DRAFT ENVIRONMENTAL IMPACT REPORT

Redwood Cabin Removal Project

Prepared for

Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

April 14, 2022

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Prepared by

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LIST OF ABBREVIATIONS

BMP	Best Management Practices
Board	Midpen Board of Directors
CA-MUTCD	California Manual on Uniform Traffic Control Devices
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society Inventory of Rare and Endangered plants
Coroner	County Medical Examiner
CRHR	California Register of Historical Resources
CWA	Clean Water Act
DPR	Department of Parks and Recreation
Draft EIR	draft environmental impact report
EIR	environmental impact report
EPG	environmental protection guidelines
ESA	Endangered Species Act
FGC	Fish and Game Code
GHG	greenhouse gasses
IPMP	Integrated Pest Management Program
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
MBTA	Migratory Bird Treaty Act
Midpen	Midpeninsula Regional Open Space District
MLD	Most Likely Descendant
NABP	Native American Burial Plan
NAHC	Native American Heritage Commission

NHPA	National Historic Preservation Act
NOP	Notice of Preparation
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
PRC	Public Resources Code
Preserve	La Honda Creek Open Space Preserve
project	Redwood Cabin Removal Project
RWQCB	Regional Water Quality Control Board
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service

EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), "an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical." As required by the guidelines, this chapter includes (1) a summary description of the Redwood Cabin Removal Project (project), (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1), (3) identification of the alternatives evaluated and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the project.

ES.2 SUMMARY DESCRIPTION OF THE PROJECT

ES.2.1 Project Location

The Redwood Cabin is situated within the upper portion of the La Honda Creek Open Space Preserve (Preserve). The Preserve encompasses 6,142 acres in the Santa Cruz Mountains within unincorporated San Mateo County, approximately 5 miles east of the Pacific Ocean. The Preserve is bounded by Highway 35 (Skyline Boulevard) to the north, by Highway 84 (La Honda Road) to the east and south, and by Bogess Creek to the west. The Redwood Cabin occupies a portion of Assessor's Parcel Number 075-330-260 and is located west of the community of Skylonda, California.

ES.2.2 Project Background

The Redwood Cabin was constructed by W.B. Allen from 1927-1928 and served as a recreational retreat for Allen's family and guests, including the YMCA and Rotary Club (LSA Associates 2018; Midpen 2020). The Redwood Cabin was acquired by Midpen in 1988 and has since been uninhabited.

In 2020, Page & Turnbull, Inc. prepared a Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (CRHR). The Historic Resource Evaluation determined that the Redwood Cabin is an historic resource per CEQA because it appears to be eligible for listing in the CRHR. The Redwood Cabin appears to be one of few remaining examples of a permanent recreational cabin from the 1920s, in the general area, with a high degree of historic integrity—historic integrity refers to a building's original character and materials, not the physical condition of the building—and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3).

On April 8, 2020, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin and implementing habitat enhancements to reflect native ecological conditions.

ES.2.3 Project Objectives

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety;
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings;

- Reduce structure and wildland fire risk by removing a structure with a history of vandalism;
- Improve the natural visual character and scenic open space qualities at the site; and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

ES.2.4 Characteristics of the Project

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including the stone retaining walls and barbeque and fire pits. Prior to demolition activities, lead-based paint present within the structure would be properly removed and disposed of.

While it is expected that excavation of posts and bases associated with the structure would be approximately 2 feet below grade, it is possible that maximum depth of excavation could reach up to 5 feet. During demolition of the structure, it is estimated that approximately 60 tons of material would be removed from the project site (ZFA 2020). Tree removal will not be required to facilitate demolition activities, although some brush clearing along the access road may be necessary.

Following completion of demolition activities, disturbed areas would be recontoured and erosion control applied to the site to ensure adequate site drainage. All demolition and recontoured areas would be compacted to 75 percent relative compaction. Native grass seed mix would be spread in the disturbed areas and weed free or native grass straw would be placed in the disturbed areas, on top of the native grass seed mix, to assist with soil stabilization and erosion control. Any wood chips or mulch generated from unsalvageable building materials may also be used to stabilize disturbed areas but will not be more than 3 inches in depth. Midpen may also conduct the following activities on the project site after demolition and recontouring:

- soil decompaction activities outside of critical rootzones,
- soil testing and, if needed, spot application of amendments such as fertilizers, lime, or organic materials, and
- revegetation or plantings.

Midpen also conducts early detection rapid response surveys for up to 3 years at revegetation sites and treats any invasive plant species on the early detection rapid response list. Other priority integrated pest management target species, including slender false brome may be treated prior to and after demolition. Slender false brome is an invasive weed of high concern at the project site; due to Midpen's mandatory quarantine of this weed, all slender false brome in the area will be treated prior to any work being completed.

Current activity at the project site consists of occasional visits from Midpen staff for inspections. Once removal of the structure and site recontouring/erosion control activities are complete, no additional maintenance or operational activities would be required at the project site except for invasive plant species treatment, if needed. The site would remain closed to the public.

ES.3 ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

ES.3.1 Project-Specific Impacts

This EIR has been prepared pursuant to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 1500, et seq.) to evaluate the physical environmental effects of the project. Midpen is the lead agency for the project and has the principal responsibility for approving and carrying out the project and for ensuring that the requirements of CEQA have been met. After the Final EIR is prepared and the EIR public-review process is complete, the Midpen Board of Directors (Board) is the party responsible for certifying that the EIR adequately evaluates the impacts of the project.

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts for the project. The table provides the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

ES.3.2 Significant-and-Unavoidable Impacts and Cumulative Impacts

The Redwood Cabin Project would result in significant and unavoidable impacts related to historical resources.

Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Implementation of the project would involve demolition of the Redwood Cabin and removal of associated site features, including the stone retaining wall, barbeque, and fire pits. The demolition of the Redwood Cabin would result in a substantial adverse change in the significance of this historical resource because the building would no longer exist. Because associated site features were determined not to possess individual historic significance and do not comprise a historic landscape, removal of these features, in tandem with the Redwood Cabin would not result in an adverse change to the significance of a historic resource. Because the Redwood Cabin structure was recommended eligible for listing in the CRHR under criterion 1 and 3, and project activities would result in an adverse change in the significance of a CEQA historic resource, impacts would be significant.

Mitigation Measure 3.2-1a requires completion of Historic American Building Survey documentation of the Redwood Cabin before commencement of any demolition work. Mitigation Measure 3.2-1b requires creation of an interpretive resource outlining the Redwood Cabin's historic status, historic context, and significance, which would be available in a digital and/or physical format for public engagement and may be shared with a relevant local organization such as the San Mateo County Historical Association. Mitigation Measure 3.2-1c requires salvage and reuse of acceptable demolished structure materials in compliance with Midpen's waste diversion requirements outlined in Midpen's Board of Directors Policy 4.08 – Construction and Demolition Waste Diversion. Implementation of Mitigation Measures 3.2-1a, 3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin, however, these measures would not reduce the project's impact associated with an adverse change to the significance of a historical resource. Because the historically eligible structure would no longer exist, impacts to the Redwood Cabin would remain significant and unavoidable after application of all feasible mitigation measures.

Impact 3.2-3: Potential to Contribute to a Significant Cumulative Impact to Cultural Resources

Implementation of EPG CUL-1 would avoid potential adverse effects to archaeological resources by ensuring proper identification, evaluation, and treatment of previously unidentified archaeological material, such that impacts would be less than significant. Therefore, implementation of the project would not contribute to a cumulative loss of archaeological resources. Similarly, other projects under Midpen's jurisdiction would be required to implement EPG CUL-1 to avoid/reduce impacts to archaeological resources.

As described in Impact 3.2-1, the Redwood Cabin is an eligible historic architectural resource. As such, implementation of the project would result in removal of a historical resource under CEQA as well as one of the few remaining structures representative of recreational development in the region. Implementation of Mitigation Measures 3.2-1a,3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin, however, these measures would not reduce the project's impact associated with an adverse change to the significance of a historical resource. This permanent loss in the resource would result in a cumulative contribution to a historic impact.

Therefore, although cumulative impacts to archaeological resources would be less than significant, cumulative impacts to cultural resources as a whole would be significant and unavoidable.

ES.4 ALTERNATIVES TO THE PROPOSED PROJECT

The following provides brief descriptions of the alternatives evaluated in this Draft EIR. Table ES-2 presents a comparison of the environmental impacts between the alternatives and the proposed project.

- Alternative 1: No Project Alternative assumes no demolition of the existing structure. The project site would remain in its current condition.
- Alternative 2: Stabilize Alternative assumes no demolition of the existing structure but includes stabilizing the building and site.
- Alternative 3: Repair and Rehabilitate Alternative assumes the repair and rehabilitation of the building for eventual reuse as a retreat space, meeting space, or hikers hut (or similar use).

ES.4.1 Environmentally-Superior Alternative

Alternative 2, Stabilize Alternative, would be the environmentally superior alternative. The Redwood Cabin would not be removed, which would result in the loss of opportunity to improve biological resources through invasive plant treatment, soil decompaction and amendments, or revegetation at the site. This would result in slightly greater impacts to biological resources but the alternative would avoid the proposed project's significant and unavoidable cultural resource impact. This significant and unavoidable impact would not be avoided under the No Project Alternative, and impacts to biological resources would be slightly greater under the No Project Alternative, for the same reason as under the Stabilize Alternative, than under the proposed project because it would not provide the long-term opportunity to improve biological resources by removing a built structure to help restore the natural biological values of a mixed evergreen forest. However, the Stabilize Alternative meets only one of the objectives: removing physical hazards to ensure public safety. The remaining four objectives would not be met by this alternative. Therefore, while the Stabilize Alternative would be the environmentally superior action alternative, it would not meet several of the project objectives.

ES.5 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

A notice of preparation (NOP) was distributed for the Redwood Cabin Project on June 9, 2021, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. A public scoping meeting was held on Wednesday, June 23, 2021 at 7:00 pm. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for was being prepared for the project and to solicit input on the scope and content of the environmental document. The NOP and responses to the NOP are included in Appendix A of this Draft EIR. Key concerns and issues that were expressed during the scoping process included the following:

- Historic value and significance of the Redwood Cabin;
- AB 52 consultation; and
- Construction traffic control plan

These issues are each addressed in this Draft EIR and accompanying Initial Study. With the exception of historical resource impacts, any impacts related to these issues are either identified as less than significant, or less than significant after mitigation.

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
Biological Resources			
Impact 3.1-1: Loss or Degradation of Habitat for Special-Status Botanical Species Suitable habitat for special-status botanical species is present within the project site; however, no special-status botanical species were identified during surveys of the site in 2020, and no loss of individual special-status plants is anticipated. With the removal of the cabin, the recontouring of the project site, and implementation of EPG BIO-10, the project would result in an increase in suitable habitat for special-status botanical species. In addition, the implementation of IPMP BMPs would avoid habitat degradation that may result from the introduction and spread of invasive plants. Therefore, the project would have a less-than-significant impact on special-status botanical species.	LTS	No mitigation is required for this impact.	LTS
Impact 3.1-2: Injury or Mortality of Special-Status Amphibians Special-status amphibians may be found within the project site. The recontouring of the site and implementation of EPG BIO-10 would ensure that there is no loss of habitat for these species. Project activities including the demolition of the Redwood Cabin and associated structures, recontouring, and staging of materials could result in the injury or mortality of special-status amphibians, and any injury or mortality of individual special-status amphibians would be a significant impact.	S	**Mitigation 3.1-2a: Protection Measures for California Red-Legged Frog** To avoid loss of individual California red-legged frog, Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures. ▶ Activities including the use of mechanical equipment, excavating, and bulldozing will require pre-activity visual surveys as well as monitoring during the activities. All maintenance activity proposals involving mechanized equipment and associated monitoring proposals will be approved by CDFW and USFWS prior to implementation of the project. ▶ Biological monitors will check for any listed species under vehicles and equipment parked for more than 30 minutes. ▶ Refueling of equipment will be conducted using heavy-gauge tarps made of chemically resistant polypropylene or other impervious material with vertical sides for spill containment. These containment tarps will be set up under the equipment prior to servicing or refueling. Once the work is completed, the tarp and its contents must be immediately removed from the property and all contaminants properly disposed of off-site. Standard operating procedures will be implemented immediately in case of fuel spillage. ▶ All vehicles must stay on designated roads, paved and unpaved, and if it is necessary for a vehicle to travel off the designated road (paved or 2 track	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		unpaved), a monitor will precede the vehicle to clear wildlife from the pathway of the vehicle. ▶ Prior to the start of work, an educational program regarding the sensitivity of the California red-legged frog and its habitat will be conducted for all personnel. ▶ Prior to the start of work, areas will be identified by the biological monitor and approved by the USFWS and CDFW as acceptable locations for the relocation of California red-legged frog if the species is encountered within the project site. Relocation areas will be a minimum of 500-feet from the boundary of the project site and will not include staging areas or roads. No California red-legged frog will be removed from Midpen property or maintained in captivity overnight without prior notification and written approval from the USFWS and CDFW unless the animal is in need of emergency medical assistance. Medical assistance will be provided by a USFWS-approved, certified wildlife veterinarian familiar with amphibian care. ▶ If a California red-legged frog enters the project site, all work shall stop until the animal leaves on its own. If the frog does not leave on its own, a biological monitor specifically authorized by the USFWS and CDFW will be allowed to handle and relocate the California red-legged frog to the pre-approved relocation area. **Mitigation 3.1-2b: Biological Monitoring for California Giant Salamander and Santa Cruz Black Salamander** To avoid loss of individual California giant salamander and Santa Cruz black salamander, Midpen will implement the following measures. ▶ Prior to the start of demolition each day, the access road and portions of the project site where activities will occur will be surveyed by a qualified biologist for the presence of California giant salamander and Santa Cruz black salamander. The survey will include the inspection of any debris from demolition or materials staged overnight for the presence of these species. ▶ If individual California giant salamanders or Santa Cruz black salamanders are discovered during daily inspections, work shall stop until the individual salamander moves on its own to a point where it is no longer at risk of incidental injury or death from project activities, or until the individual salamander is moved outside of the project site by a qualified biologist.	

<table>
<tr><th>Impacts</th><th>Significance before Mitigation</th><th>Mitigation Measures</th><th>Significance after Mitigation</th></tr>
<tr><td>Impact 3.1-3: Disturbance of Nesting Marbled Murrelet
The nearest mapped nesting habitat for marbled murrelet (Brachyramphus marmoratus) is located approximately one-half mile west of the project site. However, unmapped nesting habitat could occur within a quarter mile of the project site, and implementation of the project could result in loss of eggs and young from nest disturbance during the breeding season (March 24 – September 15) . If nesting marbled murrelets are within a quarter mile of the project site, the project would have a significant impact on this species.</td><td>S</td><td>Mitigation 3.1-3: Preconstruction surveys and nest buffers marbled murrelet
To avoid disturbance and loss of the nests of marbled murrelet Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.
Pre-demolition nest tree survey within a quarter mile of the project site for trees that meet the Pacific Seabird Group definition of potential murrelet nesting trees.
▶ If a potential nesting tree is detected within 300 feet of the project site or if a murrelet nest is detected, Midpen will notify the USFWS before work begins.
▶ If a potential nesting tree is detected greater than 300 feet and less than a quarter mile from the project site, the following will apply:
◤ If possible, work within the project site shall be confined to September 15 to November 1.
◤ If work is scheduled to be performed during the breeding season (March 24 to September 15), disturbance minimization buffers determined by the sound level anticipated from the project will be implemented based on sound level monitoring studied, submitted to USFWS and the table below.
<table>
<tr><th colspan="5">Anticipated Project-Generated Sound Level (dB)[2]</th></tr>
<tr><th>Ambient Pre-Project Sound Level (dB)[1]</th><th>Moderate (71-80)</th><th>High (81-90)</th><th>Very High (91-100)</th><th>Extreme (101-110)</th></tr>
<tr><td>Natural Ambient (≤50)[3]</td><td>50 (165)[4,5]</td><td>150 (500)</td><td>400 (1,320)</td><td>400 (1,320)</td></tr>
<tr><td>Very Low (51-60)</td><td>0</td><td>100 (300)</td><td>250 (825)</td><td>400 (1,320)</td></tr>
<tr><td>Low (61-70)</td><td>0</td><td>50 (165)</td><td>250 (825)</td><td>400 (1,320)</td></tr>
<tr><td>Moderate (71-80)</td><td>0</td><td>50 (165)</td><td>100 (330)</td><td>400 (1,320)</td></tr>
<tr><td>High (81-90)</td><td>0</td><td>50 (165)</td><td>50 (165)</td><td>150 (500)</td></tr>
</table>
[1] Ambient sound level includes all natural and human-induced sounds occurring at the project stie prior to the project, and not related to the project.
[2] Project-generated sound levels measured at 50 feet from the source
[3] "Natural Ambient" refers to sound levels generally experienced in habitats not substantially influenced by human activities
[4] All distances are given in meters, with rounded equivalent feet in parentheses.
[5] For murrelets, activities conducted during the dawn and dusk periods have special considerations for ambient sound level.
Source: USFWS 2016; USFWS 2020</td><td>LTS</td></tr>
</table>

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Project activities shall not be conducted within a visual line-of-site distance of 132 feet from a suitable nest tree as designated by a qualified biologist. ▶ If a sound study is not conducted, no project activities shall occur within a quarter mile of potential nest trees during the marbled murrelet breeding season (March 24 to September 15). ▶ If project activity takes place during the breeding season (March 24 to September 15) regardless of the distance to potential nest trees, activity will be restricted to 2 hours after sunrise and 2 hours before sunset to minimize disturbance to murrelets that may be flying over the project site to forage at the coast. ▶ If marbled murrelet protocol level surveys are conducted and do not indicate that the habitat is occupied by marbled murrelet, the seasonal and distance work restrictions may be lifted with written approval from the USFWS.	
Impact 3.1-4: Disturbance of Common Raptor and Other Common Bird Nests The project site provides suitable nesting habitat for common raptors and other common nesting birds, and project activities could result in the disturbance of active nests if demolition occurs during the nesting season. The disturbance of active nests could result in the abandonment of nests and the mortality of eggs and young, which would be a potentially significant impact.	PS	**Mitigation 3.1-4: Preconstruction surveys and nest buffers for common raptors and other nesting birds** To avoid disturbance and loss of the nests of common raptors and other nesting birds Midpen will implement the following measures. ▶ If work is scheduled to be performed during the nesting season (the specific start and end dates of the season will be determined by a qualified biologist but are typically February 15 to August 30), a pre-demolition survey will be performed within 1,000 feet of the project site, no more than 14 days prior to the start of demolition related activities. If no active nests are detected during surveys, no further mitigation is required. ▶ If active nests are found during the pre-demolition survey, a buffer will be established around each nest. No project activity will occur within a buffer of 1,000-feet around large raptor nests (e.g., buteos) 500-feet around small common raptor nests (e.g., accipiters) and 250-feet around the nests of other common bird species. The size of the buffer around any individual nest maybe reduced by a qualified biologist in consultation with CDFW, depending on screening of the nest from project activities and other site-specific conditions. These buffers will be maintained until a qualified biologist determines that any young have fledged, and the nest is no longer active.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact 3.1-5: Loss of San Francisco Dusky-Footed Wood Rat Nests The Redwood Cabin contains multiple San Francisco dusky-footed wood rat (*Neotoma fuscipes annectens*) nests. The demolition of the cabin would destroy these nests and could result in the injury or mortality of young woodrats if demolition occurs during the rearing season (approximately April 1 to July 15). The destruction of these nests and the injury or mortality of young woodrats would be a significant impact	S	**Mitigation 3.1-5: Minimize impacts from loss of San Francisco dusky-footed wood rat nests** ▶ To avoid loss of San Francisco dusky-footed wood rat during demolition, work will be conducted outside of the rearing season (before April 1 or after July 15). ▶ Prior to demolition, debris piles will be constructed outside of and adjacent to the project footprint to provide shelter for wood rats that are displaced by demolition. These debris piles will be constructed under the guidance of a qualified biologist and will consist of dead branches of various sizes (0.5 to 6 inches in diameter) collected from the surrounding area. Each pile will be approximately 3 to 5 feet high by 8 to 10 feet in diameter. The number of debris piles will be determined by a qualified biologist based on the number of nests in the Redwood Cabin prior to demolition. ▶ To avoid death of wood rats, wood rat nest materials will be removed by hand from the Redwood Cabin prior to demolition of the structure. ▶ If wood rats are observed during demolition, work will stop until the animal leaves the area on its own, or until a qualified biologist determines that work can continue without harm to the animal.	LTS
Impact 3.1-6: Loss of Bat Roosts and Mortality of Individuals The Redwood Cabin provides potential roosts for common and special-status bats. The demolition of the Redwood Cabin could result in disturbance of active bat roosts, which could result in the loss of adult and young bats. The loss of individual special-status bats, or the loss of a maternity roost of any bat species would be a potentially significant impact	PS	**Mitigation 3.1-6: Pre-demolition surveys and measures to reduce impacts to bat roosts and special-status bats** ▶ A pre-demolition bat roost survey shall be conducted at the project site by a qualified biologist no more than two days prior to the start of demolition. ▶ In addition, if demolition is anticipated to occur during the bat wintering period (from November 16 through February 15), a pre-demolition winter roost survey shall be conducted by a qualified biologist. ▶ If individual nonbreeding and non-special-status bats are roosting within the structure, a qualified biologist may remove the bats and work may proceed during any time of the year. If special-status bats or a maternity roost of any bat species is detected, demolition will not be allowed to occur during the April through August maternity season; outside of the maternity season, bats shall be excluded and provided alternate roost sites before demolition. ▶ Midpen will develop a project specific bat roost deterrent plan if special-status bats or a maternity roost of any bat species is detected in the Redwood Cabin. The deterrent plan will be submitted to CDFW for approval and will include measures such as acoustic deterrents and one-way bat doors installed outside of the maternity season (April through August), and other similar methods.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Demolition will occur when forecast nighttime lows are not below 50 degrees Fahrenheit. ▶ The materials around crevices that may provide roosting sites within the structure will be first demolished with hand tools to minimize the potential risk of injuring bats. ▶ Initial demolition will be performed in the early evening after sunset, or if evening work is not feasible, the work shall be initiated in the afternoon to ensure that any bats present are not in torpor and unable to escape. Once demolition has been started, further work may be performed at any point in the day. A qualified bat biologist will be present at the initiation of demolition to capture and temporarily hold any bats present for release the evening of the same day.	
Impact 3.1-7: Disturbance or Loss of Special-Status Mammal Den Sites (American Badger and Ringtail) The project site and adjacent redwood forest provide potential denning sites for special-status mammals. The demolition of the Redwood Cabin could result in disturbance of active dens and the injury or mortality of pups if the demolition occurs during the breeding season. The loss of active dens and injury of mortality of special-status mammal pups would be a potentially significant impact	PS	**Mitigation 3.1-7: Pre-demolition surveys and den buffers for American badger and ringtail** ▶ If the project occurs during the period when pups are potentially in the den February 15 through July 1, a qualified biologist shall conduct pre-demolition surveys within 100 feet of the project site for potential American badger and ringtail dens. The survey will occur no more than 7-days prior to implementation of demolition activities. ▶ If any potentially occupied American badger dens are located during surveys, no work shall be performed within a 100-foot buffer around dens during the period when pups are potentially in the den (February 15 through July 1). ▶ If any potentially occupied ringtail dens (e.g., brush piles, appropriately sized burrows, hollow logs, hollow trees) are located during surveys, the same buffers as described for American badger will be applied during breeding season for ringtail (May 1 through June 30).	LTS
Impact 3.1-8: Disturbance or Loss of Riparian Habitat or Other Sensitive Natural Communities The project does not contain riparian woodland; however, herbaceous riparian habitat is present along the adjacent La Honda Creek. The project would not directly affect this habitat and the implementation of EPG WQ-2 would avoid and minimize impacts from the runoff of sediment from the project. The site also contains a CDFW-designated sensitive natural community, Redwood Forest; however, this community would not be adversely affected by the project because the project would not remove any trees, would treat on-site invasive species, and	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
would restore the area disturbed by the project through the implementation of EPG BIO-10. Therefore, the impact of the project on riparian habitat and other sensitive natural communities would be less than significant.			
Impact 3.1-9: Degradation or loss of protected wetlands and other waters The access road to the project site crosses La Honda Creek and an un-named tributary. A temporary bridge may be required to move equipment across the tributary; however, no dredge or fill of the creek or tributary will occur as a result of the project. In addition, EPG WQ-2 will be implemented to avoid and minimize impacts to La Honda Creek and its tributary due to runoff from the project site. Therefore, the impact to protected wetlands and other waters would be less than significant.	LTS	No mitigation is required for this impact.	LTS
Impact 3.1-10: Potential to Interfere with Wildlife Movement and Nursery Sites The demolition of the Redwood Cabin would not result in any changes in habitat or new structures that would interfere with wildlife movement. The noise and human activity associated with the project could result in temporary impacts to wildlife movement that would not be substantial, due to the short duration and limited footprint of the project in relation to other habitat in the vicinity. Therefore, the projects impact would be less than significant.	LTS	No mitigation is required for this impact.	LTS
Impact 3.1-11: Potential to Contribute to a Significant Cumulative Impact to Biological Resources Implementation of the proposed project in the context of historical effects on the landscape and in combination with other cumulative projects in the area could result in impacts to biological resources. However, through the implementation of EPGs, BMPs, and mitigation measures, the contribution of the project would be less than cumulatively considerable. Therefore, this impact would be less than significant.	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cultural Resources			
Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource Implementation of the project would result in a substantial adverse change in the significance of a recommended-eligible historical resource. This would result in a significant impact as described in State CEQA Guideline 15064.5(b)(1).	S	**Mitigation 3.2-1a: Document historic buildings prior to removal.** Midpen shall complete Historic American Building Survey documentation of the Redwood Cabin before any demolition work is conducted. Documentation shall consist of written history of the property, plans and drawings of the historic resources, and photographs, as described below: ▶ **Written History.** The report shall be reproduced on archival bond paper. ▶ **Plans and Drawings.** An architectural historian (or historical architect, as appropriate) shall conduct research into the availability of plans and drawings of the Redwood Cabin as the building currently exists. If such plans/drawings exist, their usefulness as documentation for the building shall be evaluated by the architectural historian. If deemed adequate, the plans/drawings shall be reproduced on archival mylar. If no plans/drawings are available, or if the existing plans/drawings are not found to be useful in documenting the historic resource, a historical architect shall prepare dimensioned plans and exterior elevations of the building. A combination of existing and new drawings is acceptable. All drawings shall be reproduced on archival mylar. ◤ The architectural historian shall conduct research into the existence of the original architectural plans and drawings of the building. If found, the plans shall be reproduced on archival mylar. Alternatively, the architectural plans can be scanned and saved as TIFF files. The scanning resolution shall be not less than 300 dpi. ◤ All digital files, including drawing files, shall be saved on media and labeled following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Specifications. ▶ **Photographs.** Digital photographs shall be taken of the Redwood Cabin following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Standards. The documentation shall be prepared by an architectural historian, or historical architect as appropriate, meeting the Secretary's Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards. The documentation shall be submitted to the San Mateo County Library, the San Mateo County Historical Association, the Northwest Information Center, and the Midpen office in Los Altos.	SU

