COUNTY OF SAN MATEO PLANNING AND BUILDING DEPARTMENT

DATE: January 5, 2023

TO: Zoning Hearing Officer

FROM: Planning Staff

SUBJECT: Consideration of a Coastal Development Permit, Resource Management-

Coastal Zone Permit, and Use Permit, pursuant to Sections 6328.4, 6903,

and 6905 of the County Zoning Regulations, to install two new

prefabricated farm labor housing units, a new septic system, and a water tank on a legal 1.15-acre property located at 1585 Sunshine Valley Road in the unincorporated Moss Beach area of San Mateo County. Minimal grading and no tree removal is proposed. The project is appealable to the

California Coastal Commission.

County File Number: PLN 2022-00058 (Smith)

PROPOSAL

The applicant is requesting a Coastal Development Permit, Resource Management-Coastal Zone Permit, and a Use Permit to install two farm labor housing units (800 sq. ft. and 468 sq. ft.), a new septic system, and a 4,900-gallon water tank on a legal 1.15-acre property located at 1585 Sunshine Valley Road in the unincorporated area of Moss Beach. The two units will include one 3 bedroom/1 bathroom unit and one 1 bedroom/1bathroom unit. The project will support an on-going agricultural operation on-site that consists of growing succulent plants. The two farm labor housing units will be located on the north side of the property, north of the existing barn; existing hoop houses will be removed to accommodate the project. An existing domestic well onsite will provide water to the two new units. The project includes minimal grading (approximately 35 cubic yards) and no tree removal.

RECOMMENDATION

That the Zoning Hearing Officer approve the Coastal Development Permit, Resource Management-Coastal Zone Permit, and Use Permit, County File Number PLN 2022-00058, by making the required findings and adopting the conditions of approval listed in Attachment A.

BACKGROUND

Report Prepared By: Summer Burlison, Senior Planner, SBurlison@smcgov.org

Owner/Applicant: Therese Smith

Public Notification: Ten (10) day advanced notification for the hearing was mailed to property owners within 300 feet of the project parcel and a notice for the hearing posted in newspapers (San Mateo Times and Half Moon Bay Review) of general public circulation on December 24, 2022 and December 28, 2022, respectively.

Location: 1585 Sunshine Valley Road, Moss Beach

APN: 037-053-080

Size: 1.15 acres

Parcel Legality: Legal parcel pursuant to County subdivision, Case Number X6E 2150

Existing Zoning: RM-CZ/DR/CD (Resource Management-Coastal Zone/Design

Review/Coastal Development)

General Plan Designation: Very Low Density Residential

Local Coastal Plan Designation: Open Space

Williamson Act: Not contracted

Existing Land Use: Domestic well, barn, hoop structures

Water Supply: Existing domestic well

Sewage Disposal: Proposed onsite septic system

Flood Zone: FEMA Flood Zone A (areas subject to 1-percent annual chance of flood). A FEMA Letter of Map Amendment, dated April 15, 2016, established a base flood elevation of 194.8 ft. FEMA flood panel 06081C0117F, effective date August 2, 2017.

Environmental Evaluation: Categorically exempt pursuant to Section 15303, Class 3 (New Construction of Small Structures), of the California Environmental Quality Act (CEQA) Guidelines for the construction of new small facilities or structures. All development will be located outside of the delineated riparian corridor and will comply with flood regulations.

Setting: The 1.15-acre property is surrounded by single-family residences to the south and west, San Vincente Trail (San Mateo County Linear Park and Trail Plan) to the

east, and agricultural and equestrian uses to the north. The first 20 feet of the parcel slopes downward (approximate 10% downslope to the east) from Sunshine Valley Road with the parcel flattening as it continues toward the rear of the property. The property has multiple hoop houses, a barn and a well; the hoop houses and barn support the growing of succulents onsite. Multiple mature trees, consisting of Monterey pine, cypress, and eucalyptus, are located within the first 60 feet of the property. An intermittent waterway, Moss Beach Creek, runs through a portion of the southern rear corner of the parcel and supports riparian vegetation according to WRA Environmental Consultants. The existing domestic well shed is located approximately 50 feet from the front property line, south of the proposed farm labor housing units.

Chronology:

<u>Date</u>		Action
August 10, 2010	-	Coastal Development Permit (CDP) and Resource Management-Coastal Zone (RM-CZ) Permit approved for a new domestic well (PLN 2010-00103).
September 7, 2018	-	CDP and Grading Permit approved for a shade structure, storage barn, and driveway to support commercial succulent nursery use on the property, PLN 2017-00331 and BLD 2018-00866.
February 17, 2022	-	CDP, RM-CZ, and Use Permit to install two farm labor housing units and a septic system, PLN 2022-00058.
September 15, 2022	-	Application deemed complete.
October 17, 2022	-	The Agricultural Advisory Committee recommended approval.
January 5, 2023	-	Zoning Hearing Officer hearing.

DISCUSSION

A. KEY ISSUES

1. Conformance with the General Plan

Staff has determined the project conforms with all applicable General Plan Policies, as discussed below.

a. <u>Vegetative</u>, Water, Fish and Wildlife Resources

Policy 1.23 (Regulate Development to Protect Vegetative, Water, Fish and Wildlife Resources) and Policy 1.27 (Protect Fish and Wildlife

Resources) seek to regulate land uses and development activities to prevent, and/or mitigate to the extent possible, significant adverse impacts on vegetative, water, fish and wildlife resources.

