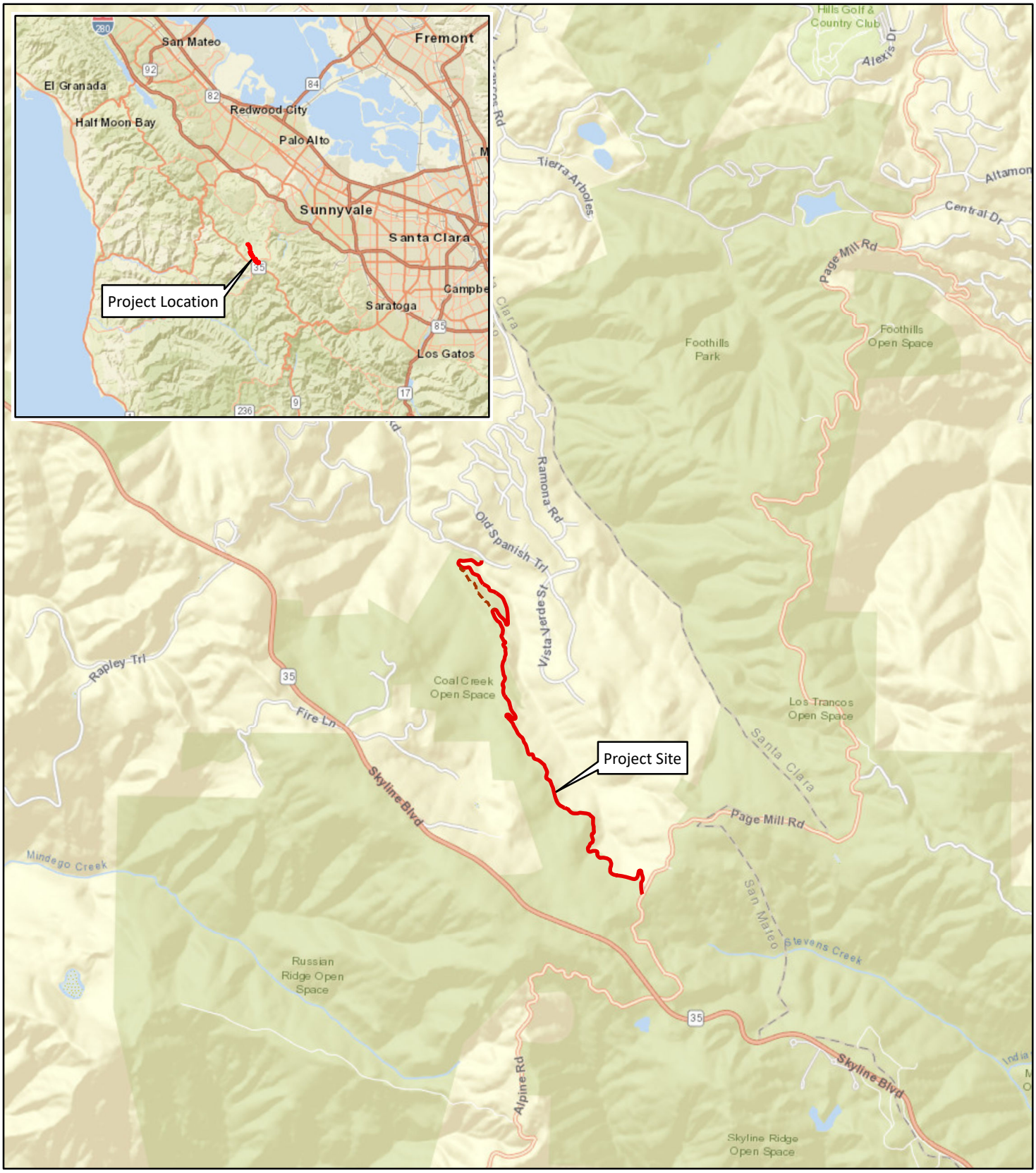
removal of one tree, a California bay laurel (*Umbellularia californica*), which is considered an upland tree. The remainder of the slide repair area consists of bare ground and does not contain any vegetation. The design of the additional slide repair is provided in Figure 4.

The revised project comprises a combination of individual site repairs, general road surface upgrades, and a limited amount of trail construction for the rerouting of the bypass trail. Individual repairs would either be implemented simultaneously to allow completion in one season or could be phased over several years. To date, the majority of the proposed site repairs evaluated in the 2021 IS/MND have been completed. Construction of the remaining work, including the additional slide repair immediately upstream of Site #21 is anticipated to take 6 weeks.

The following types of equipment would most likely be required for the general road repairs and culvert replacements (Sites #2 through #18): a scraper, box scraper, dozer, skid-steer, loader, excavator, rock trucks, and a water truck. In addition to the above, Site #21 would require more specialized equipment, including drill rig(s), a concrete pump, and a concrete truck. Similar equipment would be needed for the additional slide repair upstream of Site #21.

As part of the revised project, best management practices (BMPs) for construction site housekeeping would be implemented as described in the Storm Water Pollution Prevention Plan (SWPPP). These practices include but are not limited to the following:

- Limit construction to the dry season;
- Limit disturbance areas to only those absolutely necessary;
- Phase work to minimize the area of disturbance at any given time;
- Install sediment management devices (e.g., silt fence and fiber rolls) at the downslope perimeter of work;
- Maintain functional restroom facilities on site;
- Control dust emissions using water trucks;
- Provide concrete washouts where necessary;
- Maintain spill kits at all active work sites;
- Protect all stockpiles with plastic tarps when not in use;
- Remove garbage regularly; and
- Seed and mulch all disturbed areas as soon as possible following grading.



LSA

LEGEND

Alpine Road Trail

Bypass Trail to be Re-routed

FIGURE 1

N

0 1500 3000

FEET

Alpine Road Trail Improvements Project
San Mateo County, California

Project Location and Vicinity

SOURCE: Esri World Street Maps (03/2022).

I:\MOS1901.01\GIS\Maps\Cultural\Figure 1_Project Location and Vicinity.mxd (3/24/2022)

LSA

LEGEND

Alpine Road Trail

Bypass Trail to be Re-routed

FIGURE 2

N

0 1000 2000

FEET

Alpine Road Trail Improvements Project
San Mateo County, California

Project Area

SOURCE: USGS 7.5-minute Topo Quad - *Mindego Hill, Calif.* (1995).

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LSA

LEGEND

- Alpine Road Trail
- Proposed Bypass Trail
- San Francisco Dusky-footed Woodrat House (Mapped in 2019)
- Tree with Hollows (Mapped in 2019)

Vegetation (VNLC 2019)

- Broadleaved Upland Forest
- Broadleaved Upland Forest, Pacific Madrone
- Riparian Woodland

- Non-wetland Channel
- Culvert

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FEET

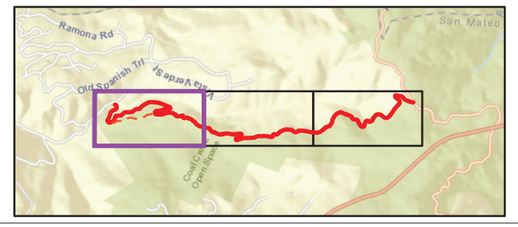

FIGURE 3A

Alpine Road Trail Improvements Project
San Mateo County, California

Existing Biological Resources

SOURCE: Vollmar Natural Lands Consulting (2019, 2020); LSA (2019); Google Aerial (2020)..

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MATCH LINE

Site Location 18

Site Location 17

Site Location 16

Site Location 15

MATCH LINE

LSA

LEGEND

- Alpine Road Trail
- Proposed Bypass Trail
- San Francisco Dusky-footed Woodrat House (Mapped in 2019)
- Tree Snag (Mapped in 2019)

Vegetation (VNLC 2019)

- Broadleaved Upland Forest
- Broadleaved Upland Forest, Pacific Madrone
- Riparian Woodland

- Non-wetland Channel
- Culvert

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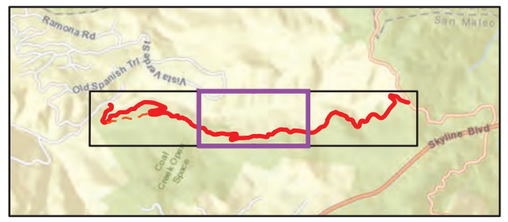
FEET



SOURCE: Vollmar Natural Lands Consulting (2019, 2020); LSA (2019); Google Aerial (2020)..