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Mitigation 3.2-1b: Redwood Cabin interpretation. Midpen will create an interpretive resource outlining the Redwood Cabin's historic status, historic context, and significance. This resource will be available in a digital and/or physical format for public engagement and may be shared with a relevant local organization such as the San Mateo County Historical Association. **Mitigation Measure 3.2-1c: Salvage of useable materials.** Should any of the demolished structure materials (i.e., redwood logs) be in acceptable condition, Midpen shall reserve materials for potential future uses and/or salvage in compliance with Midpen's waste diversion requirements outlined in Midpen's Board of Directors Policy 4.08 - Construction and Demolition Waste Diversion. If these materials are free of pests, Midpen will coordinate with a local historic salvage organization, such as Garden City Recycle and Salvage in Santa Cruz, Whole House Building Supply & Salvage in San Mateo, or Heritage Salvage in Petaluma for their reuse.	
Impact 3.2-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources Project-related ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. However, because project excavation activities would occur in previously disturbed areas, the potential for encountering archaeological material is low. Additionally, because EPG CUL-1 would be implemented in the event of a discovery, this would be a less-than-significant impact.	LTS	No mitigation is required for this impact.	LTS
Impact 3.2-3: Potential for the project, in combination with other development, to contribute to a significant cumulative impact to cultural resources. The project, in combination with other cumulative development in the area, could result in impacts to cultural resources in the area. Through the implementation of environmental protection measures, the contribution of the project would not be cumulatively considerable with respect to archaeological resources. However, because the project would result in permanent removal of a historic architectural resource, impacts to historical resources would be significant. Therefore, cumulative impacts to cultural resources would be significant.	S	Mitigation Measures, 3.2-1a, 3.2-1b, and 3.2-1c, described above.	SU

Table ES-2 Summary Environmental Impacts of the Alternatives Relative to the Redwood Cabin Project

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Stabilize Alternative	Alternative 3: Repair and Rehabilitate Alternative
Biological Resources	LTSM	Slightly Greater	Slightly Greater	Greater
Cultural Resources	SU	Slightly Less	Less	Less

Source: Compiled by Ascent in 2021

Notes: LTSM = Less Than Significant with Mitigation SU = Significant and Unavoidable

1 INTRODUCTION

This draft environmental impact report (Draft EIR) evaluates the environmental impacts of the proposed Redwood Cabin Removal Project (project) and has been prepared under the direction of Midpeninsula Regional Open Space District (Midpen) in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000-21177) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Sections 15000-15387) ("CEQA Guidelines").

This chapter of the Draft EIR provides information on the following:

- project requiring environmental analysis (synopsis);
- type, purpose, and intended uses of the Draft EIR;
- scope of the Draft EIR;
- agency roles and responsibilities; and
- standard terminology.

1.1 PROJECT REQUIRING ENVIRONMENTAL ANALYSIS

The following is a synopsis of the project characteristics. For further information on the proposed project, see Chapter 2, "Project Description."

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including retaining walls and barbeque pits. After demolition, the site would be left to return to its natural condition. Disturbed portions of the site would be recontoured and erosion control applied to the site to ensure adequate site drainage. The site would be revegetated with native grass seed mix. Excavations that extend below finish grade would be backfilled, compacted, and would entail minor grading as necessary for drainage and erosion control. No public access facilities would be constructed as part of this project.

1.2 PURPOSE AND INTENDED USES OF THIS DRAFT EIR

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the Midpen Board of Directors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002, CCR Section 15093).

According to CCR Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

Because it will carry out the project, Midpen is the lead agency, as defined by CEQA, for this EIR. Other public agencies with jurisdiction over the project are listed below in Section 1.5, "Agency Roles and Responsibilities."

1.3 SCOPE OF THIS DRAFT EIR

This Draft EIR includes an evaluation of the following two environmental issue areas as well as other CEQA-mandated issues (e.g., cumulative impacts, growth-inducing impacts, significant unavoidable impacts, alternatives):

- Biological Resources, and
- Cultural Resources.

Under the CEQA statutes and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the Redwood Cabin Removal Project; review of applicable planning documents and CEQA documentation; field work; comments received during a public scoping meeting held on June 23, 2021; and comments received on the Notice of Preparation (NOP) (see Appendix A of this Draft EIR). Applicable documentation includes the La Honda Creek Open Space Preserve Master Plan (2012); La Honda Creek Open Space Preserve Master Plan IS/MND (2012); and the White Barn Stabilization Project Addendum (2021). These documents are available on Midpen's website, respectively:

https://www.openspace.org/sites/default/files/La%20Honda%20Creek%20Preserve%20Master%20Plan.pdf
https://www.openspace.org/sites/default/files/20160629_LHC_IS_MND.pdf
https://www.openspace.org/sites/default/files/Addendum%20to%20the%20Master%20Plan%20IS-MND.pdf

The NOP was distributed on June 9, 2021, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for the project was being prepared and to solicit input on the scope and content of the environmental document. As a result of the review of existing information and the scoping process, it was determined that each of the issue areas listed above should be evaluated fully in this Draft EIR. Further information on the NOP and scoping process is provided below in Section 1.4, "Public Review Process."

1.4 PUBLIC REVIEW PROCESS

As identified above in Section 1.3, "Scope of this Draft EIR," in accordance with CEQA regulations, an NOP was distributed on June 9, 2021, to responsible agencies, interested parties and organizations, and private organizations and individuals that could have interest in the project. The NOP was available on Midpen's website and was distributed to responsible agencies, nearby jurisdictions, adjacent landowners, and local resource protection organizations.

Midpen hosted a virtual public scoping meeting to inform stakeholders about the project and solicit input regarding environmental topics and alternatives to be evaluated in the EIR. The scoping meeting was held during the Midpen Board of Directors meeting on June 23, 2021.

The purpose of the NOP was to provide notification that an EIR for the project was being prepared and to solicit input on the scope and content of the document. The NOP and responses to the NOP are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, comments from the general public as well as organizations and agencies on environmental issues may be submitted to the lead agency.

A virtual public meeting will be held on the Draft EIR on April 27, 2022, at 7 p.m. Upon completion of the public review and comment period, a Final EIR (Final EIR) and Mitigation Monitoring and Reporting Plan (MMRP) will be prepared that will include both written and oral comments on the Draft EIR received during the public-review period, responses to those comments, and any revisions to the Draft EIR made in response to public comments. The Draft EIR and Final EIR will comprise the EIR for the project.

Before approving the Redwood Cabin Removal Project, the lead agency, is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

1.5 AGENCY ROLES AND RESPONSIBILITIES

This Draft EIR will be used by Midpen and CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state and local agencies, which may have an interest in resources that could be affected by the project, or that have jurisdiction over portions of the project.

As the lead agency pursuant to CEQA, Midpen is responsible for considering the adequacy of the EIR and determining if the project should be approved.

Under CEQA, a responsible agency is a public agency, other than the lead agency, that has responsibility to carry out or approve a project (PRC Section 21069). A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California (PRC Section 21070).

The following agencies may serve as responsible agencies for the project:

State

- State Water Resources Control Board / San Francisco Bay Regional Water Quality Control Board

Local

- County of San Mateo
- Bay Area Air Quality Management District

1.6 DRAFT EIR ORGANIZATION

This Draft EIR is organized into chapters, as identified and briefly described below. Chapters are further divided into sections (e.g., Chapter 3, "Environmental Impacts and Mitigation Measures" and Section 3.2, "Cultural Resources"):

The "Executive Summary": This chapter introduces the project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant impacts and mitigation measures to reduce or avoid significant impacts.

Chapter 1, "Introduction": This chapter provides a description of the lead and responsible agencies, the legal authority and purpose for the document, and the public review process.

Chapter 2, "Project Description": This chapter describes the location, background, and goals and objectives for the Redwood Cabin Removal Project and describes the project elements in detail.

Chapter 3, "Environmental Impacts and Mitigation Measures": The sections within this chapter evaluate the expected environmental impacts generated by the project and are arranged by subject area. Within each subsection of Chapter 3, the regulatory background, existing conditions, analysis methodology, and thresholds of significance are described. The anticipated changes to the existing conditions after development of the project are then evaluated for each subject area. For any significant or potentially significant impact that would result from project implementation, mitigation measures are presented and the resulting level of impact significance after implementation of mitigation is identified. Environmental impacts are numbered sequentially within each section (e.g., Impact 3.2-1, Impact 3.2-2, etc.). Any required mitigation measures are numbered to correspond to the impact numbering; therefore, the mitigation measure for Impact 3.2-2 would be Mitigation Measure 3.2-2.

Chapter 4, "Alternatives": This chapter evaluates alternatives to the project, including alternatives considered but eliminated from further consideration, the No Project Alternative, and two alternative development options. The environmentally superior alternative is identified.

Chapter 5, "Other CEQA Sections": This chapter evaluates growth-inducing impacts and irreversible and irretrievable commitment of resources and discloses any significant and unavoidable adverse impacts.

Chapter 6, "Report Preparers": This chapter identifies the preparers of the document.

Chapter 7, "References": This chapter identifies the organizations and persons consulted during preparation of this Draft EIR and the documents and individuals used as sources for the analysis.

2 PROJECT DESCRIPTION

2.1 INTRODUCTION

The Midpeninsula Regional Open Space District (Midpen) is an independent special district in the San Francisco Bay Area that has preserved nearly 65,000 acres of public land and manages 26 open space preserves. Midpen's mission is to acquire and preserve a regional greenbelt of open space land; protect and restore the natural environment; and provide opportunities for ecologically sensitive public use and education. On the San Mateo County coast, Midpen's mission is expanded to include the preservation of agricultural lands and protection and restoration of the natural environment.

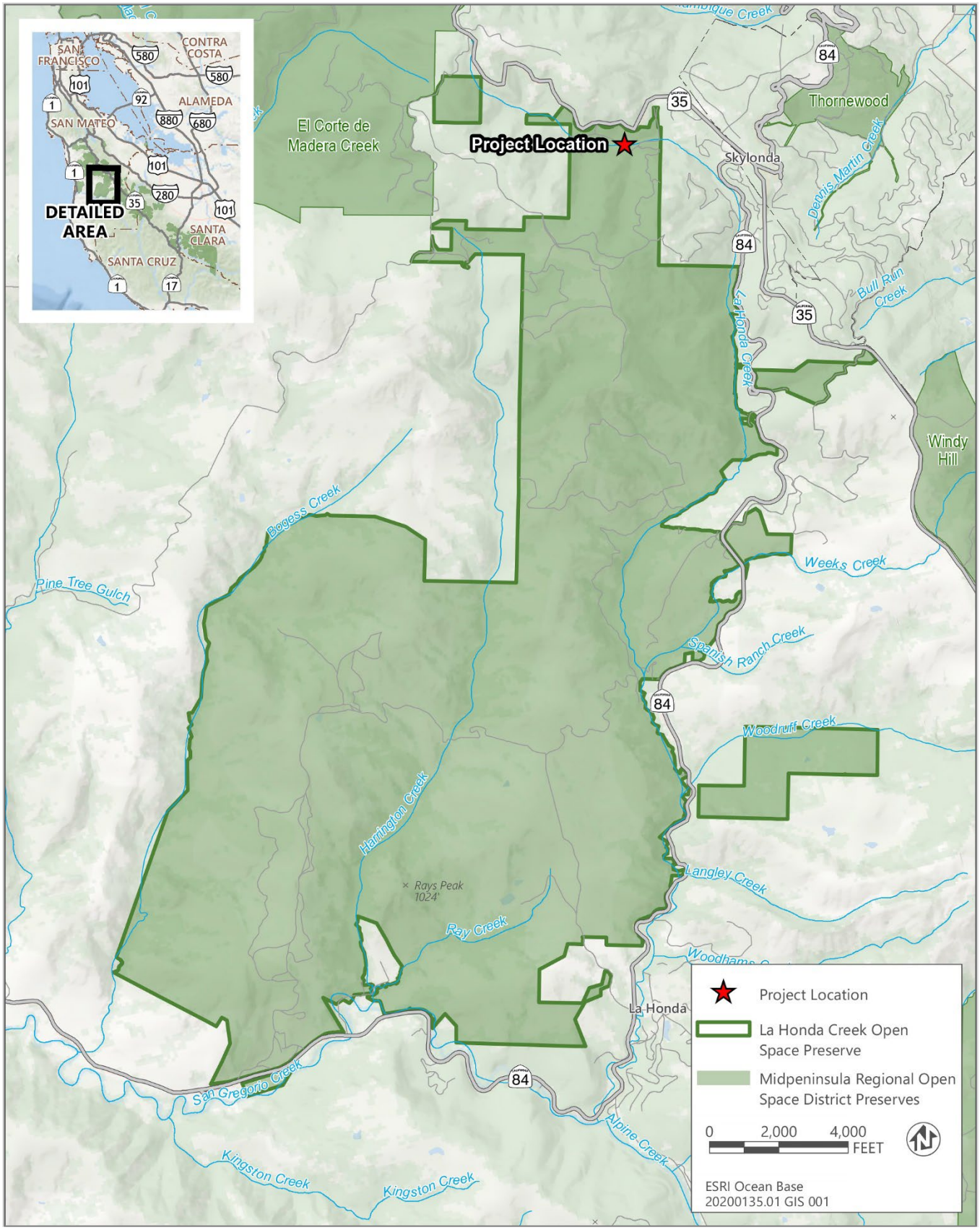
The Redwood Cabin Removal Project (project) site is located within the upper La Honda Creek Open Space Preserve (Preserve) in San Mateo County, California. The approximately 100-year-old building is currently vacant and in disrepair. The project would remove the existing Redwood Cabin and other human-made features (i.e., retaining walls, fire/barbeque pits) within the project site to remove physical hazards and improve site safety, address ongoing trespassing and vandalism issues, and restore natural resource and open space/scenic values of the surrounding mixed evergreen forest. After demolition and removal activities, site recontouring and erosion control measures would ensure soil stabilization within disturbed portions of the site. No public access facilities would be constructed as part of this project.

2.2 PROJECT LOCATION AND SETTING

The Redwood Cabin is situated within the upper portion of the Preserve. The Preserve encompasses 6,142 acres in the Santa Cruz Mountains within unincorporated San Mateo County, approximately 5 miles east of the Pacific Ocean (see Figure 2-1). The Preserve is bounded by Highway 35 (Skyline Boulevard) to the north, by Highway 84 (La Honda Road) to the east and south, and by Bogess Creek to the west.

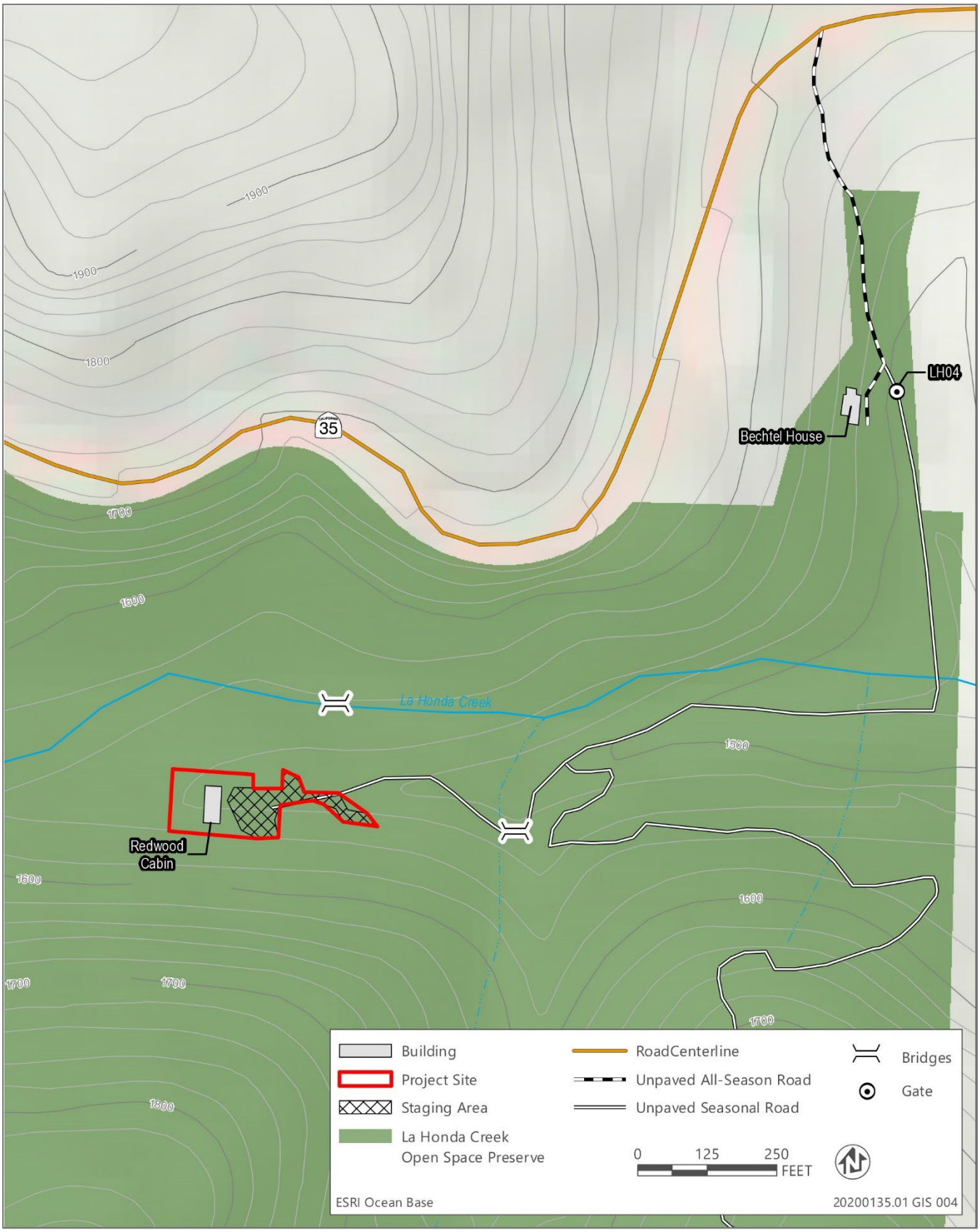
The Redwood Cabin occupies a portion of Assessor's Parcel Number 075-330-260 and is located west of the community of Skylonda, California. The project site is designated for Forest/Timber Production land uses under the San Mateo County General Plan and is zoned as Timber Land Preserve District under the San Mateo County Zoning Ordinance. Access to the Redwood Cabin is provided via an unpaved road accessible from Skyline Boulevard, which travels through two locked gates. The final segment of this unpaved road requires a four-wheel drive vehicle or access by foot (see Figure 2-2).

The project site is located in a wooded area within a portion of the Preserve that is currently not open to the public. The building is situated atop sloped terrain overlooking a circular dirt driveway that surrounds a small grove of redwood trees.



Source: Data received from Midpeninsula Regional Open Space District in 2020

Figure 2-1 Project Vicinity and Location



Source: Data received from Midpeninsula Regional Open Space District in 2021

Figure 2-2 Project Site

2.3 DESCRIPTION OF THE PROJECT SITE

2.3.1 Background

The Redwood Cabin is a large, side-gabled log cabin with a rectangular plan. The Redwood Cabin was constructed by W.B. Allen from 1927–1928 and served as a recreational retreat for Allen's family and guests, including the YMCA and Rotary Club (LSA Associates 2018; Midpen 2020). The Redwood Cabin was acquired by Midpen in 1988 and has since remained uninhabited. Today, the Redwood Cabin stands in a deteriorated state, posing a significant site safety hazard and has been the site of numerous trespassing and vandalism incidents (including fire ignitions) that raise concerns regarding overall public safety and fire risk within a very high fire severity zone.

In 2020, Page & Turnbull, Inc. prepared a Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (CRHR). The Historic Resource Evaluation determined that the Redwood Cabin is an historic resource per CEQA because it appears to be eligible for listing in the CRHR. The Redwood Cabin appears to be one of few remaining examples of a permanent recreational cabin in the Santa Cruz Mountains from the 1920s with a high degree of historic integrity—historic integrity refers to a building's original character and materials, not the physical condition of the building—and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3).

On April 8, 2020, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin and implementing habitat enhancements to reflect native ecological conditions.

STRUCTURE CONDITION

The Redwood Cabin has an approximately 2,000-square-foot footprint and is constructed of barked redwood logs with saddle notches. The cabin is supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The main entry is centered on the eastern façade and features a thick redwood burl door. Double casement windows of various sizes are present throughout all façades of the structure. The roof consists of a side-gable design with five skylights present on the east-facing roof gable. Representative photographs are shown in Figures 2-3 and 2-4. A wood plank floored deck supported by pressure treated timber previously wrapped around all four façades of the Redwood Cabin.

There is a central interior stone chimney that connects to an expansive interior fireplace. The interior of the Redwood Cabin contains a large stone fireplace in its living room, two small bedrooms, a bathroom, and a kitchen. On either side of the wall separating the two bedrooms are middens of San Francisco dusky-footed woodrat built around corner lavatories. A midden was also observed inside the kitchen cabinetry in the southwest corner of the Redwood Cabin.

