La Honda Creek Open Space Preserve

Final
White Barn Stabilization Project Addendum

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

August 13, 2021

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Contact:

Aaron Peth
Planner III
Phone: 650.691-1200
apeth@openspace.org

Prepared by:

Ascent Environmental, Inc.
455 Capitol Mall, Suite 205
Sacramento, CA 95814
www.ascentenvironmental.com

Contact:

Alta Cunningham
Project Manager
916.661.0029

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ACRONYMS AND ABBREVIATIONS

2012 IS/MND	La Honda Creek Open Space Preserve Master Plan Initial Study/Mitigated Negative Declaration
AB	Assembly Bill
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practices
Board	Midpen Board of Directors
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CAL FIRE/County Fire	CalFire and the San Mateo County Fire Department
California Register or CRHR	California Register of Historic Resources
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
DPR	California Department of Parks and Recreation
EIR	environmental impact report
EPG	environmental protection guidelines
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
IPMP	Integrated Pest Management Program
Master Plan	La Honda Creek Open Space Preserve Master Plan
Midpen	Midpeninsula Regional Open Space District
MLD	Most Likely Descendant
NAAQS	National Ambient Air Quality Standards
NABP	Native American Burial Plan
NAHC	Native American Heritage Commission
National Register or NRHP	National Register of Historic Places
PM	particulate matter
Preserve	La Honda Creek Open Space Preserve
project site	White Barn project site
TAC	Toxic air contaminant

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1 INTRODUCTION

1.1 BACKGROUND

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 White Barn project site (project site) is located within the upper La Honda Creek Open Space Preserve (Preserve) in San Mateo County, California. The approximately 160-year-old White Barn structure is currently vacant. The project would address structural deficiencies present at the White Barn and would retain and stabilize the structure, though no interior occupancy or public access would be permitted. The project would also include minor structural modifications to provide continued use of the White Barn as bat habitat while protecting the historic and structural character of the building. While the public will be restricted from entering the structure, the project will involve interpretive and educational components, including covering select windows with clear Lexan to allow viewing of the structure's interior. Once structure stabilization activities are completed, soil surfaces that have been disturbed would be seeded with site-appropriate native Santa Cruz Mountains plants.

1.2 PURPOSE OF THIS ADDENDUM

This addendum describes the project-specific details of the proposed improvements to the Preserve, identifies the project elements that have changed in the current proposal since adoption of the La Honda Creek Open Space Preserve Master Plan Initial Study/Mitigated Negative Declaration (2012 IS/MND), and compares the environmental impacts that would occur under the current proposal to those that were identified in the 2012 IS/MND prepared by Midpen.

Based on review of the project as now proposed and in accordance with Section 15164 of the State California Environmental Quality Act (CEQA) Guidelines, Midpen has prepared this addendum documenting how the project as currently proposed would not result in any new or substantially more severe environmental impacts compared to those evaluated in the 2012 IS/MND. No subsequent CEQA document is necessary for this project. No action proposed would require federal review or approval; therefore, no NEPA-related document is required.

1.3 CEQA GUIDELINES REGARDING AN ADDENDUM TO AN EIR OR NEGATIVE DECLARATION

Altered conditions, changes, or additions to a project that occur after certification of an environmental impact report (EIR) or negative declaration require additional analysis under CEQA only if they have the potential to result in new or more severe significant environmental impacts. The State CEQA Guidelines, Sections 15162 and 15164, are the legal principles informing decisions regarding whether additional environmental documentation is required. These guidelines establish three types of documentation to address such changes: a subsequent EIR, a supplement to an EIR, or an addendum to an EIR or negative declaration.

Section 15162 of the State CEQA Guidelines describes the conditions under which a subsequent EIR or negative declaration would be prepared. In summary, when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

  (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

  (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;

  (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or

  (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

(1) any of the conditions described above for Section 15162 would require the preparation of a subsequent EIR; and

(2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

According to Section 15164(b) of the State CEQA Guidelines, an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions to the previous analysis are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

The analysis herein is intended to determine if the project would result in the circumstances described in Section 15162 of the State CEQA Guidelines. As described in the following sections, none of the criteria for a subsequent or supplemental EIR are met; therefore, an addendum is the appropriate CEQA documentation to address the project.

This addendum evaluates each environmental topic covered in the 2012 IS/MND prepared by Midpen and also addresses the updated guidance for environmental analysis under CEQA recently adopted by the California Natural Resources Agency. As explained below, the evaluation considers, for each environmental topic, any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different (i.e., new or substantially more severe) environmental impact significance conclusion than identified in the 2012 IS/MND.

2 PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND

The White Barn (also known as the Dyer Barn) is a wood-frame structure that was part of cattle rangelands and a working farmstead from the 1860s until 1973. While its original construction date is unknown, aerial maps indicate that construction of the White Barn predates 1860 and it was partially rebuilt after 1900. In 1986, a 250-acre portion of the Dyer Ranch, including the White Barn, was acquired by Midpen as part of the eventual creation of the Preserve. The White Barn has been uninhabited and unused for approximately 35 years; the structure is in poor condition.

The La Honda Creek Open Space Preserve Master Plan (Master Plan) identified the White Barn as an important cultural asset and proposed to retain and maintain the White Barn in the short term and evaluate the potential and need for long-term preservation and maintenance based on professional assessments of its potential historical significance. The Master Plan included specific goals and objectives designed to preserve and reduce potential impacts to cultural resources within the Preserve. Specifically, Goal CR-1 ([p]rotect significant cultural, historical and archaeological resources) and Objective CR 1.3 call for the protection of key historically-significant structures such as the Red Barn, White Barn, and Redwood Cabin in the Preserve:

> Midpen would retain the Red Barn and hire a qualified architectural historian to determine eligibility for listing in the State and/or Federal Register. For the White Barn and Redwood Cabin, Midpen would also hire a qualified architectural historian to evaluate the historical significance of the White Barn and Redwood Cabin. Midpen would retain these structures pending the results of the architectural historian's evaluation. Unoccupied, dilapidated structures that are no longer in use by the tenant or necessary for ongoing agricultural operations, and that have been determined to be ineligible for listing on a local, State, or Federal historic register, may be demolished and removed from the Preserve.

The 2012 IS/MND and Master Plan identified key actions (1.3.d, 1.3.e, 1.3.f, and 1.3.g) and levels of priority for protection of the White Barn (Midpen 2012a). Since the adoption of the 2012 IS/MND, Midpen has undertaken the following tasks at the White Barn: 1) hired a qualified architectural historian to evaluate the structure's historical significance; 2) conducted structural assessments (Action 1.3.f); and 3) continued bat surveys.

In 2000, Midpen consultants conducted bat surveys to identify bat roosts and species composition at the White Barn. Acoustic surveys detected 8 species of bats in the immediate area, including three California state species of special concern: the Townsend's big-eared bat, the pallid bat, and the western red bat. In addition, surveys of the White Barn's interior determined that the structure was being used as day-roosting habitat for Townsend's big eared bat, as well as a colony of over 10 long-eared myotis that were likely using the structure as a maternity roost. In 2019, an additional survey found bat guano inside of the White Barn and identified three individuals of an unknown myotis species day-roosting in the rafters of the structure, verifying that the White Barn continues to function as bat roost habitat.

In February 2018, the White Barn was evaluated for its eligibility for inclusion in the National Register of Historic Places (National Register or NRHP) and the California Register of Historic Resources (California Register or CRHR). The evaluation determined that the White Barn appears eligible for inclusion in both the National and California registers. The White Barn appears individually eligible at the local level of significance for association with the early development of the ranching industry in the La Honda area (NRHP/CRHR Criterion A/1); for its vernacular architectural qualities (Criterion C/3); and for its notable example as a local variation of the Vernacular architectural style, use of local materials, and as an example of mortise-and-tenon joinery construction that may yield information important to history (Criterion D/4). For these reasons, the White Barn qualifies as a historical resource for the purposes of the CEQA, as defined at Public Resources Code section 21084.1. On April 22, 2020, the Midpen Board of Directors (Board) selected

a design alternative to stabilize the White Barn structure and proceed with environmental review. Subsequently, the Board received a memorandum on November 4, 2020 regarding the additional modifications to the White Barn for continued bat access and bat roosting structures inside the barn, signage and an inspection and maintenance plan for bat habitat (Midpen 2020).

2.2 PROJECT LOCATION AND SETTING

The White Barn project site is located within the 615-acre Dyer Ranch and Assessor Parcel Number 075-330-220 in the upper Preserve. The Preserve is a 6,142-acre property located in the northern Santa Cruz Mountains within unincorporated San Mateo County, fewer than 5 miles east of the Pacific Ocean. The Preserve is bounded by Skyline Boulevard/Highway 35 to the north and by La Honda Road/Highway 84 to the east and south, and by Bogess Creek to the west. The project site is approximately 1.4 miles south of the intersection of Bear Gulch Road and Skyline Boulevard. Skyline Boulevard is a paved two-lane roadway and Bear Gulch Road is a paved one-lane roadway surrounded by dense redwood forest (see Figure 2-1). The White Barn must be accessed from Midpen gate LH01, and parking is available in an adjacent small parking area. Although there is a service vehicle road connecting the parking area to the White Barn, visitors must walk approximately 0.3 mile to the White Barn (see Figure 2-2).

The project site is generally characterized by rolling grasslands and is bounded by woody areas and surrounding hillside. The White Barn stands at an elevation below the contemporary structures (i.e., garage and nearby residence) at the toe of a hill on a narrow flat section. The hillside continues to fall away from the barn's south face into a heavily wooded ravine. There is a garage adjacent to the White Barn (north of the staging area) that is not considered part of the project.

2.3 DESCRIPTION OF THE WHITE BARN

The White Barn measures approximately 26-feet by 40-feet and rests on a redwood beam foundation. It has a medium-pitched, front-gabled roof sheathed in corrugated metal roofing (see representative photographs in Figure 2-3). The walls are of 1-foot by 12-foot vertical redwood boards with 1-inch and 2-inch battens. The barn's superstructure is of hand-hewn redwood beams fastened by mortise-and-tenon joinery. The interior of the barn is open with hand-hewn redwood posts and centrally located feeding cribs and low partitions enclosing animal stalls or pens. It is divided into five slightly unequal bays from east-to-west. There are two 5-foot-wide doors at the corners of the east and west façades, and a 3-foot-wide door in the south façade. All doors are clad in board and batten. The east façade contains two roughly 4-foot by 4-foot four-light windows (LSA 2018).