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FIGURE 3B

Alpine Road Trail Improvements Project
San Mateo County, California

Existing Biological Resources

Site Location 2
Page Mill Road
Site Location 3
Site Location 4
Site Location 6
Site Location 7
Site Location 10 & 11
Site Location 5
Site Location 12
Site Location 9.5
Site Location 8
Site Location 9
Site Location 13
Site Location 14
MATCH LINE

LSA

LEGEND

- Alpine Road Trail
- Proposed Bypass Trail
- San Francisco Dusky-footed Woodrat House (Mapped in 2019)
- Tree Snag (Mapped in 2019)

Vegetation (VNLC 2019)

- Broadleaved Upland Forest
- Broadleaved Upland Forest, Pacific Madrone
- Riparian Woodland

- Non-wetland Channel
- Culvert

0 100 200
FEET

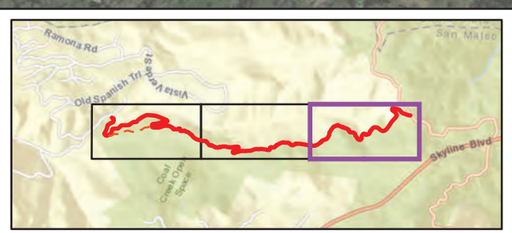

FIGURE 3C

Alpine Road Trail Improvements Project
San Mateo County, California
Existing Biological Resources

SOURCE: Vollmar Natural Lands Consulting (2019, 2020); LSA (2019); Google Aerial (2020)..

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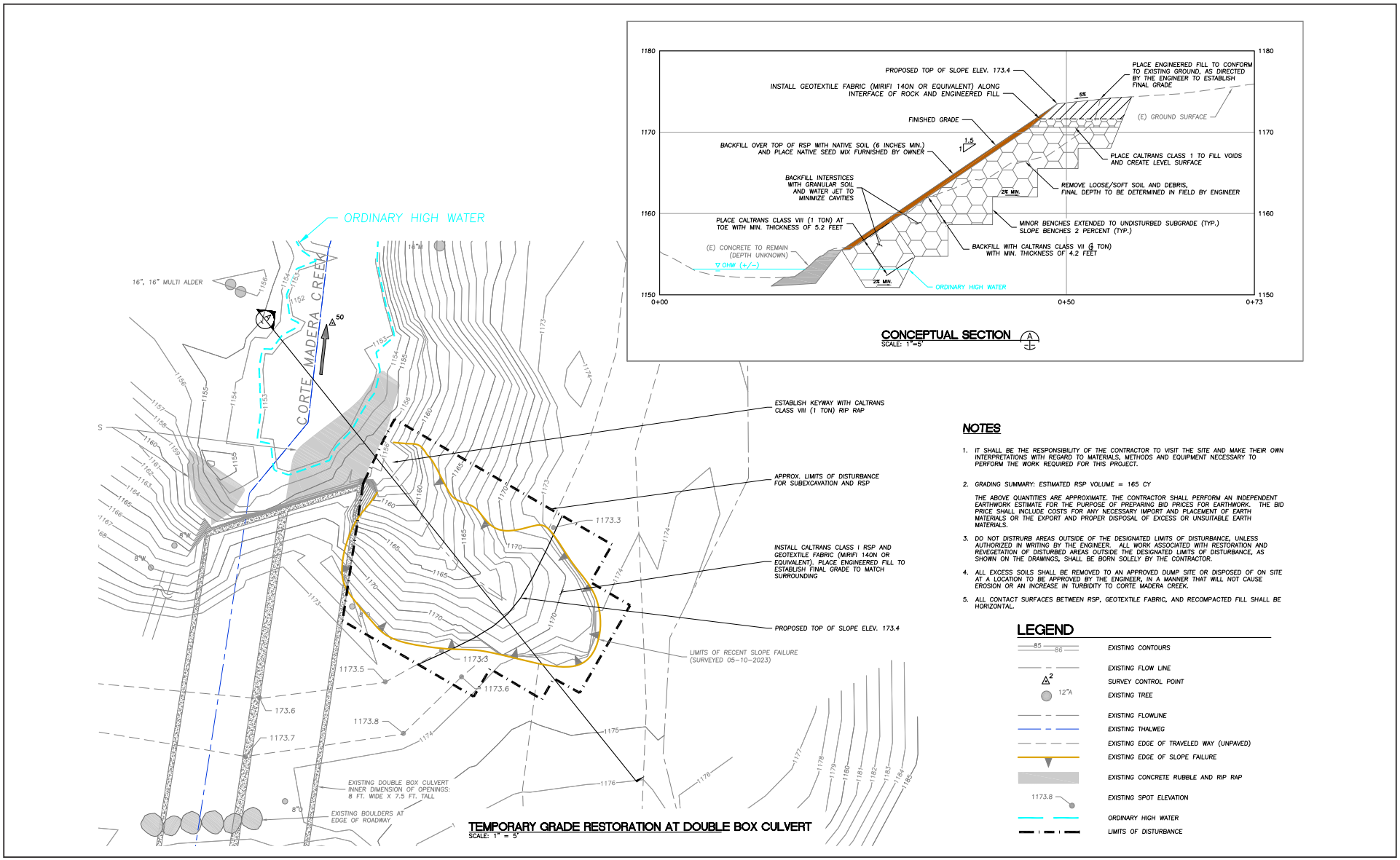

LSA

FIGURE 4

N

0 6 12

FEET

SOURCE: Waterways Consulting, Inc.

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Addendum to the Alpine Road Improvements Project IS/MND

Proposed Additional Slide Repair at Site #21

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ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

The focus of this analysis is on the potential environmental impacts resulting from the revised project and whether there would be any difference in identified impacts or required mitigation measures from those identified in the 2021 IS/MND.

The following analysis is used to: (1) compare the environmental impacts of the revised project with impacts expected to result from development of the approved project and evaluated in the 2021 IS/MND; (2) to identify whether the revised project would result in new or more severe significant environmental impacts; and (3) to identify if there have been substantial changes with respect to the circumstances under which the revised project would be undertaken since the 2021 IS/MND was adopted that would result in new or more severe significant environmental effects.

Mitigation measures are measures that would minimize, avoid, or eliminate a significant impact. The analysis contained herein evaluates each topic to identify whether additional mitigation measures beyond those identified in the 2021 IS/MND would be warranted. As discussed for each topic in the following analysis, no new mitigation measures would be required for the revised project.

This analysis confirms that the revised project is within the scope of the 2021 IS/MND, and the project would cause no new or more severe significant effects and no new mitigation measures are required.

The following discussion has been undertaken pursuant to the provisions of CEQA Guidelines Sections 15162 and 15164 to provide the District with the factual basis for determining whether any changes in the project, any changes in circumstance, or any new information since the 2021 IS/MND was adopted requires additional environmental review.

AESTHETICS

Section 3.1 of the 2021 IS/MND analyzed the visual conditions of the project area. The 2021 IS/MND identified less than significant impacts associated with aesthetics and visual resources.

Similar to the approved project, the revised project would not substantially impact a scenic vista, nor would it substantially damage scenic resources within a State scenic highway. The revised project would not include the construction of any new structures and would not include any alterations at the trailheads on Alpine Road or Page Mill Road, where publicly available scenic vistas may exist. Additionally, the project site is characterized as a rugged, hilly area covered by mixed hardwood woodland and non-native grasslands. Therefore, the project site is not visible from any existing scenic vistas. The closest State scenic highway is Skyline Boulevard (SR 35), which is located approximately 0.25 mile southwest of the project site at its closest point. However, due to the topography and vegetation of the project site and surrounding area, the project site is not visible from SR 35.