In 2020, ZFA Structural Engineers prepared a Structure Stabilization Basis of Design report (Basis of Design Report). The Basis of Design Report indicates that the Redwood Cabin is in generally poor-to-fair structural condition with obvious structural damage and apparent deterioration. Findings within the Basis of Design Report also revealed the presence of lead-based paint as well as several potential seismic deficiencies (ZFA 2020).

Source: Midpen in 2021

Photo 1: Redwood Cabin, eastern façade.

Source: Ascent Environmental in 2021

Photo 2: Fire pit at front, barbeque at rear.

Figure 2-3 Representative Photographs

Source: Midpen in 2021

Photo 3: Redwood Cabin, northern façade.

Source: Ascent Environmental in 2021

Photo 4: Redwood Cabin, western façade.

Figure 2-4 Representative Photographs

VANDALISM

The Redwood Cabin has a history of periodic trespass including recent vandalism events in 2021. Given the deteriorating condition of the structure, trespassing incidents raise concerns regarding public safety. On February 16, 2021, Midpen staff visited the Redwood Cabin and observed signs of recent vandalism: broken locks, smashed windows, and deliberate dismantlement of the deck and railing. In some cases, a remote location can protect an unoccupied structure from trespass and vandalism, but with the Redwood Cabin, it is clear that numerous people are aware of its location. Evidence of fires have been found in the past in the nonfunctional fireplaces in the Redwood Cabin, which raise concerns regarding potential fire risk given the site's located within a very high fire severity zone. The difficult access to this location makes regular patrol challenging, and any illegal activity unlikely to be observed and reported by the public.

To prevent future unauthorized entry, Midpen installed plywood boards over window and door openings that could provide ingress into the Redwood Cabin. Midpen also posted new signage around the Redwood Cabin to convey its status as a "hazardous closed area," which elevates the trespass penalty to a misdemeanor (code MROSD 802.2[b]). After trespass and vandalism were observed in April 2021, Midpen removed portions of the building's wraparound deck that were in a highly dilapidated and collapsible condition to address exterior public safety concerns

OTHER SITE FEATURES

Much of the area surrounding the Redwood Cabin is wooded. The driveway is partially delineated by stone walls and a staircase that previously connected to the Redwood Cabin deck. Various remnants of the prior use of the Redwood Cabin are scattered throughout the property, including horseshoe pits, as well as a stone barbeque pit and a brick planter (also referred to as fire pit) located east of the Redwood Cabin. Additionally, several stone retaining walls are present to the east and west of the structure.

2.3.2 Project Objectives

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety,
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings,
- Reduce structure and wildland fire risk by removing a structure with a history of vandalism,
- Improve natural visual character and scenic open space qualities at the site, and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

2.4 DESCRIPTION OF THE PROJECT

2.4.1 Redwood Cabin Removal

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including the stone retaining walls and barbeque and fire pits. Prior to demolition activities, lead-based paint present within the structure would be properly removed and disposed.

While it is expected that excavation of posts and bases associated with the structure would be approximately 2 feet below grade, it is possible that maximum depth of excavation could reach up to 5 feet. During demolition of the structure, it is estimated that approximately 60 tons of material would be removed from the project site (ZFA 2020). Tree removal will not be required to facilitate demolition activities, although some brush clearing along the access road may be necessary.

2.4.2 Site Recontouring and Revegetation

Following completion of demolition activities, disturbed areas would be recontoured and erosion control applied to the site to ensure adequate site drainage. All demolition and recontoured areas would be compacted to 75 percent relative compaction. Native grass seed mix would be spread in the disturbed areas and weed free or native grass straw would be placed in the disturbed areas, on top of the native grass seed mix, to assist with soil stabilization and erosion control. Any wood chips or mulch generated from unsalvageable building materials may also be used to stabilize disturbed areas but will not be more than 3 inches in depth. Midpen may also conduct the following activities on the project site after demolition and recontouring:

- soil decompaction activities outside of critical rootzones,
- soil testing and, if needed, spot application of amendments such as fertilizers, lime, or organic materials, and
- revegetation or plantings.

Midpen also conducts early detection rapid response surveys for up to 3 years at revegetation sites and treats any invasive plant species on the early detection rapid response list. Other priority integrated pest management target species, including slender false brome may be treated prior to and after construction. Slender false brome is an invasive weed of high concern at the project site; due to Midpen's mandatory quarantine of this weed, all slender false brome in the area will be treated prior to any work being completed.

Current activity at the project site consists of occasional visits from Midpen staff for inspections. Once removal of the structure and site recontouring/erosion control activities are complete, no additional maintenance or operational activities would be required at the project site except for invasive plant species treatment, if needed. The site would remain closed to the public.

2.5 CONSTRUCTION ACCESS, EQUIPMENT, STAGING, AND LOGISTICS

Project construction activities are estimated to begin in Fall 2023 over a duration of 10 weeks. The project would be implemented by crews consisting of approximately eight personnel. Construction activities (i.e., demolition and revegetation work) would typically occur between 7:00 a.m. and 3:30 p.m. Monday through Friday, and no work would occur on Sundays or holidays. Consistent with Section 4.88.360 of the San Mateo County Noise Ordinance for construction, any work occurring on Saturday would begin no earlier than 9:00 a.m.

Equipment and vehicles would access the project area from Highway 35 (via Highways 92 or 84), then to the unpaved driveway extended from Highway 35 to the project site. Project construction activities would not require any road closures. However, because it is uncertain if southbound Highway 35 provides adequate sight distance/stopping distance in the vicinity of where heavy vehicles would need turning access to the project site, Midpen will prepare a temporary traffic control plan to ensure the safety of Highway 35 road users and construction workers.

The California Manual on Uniform Traffic Control Devices (CA-MUTCD), Part 6: Temporary Traffic Control provides principles and guidance for the implementation of temporary traffic control to ensure the provision of reasonably safe and effective movement of roadway users through or around temporary traffic control zones while reasonably protecting road users, workers, responders to traffic incidents, and equipment. Thus, the anticipated elements of the temporary traffic control plan listed below shall be developed and implemented consistent with guidance provided in CA-MUTCD, Part 6: Temporary Traffic Control and all applicable industry standards.

At a minimum, the temporary traffic control plan will include the following elements:

- Emergency services access to local land uses shall be maintained at all times for the duration of construction activities.
- Signage along Highway 35 to notify local traffic of a construction access point.
- Roadside safety protocols shall be complied with to reduce the risk of accident.
- Use flaggers to direct traffic as necessary to ensure adequate stopping distance.

Construction equipment, materials, and vehicle staging would occur within the driveway area of the project site. The construction staging area is identified in Figure 2-2. The following pieces of equipment and vehicles are anticipated:

- excavator,
- manlift(s),
- skidsteer,
- water truck,
- boom truck,
- forklift, and
- haul truck(s).

An existing bridge is located east of the Redwood Cabin on the unpaved road that provides access to the project site. A temporary bridge may be required to span this existing bridge due to limitations in the bridge's current load capacity. The temporary bridge would be placed over the existing bridge deck to span the drainage without temporary or permanent encroachments into the streambank. The temporary bridge would be removed after construction.

The total acreage of the project (which includes the staging area and project site boundaries) is identified in Figure 2-2 (approximately 0.7 acres). All construction-related hazardous materials and waste will be covered and secured at the end of each working day. The secure location shall be determined by the Midpen project manager and should be positioned away from sources of water. Waste generated by project construction activities would be disposed of offsite. If the building materials are in good condition, Midpen will conduct salvage operations per the process outlined in Midpen's Board of Directors Policy 4.08 - Construction and Demolition Waste Diversion. Likely waste disposal locations are provided below in Table 2-1 and have been used by Midpen on past projects.

Table 2-1 Potential Waste Disposal Facilities

Waste Facility	Location	Waste Facility Information
Republic Services Ox Mountain Sanitary Landfill	12310 San Mateo Road, Half Moon Bay, CA	Ox Mountain is a Class III landfill that accepts motor oil and most solid wastes, including clean metals, recyclables, construction debris, and greenwaste; it does not accept hazardous wastes.
Waste Management Kettleman Hills Landfill	35251 Old Skyline Road, Kettleman City, CA	1,600-acre hazardous waste treatment, storage, and disposal facility. Accepts municipal solid waste and most types of hazardous wastes as defined by the USEPA and/or state of California (e.g., Class I hazardous wastes, asbestos debris, petroleum and/or metal contaminated soils/debris, various sludges)

Source: City of Half Moon Bay 2014; Waste Management 2020

2.6 PERMITS AND APPROVALS

Table 2-2 below discloses the potential permits and approvals that may be required to implement the project.

Table 2-2 Potential Permits and Approvals

Permit/Approval	Agency	Purpose/Applicability
Project Approval	Midpen	Midpen Board of Directors – approval of the project
General Construction Permit	RWQCB	Regional Water Quality Control Board – general construction permit
Building	County of San Mateo	San Mateo County Planning and Building Department – demolition and grading permits
Construction	BAAQMD	Bay Area Air Quality Management District – register all portable equipment permits with BAAQMD; notify BAAQMD of all demolition activities 10 days prior to occurrence of activity.

Compiled by Ascent in 2021.

2.7 BEST MANAGEMENT PRACTICES

Midpen has adopted numerous best management practices (BMPs) that are intended to avoid and minimize environmental impacts and comply with applicable laws and regulations. For the purposes of these guidelines, references to "Midpen" also encompasses any contractors hired to implement the treatments. These BMPs would be incorporated into the design of the project.

2.7.1 La Honda Creek Open Space Preserve Master Plan EPGs

The environmental protection guidelines (EPGs) listed below are identified in Midpen's La Honda Creek Open Space Preserve Master Plan and the associated 2012 Initial Study/Mitigated Negative Declaration (IS/MND) (Midpen 2012a; 2012b), many of which were based on, and therefore reference, the San Mateo Coastal Annexation EIR. The Project is not located within the designated Coastal Area; however the EPG's can be applied, if appropriate. The EPGs below have minor text modifications (shown in strike-through and underline) to reflect subsequent changes in Midpen's guidelines, such as adoption of the Integrated Pest Management Program (IPMP), since the time the 2012 IS/MND and Master Plan were approved. These minor changes were addressed in the White Barn Stabilization Project Addendum (Ascent 2021) and do not affect the effectiveness of the measures, but instead provide clarity and specificity. Additional project-specific revisions to the EPGs (shown in double strike-through and double underline) are included to increase their direct application to the current project and thereby enhance their effectiveness. Explanations for the revisions are shown as footnotes. These revisions will not apply to future Midpen projects.

AIR QUALITY

EPG AQ-1: Midpen shall insure that the following measures are included ~~in all future~~ as part of construction contracts to control fugitive dust emissions:

- Water all active construction areas at least twice daily and more often during windy periods~~. Active areas adjacent to existing land uses shall be kept damp at all times, of shall be treated with non-toxic stabilizers or dust palliatives~~;[1]
- Cover all trucks hauling ~~soil, sand and other~~ [2] loose materials and/or require all trucks to maintain at least two feet of freeboard;
- ~~Pave or, a~~Apply water up to three times daily~~, or apply (non-toxic) soil stabilizers~~ on all unpaved access roads, ~~parking areas~~ and staging areas~~ for construction sites~~;[3]
- Sweep daily (preferably with water sweepers) all paved access roads if visible soil material is carried onto paved access roads~~, parking areas and staging areas at construction sites~~;[4]
- Sweep streets daily (preferably with water sweepers) if visible soil material is carried onto adjacent public streets;
- ~~Hydroseed or apply non-toxic soil stabilizers to inactive construction areas;~~
- Enclose, cover, or water twice daily ~~or apply non-toxic soil binders to~~ any exposed stockpiles (dirt, sand, etc.);
- Limit traffic speeds on unpaved roads to 15 mph;
- Install sandbags or other wildlife friendly erosion control measures to prevent silt runoff to public roadways;
- Replant vegetation in disturbed areas as quickly as possible with locally appropriate native plants;
- Suspend excavation and grading activity whenever the wind is so high that it results in visible dust plumes despite control efforts.

[1] There are no existing land uses adjacent to the project site.
[2] No sand or soil will be hauled during project implementation.
[3] Paving is not occurring with the project and the project site does not include paved parking or staging areas.
[4] The project site does not include paved parking or staging areas.

BIOLOGICAL RESOURCES

EPG BIO-10: Revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed by facility construction. The project includes r~~R~~evegetation work to enhance the natural open space values of the site~~ shall be implemented prior to or concurrently with the development~~. The ~~design of an appropriate~~ revegetation work~~ program shall~~ will be designed to return native species to the site, including the areas underlying footprint of where the Redwood Cabin structure and other accessory structure currently stand.[5] ~~fully compensate for the lost habitat, with no net loss of habitat functions and values. Riparian and wetland habitat impacts will typically be mitigated at a 3:1 ratio for high-quality habitat areas and at lower ratios where lower habitat quality justifies a lower ratio. A lower ratio may also be justified if habitat mitigation is implemented and verified as successful prior to the occurrence of impacts. Mitigation shall be based on in-kind replacement of impacted habitat with habitat of equal or better biotic value.~~ [6]The revegetation ~~program~~ work ~~shall~~ will be designed by a ~~qualified~~ District-approved biologist or ecologist and submitted to the appropriate regulatory or trustee agency for approval, if required. ~~At a minimum, the revegetation program shall include a description of project impacts, mitigation calculations, the mitigation site, revegetation techniques, maintenance measures, a long-term monitoring program, and contingency measures. Native plant materials suited to the site will be utilized in all mitigation work.~~[7]

CULTURAL RESOURCES

EPG CUL-1: Midpen will apply the Standard Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials:

- **Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials**. In the event that any cultural resources are exposed during construction, work at the location of the find will halt immediately within 10 meters (30 feet) of the find. If an archaeologist is not present at the time of the discovery, Midpen will contact an archaeologist for identification and evaluation in accordance with CEQA criteria.

  A reasonable effort will be made by Midpen and archaeologist to avoid or minimize harm to the discovery until significance is determined and an appropriate treatment can be identified and implemented. Methods to protect finds include fencing, covering remains with protective material and culturally sterile soil or plywood. If vandalism is a threat, 24-hour security shall be provided. During this evaluation period, construction operations outside of the find location can continue preferably with an archaeologist monitoring any subsurface excavations.

  If the resource cannot be avoided, the archaeologist will develop an appropriate Action Plan for treatment within 48 hours to minimize or mitigate the adverse effects. Midpen will not proceed with construction activities that could affect the discovery until the Action Plan has been reviewed and approved. The treatment effort required to mitigate the inadvertent exposure of significant cultural resources will be guided by a research design appropriate to the discovery and potential research data inherent in the resource in association with suitable archaeological field techniques and analytical strategies. The recovery effort will be detailed in a professional report in accordance with current archaeological standards. Any non-grave associated artifacts will be curated with an appropriate repository.

EPG CUL-2: Application of the Native American Burial Plan (NABP) will be applied:

- **Native American Burial Plan**

  1. In the event of an inadvertent discovery of human remains and cultural items during project construction, the field crew supervisor shall take immediate steps, if necessary, to secure and protect any remains and cultural materials. This shall include but is not limited to such measures as (a) temporary avoidance by construction

[5] Restoration is not proposed as part of the project. Seeding of native species is considered revegetation and will not lead to increased ecological function such as with full restoration.

[6] Biological mitigation for loss of habitat is not required for this project. As described in Section 3.1, "Biological Resources," the impact to riparian and wetland habitat is less than significant.

[7] Because mitigation for habitat loss is not required, these items are not applicable.

until the remains and items can be removed; (b) posting a security person; (c) placement of a security fence around the area of concern; or, (d) some combination of these measures. Any such measures employed will depend upon the nature and particular circumstances of the discovery.

2. The County Medical Examiner (Coroner) shall be notified by the field crew supervisor or other designated Midpen manager and informed of the find and of any efforts made to identify the remains as Native American. If the remains are identified as a prehistoric Native American by either a professional archaeologist under contract to Midpen or the Medical Examiner's forensic archaeologist, the Medical Examiner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours of notification of the find. The Medical Examiner may choose to document and remove the remains at his/her discretion depending on the circumstances of the discovery. The NAHC then designates and notifies a Most Likely Descendant (MLD). The MLD has 24 hours to consult and provide recommendations for the treatment or disposition, with proper dignity, of the human remains and grave goods [Note: Other culturally affiliated Native Americans [Indians] may be consulted by the MLD during the consultation and recommendation process to determine treatment of the skeletal remains].
3. Each burial and associated cultural items shall be stored as a unit in a secure facility, which shall be accessible to the MLD and other Native American representative(s) or their designated alternates upon prior arrangement.
4. The remains and associated cultural items shall be reburied in a secure location as near as possible to the area of their discovery or at an off-site location acceptable to the MLD that has minimal potential for future disturbance. The reburial shall be done in a manner that shall discourage or deter future disturbance. Reburial shall be conducted by persons designated by the MLD, with the assistance, if requested, of Midpen's field crew. The location shall be fully documented, filed with the NAHC and the California Historical Resources Information System, Northwest Information Center, California State University, Sonoma and treated as confidential information.
5. If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or Midpen or designate rejects the recommendation of the MLD and mediation (as per Section 5097.94 subdivision (k)) fails, reinterment of the human remains and associated cultural items associated shall take place with appropriate dignity on the property in a location not subject to further subsurface disturbance.
6. For security reasons, no news releases, including but not limited to photographs, videotapes, written articles, or other such means that contains information about human remains or burial-related items of Native American origin shall be released by any party during the discovery, recovery and reburial unless approved by the MLD.
7. Any disputes that arise among the MLD and representatives of affected Native American groups and/or between Midpen or designee ~~designate~~ and the MLD concerning cultural affiliation or the ultimate disposition of Native American human remains and associated funerary objects and unassociated funerary objects shall be resolved according to the dispute resolution procedures in Section 5097.94 of the State of California Public Resources Code.
8. The Archaeological Data Recovery/Native American Burial Treatment Report(s) shall be prepared by professional archaeologists. The report shall include, but not be limited to, the following: project overview; ethnographic section; previous archaeological research in the region and on-site; circumstances of discovery; recovery procedures and techniques; artifact analysis; faunal analysis; osteological analysis and interpretation; and, conclusions. The MLD and other interested Native American representative(s) shall be provided an opportunity to review the report and submit comments within the same time period as accorded any other reviewers.
9. Objects not associated with the human remains and recovered from private land shall be transferred to Midpen. If curation of any objects is required, curation will be at repository approved by Midpen. Repositories can include the History Museums of San Jose collections, the Tiburon Archaeological Research Group, San Francisco State University and the Collections Facility, Department of Anthropology, Sonoma State University, Rohnert Park.

EPG CUL-3: The protocol for determining if structures are of historic value is as follows:

1. The property and building types will be identified and evaluated by a qualified cultural consultant;
2. The cultural consultant will determine if the structures in question are currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places;
3. If it is determined that the structures in question are not currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places, a DPR 523 form issued by the California Department of Parks and Recreation (DPR) will be completed by the cultural consultant and the structural and building data sent to a qualified architectural historian.
4. ~~The following measure applies only to the Southern La Honda Creek Area: As required by Mitigation CUL-1a(4) of the San Mateo Coastal Annexation EIR, if it is determined that the structures in question are currently on the California Register of Historic Resources or if the building has been determined to be of historic value, there are two options that would mitigate any impact to the historic values:~~

   a) ~~Retain and rehabilitate the building according to the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). New construction near this building should be consistent with its historic character; or~~

   b) ~~Move the building to a different location on its current parcel or to a different parcel appropriate to its historic character.~~[8]

HAZARDS AND HAZARDOUS MATERIALS

Although the La Honda Creek Open Space Preserve Master Plan does not contain specific hazardous material EPGs that apply to this specific project, the document does list the following required hazards BMPS:

1. Remove all trash and construction-related waste to a secured, covered location at the end of each working day to maintain a clean worksite. Dispose of hazardous materials according to all specified regulations.
2. Store chemicals in a non-reactive container. Store bagged, dry reactive materials in a secondary container. Protect storage areas from vandalism.
3. ~~Mix concrete no closer than 25 feet from any waterway or open ditches. Concrete shall be mixed in secure containments. Cleaning of tools shall occur in secured containments; no concrete cleaning is allowed in drainages or water bodies. All concrete waste shall be off hauled; concrete is allowed to first evaporate in containments for ease of off haul.~~[9]
4. Good housekeeping practices shall be followed to minimize storm water contamination from any petroleum products or other chemicals. Maintain spill cleanup materials where readily accessible during use.
5. Conduct proper & timely maintenance of vehicles and equipment. Cleaning or equipment maintenance shall be prohibited except in designated areas located near preserve entrances. If fueling must occur onsite, use designated areas located away from drainages and a drip pan to catch spills. Place drip pans under heavy equipment stored onsite overnight.
6. Instruct all personnel regarding the correct procedure for spill prevention and control, waste disposal, use of chemicals, and storage of materials.

[8] This applies to the Southern La Honda Creek Area only and therefore is not relevant to the project.
[9] The project does not include the use of concrete.

EPG HAZ-9: In order to reduce fire ignition risk, Midpen shall require the following measures for all maintenance and construction activities within the Preserve:

- All equipment to be used during ~~construction and maintenance~~ demolition[10] activities must have an approved spark arrestor.
- Grass and fuels around ~~construction~~ demolition sites where ~~construction~~[11] vehicles are allowed to be parked will be cut or reduced.
- Mechanical ~~construction~~[12] equipment that can cause an ignition will not be used when the National Weather Service issues a Red Flag Warning for the San Francisco Bay Area.
- Hired contractors will be required to:
  - Provide water to suppress potential fires caused by the work performed.
  - Remind workers that smoking is prohibited at the work site and on any District land per contract conditions and District Ordinance.
  - Maintain working ABC fire extinguishers on all vehicles in the work area.
  - Contact both Mountain View Dispatch at (650) 968-4411 and CAL FIRE, Skylonda, at (650) 851-1860 for emergency response in the event of a fire.

HYDROLOGY AND WATER QUALITY

EPG WQ-2: Storm water quality Best Management Practices (BMPs) as listed in this section shall be implemented to reduce potential water quality impacts. BMPs include:

1. Flow of runoff from drainage structures will be directed to vegetated areas, away from creeks and drainages as is practical.
2. ~~Conduct any trail maintenance work during low flow periods.~~ [13]
3. Use erosion and sediment control measures to minimize water quality impacts and ensure no sediment at heavily traveled trails flows into creeks. To the extent feasible, all measures will be 100 percent biodegradable and/or certified weed-free. These measures include:
   - Silt Fences
   - Straw Bale Barriers
   - Brush or Rock Filters
   - Storm Drain Inlet Protection
   - Sediment Traps
   - Sediment Basins
   - Erosion Control Blankets and Mats
   - Midpen shall prevent erosion on steep slopes by using erosion control material according to manufacturer's specifications.
4. If soil is to be stockpiled for any reason at creeksides, no run-off will be allowed to flow back to the creek.

[10] No new construction is proposed. The project entails demolition activities.
[11] No new construction is proposed. The project entails demolition activities.
[12] No new construction is proposed. The project entails demolition activities.
[13] The project does not include trail maintenance.

- Additional required Best Management Practices to project water quality:

  5. Schedule project during the dry season to avoid erosion due to surface runoff during ~~the construction phase~~ demolition and site revegetation activities. [14]

  ~~6. Construct rolling dips in areas where trail gradients exceed five percent to reduce runoff concentration; outslope trail surfaces where feasible.~~ [15]

  ~~7. Implement road and trail seasonal closures to vehicles and our recreation use, where and when appropriate.~~[16]

NOISE AND VIBRATION

EPG NOI-1: Midpen will ensure that all construction activity associated with implementation of the Master Plan will occur during the less sensitive daytime hours between 7:00 a.m. and 5:00 p.m. daily.

2.7.2 Integrated Pest Management Program BMPs

In addition, the BMPs listed below from Midpen's 2014 IPMP (Midpen 2014) and subsequent 2019 IPMP (Midpen 2019) addendum would be incorporated into the design of the project.

IPMP BMP 11: Sanitation and Prevention of Contamination -All personnel working in infested areas shall take appropriate precautions to not carry or spread weed seed or SOD-associated spores outside of the infested area. Such precautions will consist of, as necessary based on site conditions, cleaning of soil and plant materials from tools, equipment, shoes, clothing, or vehicles prior to entering or leaving the site.