Minimal vegetation removal is necessary to accommodate the project. Approximately half of the property is already disturbed with ongoing agricultural use (i.e., growing succulents within existing hoop houses).

The submitted biological assessment update, prepared by WRA Environmental Consultants and dated April 4, 2022, confirmed the course of the intermittent waterway, Moss Beach Creek, and surrounding willow riparian canopy located in the southeast portion of the property is essentially unchanged from their last assessment in 2016 when the barn was approved. Additionally, WRA opined that the property still lacks essential habitat characteristics to potentially support special-status species. Birds considered under the Migratory Bird Treaty Act (MBTA) have the potential to nest in the site's trees and the willow riparian. To avoid potential impacts to breeding birds, it is recommended that any tree or shrub removal be conducted between September 1 and February 15, outside of the breeding season. According to the proposed project plans, the applicant does not plan to construct the project during the breeding season and no tree removal is proposed. Nonetheless, staff has included a condition of approval to ensure there are no unanticipated impacts to breeding birds.

The intermittent waterway and adjoining riparian habitat are considered sensitive habitats pursuant to the County's Local Coastal Program (LCP) and therefore development buffer zones are required. The LCP requires a 30-foot buffer to be established from the edge of riparian vegetation along intermittent waterways. The project elements are proposed to be located approximately 24-feet away from the 30-foot buffer delineation. Therefore, the project is not expected to create impacts to sensitive natural resources located or potentially located on the property. Based on habitat conditions during WRA's assessment, no protocol-level surveys are recommended.

b. Soil Resources

Policy 2.17 (Regulate Development to Minimize Soil Erosion and Sedimentation) and Policy 2.23 (Regulate Excavation, Grading, Filling, and Land Clearing Activities Against Soil Erosion) seek to minimize grading; prevent soil erosion and sedimentation, among other ways by ensuring disturbed areas are stabilized; and protect and enhance natural plant communities and nesting and feeding areas of fish and wildlife.

The project involves minimal grading, approximately 25 cubic yards of cut and 10 cubic yards of fill, for the prefabricated home pads and minor site drainage. The parcel slopes downward from Sunshine Valley Road. Drainage and new impervious runoff will continue to flow to an existing retention pit and swale onsite. An erosion control plan for the project has been prepared by Sigma Prime Geosciences, Inc., and includes the use of fiber rolls to prevent sedimentation impacts on the riparian and Moss Beach Creek waterway areas.

c. Visual Quality

Policy 4.15 (Appearance of New Development), Policy 4.21 (Utility Structures), Policy 4.24 (Rural Development Design Concept), and Policy 4.25 (Location of Structures) seek to regulate development to promote and enhance good design, site relationships and other aesthetic considerations; and minimize the adverse visual quality of utility structures.

The project parcel slopes downward from the Sunshine Valley Road right-of-way. The farm labor housing units will be approximately 16 feet below the road elevation and will result in a similar visual character to adjacent rural equestrian and agricultural development in the area. The units will be approximately 16 feet in maximum height with dark green exterior vertical siding and charcoal gray composition roofing to blend in with the rural setting of the area. The units will replace existing hoop houses in the same location. Each unit will have its own overhead electrical service from an existing joint pole along Sunshine Valley Road, similar to the overhead electrical service provided to the existing barn.

d. Rural Land Use

Policy 9.45 (*Development Standards for Very Low Density Residential Uses*) seeks to buffer residential uses from surrounding resource areas by means of physical barriers, large parcels, distance, visual screening or other appropriate mechanisms.

The subject parcel has a General Plan land use designation of Very Low Density Residential. Along this stretch of Sunshine Valley Road are similarly sized and designated parcels that include residential, agricultural and equestrian uses. The farm labor housing units will support the commercial succulent nursery use being conducted onsite (with off-site retail). The units will comply with the setback requirements of the RM-CZ zoning district to provide adequate distance from adjacent developments.

e. Water Supply and Wastewater

Policy 10.15 (*Water Supplies in Rural Areas*) and Policy 10.19 (*Domestic Water Supply*) encourage the use of wells, water systems or springs instead of surface water for domestic water supply. Additionally, Policy 11.10 (*Wastewater Management in Rural Areas*) considers individual sewerage systems to be the appropriate method of wastewater management in rural areas.

A domestic well was approved for the site in 2010. The proposed project will utilize the existing domestic well for water supply. Additionally, the project includes the installation of a new septic system on the property to serve both farm labor housing units and proposed onsite water storage tank. Environmental Health Services has reviewed the project for conformance with potable water and sewage disposal requirements and has provided conditional approval.

f. Natural Hazards

Policy 15.27 (Appropriate Land Uses and Densities in Fire Hazard Areas), Policy 15.28 (Review Criteria for Locating Development In Fire Hazard Areas), Policy 15.30 (Standards for Water Supply and Fire Flow for New Development), and Policy 15.31 (Standards for Road Access for Fire Protection Vehicles to Serve New Development) seek to consider low density land uses that minimize the exposure of significant numbers of people to fire hazards; and require projects in hazardous fire areas to be reviewed by the County Fire Warden to ensure that building materials, access, vegetative clearance from structures, fire flows and water supplies are adequate for fire protection purposes.