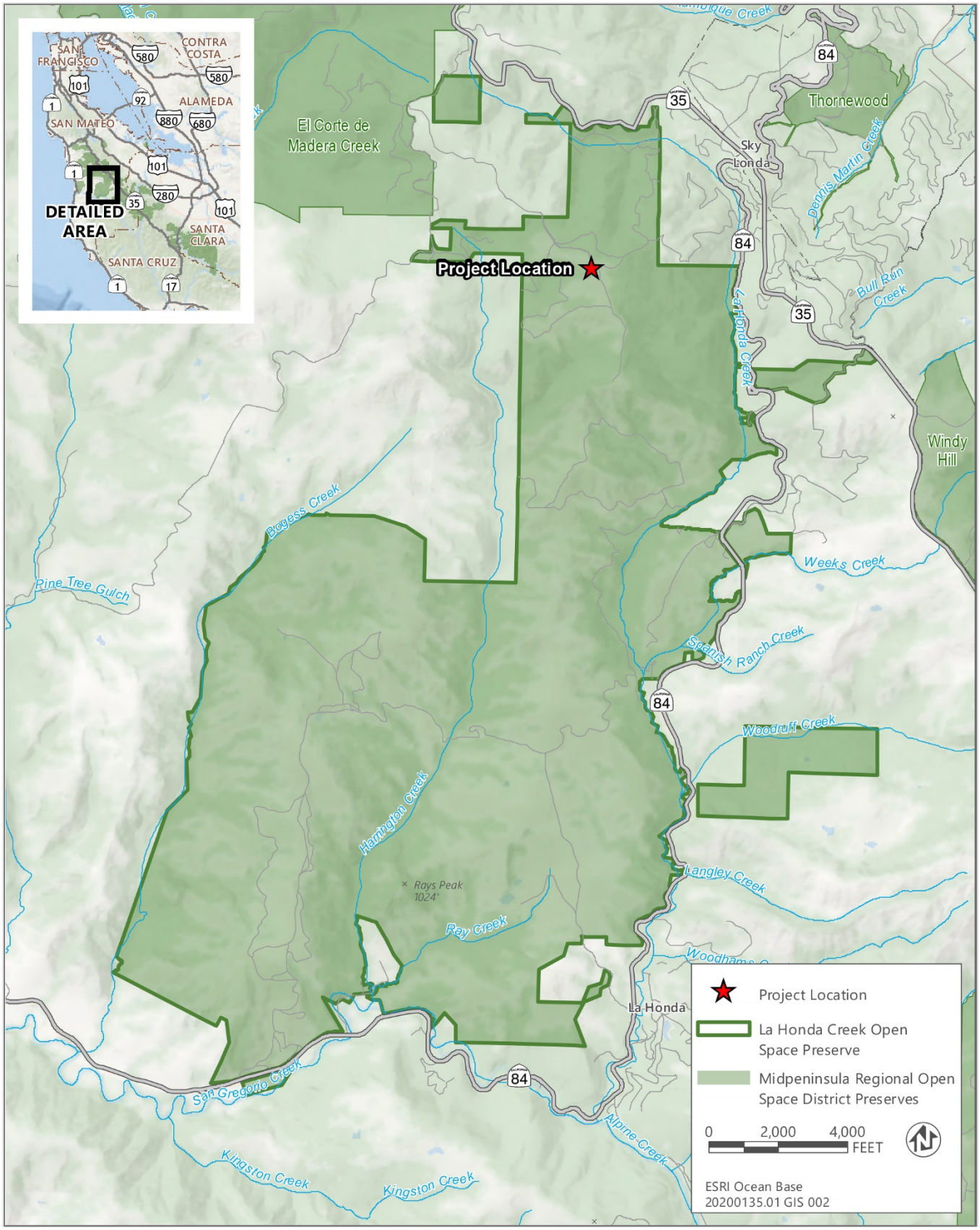
2.3.1 Current Condition of Barn Exterior

FOUNDATIONS

The foundation of this building is made of wood grade beams sitting on or partially buried in the ground, making it vulnerable to moisture from the ground, animals, and insects. Where the foundation beams are visible at the building perimeter, they are in very poor condition, spongy, and brittle to the touch.

WINDOWS

All exterior windows have been boarded up from the exterior and are now only visible from the interior. The sashes observed are in generally fair to poor condition, with no retention of the original glazing and slightly weathered and deteriorated framing. The windows to the east façade are single sash six-lite windows. There is also an open panel on the south façade covered by a sliding panel which slides on wooden tracks.



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 2020

Figure 2-2 Project Site

Source: Ascent Environmental in 2021

Photo 1: White Barn, western facade.

Source: Ascent Environmental in 2021

Photo 2: White Barn, eastern and southern facades.

Figure 2-3 Representative Photographs

DOORS

There are four doors to the White Barn, made of wood boards of similar characteristics to the boards used for the façades. The boards of the doors are nailed on the inside to a wood formed "Z" shape support on which the hinges are attached. Several of the boards are displaced in the vertical direction, giving an overall feeling of being out of square with the façade openings. In general, they are in fair to poor condition, showing heavy weathering and exposure to the elements, albeit still operable with some difficulty.

EXTERIOR WOOD CLADDING

The exterior board-and-batten siding is in fair to poor condition. Many of the battens have collapsed or are missing, leaving only remnants and traces to indicate their prior size and position. The missing battens leave the joints of the vertical boards open with varying gaps between them, which allows the intrusion of small animals, insects, water and humidity, and direct sun into the building, reducing its sheltering effect of the building interiors. The boards show a high degree of weathering from exposure to the elements, warping lengthwise in most cases. This widens the gaps separating them. Some boards have partially collapsed or are missing along the façades. The boards display a greater degree of deterioration due to moisture toward the bottom of the boards; in some cases, the bottom of the boards has rotted away completely and no longer covers the grade beams. Most boards display diverse degrees of weathering and biological growth, especially along the sides where battens are missing. Some of the boards bear evidence of termite and other insect attacks. Ultraviolet damage is greatest on the west and south façades of the White Barn and appear to be at least 1/8-inch deep in some areas.

CORRUGATED METAL ROOF

It is assumed that the existing galvanized, corrugated metal roof is a replacement for the original roofing; however, no remnants of earlier roofing are visible. The corrugated metal roofing exhibits some surface corrosion, but generally appears to be sound. Interior observations indicate that the panels may not be lapped properly within the rows of roofing, as the joints between them show diffused light coming through in bright conditions; presumably, water is also likely getting through.

2.3.2 Current Condition of Barn Interior

FLOORS

The wooden floorboards display signs of heavy use, discoloring, and partial loss of mass along the edges next to the façade cladding. Some areas have been affected by termites and other insect attacks and have biological growth, especially next to the cladding openings where boards are missing. Additionally, there is the presence of bat guano and rodent droppings on the floor. Several floorboards are loose, and do not appear to be attached to the framing below, which creates a condition for unstable footing when walking inside the building.

INTERIOR WOOD FEEDING CRIB, PEN, AND PARTITIONS

Interior partitions are formed by wooden boards nailed to the main structure supports and some secondary posts mounted directly over the floorboards. They are in generally fair condition for structures that were utilitarian in their original construction. In some areas the boards have split or become displaced, but otherwise the material is generally sound. Several pieces have biological growth where exposed to the elements, and some show signs of insect damage.

ROOF FRAMING

The roof framing appears to represent a few different eras of construction. The ridge beam is supported by tall, hand-hewn redwood posts that and appear to be original, and are mortise-and-tenon jointed to the beam. The ridge beam, rafters, and purlins all appear to be machine-milled, and may be a later replacement for the original roof framing. The roof framing appears to be in generally good condition, except for the exposed rafter tails, which are in generally fair condition. Greater exposure to the elements has caused the rafter tails to be more weathered than the protected, interior sections of framing, and in several cases the wood is splitting. The side closest to the corrugated metal displays some discoloration due to the heat originated by the metal and from humidity and rot possibly from filtering water or from condensation effects in the cooler hours of the day.

POST AND BEAM FRAMING

The main supporting structure is made of hand-hewn single pieces of redwood. Joints between the main framing elements are formed by the mortise-and-tenon system, not requiring nails or other auxiliary elements to secure the joints. All the main frame elements are in good conditions, showing only minor signs of decoloring and humidity near the base of the posts where they are in direct contact with the foundations. These signs also show on beams in the locations next to the façade cladding where either or both boards and battens are missing.

2.4 NEED FOR THE PROPOSED PROJECT

The building's current condition presents potential safety concerns, including the risk of collapse, that prevents perimeter and exterior viewing by the public. The proposed project will stabilize the foundation, and extend the building's overall lifespan, allowing for safe and limited exterior interpretive use of the structure by members of the public.

An asbestos and lead survey performed on the White Barn identified no asbestos containing materials; lead-based paint was confirmed in the barn and is the only hazardous material identified. Disturbance of lead-containing paints and materials must be conducted in accordance with the requirements of Cal/OSHA (8CCR1532.1) and with the EPA Renovation, Repair and Painting Rule. If loose and/or peeling paint is disturbed, it is required to be mitigated (Terracon 2019).

Interior surveys of the White Barn determined that the structure is used as day-roosting habitat for Townsend's big eared bat, and a colony of over 10 long-eared myotis that are likely using the structure as a maternity roost. Midpen determined the barn itself provides optimal bat roosting habitat and that function should be retained. In particular, the White Barn provides maternity roosting habitat for bats that cannot be effectively replaced in-kind without building a structure with similar characteristics to the existing barn.

2.5 PROJECT OBJECTIVES

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

- Ensure long-term preservation and stability of the White Barn to support future interpretive opportunities and ensure public and staff safety;
- Minimize, to the extent feasible, impacts to historic and biological resources;
- Protect the surrounding environment by removing loose hazardous materials on the site that could be carried off site by wind or surface water runoff;
- Allow for continued use of the White Barn as a maternity bat roost;

- Protect wildlife by removing loose hazardous materials on the site that could be internalized by local wildlife species and subsequent predators;
- Improve ecological qualities at the White Barn site and immediate surroundings; and
- Enhance natural visual character and scenic qualities;
- Provide focused interpretive and educational opportunities associated with the White Barn, consistent with open space values; and
- Implement a fiscally sustainable project.

2.6 DESCRIPTION OF THE PROJECT

The project primarily consists of improvements to and stabilization of the White Barn structure, with some interior and exterior modifications to support existing bat roosting colonies. Specifically, the project would include foundation shoring, addressing deferred maintenance surrounding the structure, and replacing decayed materials to stabilize and secure the structure, while allowing continued use of the White Barn as a maternity bat roost through installation of bat boxes and openings for bat entry. Site enhancements would include removal of the adjacent concrete foundation pad, abatement of invasive species prior to construction, clearing and maintaining vegetation along the perimeter for exterior viewing by the public, post-construction seeding of project-disturbed soils with a site-appropriate Santa Cruz Mountains native seed mix, and installation of Lexan window covering(s) for public viewing of the interior of the structure, as well as other potential focused interpretive improvements, such as information signs. Additionally, as described below in Section 2.10.1, the environmental protection guidelines (EPGs) identified in the Master Plan have been updated to reflect changes in Midpen's operational procedures.

2.6.1 White Barn Stabilization

In order to ensure long-term preservation and stability of the White Barn, support future interpretive opportunities, and ensure safety for the public and Midpen staff, improvements to the structure would occur. Structure improvements would involve internal and external repairs, removal of any loose or peeling lead-based paint along the exterior of the barn and repainting the structure's exterior redwood cladding. Project elements and details related to internal and external repairs are further described below.

WINDOWS

Fenestrations (i.e., arrangement of windows) currently boarded up from along the exterior of the White Barn would remain; select non-south facing openings along the structure sidings would be covered with clear Lexan to allow for viewing of the historic interior.

DOORS

Any deteriorated doors on the exterior and interior of the White Barn would be repaired. If deteriorated doors are beyond repair or missing, they would be replaced in-kind to match the existing elements of the structure.

FOUNDATION AND ROOF

Pressure treated blocking/shims would be installed at locations of weakened wood-grade beams to prevent further settlement of the structure and deterioration of the foundation. Additionally, wood-cross bracing would be installed at the interior of exterior walls.

2.6.2 Bat Access

Previous surveys of the White Barn have indicated the presence of bats within the structure. A maternity roost of regionally uncommon long-eared myotis was documented in 2000 as well as the presence of solitary Townsend's big-eared bat, a state species of special concern. To allow for the continued use of the White Barn as a maternity bat roost, to minimize negative impacts to the structure, and to facilitate a regular maintenance program, bat inclusion measures are proposed for the White Barn. These include introduction of new access points/openings along the structure's exterior to allow bat entry and exit. New access points would be located along the White Barn's existing siding, under the gable ends to provide protection from weather and reduce the need for additional framing. Selective removal of the historic wood siding would be required to provide the new opening.

Additionally, wall-mounted interior bat boxes would be constructed to help control bat roosting locations and allow for easier maintenance of the White Barn. The boxes are proposed to be mounted at the top of the east and west barn walls as close to the roof as possible using stainless steel straps around the historic framing so that the installation is reversible. The use of interior bat boxes to help control roosting locations would also help to protect historic materials from damage by enabling the use of raised platforms to catch bat excrement. Platforms would be constructed from wood, would stand four to six inches off the historic floor, and would be treated with a waterproof coating on the top layer to prevent bat excrement from leeching through new wood platforms to the historic wood floor below.

To limit light intrusion into the structure, which can reduce habitat suitability for certain bat species, the number of public viewing windows into the interior of the White Barn will be limited and will be restricted to non-south facing windows to limit direct sunlight from entering the structure.