Publicly accessible vantage points near the project site consist of turnouts and parking areas along Page Mill Road, Skyline Boulevard (SR 35), and Alpine Road. As noted above, the project site would not be visible from any scenic vistas due to the hilly nature of the project site and the dense vegetation that surrounds it. Further, the additional repair proposed by the revised project would ameliorate erosion conditions, slides, and slope failures along the trail alignment, which would improve the visual

conditions within the project site. Therefore, the revised project would have a less than significant impact related to visual character, similar to the approved project.

Similar to the approved project, the revised project would not include any new lighting features. District Ordinance 93-1, Section 805.2 prohibits the use of the Coal Creek OSP by the public between one-half hour after sunset and sunrise. Therefore, Coal Creek OSP and trail users and their vehicles that are parked near the project site would leave the project area during daylight hours. Vehicles parked near the project site (and their windows) would not substantially increase glare in the area such that views would be adversely affected. All temporary construction-related sources of light or glare (i.e., construction equipment headlights/safety lights) would cease following completion of construction. Therefore, implementation of the revised project would not result in impacts associated with light or glare that would adversely affect day or nighttime views in the project area.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts on visual resources, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to aesthetics. ***No new impacts or increase in severity of impacts related to aesthetics would occur.***

AGRICULTURAL AND FORESTRY RESOURCES

Section 3.2 of the 2021 IS/MND analyzed potential impacts to agriculture and forestry resources in the project area. The 2021 IS/MND identified either no impacts or less than significant impacts associated with agriculture and forestry resources.

Similar to the approved project, the revised project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use; conflict with existing zoning for agricultural use or a Williamson Act contract; or conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production. According to the State Department of Conservation, Farmland Mapping and Monitoring Program (FMMP), the project site is classified as “Other Land”. In addition, the Coal Creek OSP is managed as open space and is not currently used for agricultural production. The project site is public land and zoned RM on the San Mateo County Zoning Map. The project site is not zoned for agricultural use nor is it under a Williamson Act contract. The project site also is not zoned for forest land or timberland. The revised project would be located in the same vicinity as the approved project. Similar to the approved project, the revised project would consist of grading, drainage, and erosion control repairs and maintenance activities along approximately 7,400 linear feet of the existing Alpine Road Trail alignment, including at the new repair site just upstream of Site #21. As such, the revised project would not result in the introduction of any new uses on the project site.

Although trees are dispersed around the project site and some may be removed or otherwise affected by project construction, including the removal of one California bay laurel tree, these trees are located within an open space preserve and do not constitute forest land. Furthermore, the revised project would be consistent with the District’s management of the Coal Creek OSP as open space. Therefore, similar to the approved project, the revised project would not result in the loss of forest land or conversion of forest land to non-forest uses. Further, implementation of the revised project would

not 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. Therefore, the revised project would not adversely affect agricultural or forestry resources.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts on agriculture and forestry resources, nor result in new significant impacts. ***No new impacts or increase in severity of impacts related to agriculture and forestry resources would occur.***

AIR QUALITY

Section 3.3 of the 2021 IS/MND analyzed potential air quality impacts associated with implementation of the approved project. The 2021 IS/MND determined that all air quality impacts would result in either less than significant impacts or less than significant impacts with mitigation incorporated.

The 2021 IS/MND indicated that construction emissions associated with the approved project would be less than significant for ROG and $PM_{2.5}$ and PM_{10} exhaust emissions; however, NO_x emissions would be above the BAAQMD threshold. The 2021 IS/MND also indicated that the closest sensitive receptors that could be impacted during construction activities include the scattered rural residential uses and open space uses managed by the District that border the site to the north and east. As such, Mitigation Measure AIR-1 was prescribed to reduce construction dust and NO_x emissions and ensure construction impacts would be less than significant. Similar to the approved project, although the revised project may expose these surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment), construction contractors would be required to implement BAAQMD Basic Construction Mitigation Measures, as required by Mitigation Measure AIR-1. With implementation of Mitigation Measure AIR-1, project construction emissions would be below BAAQMD significance thresholds. The revised project would involve additional construction activities to repair the new slope failure located upstream of Site #21, resulting in an increase in construction-related air quality emissions. However, the increase in construction-related emissions would not be substantial and would not result in air quality impacts that could not be reduced to less than significant impacts with implementation of Mitigation Measure AIR-1. As such, similar to the approved project, the revised project would implement Mitigation Measure AIR-1 to ensure construction impacts on air quality would be less than significant.

The 2021 IS/MND determined operation of the approved project would not result in the generation of criteria air pollutants that would exceed BAAQMD thresholds of significance due to the nature of the project (slide repairs). As the revised project would add an additional slide repair upstream of Site #21 and would not introduce a new use at the site that could result in increased air quality impacts, operational air quality impacts would be similar to the approved project, and would continue to be less than significant.

Similar to the project, the revised project would utilize various diesel-powered vehicles and equipment during construction that could create localized orders. However, these odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. No odors would be associated with project operation. Therefore, similar to the approved project, the

revised project would result in less than significant impacts associated with odors. In addition, the revised project would generally implement the applicable measures outlined in the Clean Air Plan, including Transportation Control Measures, similar to the approved project. Therefore, the revised project would not disrupt or hinder implementation of a control measure from the Clean Air Plan.

Implementation of Mitigation Measure AIR-1 as identified in the 2021 IS/MND would remain applicable to the revised project and ensure that all air quality impacts would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts related to air quality would occur and no additional mitigation measures are required.***

BIOLOGICAL RESOURCES

Section 3.4 of the 2021 IS/MND analyzed potential impacts on biological resources with implementation of the approved project. The 2021 IS/MND determined that all impacts would be reduced to less than significant levels with incorporation of mitigation. The discussion of biological resources within the project site and vicinity included in the 2021 IS/MND was based on field surveys conducted at the project site, review of relevant documents prepared for the project, and review of on-line biological resources databases. Biological surveys and field assessments were conducted at the project site on September 27, 2019; reconnaissance-level surveys were conducted at the site on March 4 and May 30, 2019; botanical surveys were conducted on March 21, April 25, and July 18, 2019, with additional botanical information collected on June 12, 2019; and wetland delineation investigations were conducted on June 12 and July 18, 2019, and January 14, 2020. Additional follow-up botanical surveys were conducted on March 4 and April 27, 2022.

The 2021 IS/MND identified areas of potential impact, including adverse effects on special-status species, sensitive natural communities, wetland areas of the project site, and migratory movements of wildlife species. To address impacts on special status species, including special status amphibians and reptiles, nesting birds, the San Francisco dusky footed- woodrat, roosting bats, and steelhead, the 2021 IS/MND prescribed Mitigation Measures BIO-1 through BIO-5. Implementation of Mitigation Measures BIO-2 through BIO-5 would also reduce impacts on migratory movements of wildlife and nursery sites to less than significant levels. The revised project would be located within the same area as the approved project and could result in similar impacts to special-status species. Similar to the approved project, the revised project would be required to implement Mitigation Measures BIO-1 through BIO-5, which would ensure impacts on special-status species would be reduced to less than significant.

To address impacts on sensitive communities, including riparian woodland, the 2021 IS/MND prescribed Mitigation Measures BIO-6 and BIO-7, which require replacement of impacted riparian trees and shrubs and impacted Pacific madrone trees and understory native plant species. In addition, Mitigation Measure BIO-8 was prescribed to reduce potential impacts to trees from *Phytophthora* (a soil-borne pathogen that infects trees, and woody plants, and can lead to Sudden Oak Death). These mitigation measures would also apply to the revised project. The proposed slide repair would require the removal of one tree, a California bay laurel (*Umbellularia californica*), which is considered an upland tree. The remainder of the slide repair area consists of bare ground and does not contain any vegetation. Though the California bay laurel tree is an upland tree, the California Department of Fish and Wildlife (CDFW) may consider this tree to be riparian since it is growing along the bank of Corte

Madera Creek. If so, CDFW may require replacement of the tree to be replaced at a minimum 3:1 ratio, as part of the required permit amendment. No new mitigation measures would be required.