IPMP BMP 12: All staff, contractors, and volunteers shall be properly trained to prevent spreading weeds and pests to other sites.

IPMP BMP 14: Midpen staff shall ensure that rental equipment and project materials (especially soil, rock, erosion control material and seed) are free of invasive plant material prior to their use at a worksite.

IPMP BMP 21: A Midpen-approved biologist shall survey all selected treatment sites shortly before work to determine site conditions and develop any necessary site-specific measures. Treatment sites are defined as areas where IPM activity, including manual, mechanical, and chemical treatment, is expected to occur. In addition, on a repeating basis, grassland treatment sites shall be surveyed by a Midpen-approved biologist once every five years and brushy and wooded sites shall be surveyed once every five years. Brush removal on rangelands will require biological surveys before work is conducted in any year. Site inspections shall evaluate existing conditions at a given treatment site including the presence, population size, growth stage, and percent cover of target weeds and pests relative to native plant cover and the presence of special-status species and their habitat, or sensitive natural communities.

In addition, annual worker environmental awareness training shall be conducted for all treatment field crews and contractors for special-status species and sensitive natural communities determined to have the potential to occur on the treatment site by a Midpen approved biologist. The education training shall be conducted prior to starting work at the treatment site and upon the arrival of any new worker onto sites with the potential for special-status species or sensitive natural communities. The training shall consist of a brief review of life history, field identification, and habitat requirements for each special-status species, their known or probable locations in the vicinity of the treatment site, potential fines for violations, avoidance measures, and necessary actions if special-status species or sensitive natural communities are encountered.

[14] No new construction is proposed with the project.
[15] No new construction is proposed with the project.
[16] There is currently no public access to the project site.

2.7.3 Project Specific BMPs

In addition, to the La Honda Creek Open Space Preserve Master Plan EPGs and the IPMP BMPs, Midpen has identified additional BMPs that are specific to this project to avoid and minimize environmental impacts and comply with applicable laws and regulations. For the purposes of these guidelines, references to "Midpen" also encompasses any contractors hired to implement the treatments. These BMPs would be incorporated into the design of the project.

BMP AQ-1: Midpen is responsible for implementing the following Basic Construction Mitigation Measures in addition to EPG AQ-1 to reduce emissions from construction-related activities and to satisfy BAAQMD's BMP requirements.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure CCR Title 13, Section 2485). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

BMP GHG-1: To satisfy GHG emission reduction measures provided by BAAQMD, the project contractor is responsible for using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment for at least 15 percent of the fleet. An exemption from this requirement may be granted if the contractor documents that alternative fuel is not reasonably available within the County.

3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

APPROACH TO THE ENVIRONMENTAL ANALYSIS

This draft environmental impact report (Draft EIR) evaluates and discloses the environmental impacts associated with the Redwood Cabin Removal Project, in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulation, Title 14, Chapter 3, Section 1500, et seq.). Sections 3.1 and 3.2 of this Draft EIR present a discussion of regulatory background, existing conditions, environmental impacts associated with construction and operation of the project, mitigation measures to reduce the level of impact, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). Issues evaluated in these sections consist of the environmental topics identified for review in the Redwood Cabin Removal Project Initial Study (IS) (see Appendix B). Sections 3.1 and 3.2 of this Draft EIR also include a "Cumulative Impacts" discussion which presents an analysis of the project's impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines. Chapter 4, "Alternatives," presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed project, as required by Section 15126.6 of the State CEQA Guidelines. Chapter 5, "Other CEQA Sections," includes an analysis of the project's growth inducing impacts, as required by Section 21100(b)(5) of CEQA.

STANDARD TERMINOLOGY

This Draft EIR uses the following standard terminology:

"No impact" means no change from existing conditions (no mitigation is needed).

"Less-than-significant impact" means no substantial adverse change in the physical environment (no mitigation is needed).

"Potentially significant impact" means an impact that might cause a substantial adverse change in the environment (mitigation is recommended because potentially significant impacts are treated as significant).

"Significant impact" means an impact that would cause a substantial adverse change in the physical environment (mitigation is recommended).

"Significant and unavoidable impact" means an impact that would cause a substantial adverse change in the physical environment and that cannot be avoided, even with the implementation of all feasible mitigation.

INTRODUCTION TO THE ANALYSIS

In accordance with Section 15126.2 of the State CEQA Guidelines, this Draft EIR identifies and focuses on the significant direct and indirect environmental effects of the project, giving due consideration to both its short-term and its long-term effects. Short-term effects are generally those associated with construction, and long-term effects are generally those associated with project operations. As part of the IS prepared for the project and provided in Appendix B, the project was determined to have either less-than-significant impacts with mitigation incorporated, less-than-significant impacts, or no impact for the majority of environmental resource categories. The following discussion summarizes the analysis conducted for these resource categories, and presents any mitigation determined to be necessary to reduce impacts to less than significant. Refer to Appendix B for further clarification.

ENVIRONMENTAL RESOURCE CATEGORIES NOT EVALUATED FURTHER

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CCR Sections 15126.2[a] and 15128). Effects dismissed in an IS as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the lead agency subsequently receives information inconsistent with the finding in the IS (CCR Section 15143).

Based on comments received as part of the public scoping process (Appendix A) and a review of the information presented in the IS prepared for the project (Appendix B), as well as additional research and analysis of relevant project data during preparation of this Draft EIR, the following were identified as resources that would not experience any significant environmental impacts from the project.

- Aesthetics
- Agriculture and Forest Resources
- Air Quality
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards / Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire

As described in the IS, project impacts related to air quality (discussed on pages 3-5 through 3-12), energy (discussed on pages 3-18 through 3-19), and greenhouse gasses (discussed on pages 3-24 through 3-27) were determined to be less than significant with implementation of project-specific BMPs, as described in Section 2.7.3 of Chapter 2, "Project Description."

ENVIRONMENTAL RESOURCE CATEGORIES EVALUATED FURTHER

This EIR's analysis provides a more detailed evaluation of the following two environmental resource topics that require or merit additional explanation beyond what is provided in the IS:

- Section 3.1, Biological Resources
- Section 3.2, Cultural Resources

Sections 3.1 and 3.2 of this Draft EIR each include the following components as they relate to the two environmental resource topics:

- **Regulatory Setting:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from the federal, state, and local levels are each discussed as appropriate.
- **Environmental Setting:** This subsection presents the existing environmental conditions on the project site and in the surrounding area as appropriate, in accordance with State CEQA Guidelines Section 15125. The discussions of the environmental setting focus on information relevant to the issue under evaluation. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected.
- **Environmental Impacts and Mitigation Measures:** This subsection presents thresholds of significance and discusses potentially significant effects of the project on the existing environment, including the environment beyond the project boundaries, in accordance with State CEQA Guidelines Section 15126.2. The methodology for

impact analysis is described, including technical studies upon which the analyses rely. The thresholds of significance are defined and thresholds for which the project would have no impact are disclosed and dismissed from further evaluation. Project impacts and mitigation measures are numbered sequentially in each subsection (Impact 3.2-1, Impact 3.2-2, Impact 3.2-3, etc.). A summary impact statement precedes a more detailed discussion of the environmental impact. The discussion includes the analysis, rationale, and substantial evidence upon which conclusions are drawn. The determination of level of significance of the impact is defined in bold text. A "less-than-significant" impact is one that would not result in a substantial adverse change in the physical environment. A "potentially significant" impact or "significant" impact is one that would result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation. Mitigation measures are identified, as feasible, to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section 15126.4. Unless otherwise noted, the mitigation measures presented are recommended in the EIR for consideration by Midpen's Board of Directors to adopt as conditions of approval.

Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and would avoid an impact or maintain it at a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance. Where existing laws or regulations specify a mandatory permit process for future projects, performance standards without prescriptive actions to accomplish them, or other requirements that allow substantial discretion in how they are accomplished, or have a substantial compensatory component, the level of significance is determined before applying the influence of the regulatory requirements. In this circumstance, the impact would be potentially significant or significant, and the regulatory requirements would be included as a mitigation measure.

This subsection also describes whether mitigation measures would reduce project impacts to less-than-significant levels. Significant-and-unavoidable impacts are identified as appropriate in accordance with State CEQA Guidelines Section 15126.2(b). Significant-and-unavoidable impacts are also summarized in Chapter 5, "Other CEQA Sections."

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3.1 BIOLOGICAL RESOURCES

This section addresses common and sensitive biological resources that could be affected by implementation of the Redwood Cabin Project.

No comment letters were received in response to the Notice of Preparation (see Appendix A) that expressed concerns related to biological resources.

3.1.1 Regulatory Setting

FEDERAL

Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) (16 U.S.C. Section 1531 et seq.), the U.S. Fish and Wildlife Service (USFWS) regulates the taking of species listed in the ESA as threatened or endangered. In general, persons subject to ESA (including private parties) are prohibited from "taking" endangered or threatened fish and wildlife species on private property, and from "taking" endangered or threatened plants in areas under federal jurisdiction or in violation of state law. Under Section 9 of the ESA, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS has also interpreted the definition of "harm" to include significant habitat modification that could result in take.

Section 10 of the ESA applies if a non-federal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of the ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS.

Clean Water Act

Section 404 of the Clean Water Act (CWA) requires project proponents to obtain a permit from the U.S. Army Corps of Engineers (USACE) before performing any activity that involves any discharge of dredged or fill material into waters of the United States, including wetlands. Waters of the United States include navigable waters of the United States, interstate waters, tidally influenced waters, and all other waters where the use, degradation, or destruction of the waters could affect interstate or foreign commerce, tributaries to any of these waters, and wetlands that meet any of these criteria or that are adjacent to any of these waters or their tributaries. Many surface waters and wetlands in California meet the criteria for waters of the United States.

In accordance with Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredged or fill material must obtain water quality certification from the appropriate regional water quality control board (RWQCB) indicating that the action would uphold state water quality standards.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), first enacted in 1918, provides for protection of international migratory birds and authorizes the Secretary of the Interior to regulate the taking of migratory birds. The MBTA provides that it will be unlawful, except as permitted by regulations, to pursue, take, or kill any migratory bird, or any part, nest, or egg of any such bird. Under the MBTA, "take" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities." A take does not include habitat destruction or alteration, as long as there is not a direct taking of birds, nests, eggs, or parts thereof. The current list of species protected by the MBTA can be found in Title 50 of the Code of Federal Regulations (CFR), Section 10.13 (50 CFR 10.13). The list includes nearly all birds native to the United States.

STATE

California Endangered Species Act

Pursuant to the California Endangered Species Act (CESA), a permit from CDFW is required for projects that could result in the "take" of a plant or animal species that is listed by the state as threatened or endangered. Under CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species, but does not include "harm" or "harass," as does the federal definition. As a result, the threshold for take is higher under CESA than under the federal ESA. Authorization for take of state-listed species can be obtained through a California Fish and Game Code Section 2081 incidental take permit.

California Fish and Game Code Sections 3503 and 3503.5—Protection of Bird Nests and Raptors

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders *Falconiformes* and *Strigiformes*), including their nests or eggs. Typical violations include destruction of active nests as a result of tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs and/or young.

Fully Protected Species under the California Fish and Game Code

Protection of fully protected species is described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Act requires that each of the nine RWQCBs prepare and periodically update basin plans for water quality control. Each basin plan sets forth water quality standards for surface water and groundwater and actions to control nonpoint and point sources of pollution to achieve and maintain these standards. Basin plans offer an opportunity to protect wetlands through the establishment of water quality objectives. The RWQCB's jurisdiction includes waters of the United States, as well as areas that meet the definition of "waters of the state." "Waters of the state" is defined as any surface water or groundwater, including saline waters, within the boundaries of the state. The RWQCB has the discretion to take jurisdiction over areas not federally protected under CWA Section 404 provided they meet the definition of waters of the state and the State Water Resources Control Board published a new set of procedures for discharges of dredged or fill material into waters of the state on March 22, 2019. Mitigation requiring no net loss of wetlands functions and values of waters of the state typically is required by the RWQCB.

The State Water Resources Control Board has adopted the following definition of wetlands:

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

California Fish and Game Code Section 1602—Streambed Alteration

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources are subject to regulation by CDFW under Section 1602 of the California Fish and Game Code. Under Section 1602, it is unlawful for any person, governmental agency, or public utility to do the following without first notifying CDFW:

- substantially divert or obstruct the natural flow of, or substantially change or use any material from, the bed, channel, or bank of any river, stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

The regulatory definition of a stream is a body of water that flows at least periodically or intermittently through a bed or channel that has banks and supports fish or other aquatic life. This definition includes watercourses with a surface or subsurface flow that supports or has supported riparian vegetation. CDFW's regulatory authority within altered or artificial waterways is based on the value of those waterways to fish and wildlife. A CDFW streambed alteration agreement must be obtained for any action that would result in an impact on a river, stream, or lake.

LOCAL

La Honda Creek Open Space Preserve Master Plan

The La Honda Creek Open Space Preserve (Preserve) Master Plan, prepared in June 2012, represents a long-term comprehensive planning effort for the Preserve. The Biological Resource Management section of the Master Plan provides biological resource protection measures, which are identified in Chapter 2, "Project Description," and listed below. As explained in Chapter 2, "Project Description," the Environmental Protection Guidelines (EPGs) below have minor text modifications. Those shown in single strike-through and underline reflect changes in Midpen's guidelines and were adopted with Midpen Board approval of the White Barn Stabilization Project Addendum (Ascent 2021). Additional project-specific revisions to the EPGs (shown in double strike-through and double underline) are included to increase their direct application to the current project and thereby enhance their effectiveness. Explanations for the revisions are shown as footnotes. These revisions will not apply to future Midpen projects.

- **EPG BIO-10:** Revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed by facility construction. The project includes r~~R~~evegetation work to enhance the natural open space values of the site ~~shall be implemented prior to or concurrently with the development~~. The ~~design of an appropriate~~ revegetation work ~~program shall~~ will be designed to return native species to the site, including the areas underlying the footprint of where the Redwood Cabin structure and other accessory structure currently stand.[1] ~~fully compensate for the lost habitat, with no net loss of habitat functions and values. Riparian and wetland habitat impacts will typically be mitigated at a 3:1 ratio for high-quality habitat areas and at lower ratios where lower habitat quality justifies a lower ratio. A lower ratio may also be justified if habitat mitigation is implemented and verified as successful prior to the occurrence of impacts. Mitigation shall be based on in-kind replacement of impacted habitat with habitat of equal or better biotic value.~~ [2]The revegetation ~~program~~ work ~~shall~~ will be designed by a ~~qualified~~Midpen-approved biologist or ecologist and submitted to the appropriate regulatory or trustee agency for approval, if required. ~~At a minimum, the revegetation program shall include a description of project impacts, mitigation calculations, the mitigation site, revegetation techniques, maintenance measures, a long-term monitoring program, and contingency measures. Native plant materials suited to the site will be utilized in all mitigation work.~~[3]
- **EPG WQ-2:** Storm water quality Best Management Practices (BMPs) as listed in this section shall be implemented to reduce potential water quality impacts. BMPs include:
    1. Flow of runoff from drainage structures will be directed to vegetated areas, away from creeks and drainages as is practical.
    2. ~~Conduct any trail maintenance work during low flow periods.~~ [4]

[1] Restoration is not part of the project. Seeding of native species is considered revegetation and will not lead to increased ecological function such as with full restoration.

[2] Biological mitigation for loss of habitat is not required for this project. As described in Section 3.1, "Biological Resources," the impact to riparian and wetland habitat is less than significant.

[3] Because mitigation for habitat loss is not required, these items are not applicable.

[4] The project does not include trail maintenance.

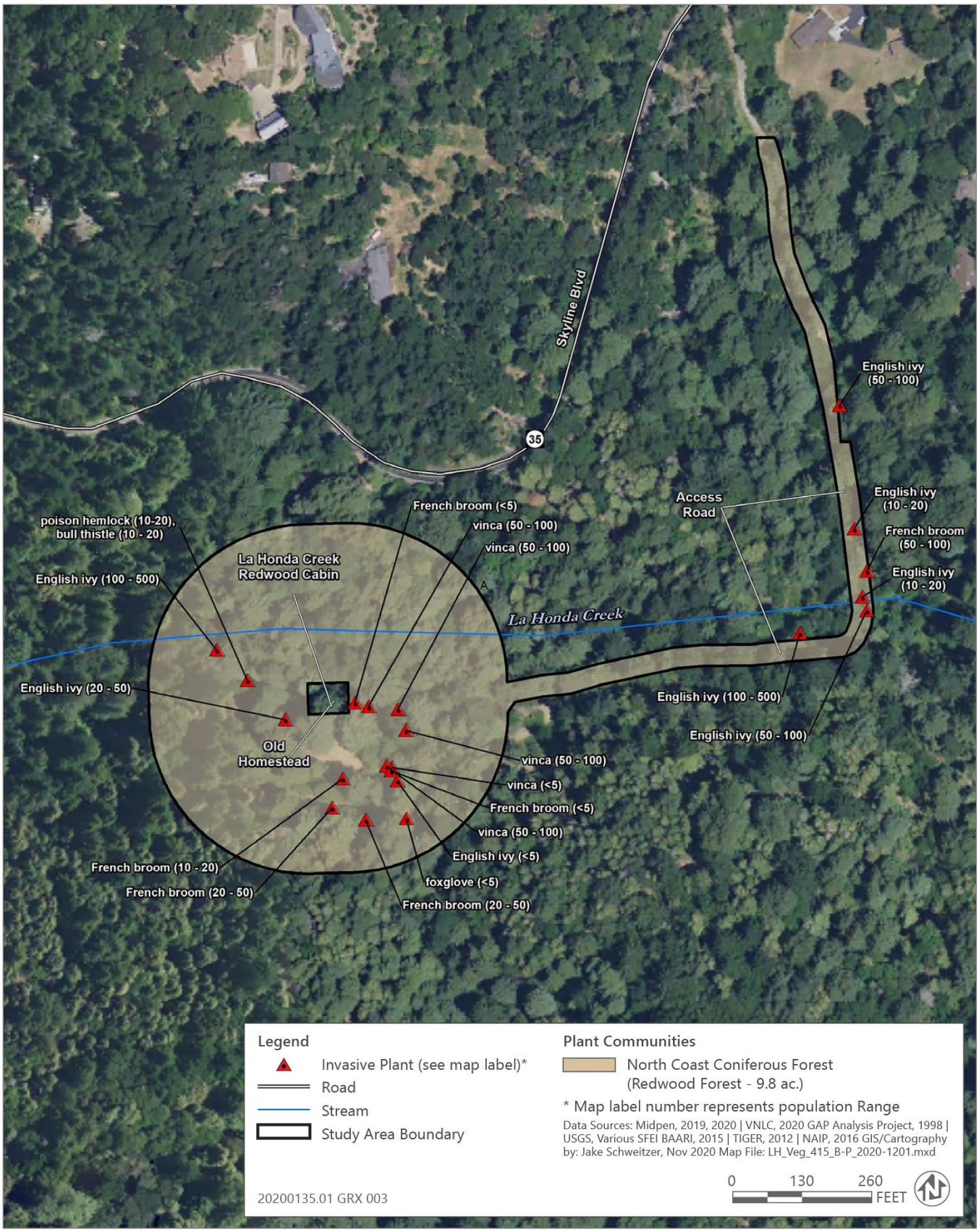
3. Use erosion and sediment control measures to minimize water quality impacts and ensure no sediment at heavily traveled trails flows into creeks. To the extent feasible, all measures will be 100 percent biodegradable and/or certified weed-free. These measures include:
    - Silt Fences
    - Straw Bale Barriers
    - Brush or Rock Filters
    - Storm Drain Inlet Protection
    - Sediment Traps
    - Sediment Basins
    - Erosion Control Blankets and Mats
    - Midpen shall prevent erosion on steep slopes by using erosion control material according to manufacturer's specifications.
4. If soil is to be stockpiled for any reason at creeksides, no run-off will be allowed to flow back to the creek.

3.1.2 Environmental Setting

LAND COVER AND COMMON WILDLIFE SPECIES

The project site is located entirely within the north coast coniferous forest land cover type (Figure 3.1-1). Coast redwood (*Sequoia sempervirens*) is the dominant species, which together with Douglas fir (*Psuedotsuga menziezii*), make up the upper forest canopy. A lower canopy of tan oak (*Notholithocarpus densiflorus*), big leaf maple (*Acer macrophyllum*), and California bay (*Umbellularia californica*) is also present. The understory within the project site is relatively sparse due to the dense tree canopy and includes shrubs and vines such as California blackberry (*Rubus ursinus*), California hazelnut (*Corylus cornuta*), and blood current (*Ribes sanquineum*). Herbaceous species found under the redwood canopy on the project site include those adapted to deep shade including redwood sorrel (*Oxalis oregana*), fetid adderstongue (*Scoliopus bigelovii*), western swordfern (*Polystichum munitum*), trail plant (*Adenocaulon bicolor*) and trillium (*Trillium* spp.). Invasive and non-native plants within the project site include French broom (*Genista monspessulana*), vinca (*Vinca* spp.), English ivy (*Hedera helix*) and broadleaved forget-me-not (*Myosotis latifolia*) (Figure 3.1-1). Vegetation along the portion of La Honda Creek within the project area is limited and patchy due to the steep banks of the creek, but includes Thimbleberry (*Rubus parviflorus*), giant chain fern (*Woodwardia fimbriata*), sedges (*Carex* spp.) and giant horsetail (*Equisetum telmateia*) (Vollmar Natural Lands Consulting 2020). Additionally, slender false brome (*Brachypodium sylvaticum*) has historically been identified at the project site. Midpen has been treating it with the objective of eradication within the site.

The project site provides habitat for many common wildlife species. Common birds that may be present within the project site include acorn woodpecker (*Melanerpes formicivorus*), Steller's jay (*Cyanocitta stelleri*), dark-eyed junco (*Junco hyemalis*), red-shouldered hawk (*Buteo lineatus*), and band-tailed pigeon (*Patagioenas fasciata*). Common amphibians and reptiles that may be found within the project site include Santa Cruz gartersnake (*Thamnophis atratus atratus*), California slender salamander (*Batrachoseps attenuates*), and rough-skinned newt (*Taricha granulosa granulosa*). Mammals that may commonly occur within the project site include Columbian black-tailed deer (*Odocoileus hemionus columbianus*), racoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*).



Source: Image produced and provided by Vollmar Natural Lands Consulting 2020, adapted by Ascent Environmental 2021

Figure 3.1-1 Landcover and Invasive Plants in the Project Site and Vicinity

SENSITIVE BIOLOGICAL RESOURCES

Special-Status Species

Special-status species are legally protected or otherwise considered sensitive by federal, state, or local resource agencies. Special-status species are species, subspecies, or varieties that fall into one or more of the following categories, regardless of their legal or protection status:

- species listed or proposed for listing as threatened or endangered under ESA (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species) or candidates for possible future listing as threatened or endangered under ESA (75 CFR 69222);
- species listed or candidates for listing by the State of California as threatened or endangered under CESA (14 CCR Section 670.5);
- species identified by CDFW as Species of Special Concern;
- species listed as Fully Protected under the California Fish and Game Code (FGC) (Section 3511 for birds, Section 4700 for mammals, Section 5050 for reptiles and amphibians, and Section 5515 for fish);
- plants listed as rare under the California Native Plant Protection Act (FGC Section 1900 et seq.);
- species ranked by the Western Bat Working Group as 'high' or 'medium' on the Regional Priority Matrix;
- species afforded protection under local or regional plans, policies, or ordinances;
- plants considered by CDFW to be "rare, threatened or endangered in California" (California Rare Plant Ranks of 1A, presumed extinct in California and either rare or extinct elsewhere; 1B, considered rare or endangered in California and elsewhere; 2A, presumed extinct in California but common elsewhere; 2B, considered rare or endangered in California but more common elsewhere; 3, about which more information is needed; and 4 of limited distribution). Note that while these rankings do not afford the same type of legal protection as ESA or CESA, the uniqueness of these species requires special consideration under Section 15380 of the CEQA Guidelines (14 CCR Section 15000 et seq.); or
- taxa (i.e., taxonomic category or group) that otherwise meet the definition of rare or endangered under Section 15380 of the CEQA Guidelines (14 CCR Section 15000 et seq.).

