

**SAN MATEO RESOURCE CONSERVATION DISTRICT
SERVICE AREA BOUNDARY EXPANSION PROJECT
CEQA EXEMPTION DISCUSSION**

Project Description

The current boundaries of the San Mateo Resource Conservation District (RCD or District) do not reasonably include all territory that benefits from and will benefit from RCD services, and splits some communities (e.g. Pacifica and Pescadero), into areas within and outside of District boundaries. The RCD intends to apply to the San Mateo Local Agency Formation Commission (LAFCo) to expand its service area boundary (by annexation) to the entire territory within its Sphere of Influence.

The current boundaries were most recently amended in 1946, are not contiguous, and do not reflect the district's services or community need for its services. The boundaries include 33,085 properties in western San Mateo County from the boundary with San Francisco to the boundary with Santa Cruz County, generally from Skyline Boulevard to the Pacific Ocean, and exclude most developed residential areas. The RCD's existing boundaries excludes a number of properties that are surrounded by RCD lands ("donut hole areas"), as well as some ridge areas along Skyline Boulevard.

LAFCo adopted an updated Sphere of Influence for the RCD on January 20, 2021 that more accurately represents where the district provides services and where those benefits accrue. The new Sphere of Influence includes areas currently excluded from district Service Area boundaries- portions of the City of Pacifica, portions of unincorporated Midcoast, portions of the City of Half Moon Bay, and portions of the unincorporated South Coast. The Midcoast is the area that includes El Granada, Miramar, Montara, Moss Beach, and Princeton communities. The South Coast is the area that includes Dearborn Park, La Honda, Loma Mar, Pescadero, Pescadero Creek County Park, Portola Redwoods State Park, and South Skyline. It also extends the district's eastern boundary to Highway 280, including currently excluded portions of the Towns of Woodside and Portola Valley.

These areas were included in the RCD's SOI because of their needs for District programs and services (e.g., risk of wildfire, risk of species extinction, risk of chronic water quality impairment); high priority opportunities for resource protection (e.g., potential for fuel load reduction, high value habitat for endangered species, potential to reduce pollution); and/or because the areas benefit from District activities (as described in the Municipal Service Review of the RCD adopted by LAFCo in July 2020).

The proposed Service Plan that accompanies the proposed expanded service area map is for a proposed boundary revision would include a substantial number of additional parcels within the district's revised Sphere of Influence, as indicated in *Appendix A: Current vs. Proposed Boundary*. The District boundaries would expand from the current approximately 160,000 acres to approximately 210,000 acres.

The proposed change to the district's boundaries would more accurately represent what the district is, where it provides services, whom it benefits, and where benefits accrue. It would help the district prioritize and include the additional areas for services, funding, and other resources, and better enable the district to address threats and provide services at an appropriate scale (e.g. climate change, wildfire, species extinction, stormwater pollution). It would facilitate the district in access funding sources.

The proposed service area expansion does not include any specific projects or project funding approvals. No improvement of structures, roads, sewer or water facilities, or other conditions are necessary to provide services. The district would not impose or require any improvements of conditions within the affected territory if the change of organization is completed. The district is non-regulatory and expansion would not result in any new restrictions, fees, or regulations on property owners. Therefore this service area expansion would, in itself, have no on-the-ground effects, nor would it induce any such effects.

The RCD conducts CEQA review for all discretionary actions that may have significant impact on the environment and would continue to do so in the proposed service area expansion. No projects are currently proposed in the area of service expansion. No Sphere of Influence changes are proposed as part of this service area expansion. The proposed service area expansion is subject to the review and approval of San Mateo LAFCo.