As described in the 2021 IS/MND, the approved project was considered a self-mitigating repair project; therefore, no compensatory mitigation for permanent impacts to jurisdictional waters was prescribed. To address temporary construction impacts on jurisdictional waters, including wetlands, the 2021 IS/MND prescribed Mitigation Measure BIO-9 requiring best management practices (BMPs) to prevent erosion and sedimentation into stream channels, prevent impacts to upland areas outside of designated work zones, control dust, and prevent accidental fuel or oil spills in or near stream channels or other sensitive habitats.

The revised project would result in approximately 817 square feet (0.019 acre) of permanent impacts to the bank of Corte Madera Creek, which is classified as "Other Waters of the United States/State." Approximately 50 square feet/10 linear feet of these impacts would occur within the ordinary high water mark of the creek, while 767 square feet/25 linear feet would occur above the ordinary high water mark. Like the approved project, the revised project would be considered a self-mitigated project because it would repair and stabilize the bank of Corte Madera Creek, preventing further erosion and impacts to the creek. In accordance with State and federal requirements, impacts to the Waters of the United States/State resulting from project implementation would require appropriate permits from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. Similar to the approved project, the revised project would be required to implement Mitigation Measure BIO-9, which would ensure impacts on jurisdictional waters/wetlands would be less than significant.

In addition, although an estimated 47 native trees, including 19 coast live oak, 3 Pacific madrone, 14 big-leaf maple, and 10 Douglas fir would be removed as part of the approved project, none of the trees proposed for removal are considered riparian trees. Since the County would not require these trees to be replaced, this impact was determined to be less than significant. The revised project would require one additional tree removal, a 5-inch diameter at breast height (dbh) California bay laurel tree. This tree is not considered a riparian tree and due to its small size, the County would not require this tree to be replaced. Therefore, the revised project would result in similar impacts on protected trees as the approved project.

In addition, similar to the approved project, the revised project would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans as the project site is not located within the limits of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Implementation of Mitigation Measures BIO-1 through BIO-9 as identified in the 2021 IS/MND would remain applicable to the revised project and ensure that impacts to all biological resources would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts related to biological resources would occur and no additional mitigation measures are required.***

CULTURAL RESOURCES

Section 3.4 of the 2021 IS/MND analyzed potential impacts on cultural resources with implementation of the approved project. The 2021 IS/MND determined that all impacts associated with cultural resources would be reduced to less than significant levels with incorporation of mitigation.

The 2021 IS/MND indicated that no above-grade structures (historic or otherwise) are present within or in the immediate vicinity of the project site and no significant historical materials were observed or are known to occur within the project site. In addition, literature review and a records search indicate that no known previously recorded Native American or historic cultural resources are located within 0.25 miles of the project site. However, the 2021 IS/MND indicated that there are previously recorded archaeological sites within 0.5 mile of the project site. These archaeological sites are situated on ridges, indicating a general sensitivity of such locations in the vicinity of the project site for pre-contact archaeological deposits and features. As no known cultural resources are present on the project site, and the revised project would be located in the same area as the approved project, implementation of the revised project would not impact any known or previously identified cultural or historical resource. However, the 2021 IS/MND identified the possibility that unidentified archaeological deposits or human remains exist on the site and may be impacted as a result of ground disturbing activities, and prescribed Mitigation Measures CUL-1 and CUL-2. Similar to the approved project, the revised project has the potential to encounter cultural deposits during construction activities. As such, the revised project would also be required to implement Mitigation Measures CUL-1 and CUL-2 identified in the 2021 IS/MND which would ensure that the impacts to cultural resources would be reduced to a less-than-significant level.

In addition, similar to the project, because the revised project is anticipated to discharge fill in waters of the United States, the District must meet requirements of Section 404 of the Clean Water Act and would need to obtain a permit from the San Francisco District of the United States Army Corps of Engineers. As such, the Corps will need to "take into account" the effect of the revised project in compliance with Section 106 of the National Historic Preservation Act (NHPA).

Implementation of Mitigation Measures CUL-1 and CUL-2 identified in the 2021 IS/MND, which require following proper protocols if unrecorded cultural resources or human remains are encountered, would ensure that the impacts to cultural resources would be reduced to a less-than-significant level. ***No new impacts or increase in severity of impacts related to cultural resources would occur and no additional mitigation measures are required.***

ENERGY

Section 3.4 of the 2021 IS/MND analyzed potential energy impacts with implementation of the approved project and determined that energy impacts would be less than significant.

Similar to the approved project, construction of the revised project would require the use of energy to fuel grading vehicles, trucks, and other construction vehicles, which would be primarily derived from non-renewable resources. However, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. In addition,

implementation of Mitigation Measure AIR-1, which requires equipment idling times be restricted to 5 minutes or less and construction workers to shut off idle equipment, would further reduce construction impacts to less-than-significant levels. Although the revised project would involve additional construction activities to repair the additional slope failure located upstream of Site #21, this additional construction is not anticipated to result in energy impacts that could not be reduced to less than significant with implementation of Mitigation Measure AIR-1.

Typically, energy consumption is associated with fuel used for vehicle trips and electricity and natural gas use. However, the revised project would include replacing 14 old culverts, constructing surface drainage features (e.g., regrading road cross slope, installing reverse grade dips, and rocking the surface of problem areas), and repairing an additional slope failure upstream of Site #21. Similar to the approved project, the revised project would not generate additional vehicle trips through the project area, increasing fuel usage. As such, operational energy impacts associated with the revised project would be less than significant. In addition, similar to the approved project, the energy usage in the project area during construction and operation would be relatively small in comparison to the State's available energy sources and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact to regional energy supplies would be minor, the revised project would not conflict with California's energy conservation plans as described in the 2019 Integrated Energy Policy Report.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified energy impacts, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts to energy resources. ***No new impacts or increase in severity of impacts related to energy would occur.***

GEOLOGY AND SOILS

Section 3.4 of the 2021 IS/MND analyzed geological, seismic, and soil conditions within the project area and potential impacts relating to geology and soils with implementation of the project. The 2021 IS/MND determined that implementation of the approved project would not cause substantial adverse effects due to rupture of a known earthquake fault, strong seismic ground shaking, seismic relation ground failure such as liquefaction, or landslides. Further, the 2021 IS/MND determined that the project would not result in substantial soil erosion or the loss of topsoil or be located on an unstable geologic units or expansive soil. The 2021 IS/MND did, however, identify potential impacts associated with paleontological resources.

Construction of the revised project would occur in the same vicinity as the approved project and would be subject to similar geological and soil conditions. As such, impacts related to geology and soils would be similar to the project, and less than significant. Although mapping at the project site indicates that the Pilarcitos Fault crosses Site #21, the Pilarcitos Fault is not believed to have been active in the past three million years. Therefore, the revised project would not directly or indirectly cause substantial adverse effects related to fault rupture. Similar to the approved project, completion

of the revised project, which involves drainage improvements, flattening slopes, and slope repairs, would improve the performance of the existing trail alignment during earthquakes. Although, 90 percent of the length of the project site and Site #21 have been mapped by the California Geological Survey as being within areas subject to earthquake-induced landslides and the project site is located on an unstable geologic unit, the improvements as part of the revised project would reduce the severity of landslides within the project site and improve the performance of the existing trail during seismic and heavy precipitation events.

Similar to the approved project, the revised project would not include any new buildings, including sanitary facilities. Therefore, there would be no impact related to septic tanks or alternative wastewater disposal systems.