Prior to the introduction of new access points along the exterior of the White Barn, a Bat Roost Deterrent and Exclusion Plan would be developed to deter bats from entering the structure while it is being stabilized and replacement bat maternity roost habitat is created. The plan would include avoidance measures for bats (Swaim 2019; described below in Section 2.12) as well as San Francisco dusky-footed woodrat and would require approval by the California Department of Fish and Wildlife. San Francisco dusky-footed woodrat avoidance measures would be similar to those previously approved by the California Department of Fish and Wildlife (CDFW) (Midpen 2018a), such as allowance for woodrats to leave the area on their own and construction of woody debris piles for use as shelter by displaced woodrats. See Appendix A for bat and woodrat avoidance measures.

Midpen anticipates annual inspections of the White Barn's interior to determine the necessity for cleaning and maintenance. Maintenance would include removal of accumulated guano and urine deposits on movable platforms that would be installed under the bat boxes, as well as in other areas where bats may continue to roost inside the building. Removal of guano and urine deposits would be conducted by qualified professionals with appropriate personal protective equipment. Maintenance activities would be avoided during maternity roosting season and winter torpor season.

2.6.3 Removal of Concrete Foundation Pad

Project improvement activities would involve removal of the concrete pad, located south of the White Barn. The approximate 160-square-foot concrete pad would be demolished and hauled off to the appropriate waste facility. Following removal of the concrete foundation pad, the disturbed area would be seeded using a Santa Cruz Mountains native seed mix.

2.6.4 Preparation of a Maintenance Plan

Midpen proposes to prepare a Maintenance Plan for the continued protection of the White Barn. The Maintenance Plan will be based on the National Park Service's Preservation Brief series, including Brief No. 31: *Mothballing Historic Buildings*, and Brief No. 20: *The Preservation of Historic Barns* and will be prepared by a qualified professional that meets the *Secretary of the Interior's Professional Qualifications Standards* (qualified professional) for architectural history.

The Maintenance Plan will discuss the benefits of monitoring and seasonal maintenance work; outline timing for regular inspections; and provide guidance on routine procedures for maintaining the White Barn, including removal of bat guano and vegetation management. The Maintenance Plan will also provide specific treatment recommendations for significant features and materials, as well as health and safety recommendations for the removal of bat waste that may require contracting with outside consultants experienced with biohazard cleanup. Additionally, the Maintenance Plan will include a procedure for emergency repairs and a checklist template for keeping a written record of completed work.

2.7 CONSTRUCTION ACCESS, EQUIPMENT, STAGING, AND LOGISTICS

Project construction activities are estimated to begin in Fall 2022 over a duration of 12 weeks, expected between September and December. The project would be implemented by crews consisting of six to ten personnel. Construction activities would typically occur between 7:00 a.m. and 3:30 p.m. Monday through Friday; 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. Because of limited access in the project area, it is not anticipated that work in separate areas of the project area would occur concurrently.

Equipment and vehicles would access the project area via Allen Road from Bear Gulch off Highway 35. The anticipated list of equipment by project activity and associated duration to complete is provided in below:

- mini excavator,
- aerial work platform(s),
- skidsteer,
- water truck,
- forklift, and
- haul truck(s).

Construction equipment, materials, and vehicle staging would occur within a flat, sparsely vegetated area adjacent to the White Barn. The construction staging area is identified in Figure 2-2.

The total acreage that would be disturbed by the project is limited to the structure stabilization area, staging area, and removal of the concrete foundation pad (approximately 0.5 acres). Any waste generated by project construction activities would be disposed of offsite. 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

2.8 SITE ENHANCEMENT AND MAINTENANCE

Following completion of activities, equipment would be removed from the project area and native grasses and forbs (if appropriate) would be seeded to improve the ecological qualities of the disturbed areas of the project site and assist with stabilization and erosion control. Midpen also conducts early detection rapid response surveys for up to 3 years on site and treats any invasive species on the early detection rapid response list. Other priority integrated pest management target species maybe treated prior to and after construction. Vegetation management activities related to invasive species would be consistent with, and are covered by, Midpen's existing Integrated Pest Management Program (IPMP) and associated EIR and Addendum, which were certified in 2014 and 2019, respectively.

Post-project operations and maintenance would include occasional and minor repairs to the White Barn (i.e., siding, boards, or roof) and clean up within the structure to remove any accumulated bat guano. As plexiglass window fixtures along the building exterior and interpretive signs age or fade, infrequent replacement of these features would occur as well. The continued clearing of vegetation for fire safety and reduction of fire fuels would occur in areas surrounding the structure within the project site. Vegetation management activities related to fire clearance would be consistent with, and are covered by, Midpen's existing Wildland Fire Resiliency Program and associated EIR, which were certified in 2021.

2.9 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
Bat Roost Deterrent and Woodrat Avoidance Plan Approval	CDFW	Deter bats from entering the structure while creation of replacement bat maternity roost habitat occurs.
Building	County of San Mateo	San Mateo County Planning and Building Department inspection of repairs to structure.

Notes: CDFW = California Department of Fish and Wildlife; NPDES= National Pollutant Discharge Elimination System; SWPPP = Stormwater Pollution Prevention Plan; SWRCB = State Water Resources Control Board.

2.10 ENVIRONMENTAL PROTECTION GUIDELINES

The EPGs listed below are identified in Midpen's La Honda Creek Open Space Preserve Master Plan and the 2012 IS/MND (Midpen 2012a; 2012b), many of which were based on the San Mateo Coastal Annexation EIR. These EPGs would be incorporated into the design of the project. The EPGs are intended to avoid and minimize environmental impacts and comply with applicable laws and regulations. For the purposes of these guidelines, reference to "Midpen" also encompasses any contractors hired to implement the treatments.

2.10.1 La Honda Creek Open Space Preserve Master Plan

The EPGs below have minor text modifications (shown in strike-through and underline) to reflect changes in Midpen's guidelines, such as adoption of the IPMP, since the time since the 2012 IS/MND and Master Plan were approved. These minor changes do not affect the effectiveness of the measures, but instead provide clarity and specificity.

AIR QUALITY

EPG AQ-1: As required by Mitigation: AIR-1 of the San Mateo Coastal Annexation EIR, Midpen shall insure that the following measures are included in all future 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~~;
- Cover all trucks hauling soil, sand and other loose materials and/or require all trucks to maintain at least two feet of freeboard;
- Pave or~~,~~ 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;
- Sweep daily (preferably with water sweepers) all paved access roads, parking areas and staging areas at construction sites;
- 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.

BIOLOGICAL RESOURCES

EPG BIO-2: As required by Mitigation BIO-1b of the San Mateo Coastal Annexation EIR, Midpen shall protect sensitive habitat areas and other areas where special-status species may be adversely affected when planning trails and other facilities. To the maximum extent feasible, trail alignments and other improvements

shall avoid impacts to sensitive habitats, including habitats for special-status plants and animals and sensitive natural communities. All improvements shall be evaluated on a case-by-case basis by a qualified biologist to identify impact avoidance measures or mitigation measures for biotic impacts. Consideration shall be given to:

- Relocating trails or other improvements
- Periodic closures
- Revegetation prescriptions
- Buffer plantings
- Discrete barrier fencing that accommodates wildlife passage
- Other appropriate measures

Removal of native vegetation shall be avoided as much as possible. The appropriate resource agencies shall be contacted regarding any trail alignments or other improvements that may impact sensitive habitats, special-status species, or their habitat. Plant replacement shall be native to the area and suitable for the site conditions.

EPG BIO-10: As required by Mitigation BIO-1j of the San Mateo Coastal Annexation EIR, revegetation and/or enhancement shall be undertaken where any sensitive habitat or special-status species habitat will be disturbed or destroyed by facility construction. Revegetation work shall be implemented prior to or concurrently with the development. The design of an appropriate revegetation program shall 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. The revegetation program shall 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.

CULTURAL RESOURCES

EPG CUL-1: As required by Mitigation CUL-2 of the San Mateo Coastal Annexation EIR, 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: As required by Mitigation CUL-3 of the San Mateo Coastal Annexation EIR, 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 <u>designee</u> ~~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: As required by Mitigation CUL-1a of the San Mateo Coastal Annexation EIR 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.
5. The following measure applies only to the Central and Northern La Honda Creek Areas: 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.

EPG CUL-4: As required by Mitigation CUL-1b of the San Mateo Coastal Annexation EIR Mitigation, short-term construction activities may impact nearby historic properties. These impacts may include dust accumulation on building facades, and increased noise and vibration from construction equipment. Construction period impacts could be mitigated to a less-than-significant level by implementing the following mitigation measures:

1. Project specifications should require the contractor(s) and any subcontractors to conform to the County's noise control requirements.
2. Project specifications should shall require the general contractor and any subcontractors to control dust and exhaust emissions of particulate through water sprinkling during demolition and excavation activities; covering of stockpiles of soil, sand and other such materials; covering trucks hauling debris, soil, sand and other such materials; street sweeping of the streets surrounding excavation and construction sites; equipment maintenance to reduce emissions; and, prohibitions on idling engines when not in use.
3. Cleaning of the adjacent historic buildings may be necessary after construction activities to prevent long-term damage to the building fabric. The need for cleaning shall be determined by a qualified Historic Architect, shall follow the standards set by the Secretary of the Interior, and shall be completed in consultation with the Historic Architect.

4. A structural engineer should inspect the buildings prior to construction to determine if the noise and vibration anticipated during construction will affect the buildings framework and fabric. The report, with any recommendations and mitigation measures, should be reviewed by a qualified Historic Architect.

HAZARDS AND HAZARDOUS MATERIALS

EPG HAZ-6: As required by Mitigation HAZ-2f of the San Mateo Coastal Annexation EIR, Midpen shall develop and maintain staging areas and trail heads to incorporate:

- Fenced parking areas paved with gravel or asphalt in a narrow configuration to discourage irresponsible vehicle use.
- Entrance and road shoulders designed to discourage parking during closure and to facilitate emergency access.
- Gates that are at least 12 feet wide constructed of heavy materials with a protected locking system for Midpen and fire access.
- 10-foot radiuses paved with gravel around trailheads.
- Signage that describes prohibited uses and warns against fire hazards.
- Low ignition fuels~~, such as grasses,~~ will be planted adjacent to trail heads and staging areas in compliance with the Wildland Fire Resiliency Program~~, and will be mowed annually as soon as 30 per cent of the light ground fuel is cured~~.
- Close trail access points on all predicted high fire response level days (Burn Index of 41, or higher) and post such closures on the Midpen website.
- Periodic patrols by Midpen staff.

EPG HAZ-8: As required by Mitigation HAZ-3b of the San Mateo Coastal Annexation EIR, Midpen preserve maps for the public shall be kept up-to-date to the extent feasible. Trail maps shall also provide trail use rules, emergency information, trail accessibility, other pertinent safety information and shall be available at all staging areas.

Additional Required Best Management Practices to Reduce Hazards Due to Chemical and Materials Pollution:

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.
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.

HYDROLOGY AND WATER QUALITY

EPG WQ-2: As required by Mitigation HYD-1b of the San Mateo Coastal Annexation EIR, 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.
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.

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.
6. Construct rolling dips in areas where trail gradients exceed five percent to reduce runoff concentration; outslope trail surfaces where feasible.
7. Implement road and trail seasonal closures to vehicles and our recreation use, where and when appropriate.

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.

2.11 INTEGRATED PEST MANAGEMENT PROGRAM BMPS

In addition, the BMPs listed below are identified in Midpen's 2014 IPMP and subsequent 2019 IPMP addendum and 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 16: Invasive plant material shall be rendered nonviable when being retained onsite. Staff shall desiccate or decompose plant material until it is nonviable (partially decomposed, very slimy, or brittle). Depending on the type of plant, disposed plant material can be left out in the open as long as roots are not in contact with moist soil, or can be covered with a tarp to prevent material from blowing or washing away.

IPMP BMP 18: When transporting invasive plant material off-site for disposal, the plant material shall be contained in enclosed bins, heavy-duty bags, or a securely covered truck bed. All vehicles used to transport invasive plant material shall be cleaned after each use.

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.