The term "California species of special concern" is applied by CDFW to animals not listed under ESA or CESA, but that are considered to be declining at a rate that could result in listing, or that historically occurred in low numbers and known threats to their persistence currently exist. CDFW's fully protected status was California's first attempt to identify and protect animals that were rare or facing extinction. Most species listed as fully protected were eventually listed as threatened or endangered under CESA; however, some species remain listed as fully protected but do not have simultaneous listing under CESA. Fully protected species may not be taken or possessed at any time and no take permits can be issued for these species except for scientific research purposes or for relocation to protect livestock.

Appendix C provides a list of special-status species potentially occurring in the project vicinity. The list was developed through a review of biological studies previously conducted in the area and a query of the California Native Plant Society Inventory of Rare and Endangered plants (CNPS); and the California Natural Diversity Database (CNDDB), a statewide inventory of the locations and conditions of the state's rarest plant and animal taxa and vegetation types. The query of the CNDDB and CNPS was conducted for the following U.S. Geological Survey 7.5' quadrangles surrounding the project site: Montara Mountain, San Mateo, Redwood Point, Half Moon Bay, Woodside, Palo Alto, San Gregorio, La Honda, and Mindego Hill. The CNDDB is based on actual recorded occurrences and does not constitute an exhaustive inventory of every resource.

Based on a review of the CNPS and CNDDB, there are six special-status botanical species, three special-status amphibians, one special-status bird, and six special-status mammals that are known to occur or could occur in the project site (CNPS 2021; CNDDB 2021). Refer to Appendix C for the full list of special-status species known to occur within the IPM Program Area region and the potential for each species to occur within the IPM Program Area.

Sensitive Natural Communities

Sensitive natural communities include those that are of special concern to resource agencies or are afforded specific consideration through CEQA or other federal or state laws. Sensitive natural communities may be of special concern to regulatory agencies and conservation organizations for a variety of reasons, including their locally or regionally declining status, or because they provide important habitat to common and special-status species. Many of these communities are tracked in CDFW's CNDDB. The north coast coniferous forest within the project site consists of coast redwood that meets the definition of Redwood Forest in the Manual of California Vegetation (Vollmar Natural Lands Consulting 2020) and is classified by CDFW as a sensitive natural community (CDFW 2020).

3.1.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This impact evaluation is based on a visit to the project site on February 1, 2021; the *La Honda Creek Preserve, Sierra Azul Preserve, Purisima Uplands, and Rancho San Antonio Preserve – Structural Surveys for Special-Status Mammal Species* (Swaim Biological 2019); the *Botanical Resources Survey Report, La Honda Structural Stabilization Project, La Honda Creek Open Space Preserve, San Mateo County, California* (Vollmar Natural Lands Consulting 2020); a review of aerial photographs of the project site and vicinity; a search of the CNDDB (CNDDB 2021); CNPS (CNPS 2021); and other relevant data sources.

THRESHOLDS OF SIGNIFICANCE

An impact on biological resources is considered significant if implementation of the project would do any of the following:

- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; or
- interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

ISSUES NOT DISCUSSED FURTHER

All potential biological resource issues identified in the significance criteria are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.1-1: Loss or Degradation of Habitat for Special-Status Botanical Species

Suitable habitat for special-status botanical species is present within the project site; however, no special-status botanical species were identified during surveys of the site in 2020, and no loss of individual special-status plants is anticipated. With the removal of the cabin, the recontouring of the project site, and implementation of EPG BIO-10, the project would result in an increase in suitable habitat for special-status botanical species. In addition, the implementation of IPMP BMPs would avoid habitat degradation that may result from the introduction and spread of invasive plants. Therefore, the project would have a **less-than-significant** impact on special-status botanical species.

The project site provides suitable habitat for six special-status botanical species (Appendix C). Of these six species, Western leatherwood (*Dirca occidentalis*), Dudley's lousewort (*Pedicularis dudleyi*), and white-flowered rein orchid (*Piperia candida*) are considered rare or endangered in California and elsewhere and are moderately threatened (CRPR 1B.2). The remaining three special-status botanical species, California bottle-brush grass (*Elymus californicus*), harlequin lotus (*Hosackia gracilis*), and Methuselah's beard lichen (*Usnea longissimi*) are of limited distribution and moderately threatened (CRPR 4.2). Although, the project site provides habitat for these species, no special-status botanical species were observed during protocol-level botanical surveys conducted of the project site in 2020 (Vollmar Natural Lands Consulting 2020). If project implementation does not occur before the current survey results expire (i.e., after 5 years or changed site conditions), another botanical survey would occur, and avoidance and/or other measures (e.g., consultation with CDFW, seed collection, transplantation) would be implemented, as required by the La Honda Creek Open Space Preserve Master Plan and the associated 2012 Initial Study/Mitigated Negative Declaration (Section 2.7.1).

The proposed removal of the Redwood Cabin and associated features, regrading, and staging of equipment would result in temporary ground disturbance; however, no special-status botanical species were detected during the 2020 protocol survey and therefore it is unlikely that any special-status botanical species would be crushed or removed by project activities. In addition, the project would result in an increase in habitat for special-status botanical species through the removal of the Redwood Cabin, regrading of the site, and the implementation of applicable measures from EPG BIO-10, which requires that revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed.

Ground disturbance during project implementation could potentially lead to the spread of invasive plants that occur on the project site (e.g., English ivy, French broom, slender false brome) (Vollmar Natural Lands Consulting 2020) (Figure 3.1-1) and introduction of new invasive plants that could degrade the habitat and outcompete special-status plants for space and nutrients should they occur on the project site in the future. However, these potential impacts would be avoided by the implementation of the IPMP BMPs, such as staff and contractor training, use of weed free material, and cleaning of tools and equipment (Section 2.7.2 of Chapter 2, "Project Description"). The project would not have direct impacts to individual special-status botanical species during project activities, EPG BIO-10 would require restoration of the site, and the implementation of IPMP BMPs would avoid habitat degradation of the site through the introduction and spread of invasive plants; therefore, the impact of the project on special-status botanical species would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.1-2: Injury or Mortality of Special-Status Amphibians

Special-status amphibians may be found within the project site. The recontouring of the site and implementation of EPG BIO-10 would ensure that there is no loss of habitat for these species. Project activities including the demolition of the Redwood Cabin and associated structures, recontouring, and staging of materials could result in the injury or mortality of special-status amphibians, and any injury or mortality of individual special-status amphibians would be a **significant** impact.

Three special-status amphibians could be found on the project site; the California red-legged frog (*Rana draytonii*), which is listed as threatened under the ESA and is a CDFW species of special concern; as well as the California giant salamander (*Dicamptodon ensatus*) and Santa Cruz black salamander (*Aneides flavipunctatus niger*), which are both CDFW species of special concern. The project would not include any construction activities within aquatic habitat for California red-legged frog within La Honda Creek; however, California red-legged frogs may use the project site seasonally for migration, sheltering, and foraging when summer rains and fogs provide adequate moisture (Bulger et al. 2003). The deep redwood forest habitat would also be suitable habitat for both California giant salamander and Santa Cruz black salamander. The project would not result in a reduction of suitable habitat for these species, because the site would be recontoured following demolition, and Midpen would apply EPG BIO-10, which requires that revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed.

Special-status amphibians may use vegetation, leaf litter, or logs and debris within the project area for shelter and may also shelter in staged materials associated with the project. Therefore, the movement of equipment and materials, the demolition of the Redwood Cabin, and recontouring of the site may result in the injury or mortality of special-status amphibians. The mortality of individual special-status amphibians would be a potentially substantial adverse effect on the local populations of these species and the impact would therefore be **significant**.

Mitigation Measures

Mitigation 3.1-2a: Protection Measures for California Red-Legged Frog

To avoid loss of individual California red-legged frog, Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.

- Activities including the use of mechanical equipment, excavating, and bulldozing will require pre-activity visual surveys as well as monitoring during the activities. All maintenance activity proposals involving mechanized equipment and associated monitoring proposals will be approved by CDFW and USFWS prior to implementation of the project.
- Biological monitors will check for any listed species under vehicles and equipment parked for more than 30 minutes.
- Refueling of equipment will be conducted using heavy-gauge tarps made of chemically resistant polypropylene or other impervious material with vertical sides for spill containment. These containment tarps will be set up under the equipment prior to servicing or refueling. Once the work is completed, the tarp and its contents must be immediately removed from the property and all contaminants properly disposed of off-site. Standard operating procedures will be implemented immediately in case of fuel spillage.
- All vehicles must stay on designated roads, paved and unpaved, and if it is necessary for a vehicle to travel off the designated road (paved or 2 track unpaved), a monitor will precede the vehicle to clear wildlife from the pathway of the vehicle.
- Prior to the start of work, an educational program regarding the sensitivity of the California red-legged frog and its habitat will be conducted for all personnel.
- Prior to the start of work, areas will be identified by the biological monitor and approved by the USFWS and CDFW as acceptable locations for the relocation of California red-legged frog if the species is encountered within the project site. Relocation areas will be a minimum of 500-feet from the boundary of the project site and will not include staging areas or roads. No California red-legged frog will be removed from Midpen property or maintained in captivity overnight without prior notification and written approval from the USFWS and CDFW unless the animal is in need of emergency medical assistance. Medical assistance will be provided by a USFWS-approved, certified wildlife veterinarian familiar with amphibian care.
- If a California red-legged frog enters the project site, all work shall stop until the animal leaves on its own. If the frog does not leave on its own, a biological monitor specifically authorized by the USFWS and CDFW will be allowed to handle and relocate the California red-legged frog to the pre-approved relocation area.

Mitigation 3.1-2b: Biological Monitoring for California Giant Salamander and Santa Cruz Black Salamander

To avoid loss of individual California giant salamander and Santa Cruz black salamander, Midpen will implement the following measures.

- Prior to the start of demolition each day, the access road and portions of the project site where activities will occur will be surveyed by a qualified biologist for the presence of California giant salamander and Santa Cruz black salamander. The survey will include the inspection of any debris from demolition or materials staged overnight for the presence of these species.

- If individual California giant salamanders or Santa Cruz black salamanders are discovered during daily inspections, work shall stop until the individual salamander moves on its own to a point where it is no longer at risk of incidental injury or death from project activities, or until the individual salamander is moved outside of the project site by a qualified biologist.

Significance after Mitigation

Implementation of Mitigation Measures 3.1-2a and 3.1-2b would reduce the impacts to special-status amphibians to a **less-than-significant** level, because these measures would survey for the presence of special-status amphibians on a daily basis during project activities; monitor for these species during project activities; stop work that may harm these species until the individual leaves on its own, or is moved by a biologist; and provide for other measures to address the protection of California red-legged frog.

Impact 3.1-3: Disturbance of Nesting Marbled Murrelet

The nearest mapped nesting habitat for marbled murrelet (*Brachyramphus marmoratus*) is located approximately one-half mile west of the project site. However, unmapped nesting habitat could occur within a quarter mile of the project site, and implementation of the project could result in loss of eggs and young from nest disturbance during the breeding season (March 24 – September 15). If nesting marbled murrelets are within a quarter mile of the project site, the project would have a **significant** impact on this species.

Marbled murrelet is listed under ESA as threatened and under CESA as endangered. Marbled murrelets forage at sea off the coast during the winter and nest in conifer forests within the coast range of California from approximately April through September. During incubation and prior to chicks fledging, adults continue to fly to and from the nest location to the sea to forage (H.T. Harvey 2007). Marbled murrelets do not build actual nests, but rather lay eggs directly on a branch of a large tree. Trees within the project site are not currently large enough to provide suitable nesting habitat for marbled murrelet, and the project would not remove trees that could adversely affect the quantity of future suitable habitat in the project site. However, there are areas of suitable nesting trees located on the preserve approximately one-half mile of the project site (H.T. Harvey 2007). While the distance from the project site to the nearest mapped suitable murrelet nesting habitat makes it unlikely that demolition activities would result in nest disturbance within this mapped habitat, other unmapped nesting habitat may be present within a quarter mile of the project site. If unmapped nesting habitat occurs within a quarter mile of the project site and project implementation occurs during the breeding season (March 24 to September 15), the flushing of adults off of the nest and disturbance of feeding could occur and result in a loss of eggs and young. Any loss of eggs or young as a result of nest disturbance would be a **significant** impact on the species.

Mitigation Measures

Mitigation 3.1-3: Preconstruction surveys and nest buffers marbled murrelet

To avoid disturbance and loss of the nests of marbled murrelet Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.

- Pre-demolition nest tree survey within a quarter mile of the project site for trees that meet the Pacific Seabird Group definition of potential murrelet nesting trees.
- If a potential nesting tree is detected within 300 feet of the project site or if a murrelet nest is detected, Midpen will notify the USFWS before work begins.
- If a potential nesting tree is detected greater than 300 feet and less than a quarter mile from the project site, the following will apply:
  - If possible, work within the project site shall be confined to September 15 to November 1.

- If work is scheduled to be performed during the breeding season (March 24 to September 15), disturbance minimization buffers determined by the sound level anticipated from the project will be implemented based on sound level monitoring studied, submitted to USFWS and the table below.

Buffer distance in feet based on anticipated project sound levels and ambient sound conditions

	Anticipated Project-Generated Sound Level (dB)[2]			
Ambient Pre-Project Sound Level (dB)[1]	Moderate (71-80)	High (81-90)	Very High (91-100)	Extreme (101-110)
Natural Ambient (≤50)[3]	50 (165)[4,5]	150 (500)	400 (1,320)	400 (1,320)
Very Low (51-60)	0	100 (300)	250 (825)	400 (1,320)
Low (61-70)	0	50 (165)	250 (825)	400 (1,320)
Moderate (71-80)	0	50 (165)	100 (330)	400 (1,320)
High (81-90)	0	50 (165)	50 (165)	150 (500)

[1] Ambient sound level includes all natural and human-induced sounds occurring at the project stie prior to the project, and not related to the project.

[2] Project-generated sound levels measured at 50 feet from the source

[3] "Natural Ambient" refers to sound levels generally experienced in habitats not substantially influenced by human activities

[4] All distances are given in meters, with rounded equivalent feet in parentheses.

[5] For murrelets, activities conducted during the dawn and dusk periods have special considerations for ambient sound level.

Source: USFWS 2016; USFWS 2020

- Project activities shall not be conducted within a visual line-of-site distance of 132 feet from a suitable nest tree as designated by a qualified biologist.
- If a sound study is not conducted, no project activities shall occur within a quarter mile of potential nest trees during the marbled murrelet breeding season (March 24 to September 15).
- If project activity takes place during the breeding season (March 24 to September 15) regardless of the distance to potential nest trees, activity will be restricted to 2 hours after sunrise and 2 hours before sunset to minimize disturbance to murrelets that may be flying over the project site to forage at the coast.
- If marbled murrelet protocol level surveys are conducted and do not indicate that the habitat is occupied by marbled murrelet, the seasonal and distance work restrictions may be lifted with written approval from the USFWS.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-3 would reduce the impacts to nests of marbled murrelets to a **less-than-significant** level because it would require surveys for the presence of nest trees and active nests and no-activity buffers around active nests to avoid disturbance during the nesting season.

Impact 3.1-4: Disturbance of Common Raptor and Other Common Bird Nests

The project site provides suitable nesting habitat for common raptors and other common nesting birds, and project activities could result in the disturbance of active nests if demolition occurs during the nesting season. The disturbance of active nests could result in the abandonment of nests and the mortality of eggs and young, which would be a **potentially significant** impact.

The redwood forest on the project site, and potentially the cabin itself, provides nesting habitat for common raptors and other nesting bird species including red-shouldered hawk, acorn woodpecker, Steller's jay, dark-eyed junco, and band-tailed pigeon. The proposed removal of the Redwood Cabin and associated features, regrading, and staging of equipment could result in the removal or disturbance of the active nests of common raptors and other nesting birds, if the activities occur during the nesting season (approximately February 15 to August 30). The removal or disturbance

of nests could result in nest abandonment by adults and the mortality of eggs and chicks. The mortality of eggs and chicks may be a substantial adverse effect on the local populations of some bird species and therefore this impact would be **potentially significant**.

Mitigation Measures

Mitigation 3.1-4: Preconstruction surveys and nest buffers for common raptors and other nesting birds

To avoid disturbance and loss of the nests of common raptors and other nesting birds Midpen will implement the following measures.

- If work is scheduled to be performed during the nesting season (the specific start and end dates of the season will be determined by a qualified biologist but are typically February 15 to August 30), a pre-demolition survey will be performed within 1,000 feet of the project site, no more than 14 days prior to the start of demolition related activities. If no active nests are detected during surveys, no further mitigation is required.
- If active nests are found during the pre-demolition survey, a buffer will be established around each nest. No project activity will occur within a buffer of 1,000-feet around large raptor nests (e.g., buteos) 500-feet around small common raptor nests (e.g., accipiters) and 250-feet around the nests of other common bird species. The size of the buffer around any individual nest maybe reduced by a qualified biologist in consultation with CDFW, depending on screening of the nest from project activities and other site-specific conditions. These buffers will be maintained until a qualified biologist determines that any young have fledged, and the nest is no longer active.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-4 would reduce the impacts to nests of common raptors and other common nesting birds to a **less-than-significant** level, because it would require surveys for the presence of active nests and no-activity buffers around active nests to avoid disturbance during the nesting season.

Impact 3.1-5: Loss of San Francisco Dusky-Footed Wood Rat Nests

The Redwood Cabin contains multiple San Francisco dusky-footed wood rat (*Neotoma fuscipes annectens*) nests. The demolition of the cabin would destroy these nests and could result in the injury or mortality of young woodrats if demolition occurs during the rearing season (approximately April 1 to July 15). The destruction of these nests and the injury or mortality of young woodrats would be a **significant** impact.

The San Francisco dusky-footed wood rat is a CDFW species of special concern that builds nests of sticks and other similar materials that may be used by multiple generations. The Redwood Cabin contains multiple San Francisco dusky-footed wood rat nests and other signs of occupancy (Swaim Biological 2019); however, no nests were observed outside of the cabin on the project site. Demolition of the Redwood Cabin would remove these woodrat nests and may also result in the injury or mortality of young woodrats in the nest if demolition occurs during the rearing season (approximately April 1 to July 15). The loss of multiple woodrat nests and injury or mortality of young woodrats would be an adverse effect on the local population of San Francisco dusky-footed wood rat and therefore the impact of the project on the species would be **significant**.

Mitigation Measures

Mitigation 3.1-5: Minimize impacts from loss of San Francisco dusky-footed wood rat nests

- To avoid loss of San Francisco dusky-footed wood rat during demolition, work will be conducted outside of the rearing season (before April 1 or after July 15).
- Prior to demolition, debris piles will be constructed outside of and adjacent to the project footprint to provide shelter for wood rats that are displaced by demolition. These debris piles will be constructed under the guidance of a qualified biologist and will consist of dead branches of various sizes (0.5 to 6 inches in diameter) collected from the surrounding area. Each pile will be approximately 3 to 5 feet high by 8 to 10 feet in diameter. The number of

debris piles will be determined by a qualified biologist based on the number of nests in the Redwood Cabin prior to demolition.

- To avoid death of wood rats, wood rat nest materials will be removed by hand from the Redwood Cabin prior to demolition of the structure.
- If wood rats are observed during demolition, work will stop until the animal leaves the area on its own, or until a qualified biologist determines that work can continue without harm to the animal.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-5 would reduce the impacts to San Francisco dusky-footed wood rat to a **less-than-significant** level, because it would ensure that nest removal does not occur during the rearing season when the project could result in the death of young wood rats, and it would require the construction of debris piles that provide shelter for wood rats that are displaced by demolition of the structure.

Impact 3.1-6: Loss of Bat Roosts and Mortality of Individuals

The Redwood Cabin provides potential roosts for common and special-status bats. The demolition of the Redwood Cabin could result in disturbance of active bat roosts, which could result in the loss of adult and young bats. The loss of individual special-status bats, or the loss of a maternity roost of any bat species would be a **potentially significant** impact.

The Redwood Cabin was surveyed for bats and bat roosts in 2019 (Swaim Biological 2019). This survey did not detect either pallid bat (*Antrozous pallidus*) or Townsend's big-eared bat (*Corynorhinus townsendii*), which are both CDFW species of special concern and considered special-status species in this analysis. However, both pallid bat and Townsend's big-eared bat have been documented to occur on the preserve and these species may occur within the project site at the time of demolition. The 2019 acoustic survey did detect fringed myotis (*Myotis thysanodes*) in the vicinity of the cabin, but no bats were observed emerging from the cabin and no bat sign was observed. While no bats or bat signs were found, the cabin and large trees on the project site provide potential roosting habitat that may be occupied at the time of demolition. Due to the deep shade on the site, the cabin is not likely to be warm enough to support a bat maternity roost (Swaim Biological 2019).

The project would not remove any trees, and therefore no tree roosts would be removed. If bats are roosting in the cabin during demolition, these individuals may be injured or killed by equipment or crushed between materials that are removed from the cabin. While unlikely due to the deep shade on the project site, if the cabin is used as a maternity roost during demolition, the death of young bats may also occur. The loss of pallid bat or Townsend's big-eared bat individuals, or the loss of a maternity roost of any bat species would be a potentially substantial adverse effect on the local population of these species and would therefore be a **potentially significant** impact.

Mitigation Measures

Mitigation 3.1-6: Pre-demolition surveys and measures to reduce impacts to bat roosts and special-status bats

- A pre-demolition bat roost survey shall be conducted at the project site by a qualified biologist no more than two days prior to the start of demolition.
- In addition, if demolition is anticipated to occur during the bat wintering period (from November 16 through February 15), a pre-demolition winter roost survey shall be conducted by a qualified biologist.
- If individual nonbreeding and non-special-status bats are roosting within the structure, a qualified biologist may remove the bats and work may proceed during any time of the year. If special-status bats or a maternity roost of any bat species is detected, demolition will not be allowed to occur during the April through August maternity season; outside of the maternity season, bats shall be excluded and provided alternate roost sites before demolition.

- Midpen will develop a project specific bat roost deterrent plan if special-status bats or a maternity roost of any bat species is detected in the Redwood Cabin. The deterrent plan will be submitted to CDFW for approval and will include measures such as acoustic deterrents and one-way bat doors installed outside of the maternity season (April through August), and other similar methods.
- Demolition will occur when forecast nighttime lows are not below 50 degrees Fahrenheit.
- The materials around crevices that may provide roosting sites within the structure will be first demolished with hand tools to minimize the risk of injuring bats.
- Initial demolition will be performed in the early evening after sunset, or if evening work is not feasible, the work shall be initiated in the afternoon to ensure that any bats present are not in torpor and unable to escape. Once demolition has been started, further work may be performed at any point in the day. A qualified bat biologist will be present at the initiation of demolition to capture and temporarily hold any bats present for release the evening of the same day.

Significance after Mitigation

Implementation of Mitigation Measure 3.1-6 would reduce the impacts to special-status and common bat species to a **less-than-significant** level, because it would ensure that the project does not result in disturbance of hibernacula or maternity roots and applies measures such as the timing of demolition and bat exclusion methods that would minimize the risk of injury or death of special-status and common bat species.

Impact 3.1-7: Disturbance or Loss of Special-Status Mammal Den Sites

The project site and adjacent redwood forest provide potential denning sites for special-status mammals. The demolition of the Redwood Cabin could result in disturbance of active dens and the injury or mortality of pups if the demolition occurs during the breeding season. The loss of active dens and injury of mortality of special-status mammal pups would be a **potentially significant** impact.

The Southern California/Central Coast evolutionary significant unit of the mountain lion (*Puma concolor*) is listed under the CESA as candidate threatened species, and mountain lions have been detected in the project area and vicinity (Santa Cruz Puma Project 2021). However, the project site is not likely to be used by mountain lions as nursery habitat due to its proximity to residential development and recreational use. The project site may be used for foraging habitat by mountain lions, and although there would be no permanent loss of habitat due to project activities, mountain lions would likely avoid the project site during demolition, resulting in a temporary loss of foraging habitat. This temporary loss of foraging habitat would not be substantial given the relatively small area of the project when compared to the available foraging habitat in the vicinity.