The 2021 IS/MND identified a potentially significant impact associated with undiscovered paleontological resources as the project site crosses several geologic units, including Lambert Shale, Alluvium, Vaqueros Sandstone, San Lorenzo Formation, and Butano Sandstone, which contain foraminifera. None of these fossils would likely be unique, and the formations in which they are contained are extensive. Therefore, it is unlikely that a significant paleontological resource would be disturbed by the revised project. However, because the possibility of accidental discovery of paleontological resources during project construction cannot be ruled out, the 2021 IS/MND prescribed Mitigation Measure GEO-1, which requires redirection of work, consultation with a qualified paleontologist and appropriate treatment, if resources are encountered during ground disturbance. As the revised project would be located on the same site as the approved project, implementation of the revised project would result in similar impacts on undiscovered paleontological resources and would also be required to implement Mitigation Measure GEO-1. With implementation of Mitigation Measure GEO-1, potential impacts to paleontological resources would be reduced to less than significant levels, similar to the approved project.

Implementation of Mitigation Measure GEO-1 as identified in the 2021 IS/MND would remain applicable to the revised project and ensure that impacts associated with geology and soils would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts related to geology and soils would occur and no additional mitigation measures are required.***

GREENHOUSE GAS EMISSIONS

Section 3.9 of the 2021 IS/MND analyzed potential impacts relating to greenhouse gas (GHG) emissions with implementation of the project. The 2021 IS/MND determined all greenhouse gas impacts would be less than significant.

Similar to the approved project, construction of the revised project would emit GHGs through the operation of construction equipment and from worker vehicles, each of which typically uses fossil-based fuels to operate. Similar to the approved project, the revised project would implement Mitigation Measure AIR-1 to ensure construction GHG impacts would be less than significant. Although the revised project would involve additional construction activities to repair the additional slope failure located upstream of Site #21, this additional construction is not anticipated to result in GHG impacts that could not be reduced to less than significant impacts with implementation of Mitigation Measure AIR-1. The 2021 IS/MND also determined operation of the approved project

would not generate additional vehicle trips through the project area and, therefore, would not increase mobile source emissions. In addition, the approved project would not be a source of energy or area source emissions due to the nature of the approved project (slide repairs). As the revised project would add an additional slide repair upstream of Site #21 and would not introduce a new use at the site that could result in GHG emissions, GHG emission generated by the revised project would be similar to the approved project and would be less than significant.

San Mateo County has an adopted Energy Efficiency Climate Action Plan (EECAP), which meets the BAAQMD requirement of a Qualified GHG Reduction Strategy and outlines policies, programs, and activities that will achieve County GHG reduction targets. As the revised project consists of grading, drainage, and erosion control repairs and maintenance activities along approximately 7,400 linear feet of the existing Alpine Road Trail alignment, similar to the approved project, the EECAP strategies would not be applicable to the revised project. In addition, as discussed above, construction and operational GHG emissions would be less than significant. Therefore, the revised project would not generate substantial GHG emissions that would have a significant effect on the environment and would not conflict with the strategies of the EECAP. Similar to the approved project, the revised project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified GHG impacts, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to GHG emissions. ***No new impacts or increase in severity of impacts related to greenhouse gas emissions would occur and no additional mitigation measures are required.***

HAZARDS AND HAZARDOUS MATERIALS

Section 3.9 of the 2021 IS/MND analyzed potential impacts associated with hazards and hazardous materials. The 2021 IS/MND identified either no impacts or less than significant impacts associated with hazards and hazardous materials with implementation of the approved project.

Similar to the approved project, the revised project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The project site is located within the Coal Creek OSP and was previously used as a County road until it was closed in the mid-1990s. There is no indication of current or historical hazardous materials use, storage, disposal, or release at the project site. No areas of ultramafic rock, a type of igneous rock that may undergo metamorphosis to serpentine, a potentially asbestos-containing rock, are mapped in the project vicinity. Soils and rock at the site would therefore not be expected to contain naturally occurring asbestos. Construction at the project site would require the use and transport of hazardous materials. These materials would include fuels, oils, and other chemicals used during construction activities. Improper use and transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and environment. However, similar to the approved project, construction activities at the project site would require implementation of a SWPPP, which would incorporate current BMPs for construction,

including site housekeeping practices, hazardous material storage, inspections, maintenance, worker training in pollution prevention measures, and containment of releases to prevent runoff via stormwater. Although designed to protect stormwater quality, implementation of the SWPPP would also reduce the potential impacts of hazardous materials releases during construction to a less-than-significant level. In addition, similar to the approved project, operation of the revised project would not require the routine transport, use, or disposal of significant quantities of hazardous materials.

The project site is not listed on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[4] The Chambers Property, located south of the project site at 7007 Page Mill Road, was previously listed as a Leaking Underground Storage Tank (LUST) site. However, the State Water Resources Control Board (State Water Board) issued case closure in January 1998; therefore, no potential exists for those contaminants to have migrated and affected soils and groundwater at the project site.[5] Therefore, no significant hazard to the public or environment would be associated with this listed site. As the revised project would be located in the same area as the approved project, impacts associated with the project site being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be the same as approved project.

Similar to the approved project, the revised project would consist of repairs and improvements to an existing trail within the Coal Creek OSP and hazardous or acutely hazardous materials would not be handled at the project site and operation of the revised project would not result in hazardous emissions. Further, no schools are located within 0.25 miles of the project site. As the revised project would be located in the same area as the approved project, the revised project would not emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. The project site is also located more than 10 miles from the nearest public airports, which include San Jose International Airport, Moffett Federal Airfield, and the Palo Alto Airport. Therefore, there would be no impact related to airport safety hazards.

The project site is located within an existing open space preserve and is not located near a population center. The San Mateo County Office of Emergency Services, a division of the Sheriff's Department, established to coordinate emergency response planning for communities in the County, identifies the La Honda Fire Brigade and the Woodside Fire Protection District as the nearest agencies with established emergency response plans. As the revised project would be located in the same area as the approved project, would be a similar distance from established populations center and would consist of the same types of improvements (e.g., slide repair), no impairment or interference with emergency response or emergency evacuation plans from either of these agencies would occur, similar to the approved project.

The project site is located in an area of high wildfire hazard, as mapped by the California Department of Forestry and Fire Protection (CAL FIRE). The District coordinates with local and regional fire agencies and undertakes a number of wildfire management practices to reduce wildfire risks on District lands. These measures include vegetation management, mowing or brushing back vegetation from roads

[4] California Environmental Protection Agency. 2020. Cortese List Data Resources. Website: calepa.ca.gov/sitecleanup/corteselist (Accessed August 11, 2023).

[5] State Water Resources Control Board. 2015. GeoTracker. Website: geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608502029 (Accessed August 11, 2023).

and trails, closing access points during periods of high fire risk, ensuring access for emergency vehicles, and training personnel in fire prevention and response.[6] Although trail users and workers could be exposed to wildland fire risks during project development and operation, management of the OSP would not change with development of the revised project. Therefore, implementation of these measures and policies would reduce the potential wildland fire risk to a less than significant level, similar to the approved project.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with hazards and hazardous materials, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to hazards and hazardous materials. ***No new impacts or increase in severity of impacts related to hazards and hazardous materials would occur.***

HYDROLOGY AND WATER QUALITY

Section 3.10 of the 2021 IS/MND analyzed potential impacts on hydrology and water quality with implementation of the project and identified less than significant impacts associated with hydrology and water quality.