IPMP BMP 22: Nesting Birds - For all IPM activities that could result in potential noise and other land disturbances that could affect nesting birds (e.g., tree removal, mowing during nesting season, mastication, brush removal on rangelands), treatment sites shall be surveyed within two weeks prior to initiating activity to evaluate the potential for nesting birds. Tree removal will be limited, whenever feasible, based on the presence or absence of nesting birds. For all other treatments, if birds exhibiting nesting behavior are found within the treatment sites during the bird nesting season: March 15 August 30 for smaller bird species such as passerines and February 15 - August 30 for raptors, impacts on nesting birds will be avoided by the establishment of appropriate buffers around active nests. The distance of the protective buffers surrounding each active nest site are: 1,000 feet for large raptors such as buteos, 500 feet for small raptors such as accipiters, and 250 feet for passerines. The size of the buffer may be adjusted by a Midpen biologist in consultation with CDFW and USFWS depending on site specific conditions. Monitoring of the nest by a Midpen biologist during and after treatment activities will be required if the activity has potential to adversely affect the nest. These areas can be subsequently treated after a Midpen biologist or designated biological monitor confirms that the young have fully fledged, are no longer being fed by the parents and have left the nest site. For IPM activities that clearly would not have adverse impacts to nesting birds (e.g., treatments in buildings and spot spraying with herbicides), no survey for nesting birds would be required.

IPMP BMP 23: San Francisco dusky-footed woodrat and Santa Cruz kangaroo rat - All Midpen staff, volunteers or contractors who will implement treatment actions shall receive training from a qualified biologist on the identification of dusky-footed woodrat, Santa Cruz kangaroo rat, and their nests or burrows.

Generally, all San Francisco dusky-footed woodrat and their nests, and Santa Cruz kangaroo rat and their burrows will be avoided and left undisturbed by proposed work activities. If a nest site or burrow will be affected, Midpen will consult with CDFW. Rodenticides, snap traps, and glue boards shall not be used in buildings within 100 feet of active San Francisco dusky-footed woodrat nests or Santa Cruz kangaroo rat burrows; instead rodent control in these areas will be limited to non-lethal exclusion and relocation activities including relocation of nests if approved by CDFW. Tenants will contact Midpen for assistance in managing rat populations in buildings and under no circumstances will be allowed to use rodenticides.

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3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW

3.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

The purpose of this checklist is to evaluate the categories in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in environmental impact significance conclusions different from those found in the 2012 IS/MND. The row titles of the checklist include the full range of environmental topics, as presented in Appendix G of the State CEQA Guidelines, as updated December 28, 2018. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but rather that there is no change in the condition or status of the impact because it was previously analyzed and adequately addressed with mitigation measures in the 2012 IS/MND. For instance, the environmental categories might be answered with a "no" in the checklist because the impacts associated with the proposed project were adequately addressed in the 2012 IS/MND, and the environmental impact significance conclusions of the EIR remain applicable. The purpose of each column of the checklist is described below.

3.1.1 Where Impact was Analyzed

This column provides a cross-reference to the pages of the IS/MND where information and analysis may be found relative to the environmental issue listed under each topic. Unless otherwise specified, all references point to the 2012 IS/MND document.

3.1.2 Any New Circumstances Involving New or Substantially More Severe Significant Impacts?

Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) that have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or having substantial increases in the severity of previously identified significant impacts.

3.1.3 Any New Information Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior

environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, the question would be answered 'Yes' requiring the preparation of a subsequent EIR or supplement to the EIR. However, if the additional analysis completed as part of this Environmental Checklist Review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered 'No' and no additional EIR documentation (supplement to the EIR or subsequent EIR) would be required.

Notably, where the only basis for preparing a subsequent EIR or a supplement to an EIR is a new significant impact or a substantial increase in the severity of a previously identified impact, the need for the new EIR can be avoided if the project applicant agrees to one or more mitigation measure(s) that can reduce the significant effect(s) at issue to less than significant levels. (See *River Valley Preservation Project v. Metropolitan Transit Development Board* (1995) 37 Cal.App.4th 154, 168.)

3.1.4 Do Prior Environmental Documents and Mitigation Address/Resolve Impacts?

This column indicates whether the prior environmental documents and adopted CEQA Findings provide mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. A "yes" response will be provided in either instance. If "NA" is indicated, this Environmental Checklist Review concludes that there was no impact, or the impact was less-than-significant and, therefore, no mitigation measures are needed.

3.2 DISCUSSION AND MITIGATION SECTIONS

3.2.1 Discussion

A discussion of the elements of the checklist is provided under each environmental category to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

3.2.2 Mitigation Measures

Applicable mitigation measures from the prior environmental review that would apply to the proposed amendment are listed under each environmental category. New mitigation measures are included, if needed.

4 ENVIRONMENTAL CHECKLIST

The purpose of this discussion below is to evaluate the environmental issue areas in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) resulting from the proposed project modifications that may result in a different environmental impact significance conclusion from the approved IS/MND. These resource issue areas are addressed below.

4.1 AESTHETICS

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
1.	**Aesthetics. Would the Project:**				
a.	Have a substantial adverse effect on a scenic vista?	Setting pp. 3-4 to 3-6; Discussion (a)	No	No	NA
b.	Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	Setting pp. 3-4 to 3-6; Discussion (b)	No	No	NA
c.	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Setting pp. 3-4 to 3-6; Discussion (c)	No	No	NA
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Setting pp. 3-4 to 3-6; Discussion (d)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project on aesthetics and visual resources and concluded that impacts would be less than significant. Structure improvements for the White Barn would include repairs and installation of Lexan window covering(s) along the building exterior. No portions of the structure would be removed or demolished, and no new sources of light would be introduced. As described in Chapter 2, "Project Description," construction equipment, materials, and vehicle staging would be temporary, and once completed, disturbed areas of the project site would be restored and, if necessary, enhanced with native gasses and forbs. The project would not affect any scenic vistas, damage scenic resources, degrade the existing visual character, or create new sources of light and/or glare. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
2.	**Agriculture and Forestry Resources. Would the project:**				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Setting p. 3-11; Discussion (a)	No	No	NA
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Setting p. 3-11; Discussion (b)	No	No	NA
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Setting p. 3-11; Discussion (c)	No	No	NA
d.	Result in the loss of forest land or conversion of forest land to non-forest land?	Setting p. 3-11; Discussion (d)	No	No	NA
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	Setting p. 3-11; Discussion (e)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to agricultural and forestry resources and determined that impacts would be less than significant. As discussed in Section 3.2 of the 2012 IS/MND, no areas in the Preserve are mapped as Farmland of Statewide or Local Importance, Unique Farmland, or Prime Farmland by the Farmland Mapping and Monitoring Program (FMMP). Land within the Preserve is designated as "Grazing Land" or "Other Land." As described on page 3-12 of the 2012 IS/MND, the San Mateo Coastal Annexation EIR included a measure to amend the Coastal Service Plan's definition of "prime agricultural land" to include "land which supports livestock for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the U.S. Department of Agriculture." Grazing land within the preserve was determined to have an annual carrying capacity of less than one animal unit per acre and therefore does not meet this criterion. Lands under Williamson Act contracts are located within the central and southern portions of the Preserve. No timberland is located in the project site and no forestland would be converted.

Implementation of the project includes stabilization of the White Barn structure as well as removal of a concrete foundation pad. Once operational, the project site would be restored to pre-project conditions and, if appropriate, native grasses and forbs would be seeded to improve any disturbed areas of the project site The project would not include conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, would not conflict with an existing zoning or Williamson Act contracts, would not result in the loss or conversion of forest land, and would not result in conversion of lands to non-agricultural or non-forest uses. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND and no further analyses is required.

4.3 AIR QUALITY

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
3.	**Air Quality. Would the project:**				
a.	Conflict with or obstruct implementation of the applicable air quality plan?	Setting pp. 3-16 to 3-17; Discussion (a)	No	No	NA
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Setting pp. 3-16 to 3-17; Discussion (c)	No	No	Yes
c.	Expose sensitive receptors to substantial pollutant concentrations?	Setting pp. 3-16 to 3-17; Discussion (d)	No	No	Yes
d.	Result in other emissions (e.g. those leading to odors) adversely affecting a substantial number of people?	Setting pp. 3-4 to 3-6; Discussion (e)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the Master Plan on potential air quality impacts. The 2012 IS/MND concluded that impacts related to conflicts with air quality plans and odors would be less than significant and that impacts related to considerable net increase of any criteria pollutants and exposure of sensitive receptors to substantial pollutant concentrations would be less than significant with implementation of Mitigation Measure 3.3-1, BAAQMD's Basic Construction Dust Mitigation. Implementation of Mitigation Measure 3.3-1 would substantially reduce fugitive dust emissions during construction.

The project modifications would result in construction activities associated with building stabilization, site enhancements, and removal of the concrete foundation pad. Emissions of criteria air pollutants and precursors would result from the use of construction equipment (i.e., mini excavator, aerial work platform, skidsteer, water truck, and forklift), haul truck trips, and vehicle trips from six to ten construction workers over a 12-week construction period. Toxic air contaminant (TAC) emissions would be generated from the use of construction equipment, haul trucks, and construction employee commute trips.

There have been updates to the air quality environmental setting since the 2012 IS/MND was prepared. In April 2017, the Bay Area Air Quality Management District (BAAQMD) adopted the most recent revision to the Clean Air Plan, titled Final 2017 Clean Air Plan (BAAQMD 2017a). The project as currently proposed does not include any land use changes or stationary sources of air pollutants, so it would not conflict with the 2017 Clean Air Plan. Additionally, the project would be required to comply with the 2017 Clean Air Plan's requirements for air pollutants during construction and operation. Therefore, the project would not result in any new or more severe significant effects than were analyzed in the 2012 IS/MND.

The project is located in the San Francisco Bay Area Air Basin, which is currently in nonattainment for ozone with respect to the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS), is in nonattainment for PM_{10} with respect to CAAQS, and is in nonattainment for $PM_{2.5}$ with respect to the NAAQS and CAAQS. For projects that are relatively small, BAAQMD has developed screening criteria to determine if a project may result in a significant impact related to criteria air pollutants and precursors. (BAAQMD 2017b:3-2 to 3-3). A project's emissions of criteria air pollutants and precursors would have a less-than-significant impact if the project's size is below the applicable screening level for its land use (i.e., would not exceed BAAQMD's thresholds for ROG, NO_x, PM_{10}, and $PM_{2.5}$), which varies based on construction- and operation-related pollutants.

Of the land uses included in the screening criteria table, the project is most similar to a warehouse. If a warehouse is larger than 259,000 square feet, it may result in potentially significant emissions that would require further analysis. The White Barn and concrete pad foundation are 1,200 square feet combined, and the project does not propose expanding the project size. Because the project is smaller than the construction-related screening criteria for the most appliable land use type (i.e., warehouse), it would not generate significant criteria air pollutants and/or precursors. Further, in accordance with EPM-1, the project is required to implement dust mitigation measures; thus, Mitigation Measure 3.3-1 would continue to be applicable. Because the project involves minor construction activities and is anticipated to be well below BAAQMD thresholds based off the screening criteria levels, the project would not result in significant construction-related criteria air pollutant or precursor emissions.

The project does not propose new parking facilities or new attractions that would result in an increase in visitors to the White Barn, nor does the project increase the size of the building; therefore the project would not result in additional operational air quality emissions and this impact would remain less than significant.

As discussed in the 2012 IS/MND, construction-related activities would result in temporary, short-term emissions of diesel particulate matter (PM) from the exhaust of off-road diesel equipment, as well as trucks delivering and moving materials from the site. Based on the screening criteria used above, construction-related emissions of criteria air pollutants (including PM_{10} and $PM_{2.5}$) would not result in significant impacts based on the project's land use type and size. The 2012 IS/MND identified places of residence as sensitive receptors. There is a single-family residence approximately 200 feet north of the proposed staging area, 285 feet northeast of the White Barn, and 315 feet northeast of the concrete pad. Considering the relatively low mass of diesel PM emissions that would be generated by construction and the temporary nature of construction, construction-related TAC emissions would not expose sensitive receptors to an incremental increase in cancer risk greater than 10 in 1 million or a hazard index greater than 1.0. The project does not propose new stationary sources or other sources of TACs, therefore the project would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a Hazard Index greater than 1.0 of the maximally exposed individual and this impact would remain less than significant.