According to the State's Fire Hazard Severity Zone Maps from the California Department of Forestry, the project site is located in a "High Fire Hazard Severity Zone", State Responsibility Area. The Coastside Fire Protection District has reviewed and conditionally approved the project for fire safety measures including materials, access, vegetative clearances, fire flows and water supplies to minimize potential fire hazards.

Policy 15.46 (Appropriate Land Uses and Densities in Flooding Hazard Areas) and Policy 15.47 (Review Criteria for Locating Development in Areas of Special Flood Hazard) encourage adequate mitigation of flood hazards when locating development and require any structure to be safely elevated above the base flood elevation and not contribute to the flooding hazard to surrounding structures.

The majority of the property is located in a mapped FEMA flood hazard Zone A with a base flood elevation of 194.8 feet (per FEMA Letter of Map Amendment, dated April 15, 2016). The project has been conditionally approved by the Floodplain Administrator as the farm labor units will be constructed above the base flood elevation and will not impact or alter flood waters.

2. Conformance with the Local Coastal Program (LCP)

Staff has determined the project conforms with applicable Local Coastal Program (LCP) Policies, as discussed below:

a. Locating and Planning New Development

Policy 1.8 (Land Uses and Development Densities in Rural Areas) allows new development in rural areas provided it will not have significant adverse impacts on coastal resources and will not diminish the ability to keep all prime agricultural land and other land suitable for agriculture in agricultural production; and excepts farm labor housing from using a density credit.

The project is not expected to have any significant adverse impact on coastal resources, as discussed throughout this staff report. The parcel does not contain prime agricultural land or other land suitable for agriculture as designated by the County General Plan. The parcel has one density credit, which is not consumed by the farm labor housing units.

b. Sensitive Habitats Component

Policy 7.3 (Protection of Sensitive Habitats) and Policy 7.11 (Establishment of Buffer Zones) establish 30-foot buffer zones along both sides of riparian corridor to protect sensitive habitats. The project parcel contains riparian corridor along Moss Beach Creek, an intermittent waterway in the southeast portion of the property. The riparian corridor has been mapped by WRA Environmental Consultants and the project will not impact the waterway or riparian vegetation onsite. The nearest component of the project will be approximately 24 feet away from the edge of the buffer zone. Also, see staff's discussion in Section A.1.a. (Vegetative, Fish, and Wildlife Resources). The project is not expected to create impacts to sensitive natural resources located or potentially located on the property.

c. Visual Resources Component

Policy 8.5 (Location of Development), Policy 8.18 (Development Design) and Policy 8.19 (Colors and Materials) require new development be located on a portion of a parcel where the development is least likely to significantly impact views from public viewpoints and best preserves the visual and open space qualities of the parcel overall; blend with and be subordinate to the environment and the character of the area where located; and to employ colors and materials that blend with the surrounding physical conditions of the site.

The two proposed prefabricated farm labor housing units will be located north of the existing barn, approximately 12 feet below the street elevation of Sunshine Valley Road (not within a scenic corridor). The units will be 800 sq. ft. and 468 sq. ft. in size with a 12/4 pitched roof and total height of approximately 16 feet with dark green exterior vertical siding and charcoal gray composition roofs. The water storage tank will be located adjacent to the well shed. The location and appearance of the development will not significantly impact the rural landscape views from the public right-of-way as the units will replace existing hoop houses in the same location.

Policy 8.6 (Streams, Wetlands, and Estuaries) requires development to be set back from the edge of streams and other natural waterways a sufficient distance to preserve the visual character of the waterway.

The two farm labor housing units will be located in the northern portion of the property and outside of the 30-foot riparian buffer zone. The closest unit is proposed to be approximately 24 feet away from the buffer zone. The proposed development will replace existing hoop houses in the same location and does not propose any changes to the appearance of the riparian vegetation or waterway.

d. Hazards

Policy 9.6 (Regulation of Development in High Risk Fire Areas) requires residential development in high risk areas to be reviewed and conditioned by the County Fire Warden to ensure that building materials, access, brush clearings and water storage capacity are adequate for fire flow and fire protection purposes.

Policy 9.9 (Regulation of Development in Floodplains) requires development located in flood hazard areas to employ the standards, limitations, and controls of the flood regulations contained in the County's Zoning Ordinance and Building Regulations.

See staff's discussion in Section A.1.f. The Coastside Fire Protection District and the Floodplain Administrator have conditionally approved the project.

3. <u>Conformance with Zoning Regulations</u>

a. RM-CZ Development Standards

The parcel is zoned RM-CZ/DR/CD (Resource Management-Coastal Zone/Design Review/Coastal Development). Construction of farm labor housing units are permitted in the RM-CZ District, subject to a RM-CZ Permit, Coastal Development Permit, and Use Permit, as being sought in the subject application. Design Review is not required for temporary farm labor housing units. Compliance with the RM-CZ Development Standards is discussed below.