The project site is located in the Corte Madera Creek subbasin of the San Francisquito Creek Watershed. Stormwater from the project site is collected in the nearby Corte Madera Creek, which discharges to the San Francisco Bay near the city of East Palo Alto. The San Francisquito Creek Total Maximum Daily Load (TMDL) for sediment, which is an action plan to restore clean water throughout the watershed, calls for specific actions, including bank stabilization and landslide repair along Alpine Road, to reduce pollutants.[7] Similar to the approved project, construction activities associated with the revised project would cause disturbance of soil during excavation work, which could adversely impact water quality. Contaminants from construction vehicles and equipment and sediment from soil erosion could increase the pollutant load in runoff being transported to receiving waters during development. During construction of the revised project, contaminants from parked vehicles could become entrained in stormwater and impact runoff quality. Similar to the approved project, the revised project would be regulated by the NPDES Program, which is established through the federal Clean Water Act and administered by the Water Board and San Mateo County. According to the water quality control plans of the Water Board, any construction activities, including grading, that would result in the disturbance of 1 acre or more would require compliance with the General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activity (Construction General Permit). With the additional slide repair at Site #21, the project site would be approximately 6.51 acres in size and would be subject to compliance with the Construction General Permit. Construction of the revised project would also be subject to the Water Board's Municipal Regional Permit (MRP), implemented in 2015 by Order R2-2015-0049. Provision C.6 of the MRP addresses construction site control for all projects. Provision C.6 requires BMPs for erosion control, run-on and

6 Midpeninsula Regional Open Space District. 2008. *Draft Wildfire Management Policy*, Agenda Item 1, Meeting 08-27. December.

7 San Francisquito Creek Joint Powers Authority. 2004. San Francisquito Creek Watershed Analysis and Sediment Reduction Plan Final Report. May.

run-off control, sediment control, active treatment systems (as necessary), good site management, and non-stormwater management. Additionally, several elements have been incorporated into the approved project design to address stormwater runoff, including locating construction equipment in flat areas where runoff is not concentrated, covering soil stockpiles, and placing sediment containment devices around the base of stockpiles and the downslope perimeter of staging areas. The revised project would also incorporate these elements. Similar to the approved project, all exposed soil surfaces in the construction staging areas would be seeded and mulched prior to the onset of the rainy season. Disturbed areas along the improved trail alignment would be seeded and mulched as appropriate. As such, the revised project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. The revised project would also not conflict with or obstruct implementation of a water quality control plan.

Similar to the approved project, the revised project does not include the use of groundwater. Increases in impervious surfaces can affect groundwater levels through a reduction in groundwater recharge through stormwater percolation; however, based on the relatively small area of impervious surface added by the revised project with the construction of retaining walls and other erosion control features, this potential impact would be less than significant. Further, this relatively small increase in impervious surface area would not substantially alter the existing drainage pattern of the area such that substantial erosion or siltation, flooding, or the impediment of flood flows would occur. As the revised project would not include the use of groundwater and would not substantially increase the amount of impervious surfaces on the project site, the revised project would also not conflict with or obstruct implementation of a sustainable groundwater management plan.

The 2021 IS/MND determined the project site is also not located flood hazard area mapped by the Federal Emergency Management Agency (FEMA) and is a sufficient distance from the ocean and nearby closed bodies of water such that the risk of tsunami, seiches, and project inundation is not anticipated. As the revised project would be located in the same area as the approved project, impacts associated with risk of inundation due to tsunami or seiche would be less than significant.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts on hydrology and water quality, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts associated with hydrology and water quality. ***No new impacts or increase in severity of impacts related to hydrology and water quality would occur.***

LAND USE AND PLANNING

Section 3.11 of the 2021 IS/MND analyzed potential impacts associated with land use and planning with implementation of the approved project and identified less than significant impacts. The revised project would be implemented in the same vicinity as the project and would be subject to the same land use plans discussed in the 2021 IS/MND. The project site is located within the existing 508-acre Coal Creek OSP in unincorporated San Mateo County, which is managed as open space.

Similar to the approved project, the revised project would not physically divide an established community as it would consist of repairs and improvements to the existing Alpine Road Trail and would not result in the removal of any means of access or the closure of any trails. Overall, similar to the approved project, the revised project would enhance public access to Alpine Road Trail and the Coal Creek OSP as a whole. Therefore, the revised project would not disrupt or divide the physical arrangement of an established community but would instead result in an overall benefit to connectivity within the area, similar to the approved project.

Similar to the approved project, the revised project would not conflict with applicable land use plan and regulations that govern the site, including the San Mateo County Zoning Ordinance, San Mateo County General Plan, and District Use and Management Plans. The project site is designated in the County's General Plan as General Open Space (OS) and zoned RM. The RM district was established to meet the County's objectives for the protection of open space and conservation. The project site is also located within the existing Coal Creek OSP, which is managed as open space with low-intensity recreation and is compatible with the RM zoning district. The OS designation is intended for resource management and production uses, and specifically encourages the District to "acquire, protect, and make available for public use open space lands in rural areas." Because the revised project would result in low-intensity recreational improvements that would enhance public access to the Coal Creek OSP, the District's management of the Coal Creek OSP as open space would continue, and the revised project would be consistent with the County General Plan. Although the revised project would consist primarily of trail and drainage improvements, it would require construction of retaining walls and culverts. Because the revised project would obtain a permit pursuant to the requirements for development within the RM district and the proposed uses of the revised project would help meet the County's objectives for the protection of open space and conservation, the revised project would be consistent with the County Zoning Ordinance, similar to the approved project. Further, the revised project would include drainage and erosion improvements and would result in the reopening of the trail for public use, which would help the District meet one of its top 25 priority action of reopening Alpine Road as detailed in the District's 2014 Open Space Vision Plan.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified land use and planning impacts, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to land use and planning. ***No new impacts or increase in severity of impacts related to land use and planning would occur.***

MINERAL RESOURCES

Section 3.12 of the 2021 IS/MND analyzed potential impacts on mineral resources with implementation of the approved project and identified no impacts. The San Mateo County General Plan Mineral Resources Map does not identify any known mineral resources or mineral recovery sites within or adjacent to the Coal Creek OSP or the project site. As the revised project would be located in the same area as the approved project, the revised project would not result in the loss of availability of a known mineral resource of value to the region or residents of the State, or the loss of availability of a locally important mineral resource recovery site, similar to the approved project.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts on mineral resources, nor result in new significant impacts. There would be no new or substantially more severe significant impacts related to mineral resources. ***No new impacts or increase in severity of impacts related to mineral resources would occur.***

NOISE

Section 3.13 of the 2021 IS/MND analyzed potential noise impacts associated with implementation of the approved project. The 2021 IS/MND determined that implementation of the approved project would result in less than significant impacts associated with temporary or permanent increase in ambient noise levels or vibration at the project site. In addition, as the project site is not located within two miles of a public or public use airport, the approved project would not result in the exposure of people residing or working in the project area to excessive noise levels.

Similar to the approved project, construction of the revised project would result in a temporary increase in ambient noise levels and ground borne vibration in the project area. The closest sensitive receptors to the project site include the scattered rural residential uses and open space uses managed by the District that border the site to the north and east. The 2021 IS/MND indicated that the closest sensitive receptor may be subject to short-term maximum construction noise reaching 79 dBA L_{max} during construction. However, construction equipment would operate at various locations within the 7,400-linear-foot length of the project; and as such, construction activities at any one receptor location would occur for a limited duration. In addition, Mitigation Measure NOI-1 was prescribed to limit construction activities to daytime hours and would reduce potential construction-period noise impacts for sensitive receptors to less-than-significant levels. As the revised project would be located on the same site as the approved project, implementation of the revised project would result in similar construction noise impacts as the approved project and would be required to implement Mitigation Measure NOI-1. Although the revised project would involve additional construction activities to repair the additional slope failure located upstream of Site #21, this additional construction is not anticipated to result in noise impacts that could not be reduced to less than significant with implementation of Mitigation Measure NOI-1. With implementation of Mitigation Measure NOI-1, impacts associated with construction noise would be similar to the approved project and would be less than significant. In addition, similar to the approved project, although construction vibration levels at the adjacent land uses would have the potential to result in temporary annoyance (e.g., six week duration), these vibration levels would no longer occur once construction of the revised project is completed. Therefore, the temporary ground borne vibration and noise impacts generated by construction equipment would be less than significant.

The 2021 IS/MND determined operation of the approved project would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity and, therefore, would not increase ambient noise levels in the project area. As the revised project would add an additional slide repair upstream of Site #21 and would not introduce a new use at the site that could result in increased noise at the project site, impacts associated with operational noise levels would be similar to the approved project and would be less than significant.