Unlike mountain lion, the CDFW fully protected ringtail (*Bassariscus astutus*), and CDFW species of special concern American badger (*Taxidea taxus*) may use the project site as denning and foraging habitat. While ringtail has not been reported to occur within the project site or vicinity, this species is not tracked in the CNDDB. It is a nocturnal species that may often go unobserved. Ringtails use boulder piles, underground cavities, brush piles, or hollow trees or tree cavities for denning, often in riparian areas (Belluomini 1980). American badger, which dens underground, is most often associated with grassland habitats, but may be found in forested habitats as well. American badger has been documented to occur on the preserve (CNDDB 2021). As discussed for mountain lion, loss of foraging habitat for ringtail and American badger from implementation would be temporary and not a substantial loss of habitat. However, demolition of the Redwood Cabin and associated features could result in disturbance of ringtail or American badger den sites if any are located within or adjacent to the project site. If the disturbance of dens occurs during the breeding season when pups are potentially in the den, this could result in injury or death of the pups. Any loss of pups would be a substantial adverse effect to the local populations of these species, and therefore the project has a potential for a **potentially significant** impact to ringtail and American badger.

Mitigation Measures

Mitigation 3.1-7: Pre-demolition surveys and den buffers for American badger and ringtail

- If the project occurs during the period when pups are potentially in the den February 15 through July 1, a qualified biologist shall conduct pre-demolition surveys within 100 feet of the project site for potential American badger and ringtail dens. The survey will occur no more than 7-days prior to implementation of demolition activities.
- If any potentially occupied American badger dens are located during surveys, no work shall be performed within a 100-foot buffer around dens during the period when pups are potentially in the den (February 15 through July 1).
- If any potentially occupied ringtail dens (e.g., brush piles, appropriately sized burrows, hollow logs, hollow trees) are located during surveys, the same buffers as described for American badger will be applied during breeding season for ringtail (May 1 through June 30).

Significance after Mitigation

Implementation of Mitigation Measure 3.1-7 would reduce the impacts to ringtail and American badger to a **less-than-significant** level, because it would ensure that the project does not result in disturbance of natal dens that could result in the death of pups though pre-demolition survey and the establishment of buffers where work would not occur.

Impact 3.1-8: Disturbance or Loss of Riparian Habitat or Other Sensitive Natural Communities

The project does not contain riparian woodland; however, herbaceous riparian habitat is present along the adjacent La Honda Creek. The project would not directly affect this habitat and the implementation of EPG WQ-2 would avoid and minimize impacts from the runoff of sediment from the project. The site also contains a CDFW-designated sensitive natural community, Redwood Forest; however, this community would not be adversely affected by the project because the project would not remove any trees, would treat on-site invasive species, and would restore the area disturbed by the project through the implementation of EPG BIO-10. Therefore, the impact of the project on riparian habitat and other sensitive natural communities would be **less-than-significant**.

The riparian zone along La Honda Creek does not form a true riparian woodland and is limited in area due to the steep banks, cobbled stream bed, and dense canopy of the north coast coniferous forest. A relatively small band of wetland riparian herbaceous vegetation (e.g., sedges and giant horsetail) is present within the creek banks below the bridge where the access road crosses the creek and along a swale adjacent to the access road (Vollmar Natural Lands Consulting 2020). The limited riparian habitat along La Honda Creek would not be directly modified by implementation of the project. In addition, sedimentation due to runoff of disturbed soils on the project site would be minimized or avoided by the implementation of EPG WQ-2. As described in Chapter 2, "Project Description," EPG WQ-2 includes measures such as the use of silt fences, straw bale barriers, and other erosion and sediment control measures.

The Redwood Forest that makes up the vegetation community on the project site is identified as a CDFW-designated sensitive natural community (CDFW 2020). The project would not remove any trees or result in any substantial removal of vegetation on site. The habitat function of Redwood Forest would be maintained with implementation of the project. In addition, following recontouring of the site, EPG BIO-10 would be implemented, which requires that revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed. Further, the Redwood Cabin Removal Project would provide the opportunity to improve biological resources at the site through invasive plant treatment, soil decompaction and amendments, or revegetation, which could improve the quality of the habitat.

Due to the lack of tree removal; avoidance of disturbance to riparian habitats along La Honda Creek; implementation of EPG WQ-2, which would avoid or minimize runoff to riparian habitat; maintenance of Redwood Forest habitat function; and implementation of EPG BIO-10, which would restore the area disturbed by the project, the impact of the project on riparian habitat and other sensitive natural communities would be **less than significant**.

Mitigation Measures
No mitigation is required for this impact.

Impact 3.1-9: Degradation or loss of protected wetlands and other waters

The access road to the project site crosses La Honda Creek and an un-named tributary. A temporary bridge may be required to move equipment across the tributary; however, no dredge or fill of the creek or tributary will occur as a result of the project. In addition, EPG WQ-2 will be implemented to avoid and minimize impacts to La Honda Creek and its tributary due to runoff from the project site. Therefore, the impact to protected wetlands and other waters would be **less than significant**.

La Honda Creek is located outside of the project site and adjacent to the unpaved access road to the site. La Honda Creek, associated swales, and its un-named tributary are potential waters of the United States, and waters of the state, and the only potential waters of the United States and the state on or adjacent to the project site. The access road crosses the creek and an un-named tributary between the site and Highway 35 over a pair of bridges. As described in Chapter 2, "Project Description, section 2.5, "Construction Access, Equipment, Staging, and Logistics," a temporary bridge may be installed over the existing bridge across the un-named tributary of La Honda Creek due to load limitations of the current structure. The temporary bridge would be placed over the existing bridge and would not disturb the bed or bank of the tributary. No disturbance or fill would occur in either La Honda Creek or its un-named tributary as a result of the project. In addition, indirect effects from runoff of disturbed soils on the project site would be minimized or avoided by the implementation of EPG WQ-2, which includes measures such as the use of silt fences, straw bale barriers, and other erosion and sediment control measures. Due to the avoidance of disturbance to La Honda Creek and its un-named tributary and implementation of EPG WQ-2, which would avoid or minimize runoff to these waters, the impact of the project on protected wetlands and other waters would be **less than significant**.

Mitigation Measures
No mitigation is required for this impact.

Impact 3.1-10: Potential to Interfere with Wildlife Movement and Nursery Sites

The demolition of the Redwood Cabin would not result in any changes in habitat or new structures that would interfere with wildlife movement. The noise and human activity associated with the project could result in temporary impacts to wildlife movement that would not be substantial, due to the short duration and limited footprint of the project in relation to other habitat in the vicinity. Therefore, the projects impact would be **less than significant**.

The demolition of the Redwood Cabin, demolition of associated structures, and site recontouring would not modify or remove natural habitats to the extent that these habitats would be unsuitable for wildlife movement. In addition, the project does not include the construction of any permanent barriers that could obstruct wildlife movement. The project would instead remove a structure from an otherwise natural habitat. However, the noise and human activity that would occur during demolition of the Redwood Cabin and associated structures would cause wildlife to avoid the area and could result in temporary interference with wildlife movement and foraging activity (see Impact 3.1-7 for additional discussion of special-status mammal movement). Due to the short duration of the demolition and the overall availability of natural habitats in the project vicinity this interference with wildlife movement would not be substantial. Other than the San Francisco dusky footed woodrat nests that occur within the Redwood Cabin and the potential bat roosts that may also be present (see Impact 3.1-5 and Impact 3.1-6 for mitigation measures to reduce impacts on these special-status species to less than significant), there are no additional wildlife nursery sites documented to occur within or adjacent to the project site. Therefore, due to the temporary and non-substantial interference with wildlife movement and the lack of other nursery sites in the project site and vicinity, the impact of the project would be **less than significant**.

Mitigation Measures
No mitigation is required for this impact.

Impact 3.1-11: Potential to Contribute to a Significant Cumulative Impact to Biological Resources

Implementation of the proposed project in the context of historical effects on the landscape and in combination with other cumulative projects in the area could result in impacts to biological resources. However, through the implementation of EPGs, BMPs, and mitigation measures, the contribution of the project would not have a cumulative impact. Therefore, this impact would be **less than significant**.

The cumulative context for the analysis of biological resources is the portion of the Santa Cruz Mountains that extends approximately from the Purisima Creek Redwoods Preserve and Phleger Estate in the North, South to the Skyline Ridge Open Space Preserve, and west to the San Mateo County Coast. This portion of the Santa Cruz Mountains was subject to extensive logging that extended from the mid 1800's to the early 1900's, and the majority of the habitats in the area reflect this history of logging. The southern portion of this area, was burned during the CZU Complex Fire in 2020 and habitat for many species, including marbled murrelet, was adversely affected by the fire.

Currently, this portion of the Santa Cruz Mountains contains limited residential and commercial development, consisting of mostly single-family homes, confined to the corridor around the major roads in the area. There is also an extensive network of public land in the area, including several Midpen preserves, Huddart County Park, and lands owned by the San Francisco Public Utility Commission. The majority of these lands are open for recreational uses. The area west to the San Mateo County Coast remains mostly agricultural with little development south of Half Moon Bay.

The proposed project in combination with other projects in the area, such as San Francisco Public Utility Commission's South Skyline Ridge Trail Extension; Midpen's Fuel Reduction Implementation projects; and natural resource protection and restoration projects, infrastructure improvement projects, and Integrated Pest Management Program projects on Midpen preserves, could contribute to cumulative impacts to biological resources.

All potential cumulative projects must comply with federal, state, and local regulations, including ESA, CESA, CWA, and CEQA regarding listed or other protected species and habitats. Potential impacts to special-status plants, special-status wildlife, and sensitive natural communities will require mitigation to reduce project impacts to a less-than-significant level on each of these projects. In addition, cumulative projects on the La Honda Creek Open Space Preserve would be subject to the BMPs discussed in Chapter 2, "Project Description.

The proposed project could have adverse effects on special-status botanical species, special-status amphibians, marbled murrelet, common nesting birds, bats, mountain lion, American badger, ringtail, redwood forest, waters of the US and state, and wildlife movement. However, these adverse effects would be temporary, and very limited in scope due to the small footprint of the project. As discussed above the EPGs, BMPs, and mitigation measures would reduce or avoid project related impacts to such an extent that they are not expected to not result in a considerable contribution to a cumulative impact. In addition, the Redwood Cabin Removal Project would provide the opportunity to improve biological resources at the site through invasive plant treatment, soil decompaction and amendments, or revegetation. Therefore, the project would not result in a cumulatively considerable incremental contribution to a cumulatively significant biological resource impact; the cumulative impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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3.2 CULTURAL RESOURCES

This section analyzes and evaluates the potential impacts of the project on known and unknown cultural resources. Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include pre-historic resources and historic-era resources.

Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical (or architectural) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes. A cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

Comment letters received in response to the Notice of Preparation (see Appendix A) expressed concerns related to the historic value of the Redwood Cabin. Additionally, the Native American Heritage Commission (NAHC) requested AB 52 and SB 18 compliance information; SB 18 does not apply to the project because there is no General Plan amendment associated with the project (which is the trigger for SB 18 compliance), and SB 18 is not a CEQA requirement and therefore is not discussed in this section. For project information related to AB 52 and tribal consultation, please refer to Section 3.18, "Tribal Cultural Resources," of the Initial Study, provided in Appendix B.

3.2.1 Regulatory Setting

FEDERAL

Section 106 of the National Historic Preservation Act

Federal protection of resources is legislated by (a) the National Historic Preservation Act (NHPA) of 1966 as amended by 16 U.S. Code 470, (b) the Archaeological Resource Protection Act of 1979, and (c) the Advisory Council on Historical Preservation. These laws and organizations maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP).

Section 106 of the NHPA and accompanying regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the main federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed in or may be eligible for listing in the NRHP. The NRHP is the nation's master inventory of known historic resources. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, and cultural districts that are considered significant at the national, state, or local level.

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1. The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
2. It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
3. It possesses at least one of the following characteristics:

   Criterion A Association with events that have made a significant contribution to the broad patterns of history (events).

   Criterion B Association with the lives of persons significant in the past (persons).

Criterion C Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).

Criterion D Has yielded, or may be likely to yield, information important to prehistory or history (information potential).

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee recognition in planning for federal or federally-assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

The National Register Bulletin also provides guidance in the evaluation of archaeological site significance. If a heritage property cannot be placed within a particular theme or time period, and thereby lacks "focus," it is considered not eligible for the NRHP. In further expanding upon the generalized National Register criteria, evaluation standards for linear features (such as roads, trails, fence lines, railroads, ditches, flumes, etc.) are considered in terms of four related criteria that account for specific elements that define engineering and construction methods of linear features: (1) size and length; (2) presence of distinctive engineering features and associated properties; (3) structural integrity; and (4) setting. The highest probability for National Register eligibility exists within the intact, longer segments, where multiple criteria coincide.

Cultural and Historic Landscapes

Under the NRHP, historic properties may be defined as sites, buildings, structures (such as bridges or dams), objects, or districts, including cultural or historic landscapes. A cultural landscape differs from a historic building or district in that it is understood through the spatial organization of the property, which is created by the landscape's cultural and natural features. Some features may create viewsheds or barriers (such as a fence), and others create spaces or "rooms" (such as an arrangement of buildings and structures around a lawn area). Some features, such as grading and topography, underscore the site's development in relationship to the natural setting. To be listed in the NRHP, a cultural landscape must meet one of the four evaluation criteria and must retain its integrity.

Historic landscapes include residential gardens and community parks, scenic highways, rural communities, institutional grounds, cemeteries, battlefields and zoological gardens. They are composed of a number of character-defining features which individually or collectively contribute to the landscape's physical appearance as they have evolved over time. In addition to vegetation and topography, cultural landscapes may include water features, such as ponds, streams, and fountains; circulation features, such as roads, paths, steps, and walls; buildings; and furnishings, including fences, benches, lights, and sculptural objects.

A cultural landscape is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes (NPS 1994).

- Historic Designed Landscape—a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person(s), trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates.
- Historic Vernacular Landscape—a landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes.

- Historic Site—a landscape significant for its association with a historic event, activity, or person. Examples include battlefields and president's house properties.
- Ethnographic Landscape—a landscape containing a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, religious sacred sites, and massive geological structures. Small plant communities, animals, subsistence, and ceremonial grounds are often components.

Secretary of the Interior's Standards

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards) provide guidance for working with historic properties. The Secretary's Standards are used by lead agencies to evaluate proposed rehabilitative work on historic properties. The Secretary's Standards are a useful analytic tool for understanding and describing the potential impacts of proposed changes to historic resources. Projects that comply with the Secretary's Standards benefit from a regulatory presumption that they would not result in a significant impact to a historic resource.

In 1992 the Secretary's Standards were revised so they could be applied to all types of historic resources, including landscapes. They were reduced to four sets of treatments to guide work on historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

STATE

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are eligible for the CRHR. The CRHR is a listing of State of California resources that are significant within the context of California's history. The CRHR is a statewide program of similar scope and with similar criteria for inclusion as those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historic resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations (CCR) Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are similar to the NRHP criteria and are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

1. Is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. Is associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Similar to the NRHP, a resource must meet one of the above criteria and retain integrity. The CRHR uses the same seven aspects of integrity as the NRHP.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "historical resources" and "unique archaeological resources." Pursuant to PRC Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 requires agencies to determine whether projects would have effects on unique archaeological resources.

Historical Resources

"Historical resource" is a term with a defined statutory meaning (PRC, Section 21084.1; determining significant impacts to historical and archaeological resources is described in the State CEQA Guidelines, Sections 15064.5[a] and [b]). Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC, Section 5024.1).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).
4. The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or 5024.1.

Unique Archaeological Resources

CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources. Public Resources Code, Section 21083.2, subdivision (g), states that unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The Act requires that upon discovery of human remains, construction or excavation activity cease and the County coroner be notified. If the remains are of a Native American, the coroner must notify NAHC, which notifies and has the authority to designate the most likely descendant (MLD) of the deceased. The Act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Health and Safety Code, Sections 7050.5 and 7052

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. Section 7052 states that the disturbance of Native American cemeteries is a felony.

Public Resources Code, Section 5097

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American burial falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

LOCAL

La Honda Creek Open Space Preserve Master Plan

The La Honda Creek Open Space Preserve (Preserve) Master Plan, prepared in June 2012, represents a long-term comprehensive planning effort for the Preserve. The Cultural Resource Management section of the Master Plan provides cultural resource protection measures, which are identified Chapter 2, "Project Description," and listed below.

EPG CUL-1: Midpen will apply the Standard Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials:

Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials. In the event that any cultural resources are exposed during construction, work at the location of the find will halt immediately within 10 meters (30 feet) of the find. If an archaeologist is not present at the time of the discovery, Midpen will contact an archaeologist for identification and evaluation in accordance with CEQA criteria.

A reasonable effort will be made by Midpen and archaeologist to avoid or minimize harm to the discovery until significance is determined and an appropriate treatment can be identified and implemented. Methods to protect finds include fencing, covering remains with protective material and culturally sterile soil or plywood. If vandalism is a threat, 24-hour security shall be provided. During this evaluation period, construction operations outside of the find location can continue preferably with an archaeologist monitoring any subsurface excavations.

If the resource cannot be avoided, the archaeologist will develop an appropriate Action Plan for treatment within 48 hours to minimize or mitigate the adverse effects. Midpen will not proceed with construction activities that could affect the discovery until the Action Plan has been reviewed and approved. The treatment effort required to mitigate the inadvertent exposure of significant cultural resources will be guided by a research design appropriate to the discovery and potential research data inherent in the resource in association with suitable archaeological field techniques and analytical strategies. The recovery effort will be detailed in a professional report in accordance with current archaeological standards. Any non-grave associated artifacts will be curated with an appropriate repository.

EPG CUL-2: Application of the Native American Burial Plan (NABP) will be applied:

Native American Burial Plan

1. In the event of an inadvertent discovery of human remains and cultural items during project construction, the field crew supervisor shall take immediate steps, if necessary, to secure and protect any remains and cultural materials. This shall include but is not limited to such measures as (a) temporary avoidance by construction until the remains and items can be removed; (b) posting a security person; (c) placement of a security fence around

the area of concern; or, (d) some combination of these measures. Any such measures employed will depend upon the nature and particular circumstances of the discovery.

2. The County Medical Examiner (Coroner) shall be notified by the field crew supervisor or other designated Midpen manager and informed of the find and of any efforts made to identify the remains as Native American. If the remains are identified as a prehistoric Native American by either a professional archaeologist under contract to Midpen or the Medical Examiner's forensic archaeologist, the Medical Examiner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours of notification of the find. The Medical Examiner may choose to document and remove the remains at his/her discretion depending on the circumstances of the discovery. The NAHC then designates and notifies a Most Likely Descendant (MLD). The MLD has 24 hours to consult and provide recommendations for the treatment or disposition, with proper dignity, of the human remains and grave goods [Note: Other culturally affiliated Native Americans [Indians] may be consulted by the MLD during the consultation and recommendation process to determine treatment of the skeletal remains].
3. Each burial and associated cultural items shall be stored as a unit in a secure facility, which shall be accessible to the MLD and other Native American representative(s) or their designated alternates upon prior arrangement.
4. The remains and associated cultural items shall be reburied in a secure location as near as possible to the area of their discovery or at an off-site location acceptable to the MLD that has minimal potential for future disturbance. The reburial shall be done in a manner that shall discourage or deter future disturbance. Reburial shall be conducted by persons designated by the MLD, with the assistance, if requested, of Midpen's field crew. The location shall be fully documented, filed with the NAHC and the California Historical Resources Information System, Northwest Information Center, California State University, Sonoma and treated as confidential information.
5. If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or Midpen or designate rejects the recommendation of the MLD and mediation (as per Section 5097.94 subdivision (k)) fails, reinterment of the human remains and associated cultural items associated shall take place with appropriate dignity on the property in a location not subject to further subsurface disturbance.
6. For security reasons, no news releases, including but not limited to photographs, videotapes, written articles, or other such means that contains information about human remains or burial-related items of Native American origin shall be released by any party during the discovery, recovery and reburial unless approved by the MLD.
7. Any disputes that arise among the MLD and representatives of affected Native American groups and/or between Midpen or designee and the MLD concerning cultural affiliation or the ultimate disposition of Native American human remains and associated funerary objects and unassociated funerary objects shall be resolved according to the dispute resolution procedures in Section 5097.94 of the State of California Public Resources Code.
8. The Archaeological Data Recovery/Native American Burial Treatment Report(s) shall be prepared by professional archaeologists. The report shall include, but not be limited to, the following: project overview; ethnographic section; previous archaeological research in the region and on-site; circumstances of discovery; recovery procedures and techniques; artifact analysis; faunal analysis; osteological analysis and interpretation; and, conclusions. The MLD and other interested Native American representative(s) shall be provided an opportunity to review the report and submit comments within the same time period as accorded any other reviewers.
9. Objects not associated with the human remains and recovered from private land shall be transferred to Midpen. If curation of any objects is required, curation will be at repository approved by Midpen. Repositories can include the History Museums of San Jose collections, the Tiburon Archaeological Research Group, San Francisco State University and the Collections Facility, Department of Anthropology, Sonoma State University, Rohnert Park.

EPG CUL-3: The protocol for determining if structures are of historic value is as follows:

1. The property and building types will be identified and evaluated by a qualified cultural consultant;
2. The cultural consultant will determine if the structures in question are currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places;
3. If it is determined that the structures in question are not currently included in a local register of historic resources, on the California Register of Historic Resources or on the National Register of Historic Places, a DPR 523 form issued by the California Department of Parks and Recreation (DPR) will be completed by the cultural consultant and the structural and building data sent to a qualified architectural historian.
4. ~~The following measure applies only to the Southern La Honda Creek Area: As required by Mitigation CUL-1a(4) of the San Mateo Coastal Annexation EIR, if it is determined that the structures in question are currently on the California Register of Historic Resources or if the building has been determined to be of historic value, there are two options that would mitigate any impact to the historic values:~~
    a) ~~Retain and rehabilitate the building according to the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). New construction near this building should be consistent with its historic character; or~~
    b) ~~Move the building to a different location on its current parcel or to a different parcel appropriate to its historic character.~~[1]
5. If it is determined that the structures in question are currently listed on or are eligible for listing on the California Register of Historic Resources, Midpen may retain and either mothball or rehabilitate the structure per Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings (U.S. Department of Interior 1990). OR Midpen may move the structure to a different location on its current parcel or to a different parcel appropriate to its historic character and mothball or rehabilitate the structure per Secretary of the Interior's Standards.

County of San Mateo General Plan

Chapter 5 of the San Mateo County General Plan Policies document (January 2013) contains goals and policies related to historical and archaeological resources. Applicable policies related to the Redwood Cabin Removal Project are listed below:

- **Policy 5.11a**: Identify high priority resources in the comprehensive inventory and apply for their designation as State Point of Historic Interest, State Historical Landmark, or inclusion in the National Register of Historic Places.
- **Policy 5.12:** Encourage the rehabilitation and recycling of historic structures.
- **Policy 5.13:** Encourage the use of innovative techniques such as density transfer, facade easements, etc., to protect historic structures.
- **Policy 5.14:** Recommend State and/or national register status for significant archaeological/paleontological sites.
- **Policy 5.16**: Discourage the demolition of any designated historic district or landmark
- **Policy 5.19a**: Encourage compatible and adaptive residential, commercial or public uses of historic structures as a means for their protection.
- **Policy 5.21:** (a) Encourage the protection and preservation of archaeological sites; (b) Temporarily suspend construction work when archaeological/paleontological sites are discovered. Establish procedures which allow for the timely investigation and/or excavation of such sites by qualified professionals as may be appropriate. (c) Cooperate with institutions of higher learning and interested organizations to record, preserve, and excavate sites.

[1] This applies to the Southern La Honda Creek Area only and therefore is not relevant to the project.

- Policy 5.22b: Expand and maintain a comprehensive inventory of all historic resources located in both unincorporated and incorporated areas.
- Policy 5.23: Encourage and coordinate efforts with groups to acquire structures of historic merit in order to prevent their loss and/or promote their adaptation for other uses.
- Policy 5.25: Maintain and update a comprehensive archaeological/paleontological data base.