	Development Standard	Proposed
Minimum Front Setback	50 feet	70 feet
Minimum Rear Setback	20 feet	+100 feet
Minimum Side Setbacks	20 feet	Left: 20 feet
		Right: 146 feet
Maximum Height	36 feet	16 feet

b. RM-CZ Development Criteria

The project conforms with the applicable RM-CZ Development Criteria contained in Chapter 36A.2 of the Zoning Regulations, as discussed below.

(1) <u>Environmental Quality and Primary Fish and Wildlife Habitat</u> Area Criteria

Section 6912.1 (Environmental Quality) and Section 6913.2 (Primary Fish and Wildlife Habitat) Criteria seek to minimize grading, adverse impacts on wildlife habitat areas, and prohibit the introduction of significant levels of noxious odors or long-term noise levels. The project includes the installation of two prefabricated farm labor housing units and a new septic system. The project will not result in noxious odors or long-term noise levels. Also, see staff's discussion in Sections A.1 and A.2 of this report.

(2) Site Design Criteria

Section 6912.2 (Site Design) Criteria seeks to ensure that development be sited and designed so that its presence is subordinate to the existing natural characteristics of the site. See staff's discussion in Section A.2.c. (Visual Resources Component).

(3) <u>Utilities Criteria</u>

Section 6912.3 (*Utilities*) Criteria requires adequate sewage and water systems to support development. The project proposes a new septic system and use of an existing domestic well to serve the farm labor housing units. The project has been reviewed and conditionally approved by Environmental Health Services for septic and well requirements.

(4) Water Resources Criteria

Section 6912.4 (Water Resources) Criteria seeks to manage surface water runoff, and implement erosion and sedimentation control processes to assure stability of downstream aquatic environments; demonstrate that withdrawals from groundwater will not be in such quantity that a continued supply would jeopardize or result in salt intrusion; construction will not significantly disrupt or diminish natural patterns of groundwater supply; and no development or alteration shall interfere with the existing capacity of water bodies.

The project will utilize existing and new stormwater measures (i.e., existing swales and retention pit, new storm drain conveyance lines) to adequately manage stormwater onsite. Erosion control measures will be implemented and maintained throughout the duration of construction to prevent erosion and sedimentation and protect riparian vegetation and the intermittent waterway form impacts. Additionally, the existing well and proposed septic system have both been conditionally approved by Environmental Health Services.

c. Use Permit Findings

Farm labor housing is a permitted use in the RM-CZ zoning district subject to a Use Permit. In order to grant approval of a Use Permit, the following finding must be made: That the establishment, maintenance, and/or conducting of the use will not, under the circumstances of the particular case, result in a significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood.

The applicant has provided application documents supporting a demonstrable need for safe and adequate housing for farm laborers on the property. The property supports a commercial succulent nursery (with off-site retail sales). Responsibilities of the farm laborers include propagation, cultivation and care of nursery stock. Staff has determined that the project will not have any significant adverse impacts to sensitive habitats or visual resources, as discussed in Section A.2 of the staff report. There is no evidence to suggest the project would be detrimental to the public or injurious to property or improvements in the area. The project has been conditionally approved by all relevant reviewing agencies to ensure compliance with their respective codes and regulations. Furthermore, the Agricultural Advisory Committee has recommended approval of the project.

B. AGRICULTURAL ADVISORY COMMITTEE

The Agricultural Advisory Committee considered the project and recommended approval at their October 17, 2022 meeting.

C. ENVIRONMENTAL REVIEW

This project is exempt from the California Environmental Quality Act (CEQA) Guidelines pursuant to Section 15303, Class 3 (New Construction of Small Structures), consisting of construction and location of new small facilities or structures. All development will be located outside of the delineated riparian corridor and will comply with flood regulations.

D. REVIEWING AGENCIES

Drainage Section
Environmental Health Services
Department of Public Works
Park Department
Coastside Fire Protection District
California Coastal Commission

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Plans
- D. Biological Report update, dated April 4, 2022

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County of San Mateo Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2022-00058 Hearing Date: January 5, 2023

Prepared By: Summer Burlison, For Adoption By: Zoning Hearing Officer

Senior Planner

RECOMMENDED FINDINGS

Regarding Environmental Review, Find:

 That the project is categorically exempt from the California Environmental Quality Act (CEQA) Guidelines, pursuant to Section 15303, Class 3 (New Construction of Small Structures), consisting of construction and location of new small facilities or structures. All development will be located outside of the delineated riparian corridor and will comply with flood regulations.

Regarding the Coastal Development Permit, Find:

- 2. That the project, as described in the application and accompanying materials required by Section 6328.7, and as conditioned in accordance with Section 6328.14, conforms to the plans, policies, requirements and standards of the San Mateo County Local Coastal Program as described in the staff report to the Zoning Hearing Officer dated January 5, 2023.
- 3. That the project is not located between the nearest public road and the sea and therefore is not subject to the public access and public recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Section 30200 of the Public Resources Code).
- 4. That the project conforms to the findings required by policies of the San Mateo County Local Coastal Program. Specifically, in regard to the Locating and Planning New Development, Sensitive Habitats, Visual Resources and Hazards Components as the project does not impact prime agricultural land or other land suitable for agriculture; will be set back a distance from the riparian buffer zone to avoid impacts to sensitive vegetation or the intermittent waterway; is designed to minimize visual resource impacts; and will comply with flood and fire standards to ensure development minimizes hazards.