In addition, as the revised project would be located on the same site as the approved project, implementation of the revised project would not result in the exposure of people residing or working in the project area to excessive noise levels as the project site is not located within two miles of a public or public use airport.

Implementation of Mitigation Measure NOI-1 as identified in the 2021 IS/MND would remain applicable to the revised project and ensure that all temporary construction noise impacts would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts related to noise would occur and no additional mitigation measures are required.***

POPULATION AND HOUSING

Section 3.14 of the 2021 IS/MND analyzed potential impacts associated with population and housing and identified no impacts with implementation of the approved project. Similar to the approved project, the revised project would result in repairs and improvements to the existing Alpine Road Trail and would not result in an increase in use. No new residential uses would result with implementation of the revised project and no utility infrastructure would be required to serve the revised project. Therefore, the revised project would not directly or indirectly induce population growth. In addition, the project site is located within the Coal Creek OSP and does not contain any residential uses. Therefore, similar to the approved project, the revised project would not displace existing people or housing, necessitating the construction of replacement housing elsewhere.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with population and housing, nor result in new significant impacts. ***No new impacts or increase in severity of impacts related to population and housing would occur.***

PUBLIC SERVICES

Section 3.15 of the 2021 IS/MND analyzed potential impacts on public services with implementation of the project and identified either no impacts or less than significant impacts associated with public services. Similar to the approved project, the revised project would not result in the need for additional or altered fire or police protection services and would not increase demand for school services, new park facilities, or other public facilities or services within the vicinity of the project site. Similar to the approved project, the revised project would not result in a substantial increase in usage of the Coal Creek OSP and would not include housing units or other structures. Therefore, the demand for fire and police protection services would not substantially increase with development of the revised project. In addition, the revised project would result in better access along the existing Alpine Road Trail, and therefore would aid in timely response for medical emergencies. Because the revised project would not include housing or employment creation facilities and would not result in substantial population growth, the revised project would not increase demand for school services, new park facilities, or other public facilities or services within the vicinity of the project site.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with

public services, nor result in new significant impacts. ***No new impacts or increase in severity of impacts related to public service would occur.***

RECREATION

Section 3.16 of the 2021 IS/MND analyzed potential impacts on recreation with implementation of the project and identified less than significant impacts. Similar to the approved project, the revised project would include repairs and improvements to the existing Alpine Road Trail. These improvements may result in a minor increase in the numbers of hikers and bicyclists based upon the ease of access. Due to the size of the Coal Creek OSP, limited availability of parking, the extensive trail system and linkages, the proximity of other open space preserves, and the daily hours of operation, it is likely that the arrival of visitors would be dispersed over time on any given day, and the visitors themselves would be dispersed throughout the Coal Creek OSP. In addition, similar to the approved project, the revised project is not anticipated to result in a significant increase of use at the project site or within the Coal Creek OSP. Therefore, the revised project is not expected to result in a substantial impact to the existing trail system, existing parking or recreational resources of the Coal Creek OSP.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with recreation, nor result in new significant impacts. ***No new impacts or increase in severity of impacts related to recreation would occur.***

TRANSPORTATION

Section 3.17 of the 2021 IS/MND analyzed potential transportation impacts with implementation of the project and identified less than significant impacts. Similar to the approved project, the revised project is anticipated to result in less than 100 net new peak-hour trips during construction and operation of the revised project, which is under the San Mateo County Department of Public Works established threshold for requiring preparation of a traffic impact analysis. Similar to the approved project, construction vehicles associated with the revised project would utilize three separate entry points to access the construction site. As described in the 2021 IS/MND, primary access to the construction site would be from Page Mill Road (Site Access #1) and would extend approximately 4,000 feet from Page Mill Road to Site #14. In order to accommodate construction equipment, the trail at Site #10 would need to be widened to approximately 12 feet by cutting into the inboard edge where a fill slope failure has narrowed the road width to approximately 6 feet. Access for construction vehicles to areas west of Site #14 would be provided along Clouds Rest Trail (Site Access #2). Site #21 and the additional site upstream of Site #21 included in the revised project would be accessed from the northern end of the Coal Creek OSP, using Ciervos Street via Alpine Road (Site Access #3). Construction workers' vehicles would park at the existing trailhead parking and along the existing trail.

The 2021 IS/MND indicated that net soils exported from the project site would equal approximately 160 cubic yards or about 10 truckloads. The revised project would include one additional repair site located upstream of Site #21 requiring 140 cubic yards of excavation and 165 cubic yards of fill. The 165 cubic yards of fill (approximately 10 truckloads) would consist of rock, which would be imported. The 140 cubic yards of excavated materials would remain on site as backfill and spread out along the

trail. As such, implementation of the revised project would increase the number of truckloads from the project site. Implementation of the revised project would result in 160 cubic yards of net soils exported from the project site and 165 cubic yards of materials imported to the project site, requiring approximately 20 truckloads. Over the duration of the construction period, these haul trips would average fewer than one per day; therefore, haul trips would not affect the AM or PM peak hours, similar to the approved project.

The 2021 IS/MND indicated that a work crew of two employees could be present at each of the initial 14 sites with four managers/foremen for the entire project area. As such, the 2021 IS/MND determined that a total of 32 workers would be present on the project site each day. For the purposes of calculating trip generation, no carpooling was assumed. Therefore, each worker was counted as a separate vehicle arriving during the AM peak hour and leaving during the PM peak hour, resulting in 32 inbound trips in the AM peak hour and 32 outbound trips in the PM peak hour for a total of 64 average daily trips (ADT). The revised project would include one additional repair site located upstream of Site #21. Using the same analysis as the 2021 IS/MND, with the incorporation of one additional repair site, the revised project would result in an additional 8 construction workers present on the project site each day, resulting in an additional 8 inbound trips in the AM peak hour and an additional 8 outbound trips in the PM peak hour for a total of 16 additional average daily trips (ADT), resulting in a total of 80 ADT for the revised project.[8] This is less than 100 peak hour trips, which is below the threshold for providing traffic impact analysis according to County guidelines. Similar to the approved project, the revised project is not anticipated to result in additional daily or peak hour trips upon completion of construction.

Based on the analysis presented above, the revised project would result in less than significant impacts associated with a conflict with a program, plan, ordinance, or policy addressing the circulation system. In addition, according to the screening threshold for small projects, defined in the State of California Governor's Office of Planning and Research Technical Advisory On Evaluating Transportation Impacts in CEQA dated December 2018, "projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact." As the revised project is expected to generate a total of 72 average daily trips (ADT), in accordance with the Technical Advisory, impacts related to CEQA Guidelines section 15064.3, subdivision (b) can be assumed to be less than significant with implementation of the revised project.

Similar to the approved project, the revised project is a rehabilitation of an existing trail and is representative of a trail use that is currently in operation and is compatible with surrounding land uses. As such, the revised project would not result in hazards due to incompatible uses (e.g., farm equipment). The revised project would also not result in inadequate emergency access, similar to the project, as implementation would maintain the existing connection between the Alpine Road Trail and the Coal Creek OSP. The existing trail is not currently maintained to handle large, heavy emergency vehicles, which could impede emergency vehicle access in the event of a wildfire. However, similar to the approved project, the revised project would improve access allowing for

[8] It should be noted that much of the project construction has already been completed; therefore, the potential ADT generated by the revised project would be even less than 80 trips.

easier ingress and egress for light weight emergency vehicles, pedestrians, and bicyclists during an emergency.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with transportation, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to transportation. ***No new impacts or increase in severity of impacts related to transportation would occur.***

TRIBAL CULTURAL RESOURCES

Section 3.18 of the 2021 IS/MND analyzed potential impacts on tribal cultural resources with implementation of the project. The 2021 IS/MND determined that all potential impacts on tribal cultural resources could be reduced to less than significant levels with incorporation of mitigation. Pursuant to AB 52, the District sent letters describing the approved project and maps depicting the project site on December 6, 2019, to tribes eligible to consult with the District. On December 9, 2019, Andrew Galvan of the Ohlone Indian Tribe responded via email to the District's letter to request the results of the "Phase I literature search and/or foot survey" that was completed for the project. On December 10, 2019, the District responded to Mr. Galvan's email with the requested information. The District described the results of the Northwest Information Center (NWIC) records search and provided Mr. Galvan with a copy of the resource record for P-41-002199, the closest pre-contact resource to the project site. The results of the cultural resources field survey were described. Later that day, Mr. Galvan responded to the District's email "... what are the professional recommendations made by the Archaeologists based on the Lit Search and the field survey." On December 17, 2019, the District transmitted the draft recommendations presented in the cultural report to Mr. Galvan. On January 15, 2020, Mr. Galvan concurred with the archaeological recommendations and did not list any additional concerns.