3.2.2 Environmental Setting

REGIONAL PREHISTORY

The regional prehistory setting, discussed below, is informed by the San Francisco Bay-Delta Regional Context and Research Design for Native American Archaeological Resources, prepared for Caltrans District 4 in 2017 (Caltrans 2017).

Human occupation in the San Francisco Bay-Delta is generally subdivided into distinct time periods, each of which is marked by various adaptive patterns and geographical distributions. San Francisco Bay-Delta archaeology is divided among three patterns: Terminal Pleistocene (13,500–11,700 calibrated years before present [cal BP]), Early Holocene (11,700–8200 cal BP), Middle Holocene (8200–4200 cal BP), and Late Holocene (4200 cal BP, onward).

Terminal Pleistocene (13,500–11,700 cal BP)

The Terminal Pleistocene is largely contemporaneous with the Clovis and Folsom periods of the Great Plains and the Southwest and is generally considered to be represented by wide-ranging, mobile hunters and gatherers who periodically exploited large game. Throughout California, Terminal Pleistocene occupation is infrequently encountered and poorly understood, and most often represented by isolated fluted points. No fluted points or archaeological deposits dated to the Terminal Pleistocene have been documented in the Bay-Delta Area. The Borax Lake site, situated near Clear Lake in the North Coast Ranges, is the nearest locality where fluted points are reported.

The absence of Terminal Pleistocene archaeological remains is undoubtedly the result of several factors, most notably the likelihood that initial human populations were small, highly mobile, and traveled rapidly across the continent. Therefore, their archeological signature on the landscape was generally faint and wide-spaced. For coastal areas, sea level rise, coastal erosion, and localized subsidence have further reduced the likelihood of documenting initial occupation of the region, and some sites may be preserved under water.

Early Holocene (11,700–8,200 cal BP)

It is typically thought that evidence for Early Holocene human occupation in central California is the product of semi-mobile hunter-gatherers exploiting a wide range of plant and animal foods from marine, lacustrine, and terrestrial contexts. Early Holocene assemblages often include stemmed points, crescents, and steepedged formed flake tools that share many attributes with contemporaneous material in the Great Basin and southern North Coast Ranges. However, milling tools (handstones and millingslabs) are ubiquitous in these early deposits, a characteristic which distinguishes Early Holocene occupations in California from those in the Great Basin.

There are only four Early Holocene deposits archaeologically documented in the Bay-Delta Area, resulting in few and poorly established patterns. No sites from this time span have been documented as yet in paleo-bay or paleo-outer coast settings, in part because these contexts are now submerged making them difficult to discover.

Diverse resource exploitation is indicated by artifact and ecofact assemblages from these sites. They include handstones and millingslabs (but not mortars and pestles), large, flaked cores and cobble tools, flake tools, well-made bifaces, and a single flaked stone crescent. Trace amounts of marine shellfish have been recovered from some inland sites, while faunal assemblages are varied and include deer, elk, rabbit, ground squirrel, coyote, and grizzly bear. Carbonized plant remains are dominated by acorn, which is indicative of fall-winter occupation.

Middle Holocene (8,200–4,200 cal BP)

More than 60 Bay-Delta Area archaeological sites have produced radiocarbon dates indicating occupation during the Middle Holocene. Both surface and buried deposits are present, including a number of substantial residential settlements. Notably, the Middle Holocene includes a series of buried sites with diverse cultural assemblages and occasional burials. In addition, several isolated human burials have been found in buried contexts, including several in the northern Santa Clara Valley of the South Bay and along the edge of the bay in the Southwest region.

Artifact assemblages are varied and include ground stone (some only with millingslabs and handstones, some with mortars and pestles, and some with both); side-notched dart points; cobble-based chopping, scraping, and pounding implements; and shell beads and ornaments. Current evidence suggests that the mortar and pestle were in use by 6000 cal BP, primarily at sites in the Amador-Livermore, Kellogg Creek, and San Ramon Valleys in the East Bay region. Mortars and pestles were the predominant milling tools used thereafter throughout the East and South Bay regions. The first evidence for extensive use of estuarine resources occurs during the middle Holocene with the expansion of San Francisco Bay's mud flats, and tidal marshes.

Shellfish exploitation included bay oyster (*Ostrea*) and mussel (*Mytilus*), while inland East Bay sites include freshwater shellfish. Faunal remains reveal diverse, local, niche-based exploitation strategies that included hunting seasonal waterfowl and capture of estuary, anadromous, and freshwater fish. Archaeobotanical assemblages from Middle Holocene contexts are varied.

Evidence for long-distance exchange, greater investment in processing technologies (e.g., mortar and pestle), and extensively occupied habitation sites, including the basal layers of many bay shore shell mounds, suggest higher population levels, more complex adaptive strategies, and longer seasonal occupation that took place during the Early Holocene. Along with burial by alluviation, undoubtedly pre-6000 cal BP sites situated along the bay margin would have been inundated by subsequent sea level rise. In part, this may explain why habitation sites from between about 8000 and 7000 cal BP are extremely rare in the wider Bay-Delta Area.

Late Holocene (4200–180 cal BP)

The Late Holocene is generally divided into the following five main time periods: Early (4200–2550 cal BP), Early/Middle Transition (2550–2150 cal BP), Middle (2150–930 cal BP), Middle/Late Transition (930–685 cal BP), and Late (685–180 cal BP). The Late Holocene is very well-documented in the Bay-Delta Area, with more than 240 radiocarbon-dated sites reflecting widespread occupation. Over the last 4,000 years it is generally thought that regional human population increased and there was an upward trend in social, political, and economic complexity, in part reflected by distinct, geographically specific cultural traditions.

The Early Period (+4050–2550 cal BP) marks the establishment or expansion of a number of large shell mounds. The earliest shell mound artifact assemblages consisted of stemmed and short, broad leaf projectile points; square-based knife blades; mortars (both unshaped and cylindrical), pestles (short and sturdy, cylindrical); crescentric stones; perforated charmstones; bone awls; polished ribs; notched and grooved net sinkers; rectangular and spire lopped *Olivella* beads; rectangular abalone (*Haliotis* sp.) beads and various pendant types; antler wedge; and stone bars or "pencils." Bay margin sites reveal a strong emphasis on marine shellfish, marine fishes, and marine mammals. Nuts, berries, and small seeds appear to have been particularly important plant foods.

Very large cemeteries first occur in the Late Holocene, and graves are common at most sites. Burials are almost exclusively found in a loose to tightly flexed position in Bay margin and Santa Clara Valley sites, and the regular occurrence of grave offerings, including shell beads and ornaments, bone objects, and charmstones, suggests well-developed mortuary practices. Artifacts recovered mostly from burial contexts reflect extensive trade networks, providing access to finely crafted implements made of obsidian originating east of the Sierra Nevada and from Napa County. *Haliotis* (abalone) and *Olivella* (olive snail) beads and ornaments also represent trade items, since manufacturing sites are undocumented in the local region. Multi-season plant and animal foods, residential structures, cemeteries, mortars and pestles, and evidence for regular exchange, all suggest that relatively sedentary communities had emerged by the Early Period.

The Middle Period (2150–930 cal BP) is often considered to have witnessed greater settlement permanence—characterized by either sedentary or multi-season occupation. This time interval is also often considered to have been the heyday of mound building (as many of the bay margin shell mounds have dates within this time span) and correlated with greater social complexity and ritual elaboration. A series of changes in artifact types has been documented, including barbless and single-barbed bone fishing spears; large, shaped mortars and equally large pestles; and ear spools and varied forms of *Haliotis* and *Olivella* beads and ornaments. Mortuary practices were often highly ritualized, and some individuals, typically males, were buried with thousands of shell beads. Terrestrial resources appear to have been more heavily exploited than previously, based on food remains and isotopic analysis of human bone. Shifts in resource emphasis included greater use of deer; less reliance on oysters and more on mussels, clams or horn snail; and increased acorn exploitation.

The Late Period (685–180 cal BP) is the best-documented era, and current evidence suggests that Bay-Delta Area populations grew in size, sedentary villages flourished, and material signatures of ritual activity increased. Artifact assemblages at the end of this period included clamshell disk beads, distinctive *Haliotis* pendants, flanged steatite pipes, chevron-etched bone whistles and tubes, and needle-sharp coiled basketry awls." The bow and arrow also are first documented in the region circa 700 cal BP, near the start of the Late Period. Funerary rituals were strongly patterned and included flexed interments and intentionally broken grave offerings, along with occasional cremations.

HISTORIC SETTING

Regional History

The Redwood Cabin is situated on land that was historically occupied by the Ohlone peoples prior to Spanish and Mexican settlement. The Redwood Cabin is located in the former Rancho San Gregorio, which stretched from the coast of the Pacific Ocean up to the forested heights of the Santa Cruz Mountains.

The California Gold Rush and the rapid development of the city of San Francisco triggered a logging boom in the Santa Cruz Mountains. By the late 1800s and early 1900s, commercial timber logging in the Santa Cruz Mountains had subsided. Beginning in the mid 1800s, the Santa Cruz Mountains were becoming a prime area for recreation, including camping, hunting, and fishing. The area's proximity to San Francisco and other Bay Area cities, paired with the rise of the personal automobile in the early twentieth century made the forests of the San Francisco Peninsula ideal locations for middle-class and wealthy families to vacation. Tourism became the livelihood of La Honda, a nearby former logging town located south of the Redwood Cabin. Lodges and hotels were also constructed during this period to accommodate non-campers and long-term visitors.

During the early 1920s, San Francisco, San Mateo, Santa Clara and Santa Cruz counties established a joint highway district in order to build Skyline Boulevard. Following the construction of Skyline Boulevard, the area was made more accessible to both visitors and year-round residents. The 1920s and 1930s brought the peak of residential development for the area. Developments like Skylonda (located directly east of the Redwood Cabin on Skyline Boulevard), Cuesta La Honda, the Middleton Tract, Sierra Morena Woods, Kings Mountain Park, and La Honda Park followed in the subsequent two decades, bringing hundreds of summer houses and cabins to the immediate area.

Despite their early popularity, most of the lodges and hotels along Skyline Ridge and in La Honda did not remain open past the Depression. As other recreation areas became accessible, the popularity of La Honda and the Santa Cruz Mountains waned. With the rise of the conservation movement in the 1970s, the remaining forests, coastal areas, and open spaces of the Santa Cruz Mountains were preserved. As a result, much of the surrounding area, including the Redwood Cabin, has been incorporated into local and state parks and open space preserves. Today, the area serves yet again as a popular day recreation area and the occasional permanent residence or vacation home (Page & Turnbull 2020).

Project Site History

The Redwood Cabin is situated on land within the boundary of the former Rancho San Gregorio and is near the site of former lumber mills, including Harrington Mill. According to Midpen's records, the Redwood Cabin was constructed by W.B. Allen as a family retreat from 1927-1928. Allen settled in Palo Alto in 1903 and owned and

operated Palo Alto Hardware. By 1918, he purchased 400 acres in La Honda including the subject parcel. With the assistance of Norwegian laborers, Allen constructed the lodge on a bedrock foundation using local timber pieced together without nails. In addition to the lodge, Allen imported stones from the coast to construct walls, stairs, and numerous stone-lined hiking trails throughout the property. In the 1930s, the California Conservation Corps assisted with the improvement of some roads near the property. The Allen family as well as local groups, including the YMCA and the rotary club, used the lodge as a summer retreat for decades. The property remained in the Allen (Paulin) family until 1988 when Midpen purchased it.

By the early 1940s, Skyline Boulevard had been fully constructed along the Peninsula and a dirt road extended south, partially along the footprint of the road that connects to the Redwood Cabin. The Redwood Cabin first appeared on a USGS topographic map in 1961. During this time, the Skylonda development had grown and a section of Allen Road that connected the Redwood Cabin to Dyer Ranch and the White Barn was converted to a "Jeep trail," (i.e., an unimproved dirt road). A 1991 USGS topographic map shows the Redwood Cabin on the access road to Skyline Boulevard and a re-configured Allen Road.

An appraisal report from the San Mateo County Assessor's Office, dated June 10, 1953 and July 21, 1954, is the earliest and only known official record of the Redwood Cabin on file at the County of San Mateo. The record lists the date of construction as approximately 1920 and indicates a 66-foot by 30-foot rectangular building labeled "lodge" with a wraparound open plank deck and a larger rear deck. The lodge is described as a 6-room building with one bathroom and redwood log walls; light shake roof; exposed rustic along rake of rafters; mud sills and large rustic posts; pine floor; large natural stone fireplace; and deck pillars set on concrete piers. Three other buildings accompany the lodge on the appraisal report and are noted as being removed in 1966. The buildings appear to have been situated around the circular driveway and included two garages and a caretaker's cabin with an open deck at the front. The caretaker's cabin and two garages are no longer extant on the site, and it is unknown whether they were demolished or relocated.

RECORDS SEARCHES AND REPORTS

A cultural resources literature search was conducted in July 2021 by the Northwest Information Center (NWIC) of the California Historical Resources Information System at Sonoma State University. The records search was conducted to determine if prehistoric or historic cultural resources had been previously recorded within the project site, the extent to which the project site had been previously surveyed, and the number and type of cultural resources within a 0.25-mile radius of the project site. The following information was reviewed as part of the records search:

- NRHP and CRHR,
- California Office of Historic Preservation Historic Property Directory,
- California Inventory of Historic Resources,
- California State Historic Landmarks,
- California Points of Historical Interest, and
- Historic properties reference map.

The NWIC records search indicated that no resources were located within the project area or within a 0.25-mile radius of the project area.

As described in Chapter 2, "Project Description," the *La Honda Creek Redwood Cabin Historic Resources Evaluation Report* (Historic Resources Evaluation) was prepared for the Redwood Cabin structure by Page & Turnbull, Inc. in 2020. The report indicated that the building was not included in the San Mateo County Inventory of County Historic Resources (Page & Turnbull 2020).

CRHR criteria were used to evaluate the significance of the historic features and archaeological sites. The CRHR is discussed in more detail above in Section 3.2.1, "Regulatory Setting." Eligibility for listing in the CRHR rests on twin factors of significance and integrity. A resource must have both significance and integrity to be considered eligible.

Loss of integrity, if sufficiently great, will become more important than the historical significance a resource may possess and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible.

California Register of Historical Resources Eligibility

Findings of the Historic Resources Evaluation determined that the Redwood Cabin is a historical resource per CEQA because it appears to be eligible for listing in the CRHR under the following criteria:

Criterion 1. The La Honda Creek Redwood Cabin does appear to be significant under Criterion 1 (Events) as a property associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States. The cabin was constructed at a peak of outdoor recreation in the Santa Cruz Mountains. The Redwood Cabin's construction appears representative of a broader pattern of recreational development in the Santa Cruz Mountains following the San Francisco Peninsula's logging boom, specifically at a time when recreation shifted from camps to cabins and early subdivisions. While the cabin does not appear to be one of the earliest recreational cabins (from the late 1800s and early 1900s), it appears to be one of the last remaining ones intact from the transition era to permanent structures. Most of the original lodges and hotels appear nonextant. The Redwood Cabin appears to be a rare building typology and retains its original rural setting. Therefore, the property does appear to be individually eligible for listing under Criterion 1 with its period of significance, 1927-1928, the years of its construction.

Criterion 3. The La Honda Creek Redwood Cabin does appear to be individually eligible for listing in the California Register under Criterion 3 (Architecture) as a building that embodies the distinctive characteristics of a type, period, region, or method of construction, or that represents the work of a master or possesses high artistic values. The Redwood Cabin is a large, one-story side-gabled rectangular log cabin. It is constructed of barked redwood logs of various sizes, with saddle notches that are set unconventionally and upside down. The cabin is supported by large rustic wood posts, some of which are set in concrete and others of which are set on grade. The cabin features a large, centered stone chimney that connects to an expansive interior fireplace, its foundation visible from beneath the cabin. Its openings consist of what appear to be original wood sash multi-lite windows, a large, handmade redwood door with iron details, and paneled one-lite wood doors and wood multi-lite French doors throughout. Much of the cabin appears to be original. The building clearly utilizes local materials, and while its construction method appears slightly "primitive," it appears indicative of the rural, woodsy character of the area and the period in which the region was transitioning to more permanent recreational structures. As such, the Redwood Cabin does appear to be a unique property type or architectural style such that it would rise to the level of individual significance within a local context (Page & Turnbull 2020).

Integrity

As determined in the Historic Resources Evaluation, the Redwood Cabin retains sufficient historic integrity to be eligible for listing in the CRHR as an individual resource under each of the following categories:

- Location,
- Setting,
- Design,
- Materials,
- Workmanship,
- Feeling, and
- Association.

In summary, CRHR eligibility was determined for the Redwood Cabin because it appears to be one of few remaining examples of a permanent recreational cabin from the 1920s with a high degree of integrity and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is an example of an uncommon rustic recreational cabin in the Bay Area (CRHR Criterion 3). Further, the Historic Resource Evaluation determined that the Redwood Cabin retains a sufficient historic integrity to be eligible for listing in the CRHR as an individual resource (Page & Turnbull 2020).

Historic Landscape

In 2021, the La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum (memo) was prepared by Page & Turnbull. The memo indicates that while the Redwood Cabin, itself, was constructed around 1927 to 1928 for owner W.B. Allen, research has not definitively revealed the original date of construction, builder, use, and any other historic associations of the individual landscape features on the site. Without this information, it is not known whether these features contribute to the property's overall significance under Criteria 1 and 3 for listing on the CRHR. The features are clustered around the cabin and most likely served a support function for the cabin and its occupants. Due to their ancillary nature, the historic significance of these landscape features is likely to be dependent upon and inextricably connected to the cabin. Thus, removing the cabin but retaining the surrounding contributing landscape features would result in a loss of any associative historic significance that the landscape features may possess, as well.

Furthermore, the landscape features at the Redwood Cabin property do not appear to be individually historically significant as separate entities from the Redwood Cabin. The stone walls along the circular driveway, as well as the stairs leading up to the cabin and various hiking trails throughout the site, were reportedly constructed by W.B. Allen, using stones imported from the California coast. There is speculation that the Civilian Conservation Corps may have assisted with the construction of these walls and helped improve other roads in the surrounding area in the 1930s. However, no clear documentary evidence has been uncovered to date that confirms that the Civilian Conservation Corps did, in fact, construct the walls or any other features at the La Honda Creek Redwood Cabin property.

Ultimately, the features do not appear to possess individual historic significance apart from the Redwood Cabin and do not comprise a historic landscape. The landscape features were likely built as auxiliary features that served the Redwood Cabin and its occupants; therefore, any potential historic significance they may possess is likely to be as site features associated with the cabin itself (Page & Turnbull 2021).

3.2.3 Impacts and Mitigation Measures

METHODOLOGY

The impact analysis for archaeological and historical resources is based on the findings and recommendations of the *La Honda Creek Redwood Cabin Historic Resources Evaluation Report* (Page &Turnbull 2020) as well as the *La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum* (Page & Turnbull 2021). The analysis is also informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources.

Section 21083.2 of the State CEQA Guidelines defines "unique archaeological resource" as an archeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following CRHR-related criteria: 1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) that it as a special and particular quality, such as being the oldest of its type or the best available example of its type; or 3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person. An impact on a "nonunique resource" is not a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.5[c][4]). If an archaeological resource qualifies as a resource under CRHR criteria, then the resource is treated as a unique archaeological resource for the purposes of CEQA.

In addition, according to PRC Section 15126.4(b)(1), if a project adheres to the Secretary of the Interior's Standards for the Treatment of Historic Properties, the project's impact "will generally be considered mitigated below the level of a significance and thus is not significant".

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, the project would result in a significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines; or
- cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.

ISSUES NOT DISCUSSED FURTHER

All potential archaeological and historical resource issues identified in the significance criteria are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Implementation of the project would result in a substantial adverse change in the significance of a recommended-eligible historical resource and would not implement Preserve Master Plan EPG CUL-3 No. 5, as stated. This would result in a **significant** impact as described in State CEQA Guideline 15064.5(b)(1).

As discussed previously, the Redwood Cabin was evaluated for CRHR eligibility in 2020. The Historic Resources Evaluation concluded that the structure appears eligible for listing in the CRHR because it appears to be one of few remaining examples of a permanent recreational cabin from the 1920s with a high degree of integrity and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1); and is an example of an uncommon rustic recreational cabin in the Bay Area (CRHR Criterion 3) (Page & Turnbull 2020).

As described in Section 3.2.2, "Environmental Setting," the *La Honda Creek Redwood Cabin Landscape Evaluation Commentary Memorandum* concluded that landscape features surrounding the project site do not appear to possess individual historic significance apart from the Redwood Cabin and do not comprise a historic landscape. These landscape features were likely built as auxiliary features that served the Redwood Cabin and its occupants; therefore, any potential historic significance they may possess is likely to be as site features associated with the cabin itself (Page & Turnbull 2021).

Implementation of the project would involve demolition of the Redwood Cabin and removal of associated site features, including the stone retaining wall, barbeque, and fire pits. The demolition of the Redwood Cabin would result in a substantial adverse change in the significance of this historical resource because the building would no longer exist. Because associated site features were determined not to possess individual historic significance and do not comprise a historic landscape, removal of these features, in tandem with the Redwood Cabin would not result in an adverse change to the significance of a historic resource.

EPG CUL-3 No. 5 of the Preserve Master Plan calls for retaining/mothballing or moving historical resources. However, the Master Plan recommends historical and structural evaluations of the Redwood Cabin for future Midpen Board of Directors consideration on the disposition of the structure. Consistent with the Master Plan, historical and structural evaluations for the Redwood Cabin were prepared in 2020. Based on those evaluations, the Midpen Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin.

Because the Redwood Cabin structure was recommended eligible for listing in the CRHR under criterion 1 and 3, and project activities would result in an adverse change in the significance of a CEQA historic resource, impacts would be **significant**.

Mitigation 3.2-1a: Document historic buildings prior to removal.

Midpen shall complete Historic American Building Survey documentation of the Redwood Cabin before any demolition work is conducted. Documentation shall consist of written history of the property, plans and drawings of the historic resources, and photographs, as described below:

- **Written History.** The report shall be reproduced on archival bond paper.
- **Plans and Drawings.** An architectural historian (or historical architect, as appropriate) shall conduct research into the availability of plans and drawings of the Redwood Cabin as the building currently exists. If such plans/drawings exist, their usefulness as documentation for the building shall be evaluated by the architectural historian. If deemed adequate, the plans/drawings shall be reproduced on archival mylar. If no plans/drawings are available, or if the existing plans/drawings are not found to be useful in documenting the historic resource, a historical architect shall prepare dimensioned plans and exterior elevations of the building. A combination of existing and new drawings is acceptable. All drawings shall be reproduced on archival mylar.
  - The architectural historian shall conduct research into the existence of the original architectural plans and drawings of the building. If found, the plans shall be reproduced on archival mylar. Alternatively, the architectural plans can be scanned and saved as TIFF files. The scanning resolution shall be not less than 300 dpi.
  - All digital files, including drawing files, shall be saved on media and labeled following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Specifications.
- **Photographs.** Digital photographs shall be taken of the Redwood Cabin following the Secretary's Standards and Guidelines for Archeology and Historic Preservation Digital Photography Standards.

The documentation shall be prepared by an architectural historian, or historical architect as appropriate, meeting the Secretary's Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards. The documentation shall be submitted to the San Mateo County Library, the San Mateo County Historical Association, the Northwest Information Center, and the Midpen office in Los Altos.

Mitigation 3.2-1b: Redwood Cabin interpretation.

Midpen will create an interpretive resource outlining the Redwood Cabin's historic status, historic context, and significance. This resource will be available in a digital and/or physical format for public engagement and may be shared with a relevant local organization such as the San Mateo County Historical Association.

Mitigation Measure 3.2-1c: Salvage of useable materials.

Should any of the demolished structure materials (i.e., redwood logs) be found to be in acceptable condition (i.e., no lead paint, minimal dry rot), Midpen shall reserve materials for potential future uses and/or salvage in compliance with Midpen's waste diversion requirements outlined in Midpen's Board of Directors Policy 4.08 - Construction and Demolition Waste Diversion. If these materials are free of pests, Midpen will coordinate with local historic salvage organization, such as Garden City Recycle and Salvage in Santa Cruz, Whole House Building Supply & Salvage in San Mateo, or Heritage Salvage in Petaluma for their reuse.