Regarding the Resource Management-Coastal Zone Permit, Find:

5. That the project conforms to the Development Standards and the Development Review Criteria contained in Chapter 36 and 36A.2 of the San Mateo County Zoning Regulations. The project conforms to the minimum setbacks and maximum height limit allowed in the RM-CZ Zoning District. The project conforms to Section 6912.1 (Environmental Quality Criteria), Section 6912.2. (Site Design Criteria), Section 6912.3 (Utilities), Section 6912.4 (Water Resources Criteria), and Section 6913.2 (Primary Fish and Wildlife Habitat Areas Criteria) of the RM-CZ Development Review Criteria. The project, as proposed and conditioned, will not introduce long-term noise or odor levels; has been designed to avoid impacts to sensitive habitats, including riparian vegetation; minimizes grading and avoids tree removal; incorporates erosion control measures to minimize construction impacts to property and the intermittent waterway; fits into the surrounding rural setting; and provides adequate utilities to serve the proposed farm labor housing units.

Regarding the Use Permit, Find:

6. That the establishment, maintenance, and/or conducting of the use will not, under the circumstances of the particular case, result in a significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood as the applicant has demonstrated a need for safe and adequate housing for qualifying farm laborers associated with commercial succulent nursery duties on the property. The project will not have any significant adverse impacts to sensitive habitats or visual resources and the project has been conditionally approved by all relevant reviewing agencies to ensure compliance with their respective codes and regulations.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

- 1. This approval applies only to the proposal as described in this report and materials submitted for review and approval by the Zoning Hearing Officer at the January 5, 2023 meeting. The Community Development Director may approve minor revisions or modifications to the project if they are found to be consistent with the intent of and in substantial conformity with this approval.
- 2. These permits shall be valid for a period of five (5) years from the date of final approval. Renewal of the Use Permit to allow continuance of the Farm Labor Housing (FLH) units beyond this duration shall be applied for six (6) months prior to expiration to the Planning and Building Department. Adequate documentation which demonstrates that the FLH worker(s) each derive more than 20 hours per week average employment from on- or off-site agricultural operations (within San Mateo County) and earn at least half their income from agriculturally-related work

shall be submitted upon demand with reasonable notice, or at a minimum, at the time of Use Permit renewal or amendment. Failure to submit such documentation may result in a public hearing to consider revocation of this permit.

- 3. The units shall be occupied by qualified farm workers and their dependents only.
- 4. In the case of proposed changes to the permitted Farm Labor Housing (FLH) units, the owner shall submit a written description of the proposed change to the Planning and Building Department, and if the change is considered significant by the Community Development Director, submit a complete permit amendment application. Any changes, even if deemed minor, may require a building permit.
- 5. In the event that the farming operations justifying the FLH units ceases or if the FLH development is proposed to be enlarged or significantly changed, it shall be the owner's/applicant's responsibility to notify the County by letter of such change and apply for the necessary permits to remove the structures or use them for another permittable use. Accordingly, such notice shall identify the owner's/applicant's intention to either remove the FLH units (and associated infrastructure) or otherwise convert such improvements to that allowed by zoning district regulations. In either case, building permits and associated inspections by Building and Environmental Health shall be required to ensure that all structures have been removed, infrastructure properly abandoned or that such converted development complies with all applicable regulations.
- The owner/applicant shall maintain the units and ancillary support facilities and infrastructure in a manner satisfactory to and in compliance with all applicable County regulations.
- 7. Noise sources associated with demolition, construction, repair, remodeling, or grading of any real property shall be limited to the hours from 7:00 a.m. to 6:00 p.m. weekdays and 9:00 a.m. to 5 p.m. Saturdays. Said activities are prohibited on Sundays, Thanksgiving, and Christmas (San Mateo County Ordinance Code Section 4.88.360).
- 8. The applicant shall submit an Erosion and Sediment Control Plan as part of the building permit submittal that conforms with the County's General Erosion and Sediment Control Plan Guidelines. Furthermore, during project construction, the applicant shall, pursuant to Chapter 4.100 of the San Mateo County Ordinance Code, minimize the transport and discharge of stormwater runoff from the construction site into storm drain systems and water bodies by:
 - a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 1 and April 30.

- b. Removing spoils promptly, and avoiding stockpiling of fill materials, when rain is forecast. If rain threatens, stockpiled soils and other materials shall be covered with a tarp or other waterproof materials.
- c. Storing, handling, and disposing of construction materials and wastes so as to avoid their entry to the storm drain system or water body.
- d. Avoiding cleaning, fueling or maintaining vehicles on-site, except in an area designated to contain and treat runoff.
- e. Limiting and timing applications of pesticides and fertilizer to avoid polluting runoff.
- f. Avoiding tracking dirt or other materials off-site.
- g. Control and prevention of the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- h. Protecting areas not to be disturbed, including adjacent properties, using a vegetative buffer strip, sediment barriers or fencing.
- i. Covering construction materials stored on-site with a tarp or other waterproof material when not in use.
- Delineating with field markers and fencing all clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses.
- k. The contractor shall train and provide instruction to all employees and subcontractors regarding the Construction Best Management Practices.
- 9. No construction shall occur until a valid building permit has been issued for the approved scope of work.
- 10. This permit does not allow for the removal of any trees. Removal of any tree with a diameter equal to, or greater than, 12 inches as measured 4.5 feet above the ground may require a separate tree removal permit.