Consistent with the 2012 IS/MND, project implementation would not create objectionable odors affecting a substantial number of people. The project as currently proposed would not result in new sources of odors, the relocation of existing odor sources, or the development of residences near an existing odor source.

For all these reasons, the project as currently proposed would not result in any new or substantially more severe air quality impacts than those identified in the adopted 2012 IS/MND.

4.4 BIOLOGICAL RESOURCES

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
4.	**Biological Resources. Would the project:**				
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Setting p. 3-24 to 3-25; Discussion (a)	No	No	Yes, mitigation has been updated
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	Setting p. 3-24 to 3-25; Discussion (b)	No	No	NA
c.	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?	Setting p. 3-24 to 3-25; Discussion (c)	No	No	NA
d.	Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Setting p. 3-24 to 3-25; Discussion (d)	No	No	NA
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Setting p. 3-24 to 3-25; Discussion (e)	No	No	NA
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Setting p. 3-24 to 3-25; Discussion (f)	No	No	NA

The 2012 IS/MND identified Master Plan Objectives that would minimize impacts to special-status species (Midpen 2012b:3-26); however, as disclosed in the 2012 IS/MND, potentially significant impacts related to loss of special-status plants, special-status amphibians and reptiles, occupied common and special-status bat roosts, common and special-status nesting birds, and special-status anadromous fish during ground-disturbing activities (i.e., trail construction, road and parking improvements, vegetation management, stream bank reinforcement, or other ground-disturbing activities) could still occur. The 2012 IS/MND also disclosed that potentially significant impacts to the of Waters of the U.S. during construction of trail improvements may still occur after the implementation of Master Plan Objectives and EPGs (Midpen 2012b:3-36). The 2012 IS/MND further identified that these impacts would be reduced to a less-than-significant impact with implementation of Mitigation Measures BIO-1 through BIO-6 (Midpen 2012b:3-27 through 3-36). The 2012 IS/MND identified a less-than-significant impact associated with implementation of the Master Plan on riparian or other sensitive natural communities, interference with wildlife movement, and conflict with local

policies or ordinances, with the application of Master Plan Objectives. The 2012 IS/MND concluded there was no impact related to conflict with an approved habitat conservation plan.

A botanical resource evaluation was conducted for the proposed project site and surrounding area in 2020 (Appendix B). This evaluation identified three special-status plant species with potential to occur within the project site (i.e., valley and foothill grassland) that were not previously considered in the 2012 IS/MND: bent-flowered fiddleneck, harlequin lotus, and Santa Cruz clover (see Appendix B for scientific names, legal status, and habitat descriptions of these species). However, no special-status plants were detected during protocol surveys in 2020 (Appendix B). Ground disturbance during project implementation could potentially lead to the introduction and spread of 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 (Section 2.11). The loss of special-status plant habitat would be avoided by the application of EPG BIO-10 which requires revegetation of special-status species habitat. Although not detected during the 2020 survey, should these special-status plant species occur on the project site in the future, they could be crushed, trampled, or removed during ongoing maintenance of the White Barn. The potential crushing, trampling, or removal of these special-status plants would be a significant impact. However, the application of the 2012 IS/MND mitigation measure BIO-1 would reduce this potential impact to less than significant by avoiding special-status plants when feasible, and compensatory mitigation to a no-net-loss of occupied habitat and individuals when avoidance is not feasible.

A review of the CDFW's California Natural Diversity Database (CNDDB) (CNDDB 2021a) and other relevant information was conducted for the proposed project (Appendix C). The review identified six special-status animal species that could or are known to occur within the project site that were not previously analyzed in the 2012 IS/MND: Crotch bumble bee, Santa Cruz black salamander, burrowing owl, American badger, mountain lion, and San Francisco dusky-footed woodrat (see Appendix C for scientific names, legal status, and habitat descriptions of these species).

Stabilization of the barn and removal of the concrete would occur during September to December at the end of the fight period for Crotch bumble bee workers and males (March through September), which corresponds to the end of the season when nest colonies would be active (Xerces Society 2018). Solitary queens may overwinter under leaf litter or in small cavities a few centimeters into loose soil; however, the ground within the disturbance footprint of the project, including the staging area, does not have the leaf litter or loose soil that is suitable habitat for overwintering queens. Therefore, the stabilization and concreate pad removal is not likely to impact Crotch bumble bee.

Both American badger and mountain lion may forage within the project site and are known to occur on the Preserve; however, the existing human disturbance within the project site from visitors and Midpen staff makes it unlikely that American badger or Mountain lion would den in the vicinity of the project. The temporary additional disturbance from barn stabilization, removal of the concreate pad, and ongoing building maintenance would also not result in a substantial reduction in foraging habitat or behavior for either species. Similarly, burrowing owl may forage in the project site, but are not likely to nest in the habitat adjacent to the site due to human disturbance and short-term, temporary additional disturbance from project activities would not substantially reduce foraging habitat or behavior.

Survey of the barn in 2019 (Swaim 2019) did not detect San Francisco dusky-footed woodrat within the structure; however, the barn does provide suitable habitat and woodrats could be present within the barn at the time of project implementation. The stabilization of the barn would occur outside of the rearing season for woodrats (April to mid-July) and therefore would not impact the care and feeding of young. In addition, as discussed in the project description (Section 2.6.2), a Bat Roost Deterrent and Exclusion Plan would be developed prior to stabilization of the barn. The plan would be submitted for approval by the CDFW and would include general San Francisco dusky-footed woodrat avoidance measures such as those previously approved by the CDFW. The measures would include allowing woodrats to leave the area on their own and construction of woody debris piles for use as shelter by displaced woodrats (Midpen 2018a). The

implementation of these avoidance measures would reduce the potential impact of the project on San Francisco dusky-footed woodrat to less than significant.

Santa Cruz black salamander could move through the project site between sunset and sunrise, particularly during and after rains or foggy days when the relative humidity is high. The stabilization and removal of the concrete pad and ongoing maintenance would take place during the day when movement of Santa Cruz black salamander is not likely to occur, and the area does not contain the microhabitats (e.g., rocks, logs) that would provide shelter to the species during the day or dry periods. Construction materials staged within the project site could provide temporary refuge to Santa Cruz black salamanders that move into the project site. Salamanders sheltering within construction materials could be injured or killed when those materials are moved. The potential injury or death of Santa Cruz black salamanders would be a significant impact. The implementation of Mitigation Measure BIO-2d, below, would require that staged materials be inspected for Santa Cruz black salamanders and a work stoppage if salamanders are detected until the salamanders leave or are moved by a biologist. With the implementation of Mitigation Measure BIO-2d, injury or death of individuals would be avoided, and the potential impact to Santa Cruz black salamander would be reduced to less than significant.

The project site is located within a natural setting that is habitat for multiple native wildlife species. However, the project would not result in any new structures that would pose a substantial barrier to wildlife movement. The barn itself is a wildlife nursery site used by both common and special-status bat species as a roost; however, the design of the project contains elements that would facilitate the continued use of the structure as a bat roost (Section 2.6.2). Additionally, Mitigation Measure BIO-3 has been updated, shown below in strike-through and underline, to include the general bat avoidance and deterrent measures that were recommended in the structural survey for special-status mammal species (Swaim 2019). Therefore, use of the barn as a nursery site would not be impeded and impacts to wildlife movement and nursery sites would be less than significant.

The project site does not contain jurisdictional wetlands, riparian, or other sensitive habitats. The project would not result in tree removal and does not occur within or adjacent to a Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, there would be no impact to these biological resources from implementation of the project. Mitigation Measures BIO-2b, Preconstruction Surveys and Protection Measures for Western Pond Turtles; BIO-5, Protection and Compensation Measures for Anadromous Fish; and BIO-6, Wetland Minimization and Compensation Measures, as identified in the 2012 IS/MND would not be required for the project as currently proposed.

The database queries and botanical studies conducted since the 2012 IS/MND have detected additional special-status species than could occur within the project site. However, with the application of project design elements (Section 2.6.2) the implementation of Mitigation Measure BIO-2d below, and the continued implementation of 2012 IS/MND Mitigation Measures BIO-1, Conduct Special-status Plant Surveys, Implement Avoidance and Mitigation Measures, or Provide Compensatory Mitigation; BIO-2a, Protection and Compensation Measures for California Red-legged Frog; BIO-2c, Preconstruction Surveys and Protection Measures for San Francisco Garter Snake; BIO-3, Preconstruction Surveys and Protection Measures for Bat Roosts in Buildings; BIO-4a, Preconstruction Surveys and Protection Measures for Raptors and Other Nesting Birds; and BIO-4b, Avoidance of Nesting Habitat and Protection Measures for Marbled Murrelets, the project would not result in any new significant or substantially more severe impacts to these additional special-status species. In addition, the project would not result in any new significant or substantially more severe impacts to the other biological resources analyzed in the 2012 IS/MND. Therefore, the findings of the 2012 IS/MND remain valid and no further analysis is required.

MITIGATION MEASURES

Mitigation Measure BIO-2d; Biological Monitoring for Santa Cruz Black Salamander

- Prior to the start of construction each day, any materials staged overnight will be inspected for the presence of Santa Cruz black salamander.
- If individual Santa Cruz black salamanders are discovered during daily inspections, work shall stop until the individual salamander is no longer at risk of incidental injury or death from project implementation, or until the individual salamander is moved outside of the project site by a qualified biologist.

Mitigation Measure BIO-3; Preconstruction Surveys and Protection Measures for Bat Roosts in Buildings

Preconstruction bat surveys

Within two days of the start of work, at all project locations, preconstruction bat roost surveys shall be conducted~~. Surveys for roosting bats on the project site will be conducted~~ by a qualified District staff or contractor. Surveys will consist of a daytime pedestrian survey looking for evidence of bat use (e.g., guano) and/or an evening emergence survey to note the presence or absence of bats. The type of survey will depend on the condition of the structure ~~buildings~~. If work is anticipated to occur during the bat wintering period (generally from November 16 through February 15) preconstruction winter roost surveys shall be conducted. If no bat roosts are found, then no further study is required. If evidence of bat use is observed, the number and species of bats using the roost will be determined. Bat detectors may be used to supplement survey efforts but are not required.

Special-status bat avoidance and minimization

If special-status bat roosts (i.e., winter hibernacula, day roosts, night roosts, or maternity roosts) are detected during preconstruction bat surveys, the following avoidance and minimization measures will apply in addition to the general bat measures described below.

No building or tree work (over 16" DBH) shall be conducted during the bat wintering period if surveys determine that special-status bats or hibernacula are present. If roosts of ~~pallid or Townsend's big eared~~ special-status bats ~~are determined to be present and~~ must be removed, the bats will be excluded from the roosting site before the structure ~~facility~~ is removed. A site-specific plan ~~program~~ addressing compensation, exclusion methods, and roost removal procedures will be developed in consultation with CDFW~~DFG~~ before implementation. Exclusion methods may include use of one-way doors at roost entrances (bats may leave but not reenter), ~~or~~ sealing roost entrances when the site can be confirmed to contain no bats, or other general bat exclusion measures outlined below. Exclusion efforts shall ~~may~~ be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). The loss of each special-status bat roost (if any) will be replaced in consultation with CDFW~~DFG~~ and may include construction and installation of bat boxes suitable to the bat species and colony size that was excluded from the original roosting site, and other general habitat replacement measures outlined below. Roost habitat replacement will be implemented before bats are excluded from the original roost sites. ~~The District has successfully constructed bat boxes elsewhere that have subsequently been occupied by bats.~~ Once the replacement roosts are constructed and it is confirmed that bats are not present in the original roost site, the structures may be removed or sealed.

~~In the case of renovation work, renovations will be done in as concentrated a time period as possible and will be timed to minimize disturbance to bat roosts as recommended by a bat expert. Renovations will be done in a manner that will promote the continued use of the structure by bats whenever feasible.~~

General bat roost deterrent/exclusion measures

At project locations with potentially suitable bat roost habitat, a site-specific bat roost deterrent plan for shall be prepared. The following measures below shall be considered but may not be applicable to all sites. Alternative roost deterrents may be implemented if approved by qualified biologist. The site-specific deterrent plan shall be submitted to CDFW for approval.