A Plan for Services has been prepared for the expansion. As noted in that Plan:

In San Mateo County, the RCD is a boots-on-the-ground agency using very diverse tools. The district's work takes many forms, including:

- *Technical assistance from experts on staff, partners, or consultants as needed. Examples: hydrologists, engineers, biologists, foresters, soil scientists.*
- *Project implementation on public and private lands. Examples: chipping and hauling services to help private landowners reduce risk of wildfire; modifying a County road to restore migration for endangered salmon; dredging a creek through State, County, and private properties to implement a wildlife-friendly flood control project; helping farmers upgrade water infrastructure to maximize conservation.*
- *A trusted broker coordinating conservation across jurisdictions and land ownerships, leveraging local, state, federal, and private funding. Example: securing State and federal grants to repair a failing access road on County Parks property, coordinating project design and permitting, managing construction contracts, and overseeing construction—all in partnership with Parks staff.*
- *Outreach and education in various formats on a wide range of issues of concern to the community. Examples: on-farm tailgate workshops in Spanish for farmworkers about irrigation water conservation; workshops for equipment operators to learn best practices to protect forests, including operators from County and State Parks as well as local private construction businesses; outreach to pet owners regarding water quality pollution from pet waste; workshops for equestrians about how to compost manure; and assisting the County with outreach regarding sea level rise.*

- *Financial assistance via grants, cost-share programs, and other resources for RCD staff, partner organizations, and contractors to directly benefit the community.*

Recent services of the RCD have addressed community needs and priorities regarding wildlife, water, climate, agriculture, and wildfire, as summarized below:

- Wildlife: restoring ecosystems and habitat with a focus on species at risk of becoming extinct.
- Water: improving water conservation, water resource management, and water quality to help ensure clean and reliable water for people, wildlife, and agriculture.
- Climate: removing greenhouse gases from the atmosphere, reducing emissions, and building critically needed resilience to extreme weather conditions for wildlife and the community.
- Agriculture: helping ensure viable local agriculture while also helping agriculture be environmentally beneficial.
- Wildfire: reducing the risk of catastrophic fire, improving forest health, and healing the land after fire does occur.

Categorical Exemption Analysis

The project would conform with the Class 20 and General Rule exemptions requirements, as discussed below.

Class 20 Exemption

Class 20 consists of changes in the organization or reorganization of local governmental agencies where the changes do not change the geographical area in which previously existing powers are exercised. Examples include but are not limited to:

- (a) Establishment of a subsidiary district;
- (b) Consolidation of two or more districts having identical powers;
- (c) Merger with a city of a district lying entirely within the boundaries of the city.

The proposed project does not change the geographic area covered by the District's existing sphere of influence (SOI) or area of authority as provided for in its enabling legislation, but rather expands the District's boundaries to be contiguous with that SOI. Therefore, this exemption applies to this project.

Analysis of Exceptions to Categorical Exemptions

Per CEQA Guidelines section 15300.2, exceptions to the Section 15301 categorical exemption can apply where the following occur:

- Cumulative impact of the same type in the same place, over time is significant.
- Significant effect due to unusual circumstances.
- Damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a state scenic highway.
- Hazardous Waste Sites included on any list compiled pursuant to Section 65962.5 of the Government Code.
- A substantial adverse change in the significance of a historical resource.

As discussed above, the proposed expansion does not include any specific approvals of any project that would have on-the-ground impacts. Therefore there is no possibility that any of these exceptions would apply to this project.

General Rule Exemption

Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to environmental review. In such cases, the activity is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. (See CEQA Guidelines Section 15061(b)(3)). CEQA Categorical Exemption exceptions do not apply to this exemption. As described above, the proposed service area expansion does not have the potential to result in a significant impact to the physical environment. Therefore, this exemption would apply.

Conclusions

As discussed above, the project is within the parameters of the Class 20 Exemption and none of the exceptions to that exemption would apply. In addition, as described above, there is no potential for any significant impacts, so the CEQA General Rule Exemption also would apply to the proposed project.

Resource Conservation District Current vs. Proposed Boundary

- Areas of Inclusion
- Current Boundary

0 2.5 5 10 Miles