- 11. The project site is located within the Fitzgerald Area of Special Biological Significance (ASBS) Watershed and is considered a Construction Stormwater Regulated Site. Weekly construction inspections are required throughout the duration of land disturbance during the rainy season (Oct. 1 to through April 30) for sites within the ASBS Watershed, as required by the State Water Resources Control Board General Exceptions to the California Ocean Plan with Special Protections adopted on March 20, 2012.
- 12. The project site is located within the Fitzgerald Area of Special Biological Significance (ASBS) Watershed. Runoff and other polluted discharges from the site are prohibited. Development shall minimize erosion, treat stormwater from new/replaced impervious surfaces, and prevent polluted discharges into the ASBS or a County storm drain (e.g., car washing in a driveway or street, pesticide application on lawn).
- 13. An Erosion Control Pre-Site Inspection shall be conducted prior to the issuance of a building permit to ensure the approved erosion control measures are installed adequately prior to the start of ground disturbing activities.
- 14. The project is prohibited from the use of architectural copper unless the property owner adheres to Best Management Practices (BMPs) for the use and routine maintenance of architectural copper to prevent polluted discharge into the storm drains:
 - a. Use copper materials that have been pre-patinated at the factory.
 - b. Discharge rinse water from on-site patination to landscaping. Prevent rinse water from flowing to any storm drains, including blocking off storm drain inlets if needed.
 - c. Collect rinse water from on-site patination in a tank and haul off-site for proper disposal.
 - d. Coat copper materials with an impervious coating that prevents further corrosion and runoff.
- 15. Any tree or shrub removal shall be conducted between September 1 and February 15, outside of the breeding season for birds. If it is not possible to conduct vegetation removal during this time period, pre-construction breeding bird surveys shall be necessary to avoid potential impacts to breeding birds. If breeding birds protected by the Migratory Bird Treaty Act and California Fish and Game Code are observed during pre-construction surveys, no vegetation removal should occur within a 50-foot buffer surrounding the occupied nest. Buffers surrounding nesting birds may be larger or smaller as determined by a qualified biologist based on the location of the nest and species of bird.

Drainage Section

- 16. The following will be required at the time of building permit submittal:
 - a. Final grading and drainage plan prepared by a registered Civil Engineer providing adequate stormwater runoff mitigation from the new structures and indicating that existing drainage mitigation infrastructure swales will be repaired after construction as needed.
 - b. FEMA Elevation Certificate for each building.

Department of Public Works

- 17. Prior to the issuance of the building permit, the applicant will be required to provide payment of "roadway mitigation fees" based on the square footage (assessable space) of the proposed building per Ordinance No.3277.
- 18. An encroachment permit shall be obtained prior to any work within a County right-of-way.

Environmental Health Services

- 19. After the building permit is approved, a permit from Environmental Health Services shall be obtained for the septic installation.
- 20. The applicant shall provide treatment for Iron and Manganese and resample to show appropriate water quality prior to building permit final by Environmental Health Services. Environmental Health Services will then issue the Permit to Operate as a Domestic Source.

Coastside Fire Protection District

21. Fire Access Roads: Fire suppression operations involve heavy pieces of apparatus that must set-up and operate close to buildings. California Fire Code and fire district ordinances require construction that allows fire apparatus to be placed directly outside the building. Additionally, it is the developer/owner's responsibility to assure well-marked fire lanes are provided around the entire outside perimeter of the building. When fire protection, including fire apparatus access roads and water supplies for fire protection, is required, such protection shall be installed and made serviceable prior to and during the time of construction and before combustibles are on the project site. Approved signs and painted curbs or lines shall be provided and maintained to identify fire apparatus access roads and state the prohibition of their obstruction. Fire lanes shall be in accordance with Coastside Fire District specification. Contact the Fire Prevention Bureau for those specifications.