- Deterrents shall be placed outside of April through August maternity season.
- At least seven (7) days before properties are demolished and/or stabilized, open all windows and doors to increase airflow.
- Deploy ultrasonic acoustic deterrents inside the structures and/or near areas where bats may roost. No acoustic deterrents shall be placed next to roosting bats, if bats are observed, deterrents will be placed once bats have left the site.
- Installation of one-way bat doors and exclusion of bats from the structure shall occur outside of the April through August maternity season.

4.5 CULTURAL RESOURCES

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
5.	**Cultural Resources. Would the project:**				
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Setting p. 3-38 to 3-39; Discussion (a)	No	No	NA
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Setting p. 3-38 to 3-39; Discussion (b)	No	No	NA
c.	Disturb any human remains, including those interred outside of formal cemeteries?	Setting p. 3-38 to 3-39; Discussion (d)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project on cultural resources and concluded that impacts would be less than significant. The project as now proposed is similar to the components evaluated in the 2012 IS/MND, which included protection of the White Barn.

As described in Chapter 2, "Project Description," the White Barn was evaluated in February 2018 for its eligibility for inclusion in the NRHP and the CRHR. Evaluation of the White Barn determined that the structure appears eligible for inclusion in both registers under NRHP/CRHR Criterion A/1 for significant associations with early agricultural land use and development of San Mateo County in the mid-19th through the mid-20th century; under NRHP/CRHR Criterion C/3 as a representative example of a Vernacular utilitarian building type associated with mid-19th century agricultural built environment development in San Mateo County and California; and under NRHP/CRHR Criterion D/4 for the potential to yield information as an early example of local adaptation of the Vernacular architectural style to rural San Mateo County, use of local materials, and mortise-and-tenon joinery construction. Therefore, the White Barn qualifies as a historical resource for the purposes of the CEQA, as defined at Public Resources Code section 21084.1 (LSA 2018).

Character-Defining Features of the exterior of the White Barn include: the tall, simple, one story volume; the gable end roof; the overhanging eaves with plumb cut exposed rafter tails; the vertical board and batten siding; door and window opening sizes and locations; board and batten doors; four light windows; and corrugated metal roofing. Character-Defining Features of the interior of the White Barn include: the exposed post and beam, hand hewn, structural framework; the exposed machine sawn roof rafters and skip sheathing; the interior division of space; wood board flooring; and wood stalls, feeding cribs and pens (Interactive Resources, Inc. 2017). Structure improvements to the White Barn would involve internal and external repairs, removal of any loose or peeling lead-based paint along the exterior of the barn, and repainting the structure's exterior redwood cladding. Additionally, bat roost boxes would be installed and mounted along the structure's interior walls. These project activities would not affect the White Barn's character defining features or integrity and therefore would not substantially physically alter or modify the structure such that an adverse change in the significance of the resource would occur.

Further, implementation of EPG CUL-3 and EPG-CUL-4, which would be included as part of the project, would ensure that project activities not adversely impact the historical resource by adhering to the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings, and implementing measures during construction to avoid noise/vibration damage to the structure. Additionally, as described in Chapter 2, "Project Description," the project includes the preparation of a Maintenance Plan to ensure the continued protection of the White Barn.

Construction activities associated with removal of the concrete pad could result in the unanticipated discovery of cultural resources. As discussed in the 2012 IS/MND, implementation of EPG CUL-1 and EPG CUL-2 would ensure that adverse impacts related to archaeological, historical, or tribal cultural resources, including human remains, be avoided through implementation of discovery protocol during construction and application of a Native American Burial Plan (if necessary).

Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND. No mitigation would be required.

4.6 ENERGY

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
6.	**Energy. Would the project:**				
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Not addressed	No	No	NA
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Not addressed	No	No	NA

The 2012 IS/MND did not address Energy because the topic was not required by the CEQA Guidelines at the time. A comprehensive update to the CEQA Guidelines has been completed since adoption of the IS/MND. Appendix G of the CEQA Guidelines, which became effective on December 28, 2018, was revised to include Energy as a category of analysis.

Energy would be required to construct, operate, and maintain construction equipment and to produce and transport construction materials associated with stabilization of the White Barn, site enhancements, and removal of the concrete foundation pad. Most energy consumption would result from operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks supplying materials. However, stabilization activities would be relatively minor and would not increase long-term energy or fuel demand. The project would not increase energy demand after stabilization is complete, as it does not propose new facilities that would result in an increase in energy consumption. Project energy consumption for construction would not be considered wasteful, inefficient, or unnecessary.

There are no relevant plans that pertain to the efficient use of energy from construction activities at the state or local level. Therefore, the project would not obstruct with a state or local plan for renewable energy or energy efficiency.

This section provides energy-related analysis in accordance with the updated Appendix G of the CEQA Guidelines, which became effective on December 28, 2018. While not analyzed in the 2012 IS/MND, the proposed project changes would not result in significant impacts related to energy. Therefore, no mitigation is required.

4.7 GEOLOGY AND SOILS

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
7.	**Geology and Soils. Would the project:**				
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.) ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	Setting p. 3-42 to 3-43; Discussion a(i-iv)	No	No	NA
b.	Result in substantial soil erosion or the loss of topsoil?	Setting p. 3-42 to 3-43; Discussion (b)	No	No	NA
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Setting p. 3-42 to 3-43; Discussion (c)	No	No	NA
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	Setting p. 3-42 to 3-43; Discussion (d)	No	No	NA
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Setting p. 3-42 to 3-43; Discussion (e)	No	No	NA
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Setting p. 3-38 to 3-39; Discussion (d)	No	No	Yes

The 2012 IS/MND evaluated the potential impacts of the project on geology and soils and concluded that impacts related to rupture of a known fault, seismic ground shaking, seismic-related ground failure and liquefaction, landslides, soil erosion or loss of topsoil, unstable geologic units/soils, expansive soils, and paleontological resources would be less than significant.

The project as now proposed is similar to the components evaluated in the 2012 IS/MND. Minor improvements to the White Barn structure would occur within the building's interior and exterior, and removal of the 160-square foot concrete pad would involve minimal ground disturbance. Additionally, disturbed areas of the project site would be enhanced to assist with stabilization and erosion control. Further, EPG CUL-2, as well as standard BMPs for erosion control, which are included as part of the project,

would be implemented during project construction. The project would not exacerbate any existing risks associated with geologic hazards. As such, the potential for impacts related to earthquake fault rupture, ground shaking, ground failure, landslides, unstable soils, or expansive soils as a result of project activities would be less than what was identified in the 2012 IS/MND. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.8 GREENHOUSE GAS EMISSIONS

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
8.	**Greenhouse Gas Emissions. Would the project:**				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Setting pp. 3-47 to 3-48; Discussion (a)	No	No	NA
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Setting pp. 3-47 to 3-48; Discussion (b)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the Master Plan on greenhouse gas (GHG) emissions associated with construction- and operations-related activities and concluded that GHG emission impacts would be less than significant. The 2012 IS/MND also concluded that the Master Plan would have a less than significant impact related to conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

There have been updates to the environmental setting since the 2012 IS/MND was prepared, however these changes do not result in any new or more severe significant effects than were analyzed in the 2012 IS/MND. In August 2016, Senate Bill 32 (SB 32) was signed into law and serves to extend California's GHG reduction programs beyond 2020 and authorize California Air Resources Board (CARB) to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. In 2017, CARB updated the California Climate Change Scoping Plan (Scoping Plan) which lays out the framework for achieving the mandate of SB 32 and identifies the GHG reductions needed by each emissions sector. The 2017 Scoping Plan also identifies how GHGs associated with proposed projects could be evaluated under CEQA (CARB 2017:101-102). In 2018, Midpen adopted a Climate Action Plan to minimize the impact of the agency's operations have on the environment by reducing operational GHG emissions 20 percent by 2022, 40 percent by 2030, and 80 percent by 2050.

The project was identified as part of the Master Plan and the potential GHG emissions associated with the project were modeled in the 2012 IS/MND. The modeled construction- and operation-related GHG emissions for projects implemented under the Master Plan were well below the applicable BAAQMD thresholds. The project as currently proposed would result in construction activities associated with building stabilization, site enhancements, and removal of concrete foundation pad. Construction- related GHG emissions would result from the use of construction equipment (haul trucks, mini excavator, aerial work platform, skidsteer, water truck, and forklift) and vehicle trips from six to ten construction workers over a 12-week construction period.

To determine whether the project would generate potentially significant GHG emissions, the project was evaluated using BAAQMD's CEQA Guidelines. BAAQMD has adopted operational thresholds of significance for GHG emissions but has not adopted construction-related thresholds for GHG emissions. To be conservative, the project was evaluated using the BAAQMD screening criteria for operational GHG emissions, which accounts for mobile- and energy-related emission from land uses of varying sizes (BAAQMD 2017b:3-2 to 3-3). Of the land uses included in the screening criteria table, the project is most similar to a warehouse. If a warehouse is larger than 64,000 square feet, it may result in potentially significant emissions that would require further analysis. The White Barn and concrete pad foundation are 1,200 square feet combined and the project does not propose expanding the project size. Because the project is smaller than the screening criteria for the most appliable land use type (i.e., warehouse), it would not generate significant GHG emissions. Further, this project was modeled in the IS/MND as a potential project that could occur under the

Master Plan's implementation. The 2012 IS/MND estimated all projects under the Master Plan would result in 328 MTCO2e/year in construction-related emissions. The 2012 IS/MND compared this to the BAAQMD operational GHG threshold of significance of 1,100 MTCO2e/year. Because the project is only one of several evaluated under the IS/MND's modeling, it can be assumed that the project would generate fewer GHG emissions.

The project does not propose new parking facilities or new attractions that would result in an increase in visitors to the White Barn, nor does the project increase the size of the building, therefore the project would not result in additional operational GHG emissions.

Because the project involves minor construction activities, would not involve substantial changes to the current operation of the Preserve, and is below BAAQMD GHG emission screening criteria levels and thus BAAQMD threshold of significance, the project is not anticipated to generate substantial direct or indirect GHG emissions. BAAQMD's thresholds were developed based on evidence that a given projects compliance with such thresholds would not result in levels of GHG emissions that would be cumulatively considerable under CEQA and would not hinder the state's ability to meet its adopted reduction targets under SB 32. Construction-generated GHG emissions would not exceed BAAQMD's mass emission threshold of 1,100 MT CO2e/year under the project. Therefore, construction-generated emissions as a result of the project would not be a substantial contribution to global climate change and would conflict with the SB 32 or 2017 Scoping Plan. The project does not propose changes to land use or include stationary sources of GHG emissions, therefore the project would not conflict with Midpen's Climate Action Plan (Midpen 2018b) implementation or GHG emission reduction targets. Thus, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
9.	**Hazards and Hazardous Materials. Would the project:**				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Impacts HZ-1 and HZ-2	No	No	NA
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Setting p. 3-50 to 3-51 Discussion (a,b)	No	No	NA
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Setting p. 3-50 to 3-51 Discussion (c)	No	No	NA
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Setting p. 3-50 to 3-51 Discussion (d)	No	No	NA
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Setting p. 3-50 to 3-51 Impacts described on Discussion (e,f)	No	No	NA
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Setting p. 3-50 to 3-51 Discussion (g)	No	No	NA
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Setting p. 3-50 to 3-51 Discussion (h)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to hazards and hazardous materials and determined that impacts would be less than significant. The project would involve improvements to the White Barn structure and removal of a 160-square foot concrete pad. Although bat guano is not considered a hazardous material, bat excrement has been identified within the structure. Additionally, installation of proposed bat roosting boxes would continue to result in bat excrement within the White Barn. Once the project is operational, no public access to the interior would be permitted, except for regular maintenance activities performed by Midpen staff. Midpen staff would be required to wear appropriate personal protective equipment when accessing and/or cleaning the interior cleaning of the structure. Any construction and/or demolition materials generated by the project would be off hauled to either Republic Services Ox Mountain Sanitary Landfill or the Waste Management Kettleman Hills Landfill in compliance with state and local regulations for the transport and handling of hazardous materials. Further, EPG HAZ-6 and EPG HAZ-8, identified in Chapter 2, "Project Description," would be implemented to reduce fire hazards, maintain site accessibility, and reduce hazard/hazardous material exposure. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.10 HYDROLOGY AND WATER QUALITY

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
10.	**Hydrology and Water Quality. Would the Project:**				
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Setting p. 3-58 to 3-60; Discussion (a)	No	No	NA
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Setting p. 3-58 to 3-60; Discussion (b)	No	No	NA
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or iv. impede or redirect flood flows?	Setting p. 3-58 to 3-60; Discussion (c-e; h)	No	No	NA
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Setting p. 3-58 to 3-60; Discussion (g-j)	No	No	NA
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Setting p. 3-58 to 3-60	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to hydrology and water quality and determined that impacts would be less than significant.