The 2021 IS/MND indicated that the project site is not listed on, or eligible for listing on, the CRHR. Additionally, the District, as Lead Agency, has not determined that there are any existing resources significant to Native American Tribes within the project site. The 2021 IS/MND determined that with implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts on tribal cultural resources would be less than significant. As the revised project would be located on the same site as the approved project, potential impacts on tribal cultural resources would be similar to those discussed in the 2021 IS/MND and during tribal consultation efforts. The revised project would also be required to implement Mitigation Measures CUL-1 and CUL-2, and as such, potential impacts on tribal cultural resources would be similar to the approved project and would be less than significant.

Implementation of Mitigation Measures CUL-1 and CUL-2 as identified in the 2021 IS/MND would remain applicable to the revised project and ensure that impacts to all tribal cultural resources would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts related to tribal cultural resources would occur and no additional mitigation measures are required.***

UTILITIES AND SERVICE SYSTEMS

Section 3.19 of the 2021 IS/MND analyzed potential impacts on utilities and service systems with implementation of the approved project and identified either no impacts or less than significant impacts associated with utilities and service systems. The project site does not contain any existing water, wastewater, stormwater drainage, electric, natural gas, or telecommunication infrastructure. Similar to the approved project, the revised project would not include the construction of any new buildings and therefore would not require any new or relocated utility lines or connections. In addition, similar to the approved project, the revised project would not include any new structures or facilities that would generate wastewater or water demand, and as such, there would be no impact to existing or future water supplies or impact on wastewater treatment services.

The District does not provide regular trash collection services, as District ordinances require users to dispose of any refuse brought to the Coal Creek OSP and prohibit public littering or dumping of any material onto the Coal Creek OSP. Illegal trash is removed from the Coal Creek OSP by District maintenance crews and properly disposed of. Solid waste may be generated by users of the project site once operational; however, similar to the approved project, the amount of solid waste generated by the revised project would be minimal. Further, because the District would properly dispose of any illegal litter, the revised project would not affect landfill capacity and would comply with all statutes and regulations related to solid waste.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with utilities and service systems, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to utilities and service systems. ***No new impacts or increase in severity of impacts related to utilities and service systems would occur.***

WILDFIRE

Section 3.20 of the 2021 IS/MND analyzed potential wildfire impacts with implementation of the project and identified no impacts associated with wildfire. The project site is located in a State Responsibility Area (SRA) for fire hazards, as mapped by CAL FIRE, and is located within a high fire hazard severity zone. As the revised project would be located in the same area as the approved project, no impairment or interference with emergency response or emergency evacuation plans would occur due to the distance of the project site from population centers and the nature of the revised project. Similar to the approved project, the District would continue to coordinate with local and regional fire agencies and undertake a number of wildfire management practices. Additionally, one of the BMPs identified in the 2021 IS/MND and included in the approved project design would be to restore the project site to pre-project conditions after the completion of the work. The revised project would be required to implement this BMP; therefore, the revised project would not exacerbate wildfire risks.

Similar to the approved project, the revised project would include repairs and improvements along the existing Alpine Road Trail, including the additional repair site located upstream of Site #21. These improvements would include the maintenance of vehicular access (generally a minimum of 12 feet)

along approximately 2,600 linear feet of road, extending from Page Mill Road to Site #10. The revised project would not include any buildings and therefore would not require emergency water sources, power lines, or other utilities to be installed. The repairs would consist of grading, drainage, and erosion control and would therefore reduce the potential for downslope or downstream flooding or landslides. The revised project would also include the repair of a fill slope failure at Site #21 and the repair of a fill slope failure at a site located upstream of Site #21. As such, similar to the approved project, the revised project would not exacerbate fire risk associated with the installation or maintenance of infrastructure and would not expose people or structures to significant risks, including downslope flooding or landsides.

Based on the information in the 2021 IS/MND and this environmental analysis, the revised project would not substantially increase the severity of the previously identified impacts associated with wildfire, nor result in new significant impacts. With adherence to applicable regulatory requirements there would be no new or substantially more severe significant impacts related to wildfire. ***No new or substantially more severe significant effects related to wildfire would occur.***

COMPARISON TO THE CONDITIONS LISTED IN CEQA GUIDELINES SECTIONS 15162 AND 15164

The following discussion summarizes the reasons that a new or subsequent IS/MND or EIR, pursuant to CEQA Guidelines Sections 15162, is not required to evaluate the environmental effects of the revised project. The analyses prepared for each CEQA topic in the previous sections demonstrate that the revised project is addressed within the scope of the 2021 IS/MND, and no new significant impacts are identified, no significant impacts are more severe, no new mitigation measures are required, and no substantial changes to the existing environmental circumstances have occurred leading to new or more severe previously identified significant impacts.

SUBSTANTIAL CHANGES TO THE PROJECT

As discussed in Section 2.0, Project Description, the revised project has not substantially changed from the project identified and evaluated in the 2021 IS/MND. Additionally, the changes identified for the revised project do not substantially change the scope of proposed improvements proposed and evaluated in the 2021 IS/MND. As such, an Addendum is the appropriate document to address these minor modifications rather than a Subsequent IS/MND or EIR.

SUBSTANTIAL CHANGES IN CIRCUMSTANCES

As described for each CEQA topic in the previous sections, the existing environmental conditions or circumstances in and around the project site have not changed such that implementation of the proposed minor modifications to the project would result in new significant environmental effects or a substantial increase in the severity of significant environmental effects identified in the 2021 IS/MND, and thus major revisions to the 2021 IS/MND are not required.

NEW INFORMATION

No new information of substantial importance, which was not known and could not have been known when the 2021 IS/MND was adopted, has been identified to show that the proposed minor modifications to the project would be expected to result in: 1) new significant environmental effects not identified in the 2021 IS/MND; 2) substantially more severe environmental effects than shown in the 2021 IS/MND; 3) mitigation measures or alternatives previously determined to be infeasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project sponsor declines to adopt the mitigation measure or alternative; or 4) mitigation measures or alternatives which are considerably different from those identified in the 2021 IS/MND would substantially reduce one or more significant effects of the project but the project sponsor declines to adopt the mitigation measure or alternative. In addition, the proposed minor modifications to the project would require no new mitigation measures because no new or substantially more severe impacts are expected beyond those identified in the 2021 IS/MND.

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CONCLUSION

On the basis of the evaluation presented above, the revised project, if implemented, would not trigger any of the conditions listed under the CEQA Framework for Use of an Addendum section of this Addendum, requiring preparation of a subsequent or supplemental IS/MND. Thus, this Addendum satisfies the requirements of CEQA Guidelines Section 15162 and 15164. The implementation of the additional slide repair would not introduce new significant environmental effects, substantially increase the severity of previously identified significant environmental effects or demonstrate that mitigation measures or alternatives previously found not to be feasible would in fact be feasible. The proposed changes that would be implemented as part of the revised project would not alter the findings in the 2021 IS/MND. In addition, no change has occurred with respect to the circumstances surrounding the project that would cause new or substantially more severe significant environmental effects than identified in the 2021 IS/MND, and no new information has become available that shows that the project would cause significant environmental effects not already analyzed in the 2021 IS/MND. Therefore, no further environmental review is required beyond this Addendum to the 2021 IS/MND.

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