Significance after Mitigation

Implementation of Mitigation Measures 3.2-1a,3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin through structure documentation, creation of an interpretive resource, and salvage of useable materials. However, because the historically eligible structure would no longer exist, impacts to the Redwood Cabin would remain **significant and unavoidable**.

Impact 3.2-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources

Project-related ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. However, because project excavation activities would occur in previously disturbed areas, the potential for encountering archaeological material is low. Additionally, because EPG CUL-1 would be implemented in the event of a discovery, this would be a **less-than-significant** impact.

As previously described, result of the NWIC records search indicated that no resources were located within the project area or within a 0.25-mile radius of the project area. Implementation of the project would result in demolition of the Redwood Cabin, removal of associated site features (e.g., stone retaining wall and barbeque and fire pits), and site recontouring activities post-construction. Demolition activities and staging associated with project implementation would result in ground disturbance at the project site. As described in Chapter 2, "Project Description," the wooden posts that support the Redwood Cabin structure would be removed as part of structure demolition. Removal of these wood posts would involve excavation of up to 2 to 5 feet in an area that had been disturbed during the installation of these posts. The project site is relatively disturbed from previous site uses, such as the construction of the retaining wall, and as indicated by the negative NWIC records search results, no known archaeological resources are present within the project site. Nevertheless, because the project would result in earth-moving activities, there is the potential that previously undiscovered archaeological materials could be encountered during construction.

In the event of that unanticipated archaeological materials are encountered during construction, Midpen and the construction contractor would implement EPG CUL-1, Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials as identified in Section 3.2.1, "Regulatory Setting," and originally described in the La Honda Creek Open Space Preserve Master Plan. CUL-1 includes discovery protocol such as stopping work within 30 feet of the discovery, notifying a qualified professional, and implementing methods to protect the find (e.g., fencing) until the significance of the find is determined and a treatment plan can be identified and implemented.

Because excavation would occur previously disturbed areas of the project, the potential for encountering archaeological material is low, and because EPG CUL-1 would be implemented in the event of a discovery, project impacts related to archaeological resources would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.2-3: Potential to Contribute to a Significant Cumulative Impact to Cultural Resources

The project, in combination with other cumulative development in the area, could result in impacts to cultural resources in the area. Through the implementation of environmental protection measures, the contribution of the project would not be cumulatively considerable with respect to archaeological resources. However, because the project would result in permanent removal of a historic architectural resource, impacts to historical resources would be significant. Therefore, cumulative impacts to cultural resources as a whole would be **significant**.

The cumulative context for the cultural resources analysis considers a broad regional system of which the resources are a part. The cumulative context for archaeological resources is the San Francisco Bay-Delta region, where archaeologists have developed a taxonomic framework describing patterns characterized by technology, particular artifacts, economic systems, trade, burial practices, and other aspects of culture. The cumulative context for historical resources includes recreational development in the Santa Cruz Mountains.

Because all significant cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant cultural resources, all adverse effects erode a dwindling resource base. The loss of any one archaeological site could affect the scientific value of others in a region because these resources are best

understood in the context of the entirety of the cultural system of which they are a part. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather than on a single project or parcel boundary.

Archaeological Resources

No known unique archaeological resources are located within the boundaries of the proposed project site; nonetheless, project-related earth-disturbing activities could damage undiscovered archaeological resources. The proposed project in combination with other projects in the area, such as Midpen's Fuel Reduction Implementation projects, Agricultural Workforce Housing at La Honda Creek Open Space Preserve, and bridge replacement and repair projects in the Preserve, could contribute to ongoing substantial adverse changes in the significance of unique archaeological resources. As described above, implementation of EPG CUL-1, would avoid potential adverse effects to archaeological resources by ensuring proper identification, evaluation, and treatment of previously unidentified archaeological material, such that impacts would be less than significant. Therefore, implementation of the project would not contribute to a cumulative loss of archaeological resources. Similarly, cumulative project under Midpen's jurisdiction would be required to implement EPG CUL-1 to avoid/reduce impacts to archaeological resources.

Historical Resources

The Redwood Cabin was constructed during a peak of outdoor recreation activities in the Santa Cruz Mountains. The Redwood Cabin's construction appears representative of a broader pattern of recreational development in the Santa Cruz Mountains following the San Francisco Peninsula's logging boom, specifically at a time when recreation shifted from camps to cabins and early subdivisions. A small number of other redwood cabins are located in the Bay Area; however, they do not appear to have been evaluated for CRHR- or NRHP-eligibility, and, therefore, it is not known if they are historical resources under CEQA. While the Redwood Cabin does not appear to be one of the earliest recreational cabins (from the late 1800s and early 1900s), it appears to be one of the last remaining ones intact from the transition era to permanent structures, in the area. Additionally, as described in Impact 3.2-1, the Redwood Cabin is an eligible historic architectural resource. As such, implementation of the project would result in removal of a CEQA historical resource as well as one of the few remaining structures representative of recreational development in the region. Implementation of Mitigation Measures 3.2-1a, 3.2-1b, and 3.2-1c would lessen the impacts related to the loss of the Redwood Cabin, however, would not reduce the project's impact associated with an adverse change to the significance of a historical resource. This permanent loss in the resource would result in a cumulatively considerable contribution to a historic impact.

Conclusion

Therefore, although cumulative impacts to archaeological resources would be less than significant, cumulative impacts to cultural resources as a whole would be **significant and unavoidable**.

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4 ALTERNATIVES

4.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The range of alternatives studied in an EIR is governed by the "rule of reason," requiring evaluation of only those alternatives "necessary to permit a reasoned choice" (State CEQA Guidelines Section 15126.6[f]). Further, an agency "need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (State CEQA Guidelines Section 15126.6[f][3]). The analysis should focus on alternatives that are feasible (i.e., that may be accomplished in a successful manner within a reasonable period of time, taking economic, environmental, social, and technological factors into account). Alternatives that are remote or speculative or that do not feasibly meet most of the project objectives need not be discussed. Furthermore, the alternatives analyzed for a project should focus on reducing or avoiding significant environmental impacts associated with the project, as proposed.

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety;
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings;
- Reduce structure and wildland fire risk by removing a structure with a history of vandalism;
- Improve natural visual character and scenic open space qualities at the site; and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

4.2 SUMMARY OF ENVIRONMENTAL IMPACTS

The purpose of this section is to briefly summarize the significant impacts to the environment with implementation of the Redwood Cabin Removal Project, as identified in Chapter 2 of this document. Potentially significant impacts, which implementation of feasible mitigation measures would reduce to a less-than-significant level, were identified for biological resources (special-status species and associated habitats) and archaeological resources.

Significant impacts were identified for cultural resources for which further mitigation is not available and the impact remains significant and unavoidable. Specifically, the proposed project would result in demolition of a structure that has been recommended eligible for listing in the California Register of Historical Resources (CRHR). Although mitigation measures require documentation of the building before removal, because the building would be lost, the impact is considered significant and no additional feasible mitigation measures are available. This is also considered a significant contribution to a cumulative impact.

See Section 3.1, "Cultural Resources" and Section 3.2, "Biological Resources" of this Draft EIR for a more detailed summary of the impact conclusions and mitigation measures identified.

4.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision maker(s). (See Pub. Resources Code, § 21081(a)(3).) At the time of action on the project, the decision maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered but are not evaluated further in this Draft EIR.

4.3.1 Retain Site Elements Alternative

The Retain Site Elements Alternative would be similar to the proposed project in that it would remove the Redwood Cabin, but this alternative would retain other site elements outside of the immediate cabin footprint, such as the horseshoe pit, barbeque, and stone retaining walls. No long-term operations and maintenance would occur to manage the features left on site. This alternative was mentioned by a Midpen Board of Director's member during a June 2021 Board scoping meeting.

The horseshoe pit, barbeque, and stone retaining walls do not have historical significance on their own and, as described in Section 3.1, "Cultural Resources," are not recommended eligible for listing in the CRHR as landscape features. This alternative was eliminated from further consideration because it would not avoid project-related

significant and unavoidable impacts associated with removal of historic structures and would also not meet the project objectives. For these reasons discussed, the Retain Site Elements Alternative has been eliminated from further consideration in this Draft EIR.

4.3.2 Relocate and Stabilize Alternative

This alternative involves relocating the Redwood Cabin to a new location, either within La Honda Creek Open Space Preserve or to a site not owned by Midpen, if a feasible site were identified, as allowed by EPG CUL-3. Currently, there is no public access to or around the Redwood Cabin; the Relocate and Stabilize Alternative would select a location that would allow public viewing and historic interpretation of the cabin. In order to retain the structure's historic integrity and therefore its eligibility for listing in the CRHR, the site would have to be in a similar setting to the current location. Under the Relocate and Stabilize Alternative, the Redwood Cabin would be stabilized so that visitors could walk around the perimeter and view the structure up close; however, interior access would not be permitted.

This alternative was eliminated from further consideration because it fails to meet two project objectives. Objective 2, enhance habitat at the Redwood Cabin site and immediate surroundings, would not be met because preparing a new building site for the Redwood Cabin would expand the disturbed project footprint by impacting new areas of undisturbed, natural habitat. This could result in significant impacts to biological resources. Objective 6, implement a fiscally sustainable project, would not be met because relocating the cabin would significantly increase costs to disassemble, move and reconstruct the building, which would then require additional stabilization improvements to reduce public safety hazards at the relocation site. Thus, this alternative would not achieve a fiscally sustainable project. For these reasons discussed, the Relocate and Stabilize Alternative has been eliminated from further consideration in this Draft EIR.

4.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

California Code of Regulations Section 15126.6(e) (1) requires that the no project alternative be described and analyzed "to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss "the existing conditions at the time the notice of preparation is published…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (Section 15126.6[e][2]). "If the project is… a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (Section 15126[e][3][B].)

The following alternatives are evaluated in this Draft EIR.

- Alternative 1: No Project Alternative assumes no demolition of the existing structure. The project site would remain in its current condition.
- Alternative 2: Stabilize Alternative assumes no demolition of the existing structure but includes stabilizing the building and site.
- Alternative 3: Repair and Rehabilitate Alternative assumes the repair and rehabilitation of the building for eventual reuse as a retreat space, meeting space, or hikers hut (or similar use).

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed project, are provided below.

4.4.1 Alternative 1: No Project Alternative

Under Alternative 1, the No Project Alternative, no actions would be taken by Midpen and the project site would remain unchanged. The Redwood Cabin would remain vacant and in its current deteriorated condition. The No Project Alternative would not meet the project objectives. However, as required by CEQA, the No Alternative is evaluated in this Draft EIR. This alternative would not meet any of the objectives identified in Section 4.1.

Biological Resources. The No Project Alternative includes no demolition or excavation activities and no changes in the current activities at the project site. Therefore, no impact to biological resources would occur. However, this alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. No invasive plant treatment would occur as part of this alternative, nor would site enhancements, including soil decompaction and amendments, or revegetation. The proposed project includes environmental protection guidelines, best management practices, and requires mitigation measures to reduce construction-related impacts to special-status species and habitat. Because of this loss of opportunity to improve biological resources if the Redwood Cabin were retained, compared to the proposed project, the No Project Alternative would result in *Slightly Greater* impact to biological resources than the proposed project.

Cultural Resources. No sub-surface archaeological resources would have the potential to be affected by implementation of the No Project Alternative because it includes no excavation or other ground-disturbing activities. However, the proposed project includes EPGs to reduce construction-related impacts to archaeological resources. The existing historical resource on the site, the Redwood Cabin, would not be demolished. Although implementation of the No Project Alternative might appear to avoid the significant impact of the proposed project by avoiding demolition of a CRHR-eligible building, further deterioration under the No Project Alternative would likely ultimately result in an overall similar impact because over time, this deterioration and on-going vandalism would further compromise the already deteriorating nature of the building. It is likely that the cabin would become so greatly deteriorated, it would no longer be able to convey its historical significance and no longer be eligible for listing in the CRHR. Compared to the proposed project, the No Project Alternative would, in the long-term, result in *Slightly Less* impact to cultural resources than the proposed project and would not ultimately substantially reduce or avoid the significant impact since the structure would continue to fall in disrepair over time.

4.4.2 Alternative 2: Stabilize Alternative

The Stabilize Alternative would address structural deficiencies to retain and stabilize the structure over the long term. The goal of this alternative is to freeze or reduce building deterioration over time while preserving as many of the exterior character-defining features as possible. The stabilize alternative would require incurring short- and long-term costs to maintain the site.

The stabilization methods under the Stabilize Alternative target only the gravity related structural deficiencies and would not allow for re-occupancy of the building. The following methods would be implemented under this alternative:

- Mothball the structure per Secretary of the Interior's standards: board up and secure the structure's windows, doors, skylights, and openings/gaps; restrict access to the interior of the structure; provide passive ventilation to the interior; develop and implement a maintenance and monitoring plan. Mothballing also includes wildlife exclusion plans. The mothballing plan would also include hazardous material abatement to encapsulate or remove the existing lead paint in the structure.
- Exterior: remove collapsed and unsafe portions of the porch framing, and handrail – replace only what is necessary for ongoing maintenance of the structure; repair the roof for waterproofing; repair the chinking

between the exterior logs for waterproofing and treating for insects. Additional site security, including cyclone fencing and no trespassing signs would likely be needed.

- Site preparation: prepare the subfloor and surrounding area for foundation repairs, stabilize the underside of the structure with wood box cribbing, remove shrubs and weeds adjacent to the structure, remove five trees that are either dead, growing at a heavy lean towards the structure, or unhealthy.
- Wildlife management: pest control, preconstruction surveys for bats and woodrats prior to stabilization activities, removal of wildlife in the structure.
- Utilities: disconnect and remove power, electrical panel, and plumbing.

This alternative would achieve only one of the project objectives identified in Section 4.1. Because the Redwood Cabin would not be removed under the Stabilize Alternative, it would not enhance the habitat of the site and surroundings or improve natural visual character and scenic qualities to the degree of the proposed project. Although some habitat improvement activities would occur under this option, such as shrub, weed, and dead tree removal, they would be limited to areas outside the footprint of the building. Additionally, because the cabin would not be removed, continued vandalism and risk of fire, either to the structure itself or to both the structure and surrounding area, would remain. Stabilizing the Redwood Cabin would remove physical hazards for improved public safety.

Biological Resources. The Stabilize Alternative includes no demolition or excavation activities and no changes in the current activities at the project site. Bats and woodrats exclusion activities would occur prior to stabilization activities as part of the mothballing plan; however, long-term exclusion would require on-going inspection and maintenance and is unlikely to be effective, given the frequency the building has been vandalized. Invasive plant treatment would occur under this alternative, however, any additional site enhancements, including soil decompaction and amendments, or revegetation would only occur under Midpen's Invasive Pest Management Program or the Wildland Fire Resiliency Program. Therefore, this alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. This alternative would also include the environmental protection guidelines, best management practices, and similar mitigation measures to the proposed project to reduce construction-related impacts to special-status species, including bats and woodrats. Because of this loss of opportunity to improve biological resources if the Redwood Cabin were retained, compared to the proposed project, the Stabilize Alternative would result in *Slightly Greater* impact to biological resources than the proposed project.

Cultural Resources. No sub-surface archaeological resources are likely to be affected by implementation of the Stabilization Alternative because it includes only minor ground-disturbing activities in previously disturbed areas (i.e., foundation repair, utility removal). The alternative would include EPGs to reduce any potential impacts to archaeological resources. The existing historical resource on the site, the Redwood Cabin, would not be demolished thereby avoiding a significant and unavoidable impact. Stabilization of the Redwood Cabin would reduce building deterioration over time. Through up front and ongoing stabilization repairs and maintenance investments, the building would retain its historical significance and remain eligible for listing in the CRHR. Compared to the proposed project, the Stabilize Alternative would result in *Less* impact to cultural resources than the proposed project.

4.4.3 Alternative 3: Repair and Rehabilitate Alternative

Under Alternative 3, the Repair and Rehabilitate Alternative, the building would be rehabilitated for eventual reuse as a retreat space, meeting space, or hikers hut (or similar use). Under this alternative, the Redwood Cabin would remain off-limits to the public. The building would be rehabilitated following the recommendations of the Secretary of the Interior's Standards for the Treatment of Historic Properties. Rehabilitating the structure to allow for a retreat space, meeting space, or hikers hut, would likely require upgrades and alterations of several building and site elements. The Repair and Rehabilitate Alternative would require substantial investment and ongoing costs to improve and maintain the structure.

- Exterior: Fully reconstruct porch and railing; repair the roof for waterproofing; repair the chinking between the exterior logs for waterproofing and treat for insects; prepare hazardous material abatement plan to encapsulate or remove the existing lead paint in the structure.

- Foundation: remove and replace the lower three courses of horizontal logs on the exterior; lift the foundation back to its original level and pin the underside for stability; pour concrete footings for each post that extends into the ground.
- Wildlife management: pest control, preconstruction surveys for bats and woodrats prior to stabilization activities; remove wildlife in the structure; prepare a wildlife exclusion plan.
- Interior finishes: remodel bathroom and kitchen for reuse.
- Site utilities: install a new septic system; provide a safe drinking water source by verifying viability of existing water source for reuse or drilling for a new water source; replace interior plumbing and electrical.

This alternative would achieve only two of the project objectives identified in Section 4.1. Because the Redwood Cabin would not be removed under the Repair and Rehabilitate Alternative, it would not enhance the habitat of the site and surroundings or improve natural visual character and scenic qualities to the degree of the proposed project. Rehabilitating the Redwood Cabin would remove physical hazards to ensure public safety. Additionally, by eventually activating the project site, the potential for vandalism and associated fire risk would be reduced, but not eliminated since the building would remain vacant for extended periods of time between occupancy.

Biological Resources. The Repair and Rehabilitate Alternative includes construction and excavation activities related to the installation of new concrete footings, site utilities, and a new septic system which were not included in the proposed project. Invasive plant treatment would occur under this alternative, however, any additional site enhancements, including soil decompaction and amendments, or revegetation would only occur under Midpen's Invasive Pest Management Program or the Wildland Fire Resiliency Program. Therefore, this alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. This alternative would also include the environmental protection guidelines, best management practices, and similar mitigation measures to the proposed project to reduce construction-related impacts to special-status species and habitat. However, unlike the proposed project or other alternatives, this alternative includes an eventual operational component—opening the structure for limited gatherings—that could result in additional effects related to biological resources. Intensifying use in this area as a destination site that accommodates gatherings, especially with the use of an operational kitchen, would generate food waste, which could attract invasive wildlife species (especially birds and rodents), which could affect the ecology of the site and negatively impact future marbled murrelet nesting success. Compared to the proposed project, the Repair and Rehabilitate Alternative would result in *Greater* impacts to biological resources than the proposed project.

Cultural Resources. Because the Repair and Rehabilitate Alternative includes ground-related construction activities associated with the installation of concrete footings, site utilities and a septic system, potential impacts to sub-surface archaeological resources would be slightly greater than the proposed project. However, the alternative would include EPGs to reduce construction-related impacts to archaeological resources. The existing historical resource on the site, the Redwood Cabin, would not be demolished thereby avoiding a significant and unavoidable impact. Rehabilitation of the Redwood Cabin would be consistent with recommendations of the Secretary of the Interior's Standards for the Treatment of Historic Properties. The building would retain its historical significance and remain eligible for listing in the CRHR. Compared to the proposed project, the Repair and Rehabilitate Alternative would result in *Less* impact to cultural resources than the proposed project.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As illustrated in Table 4-1, below, the Stabilize Alternative would be the environmentally superior alternative. It would result in slightly greater impacts to biological resources but would avoid the proposed project's significant and unavoidable cultural resource impact. This significant and unavoidable impact would not be avoided under the No Project Alternative, and impacts to biological resources would be slightly greater under the No Project Alternative than under the proposed project because it would not provide the long-term opportunity to improve biological resources.

The Repair and Rehabilitate Alternative would also avoid the proposed project's significant and unavoidable cultural resource impact, however, impacts to biological resources would be greater under this alternative. As with the Stabilize Alternative, the Repair and Rehabilitate Alternative does not provide the long-term opportunity to improve biological resources that the proposed project does. Additionally, although the site is not currently open to the public, there would be a greater area of ground disturbance once the site is open to the public. The Master Plan identified this area for future public access opportunities, but the timeline for opening this area of La Honda Creek Open Space Preserve is many multiple years out given other public access priorities for the preserve.

Table 4-1 Summary of Environmental Effects of the Alternatives Relative to the Proposed Redwood Cabin Project

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Stabilize Alternative	Alternative 3: Repair and Rehabilitate Alternative
Biological Resources	LTSM	Slightly Greater	Slightly Greater	Greater
Cultural Resources	SU	Slightly Less	Less	Less

Notes: LTSM = Less Than Significant with Mitigation SU = Significant and Unavoidable

Source: Compiled by Ascent in 2021

Table 4-2 identifies which project objectives are met by the alternatives described above. As described in Section 4.4.2, the Stabilize Alternative meets only one of the objectives: removing physical hazards to ensure public safety. The remaining four objectives would not be met by this alternative. Therefore, while the Stabilize Alternative would be the environmentally superior action alternative, it would not meet the objectives of the project as presented above in Section 4.1.

Table 4-2 Objectives Achieved by Project Alternatives

Project Objective	Objective Met? Alternative 1: No Project Alternative	Objective Met? Alternative 2: Stabilize Alternative	Objective Met? Alternative 3: Repair and Rehabilitate Alternative
Remove physical hazards to ensure public safety	No	Yes	Yes
Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings	No	No	No
Reduce structure and wildland fire risk by removing a structure with a history of vandalism	No	No	Yes
Improve natural visual character and scenic open space qualities at the site	No	No	No
Implement a fiscally sustainable project consistent with Midpen's mission as an open space district	No	No	No

Source: Compiled by Ascent in 2021

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5 OTHER CEQA SECTIONS

5.1 GROWTH INDUCEMENT

California Environmental Quality Act (CEQA) Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an environmental impact report (EIR). Section 15126.2(d) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

5.1.1 Growth-Inducing Impacts of the Project

Project construction activities would involve construction crews of approximately eight people over a period of 10 weeks. It is anticipated that construction crews would be part of the existing workforce in the greater San Mateo County area and therefore would not result in the need to hire new construction employees within the region. Once project construction activities are complete, the project site would remain inaccessible to the public. Implementation of the Redwood Cabin Removal Project would not induce population growth because it would not introduce new land uses associated with population increases (e.g., housing, employment centers.) The project would not include land uses that would result in people relocating to the area and would not displace housing units or people. Additionally, project activities would not extend utilities to an area not currently served, and would, therefore, not contribute to future growth of the project area. As such, implementation of the project would not cause growth inducing impacts.

5.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3 (project level and cumulative impacts) of this Draft EIR, after implementation of the recommended mitigation measures, most of the impacts associated with the Redwood Cabin Removal Project would be reduced to a less-than-significant level. The following impact is considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

5.2.1 Cultural Resources

Impact 3.2-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Implementation of the project would involve removal of the Redwood Cabin which has been recommended eligible for listing in the California Register of Historical Resources. Thus, the project would adversely result in significant changes to a CEQA historical resource. Mitigation Measure 3.2-1 requires Midpen to complete documentation of the structure, which involves preparation of written history for the property, plans and drawings of the historical resource, and photographs. However, even after implementation of Mitigation Measure 3.2-1, the project would still result in a **significant and unavoidable** impact because the historical resource would no longer exist.

5.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, the State CEQA Guidelines section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generation to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The project would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation, including the following:

- water supply for project construction activities; and
- energy expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and transportation vehicles that would be needed for project construction activities.

These nonrenewable resources would represent only a very small portion of the resources available in the region and would not affect the availability of these resources for other needs within the region.

Construction activities would not result in inefficient use of energy or natural resources. Demolished materials would be salvaged, reused, and/or recycled as feasible. During removal of the Redwood Cabin, construction contractors would use best available engineering techniques, construction and design practices, and equipment operating procedures. Once construction activities are complete, the project site would be vacant, would not be accessible to the public, and would not result in any consumption of energy and natural resources above what is currently used for periodic monitoring, and fuel reduction activities.

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None

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Chapter 4 Alternatives

None

Chapter 5 Other CEQA Sections

None

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