The project would involve exterior and interior improvements to the White Barn structure and removal of a 160-square foot concrete pad. As described in Chapter 2, "Project Description," once construction activities are complete, the project site would be enhanced to assist with stabilization and erosion control. Project activities would not result in site changes that would lead to violations of any water quality standard or waste discharge requirements or other degradation of water quality; a substantial decrease in groundwater supplies or substantial interference with groundwater recharge; a substantial alteration in the drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or off-site, a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, creation or contribution of runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or the impeding or redirecting of flood flows; or, in flood hazard, tsunami, or seiche zones, the risk that pollutants would be

released because of project inundation. Further, EPG WQ-2, identified in Chapter 2, "Project Description," would require implementation of storm water quality BMPs to reduce project-generated erosion and runoff. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.11 LAND USE AND PLANNING

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
11.	**Land Use and Planning. Would the project:**				
a.	Physically divide an established community?	Setting p. 3-65; Discussion (a)	No	No	NA
b.	Create a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Setting p. 3-65; Discussion (b)	No	No	NA

As discussed in the 2012 IS/MND, impacts related to land use were determined to be less than significant. The Preserve is located in the rural western portion of unincorporated San Mateo County in the Santa Cruz Mountains. The project site is currently used as an open space preserve and for grazing. Although there are a few isolated houses, there is no established residential community located within the Preserve.

The project site is zoned as a Resource Management District (RM) and the land use is identified as open space (San Mateo County 2021). One single family residence is located approximately 160 feet northeast of the proposed project, along Allen Road. The project consists of building stabilization and revegetation activities as well as removal of a concrete foundation pad. Project activities would not divide an established community. Additionally, project activities would be consistent with the Master Plan and would not conflict with any existing land use plans, policies, or regulations adopted for the purposes of mitigating an environmental effect. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.12 MINERAL RESOURCES

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
12.	**Mineral Resources. Would the Project:**				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Setting p. 3-67; Discussion (a)	No	No	NA
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	Setting p. 3-67; Discussion (b)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project on mineral resources and concluded that impacts would be less than significant. The 2012 IS/MND identified one Significant Mineral Resource Area in the southwest portion of the Preserve, in the former Driscoll Ranch property. This resource is identified in the County General Plan as the La Honda Oil Field.

No known mineral resources are identified within, or immediately adjacent to, the project site. Further, the project includes stabilization of the White Barn and removal of a concrete pad and would not involve removal of known or locally important mineral resources. Therefore, the proposed project would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND and no further analyses is required.

4.13 NOISE

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
13.	**Noise. Would the project result in:**				
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Setting, p. 3-69; Discussion (a), (c), and (d)	No	No	NA
b.	Generation of excessive groundborne vibration or groundborne noise levels?	Setting, p. 3-69; Discussion (b)	No	No	NA
c.	For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Setting, p. 3-69; Discussion (e) and (f)	No	No	NA

The County of San Mateo Zoning Regulations were updated in 2020 (County of San Mateo 2020), after certification of the 2012 IS/MND. However, the noise performance standards for one-family residential land uses were not changed as part of the update. Therefore, the same county standards discussed in the 2012 IS/MND are applicable to the project.

The 2012 IS/MND concluded that all impacts related to short-term construction and long-term operational noise would be less than significant, including the exposure of existing sensitive receptors to increased noise levels and noise levels in excess of county standards. The 2012 IS/MND also concluded that there would be no impact regarding aircraft noise and no impact regarding vibration from the operation of heavy-duty construction equipment. No mitigation was required for any noise or vibration impacts.

The project would involve the operation of construction equipment (haul trucks and a mini excavator, aerial work platform, skidsteer, water truck, and forklift), as well as the use of hand-held tools for stabilization of the White Barn and removal of the concrete pad. As discussed in the 2012 IS/MND, the operation of construction equipment, both mobile and stationary in nature, generates noise. A single-family residence that could experience temporarily increased noise levels due to construction activity is located approximately 200 feet north of the proposed staging area, 285 feet northeast of the White Barn, and 315 feet northeast of the concrete pad. However, construction noise would be temporary, intermittent, and short in duration. In addition, construction activities would be limited to the less noise-sensitive daytime hours in compliance with EPG NOI-1 and the allowed hours of construction specified in Section 4.88.360 of the San Mateo County Noise Ordinance (7:00 a.m. to 6:00 p.m., Monday through Friday, 9:00 a.m. to 5:00 p.m. on Saturdays, and no time on Sundays), which are even more restrictive than the allowed hours of construction specified in the County of San Mateo Zoning Regulations (7:00 a.m. to 5:00 p.m., daily).

Post-project operations and maintenance would include occasional and minor repairs to the White Barn, clean up within the structure, and continued clearing of vegetation for fire safety and reduction of fire fuels, which would not generate substantial noise. The White Barn would remain accessible to the public for viewing. The project would not involve new parking facilities or new attractions that would result in a

substantial increase in visitors to the White Barn. Therefore, the project would not result in a substantial increase in traffic noise along local roadways or an increase in traffic volumes greater than that analyzed in the 2012 IS/MND. Consistent with the 2012 IS/MND, no drilling or blasting would occur as part of the project. Construction activities required for the project would involve minimal site disturbance and would not generate excessive groundborne vibration. The project site is not located within two miles of a public airport or private airstrip and is not located within an airport planning or influence area. In addition, the project would not include any new residential land uses or permanent new structures where people would live or work. Therefore, the project would not expose people to excessive airport-related noise.

For the reasons listed above, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.14 POPULATION AND HOUSING

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
14.	**Population and Housing. Would the Project:**				
a.	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Setting p. 3-73; Discussion (a)	No	No	NA
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Setting p. 3-73; Discussions (b) and (c)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to population and housing and concluded that impacts would be less than significant. One single family residence is located approximately 160 feet northeast of the proposed project, along Allen Road. The project involves stabilization of the White Barn structure and removal of a concrete foundation pad. The project would not introduce any new housing or population and would not require the construction of homes elsewhere. As such, the project would not induce population growth, displace homes, or displace people. Therefore, the proposed project would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.15 PUBLIC SERVICES

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
15.	**Public Services.**				
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any public services:				
i.	Fire protection?	Setting pp. 3-75 to 3-76; Discussion (a)	No	No	NA
ii.	Police protection?	Setting pp. 3-75 to 3-76; Discussion (a)	No	No	NA
iii.	Schools?	Setting pp. 3-75 to 3-76; Discussion (a)	No	No	NA
iv.	Parks?	Setting pp. 3-75 to 3-76; Discussion (a)	No	No	NA
ii.	Other Public Facility?	Setting pp. 3-75 to 3-76; Discussion (a)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project on public services and concluded that impacts would be less than significant. As described in the Section 3.14 "Public Services" of the 2012 IS/MND, the Preserve relies on CalFire and the San Mateo County Fire Department (CAL FIRE/County Fire) for fire protection services. Additionally, Midpen Ranger staff are trained as first responders to fires (Midpen 2021a). Police protection is provided by Midpen Rangers and the San Mateo County Sheriff's Department.

The project consists of structure stabilization activities and removal of a concrete pad. The project would not introduce new housing or populations such that the provision of new or expansion of existing public services including fire protection, police protection, schools, parks, or other public facilities would be required. Further, fire protection/first response and law enforcement access would be maintained at all times to ensure minimization of any delays related to emergency response times during project activities. Therefore, the proposed project would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND and no further analyses is required.

4.16 RECREATION

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
16.	**Recreation.**				
a.	Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Setting pp. 3-75 to 3-76; Discussion (a)	No	No	NA
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Setting pp. 3-75 to 3-76; Discussion (b)4	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to recreation and concluded that impacts would be less than significant.

The project site is approximately 150 feet from the Coho Vista Trail and approximately 500 feet from the Cielo Trail, both of which are open to hikers, equestrian trail users, and dogs on-leash. The project consists of stabilization of the White Barn structure and removal of a concrete foundation pad. The project would not introduce new users to the area and therefore would not result in substantially increased use of nearby trails within the Preserve, or nearby parks. Further, the project does not include, nor would it require, the construction of additional recreational facilities, resulting in an adverse effect on the environment. Therefore, the proposed project would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND and this impact would remain less than significant.

4.17 TRAFFIC AND CIRCULATION

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
17.	**Transportation/Traffic. Would the project:**				
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Setting: p. 3-80; Discussion (a)	No	No	NA
b.	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Not addressed	No	No	NA
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Setting: p. 3-80; Discussion (d)	No	No	NA
d.	Result in inadequate emergency access?	Setting: p. 3-80; Discussion (e)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to recreation and concluded that impacts would be less than significant. The project site is accessible through Allen Road, which is a private road accessed from Highway 35 via Bear Gulch Road.

The project includes stabilization of the White Barn structure as well as removal of a concrete foundation pad. The project would not construct any additional transportation facilities that could result in increased hazards due to geometric design or conflict with any applicable plan, policy or ordinance relating to circulation. Construction-related equipment and vehicles would access the project area via Allen Road from Bear Gulch off Highway 35. Road closure is not anticipated, and emergency access would be maintained at all times. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND and no further analyses is required.

4.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
18. Tribal Cultural Resources. Would the project:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k), or (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Not addressed	No	No	NA

Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) established a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (Public Resources Code Section 21084.2). AB 52 consultation requirements went into effect on July 1, 2015 for all projects that had not already published a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration, or published a Notice of Preparation of an Environmental Impact Report prior to that date (Section 11 [c]). Specifically, AB 52 requires that "prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation" (21808.3.1 [a]), and that "the lead agency may certify an environmental impact report or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource only if" consultation is formally concluded (21082.3[d]).

However, in the case of the current project, the lead agency has prepared this addendum to the previously certified 2012 IS/MND, in accordance with Section 15164 of the CEQA Guidelines. An addendum was determined to be the most appropriate document because none of the conditions described in Section 15162, calling for preparation of a subsequent EIR, have occurred. The addendum addresses minor technical changes or additions and confirms that the project is consistent with what was previously analyzed under the 2012 IS/MND. As such, the addendum will not result in an additional certification; therefore, the AB 52 procedures specified in PRC Sections 21080.3. 1(d) and 21080.3.2 do not apply and no tribal consultation under AB 52 is required.

4.19 UTILITIES & SERVICE SYSTEMS

	Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
18.	**Utilities and Service Systems. Would the Project:**				
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Setting p. 3-89; Discussion (c)	No	No	NA
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Setting p. 3-89; Discussion (d)	No	No	NA
c.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Setting p. 3-89; Discussion (e)	No	No	NA
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Setting p. 3-89; Discussion (f)	No	No	NA
e.	Comply with federal, state, and local statutes and regulations related to solid waste?	Setting p. 3-89; Discussion (g)	No	No	NA

The 2012 IS/MND evaluated the potential impacts of the project related to utilities and service systems and determined that impacts would be less than significant.

The project would involve exterior and interior improvements to the White Barn structure and removal of a 160-square foot concrete pad. Project construction activities, as well as operation, would not result in site changes that would lead to construction or expansion of new/expanded utility infrastructure, increased water demand, or increased generation of wastewater and solid waste. Further, stabilization activities associated with project implementation would comply with existing regulations related to solid waste disposal. Therefore, the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

4.20 WILDFIRE

Environmental Issue Area	Where Impact Was Analyzed in the IS/MND.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
19. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	Setting p. 3-50 to 3-51; Discussion (g)	No	No	NA
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Setting p. 3-50 to 3-51; Discussion (h)	No	No	NA
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not Addressed	No	No	NA
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Not Addressed	No	No	NA

Wildfire was not a topic in the 2012 IS/MND. The topic was included in the updated Appendix G of the CEQA Guidelines, which became effective on December 28, 2018. As described in Section 3.8, "Hazards and Hazardous Materials," of the 2012 IS/MND, fire protection within Midpen's boundaries is provided by the jurisdictional local fire departments and CAL FIRE. Midpen works cooperatively with these jurisdictional fire agencies to reduce fire risk. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Viewer, the project site is within a zone of high fire hazard severity in a State Responsibility Area (CAL FIRE 2021).