- 22. Address Numbers: Building identification shall be conspicuously posted and visible from the street. (TEMPORARY ADDRESS NUMBERS SHALL BE POSTED PRIOR TO COMBUSTIBLES BEING PLACED ON SITE). The letters/numerals for permanent address numbers shall be of 6-inch height with a minimum 1/2-inch stroke and of a color, which is contrasting with the background. Such letter/numerals shall be illuminated and facing the direction of access. Distance from Road Address No. Size 0-50 feet, 6-inch; 50-100 feet, 8-inch; 100-150 feet, 10-inch; 150 + feet, 12-inch; with a corresponding increase in stroke width.
- 23. Address numbers and directional signs may be required at the entrance to the driveway/access road, road forks, and intersections. When located on the street the numbers shall be visible from each direction of travel. This remote signage shall consist of a 6-inch by 18-inch green reflective metal sign with 3-inch reflective Numbers/ Letters similar to Hy-Ko 911 or equivalent.
- 24. Fire Access Roads The applicant must have a maintained asphalt surface road for ingress and egress of fire apparatus. The Department of Public Works, the Coastside Fire Protection District Ordinance 2019-013 and the California Fire Code shall set road standards. As per the 2019 CFC, dead-end roads exceeding 150 feet shall be provided with a turnaround in accordance with Coastside Fire District specifications. As per the 2019 CFC, Section Appendix D, road width shall not be less than 20 feet. Fire access roads shall be installed and made serviceable prior to combustibles being placed on the project site and maintained during construction. Approved signs and painted curbs or lines shall be provided and maintained to identify fire access roads and state the prohibition of their obstruction. If the road width does not allow parking on the street (20-foot road) and on-street parking is desired, an additional improved area shall be developed for that use.
- 25. Fire apparatus roads to be a minimum of 20 feet wide with minimum of 35 feet centerline radius and a vertical clearance of 15 feet CFC503, D103, T-14 1273.
- 26. Dead end emergency access exceeding 150 feet shall be provided with width and turnaround provisions meeting California Fire Code Appendix D.
- 27. "No Parking Fire Lane" signs shall be provided on both sides of roads 20 to 26 feet wide and on one side of roads 26 to 32 feet wide. CFC D103.6.
- 28. Vegetation Management (SRA) The 2019 California Fire Code Chapter 49 and Public Resources Code 4291. A fuel break of defensible space is required around the perimeter of all structures to a distance of not less than 30 feet and may be required to a distance of 100 feet or to the property line. This is neither a requirement nor an authorization for the removal of living trees. Trees located within the defensible space shall be pruned to remove dead and dying portions, and limbed up 6 feet above the ground. New trees planted in the defensible

space shall be located no closer than 10 feet to adjacent trees when fully grown or at maturity. Remove that portion of any existing trees, which extends within 10 feet of the outlet of a chimney or stovepipe or is within 5 feet of any structure. Maintain any tree adjacent to or overhanging a building free of dead or dying wood.

- 29. Emergency Building Access: The proposed project will require the installation of "Knox Boxes". These emergency key boxes are required when access to or within a structure or an area is unduly difficult because of secured openings or where immediate access is necessary for life saving or fire-fighting purposes. The Chief will determine the location for the key box and provide an authorized order form. All security gate systems controlling vehicular access shall be equipped with a "Knox" key operated emergency entry device. For application and instructions please email cfpdfiremarshal@fire.ca.gov. If you need further assistance please contact Coastside Fire Protection District at 650/726-5213.
- 30. A Knox padlock or key switch will be required if there is limited access to property. CFC 506.1. For application and instructions please email cfpdfiremarshal@fire.ca.gov.
- 31. Gates shall be a minimum of 2 feet wider than the access road/driveway they serve. Overhead gate structures shall have a minimum of 15 feet of vertical clearance. Locked gates shall be provided with a Knox Box or Knox Padlock. Electric gates shall have a Knox Key Switch. Electric gates shall automatically open during power failures. CFC 503.6, 506. For application and instructions or to contact the Fire Marshal's office please cfpdfiremarshal@fire.ca.gov.
- 32. CRC 2019 Section R337: This project is located in a State Responsibility Area for wildfire protection. Roofing, attic ventilation, exterior walls, windows, exterior doors, decking, floors and underfloor protection shall comply with CRC 2019 Section R337 requirements. You can visit the Office of the Sate Fire Marshal's website at http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland.php and click the new products link to view the "WUI Products Handbook".
- 33. Copy R-337 Worksheet to a plan sized sheet and check appropriate boxes for the building permit plan submittal.
- 34. Provide window and door schedule showing it meets R-337 and add it to the worksheet. All exterior doors including garage doors must meet R-337.
- 35. Provide eave and gutter details that meet R-337, include all materials.
- 36. Add R-337 required vents to the worksheet.

- 37. All fire conditions and requirements must be incorporated into your building plans, prior to building permit issuance. It is your responsibility to notify your contractor, architect and engineer of these requirements.
- 38. Final acceptance of the project is subject to field inspection and necessary tests. NOTE: An additional re-inspection fee may be charged for missed appointments, failure to comply or not being ready.