Section 3.8, "Hazards and Hazardous Materials," discussion (g) of the 2012 IS/MND, states there are no adopted emergency response plans or emergency evacuation plans and the Master Plan includes appropriate emergency vehicle access. However, in 2016 Midpen developed an Emergency Operations Plan (Midpen 2016) to enable Midpen to respond to any emergency, including hazardous materials, geologic hazards, landslides, wildland fire, floods, severe storms, and terrorism events. The Emergency Operations Plan established the emergency operations center, assigned tasks, specified policies and procedures, and provided for the coordination of planning efforts of the various emergency staff and service elements using the Standardized Emergency Management System. As related to wildland fire, the Emergency Operations Plan contains a checklist of operating procedures that should be followed in case of a fire; these procedures include contacting the Ranger Branch immediately if evacuation is required and coordinating all evacuations throughout the Operations Section.

Additionally, in May 2021, Midpen released the Wildland Fire Resiliency Program (Program) which includes a Vegetation Management Plan, Prescribed Fire Plan, Wildland Pre-Fire Plan/Resource Advisor Maps, and Monitoring Plan. Section 6 of the Program, "Wildland Pre-Fire Plan/Resource Advisor Maps," includes guidance for Open Space Preserves within Midpen's jurisdiction to include in their Wildland Pre-Fire Plan. Specifically, guidance related to emergency access and evacuation elements as well as best management practices to be implemented during and post-fire activities are identified (Midpen 2021b).

The project would include structure improvements and removal of a concrete pad within the project site and does not include any modifications to an adopted emergency plan, nor would it physically interfere with an adopted emergency plan. Thus, project implementation would not impair an existing or adopted emergency response plan or emergency evacuation plan. The project site is located within an area with rolling hills and vegetation. However, as described in Chapter 2, "Project Description," the project area receives regular vegetation clearing for fire safety, and, once operational, the project area and any fire fuels would continue to be cleared. Vegetation management activities would be consistent with, and are covered by, Midpen's existing IPMP. As described above in Section 3.19, "Utilities and Service Systems," the project does not include any new or expanded infrastructure. As such, no installation or maintenance of infrastructure within the project site would occur such that fire risk would be exacerbated. Further, the project would not expose people or structures to flooding or landslide risks, as a result of post-fire site conditions, because no new structures or occupants would be introduced. As previously described, disturbed portions of the project site would be restored post-construction and would be enhanced to assist with stabilization and erosion control. For these reasons, project implementation would not result in significant impacts associated with impairment of emergency response plans, exposure to wildfire, exposure to risks associated with post-fire site conditions, or exacerbation of wildfire risk. Impacts would be less than significant, and the project as now proposed would not result in any new or substantially more severe impacts than those identified in the adopted 2012 IS/MND.

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5 CONCLUSION

As demonstrated above, project activities associated with stabilization of the White Barn, removal of the concrete foundation pad, and site enhancement would not result in any new significant effects and would not substantially increase the severity of impacts identified in the 2012 IS/MND. The project does not require major revisions to the analysis previously adopted in the 2012 IS/MND, nor are there substantial changes that would occur with respect to the circumstances under which the project would be undertaken. Therefore, implementation of the project would not result in new or substantially more severe impacts to any environmental resources. No additional environmental review is necessary.

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6 LIST OF PREPARERS

Midpeninsula Regional Open Space District (Lead Agency)

Aaron Peth ..... Project Manager

Ascent Environmental, Inc. (CEQA Compliance)

Mike Parker ..... Principal
Alta Cunningham ..... Project Manager
Kirsten Burrowes ..... Assistant Project Manager/Environmental Planner
Ted Thayer ..... Biologist
Masury Lynch ..... Noise Specialist
Richa Nanavanti ..... Environmental Planner
Carrie Simmons ..... Air Quality/Climate Change Analyst
Lisa Merry ..... GIS Specialist/Resource Analyst
Brian Perry ..... Graphics
Michele Mattei ..... Publishing Specialist

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MITIGATION MONITORING PROGRAM

1 INTRODUCTION

1.1 BACKGROUND

Public Resources Code section 21081.6 and section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports. This Mitigation Monitoring Program (MMP) has been developed for the White Barn Stabilization Project (project), consistent with the requirements of Public Resources Code section 15097.

In July 2012, Midpeninsula Open Space District (Midpen) prepared an Initial Study/Mitigated Negative Declaration (2012 IS/MND) to evaluate the potential environmental effects resulting from implementation of the proposed La Honda Creek Open Space Preserve Master Plan. The White Barn, which is located within the La Honda Creek Open Space Preserve, has been evaluated as appearing eligible for inclusion in both the National and California registers. On April 22, 2020, the Midpen Board of Directors selected a design alternative to stabilize the historic White Barn structure and proceed with environmental review. Based on review of the project as now proposed and in accordance with Section 15164 of the CEQA Guidelines, Midpen prepared and approved an addendum that documents how the project as currently proposed would not result in any new or substantially more severe environmental impacts compared to those evaluated in the 2012 IS/MND. The project addendum describes the project-specific details of the proposed stabilization activities and site improvements, identifies the project elements that have changed in the current proposal since adoption of the 2012 IS/MND, and compares the environmental impacts that would occur under the current proposal to those that were identified in the 2012 IS/MND prepared by Midpen. The addendum identified applicable mitigation measures from the 2012 IS/MND as well as mitigation measures from the 2012 IS/MND that, as revised in the addendum, apply to the proposed project. Mitigation measures from the 2012 IS/MND are updated in the addendum to meet current best practices. All revised mitigation measures within the addendum supersede those measures in the 2012 IS/MND.

1.2 MITIGATION MONITORING PROGRAM

The intent of the MMP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The MMP is intended to be used by Midpen staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. The mitigation measures described herein are taken from the White Barn Stabilization Project addendum and the 2012 IS/MND and are assigned the same number as in the addendum and 2012 IS/MND. The MMP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

The following table indicates the mitigation measure number, the mitigation measure text, the monitoring agency, implementation timing, and an area to record monitoring compliance. Midpen will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMP and for ensuring compliance. Note that changes made to mitigation measures from the 2012 IS/MND are identified using ~~strikethrough~~ text for deleted text and <u>underline</u> text for added text.

Mitigation Monitoring Program

Mitigation Measure	Measure Description	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
4.3 Air Quality				
Mitigation Measure 3.3-1:	Midpen shall require all its construction contractors to implement the following basic construction mitigation measures. Some, but not all of these measures are similar to the dust control measures required by the Environmental Protection Guidelines which directly incorporate the Mitigation Measures of the San Mateo Coastal Annexation EIR. (The measures below provide updated consistency with BAAQMD regulations.) <u>Basic Construction Mitigation Measures</u> ◢ All exposed and un-compacted surfaces (e.g., staging areas, soil piles, and graded areas,) shall either be watered two times per day or covered with mulch, straw, or other dust control cover. ◢ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ◢ All visible mud or dirt track-out onto adjacent public roads shall be collected and removed at least once per day. The use of dry power sweeping is prohibited. ◢ All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). ◢ All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding, dust control covers, or soil binders are used. ◢ 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 measures (ATCM) Title 13, Section 2485 of California Code of Regulations). 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.	Midpen and construction contractor	During construction	
4.4 Biological Resources				
Mitigation Measure BIO-2d: Biological Monitoring for Santa Cruz Black Salamander	◢ Prior to the start of construction each day, any materials staged overnight will be inspected for the presence of Santa Cruz black salamander. ◢ If individual Santa Cruz black salamanders are discovered during daily inspections, work shall stop until the individual salamander is no longer at risk of incidental injury or	Midpen and a qualified biologist	Prior to construction (daily)	

Mitigation Monitoring Program

Mitigation Measure	Measure Description	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
	death from project implementation, or until the individual salamander is moved outside of the project site by a qualified biologist.	CDFW, as appropriate		
Mitigation Measure BIO-3: Preconstruction Surveys and Protection Measures for Bat Roosts in Buildings	<u>Preconstruction bat surveys</u> <u>Within two days of the start of work, at all project locations, preconstruction bat roost surveys shall be conducted</u>~~. Surveys for roosting bats on the project site will be conducted~~ by a qualified Midpen staff or contractor. Surveys will consist of a daytime pedestrian survey looking for evidence of bat use (e.g., guano) and/or an evening emergence survey to note the presence or absence of bats. The type of survey will depend on the condition of the <u>structure</u> ~~buildings~~. <u>If work is anticipated to occur during the bat wintering period (generally from November 16 through February 15) preconstruction winter roost surveys shall be conducted.</u> If no bat roosts are found, then no further study is required. If evidence of bat use is observed, the number and species of bats using the roost will be determined. Bat detectors may be used to supplement survey efforts but are not required. <u>Special-status bat avoidance and minimization</u> If special-status bat roosts (i.e., winter hibernacula, day roosts, night roosts, or maternity roosts) are detected during preconstruction bat surveys, the following avoidance and minimization measures will apply in addition to the general bat measures described below. No building or tree work (over 16" DBH) shall be conducted during the bat wintering period if surveys determine that special-status bats or hibernacula are present. If roosts of ~~pallid or Townsend's big eared~~ special-status bats ~~are determined to be present and~~ must be removed, the bats will be excluded from the roosting site before the structure ~~facility~~ is removed. A site-specific plan ~~program~~ addressing compensation, exclusion methods, and roost removal procedures will be developed in consultation with CDFW~~DFG~~ before implementation. Exclusion methods may include use of one-way doors at roost entrances (bats may leave but not reenter), ~~or~~ sealing roost entrances when the site can be confirmed to contain no bats, or other general bat exclusion measures outlined below. Exclusion efforts shall ~~may~~ be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). The loss of each special-status bat roost (if any) will be replaced in consultation with CDFW~~DFG~~ and may include construction and installation of bat boxes suitable to the bat species and colony size that was excluded from the original roosting site, and other general habitat replacement measures outlined below. Roost habitat replacement will be implemented before bats are excluded from the original roost sites. ~~The District has successfully constructed bat boxes elsewhere that have subsequently been occupied by bats.~~ Once the replacement	Midpen and a qualified biologist Midpen, a qualified biologist, construction contractor, and CDFW	Prior to construction Prior to and during construction	

Mitigation Monitoring Program

Mitigation Measure	Measure Description	Monitoring Agency	Implementation Schedule	Monitoring Compliance Record (Name/Date)
	roosts are constructed and it is confirmed that bats are not present in the original roost site, the structures may be removed or sealed. ~~In the case of renovation work, renovations will be done in as concentrated a time period as possible and will be timed to minimize disturbance to bat roosts as recommended by a bat expert. Renovations will be done in a manner that will promote the continued use of the structure by bats whenever feasible.~~ General bat roost deterrent/exclusion measures At project locations with potentially suitable bat roost habitat, a site-specific bat roost deterrent plan for shall be prepared. The following measures below shall be considered but may not be applicable to all sites. Alternative roost deterrents may be implemented if approved by qualified biologist. The site-specific deterrent plan shall be submitted to CDFW for approval. ◢ Deterrents shall be placed outside of April through August maternity season. ◢ At least seven (7) days before properties are demolished and/or stabilized, open all windows and doors to increase airflow. ◢ Deploy ultrasonic acoustic deterrents inside the structures and/or near areas where bats may roost. No acoustic deterrents shall be placed next to roosting bats, if bats are observed, deterrents will be placed once bats have left the site. ◢ Installation of one-way bat doors and exclusion of bats from the structure shall occur outside of the April through August maternity season.	Midpen, a qualified biologist, and CDFW, as appropriate	During construction	

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