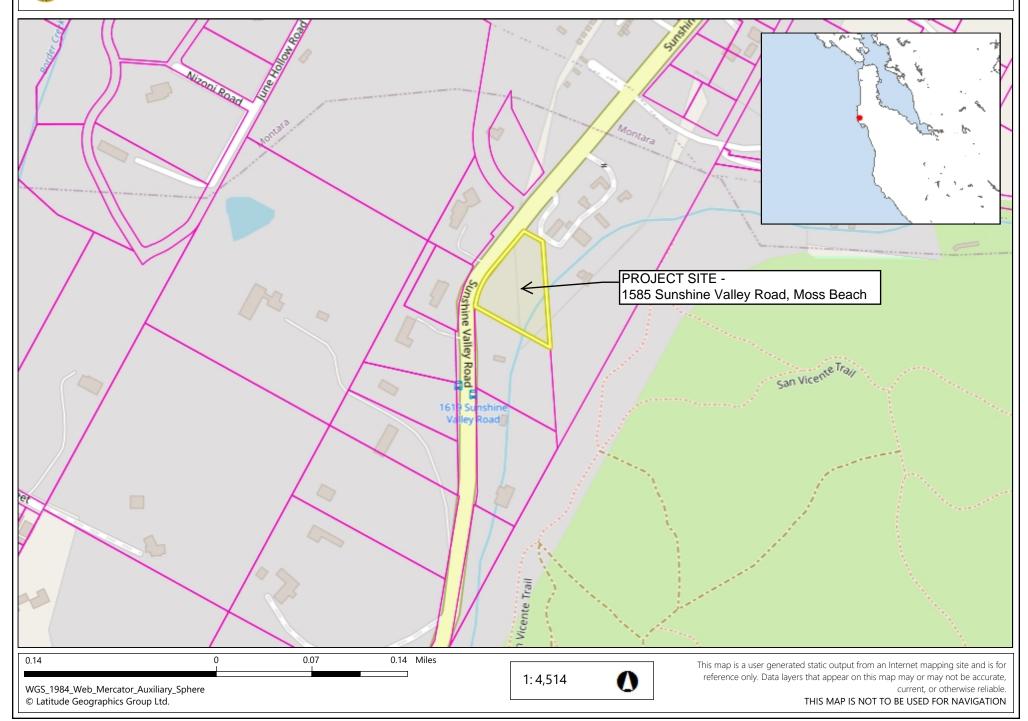
SSB:cmc - SSBGG0406_WCU.DOCX



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT

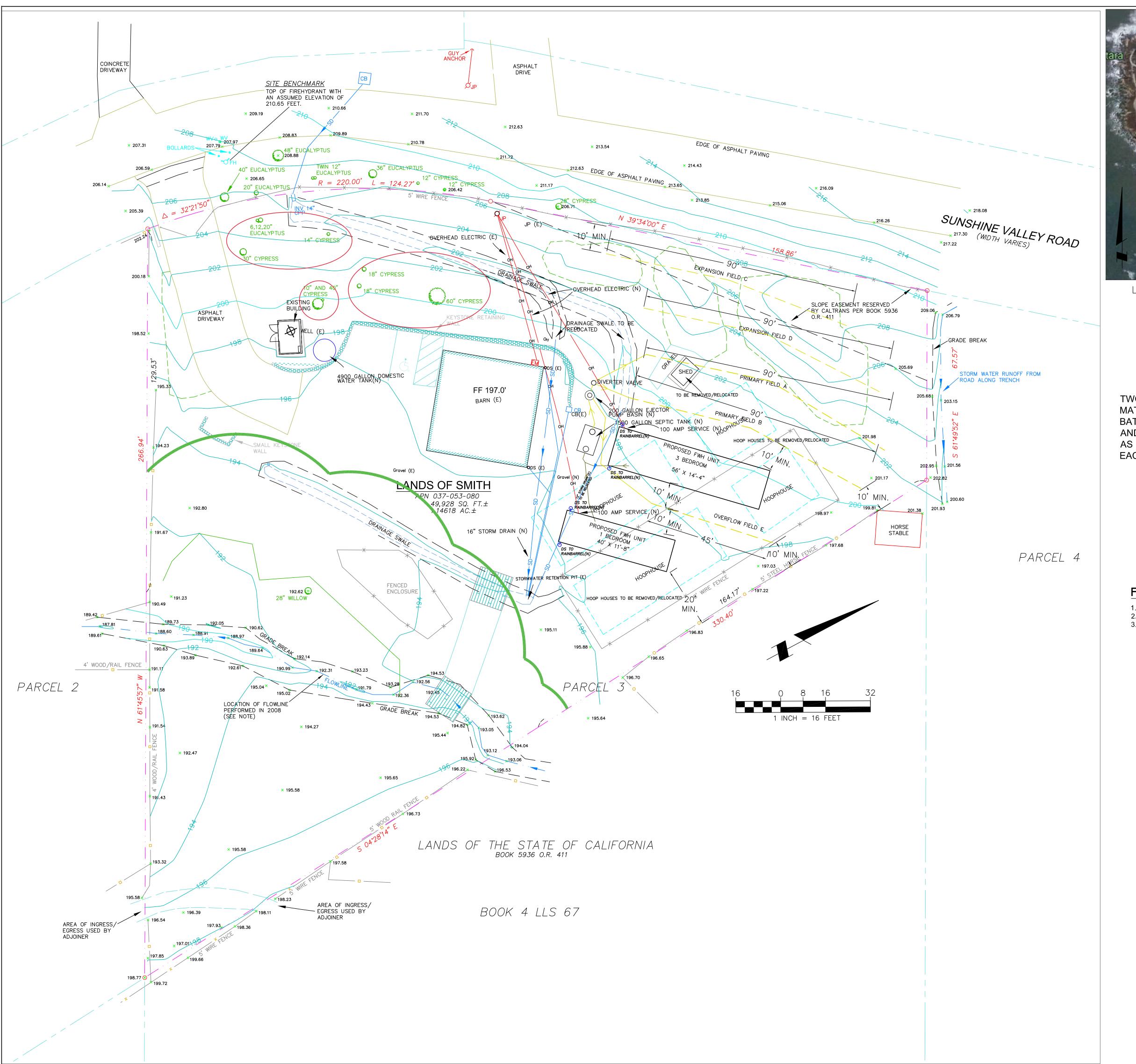
PLN2022-00058 - 1585 Sunshine Valley Road

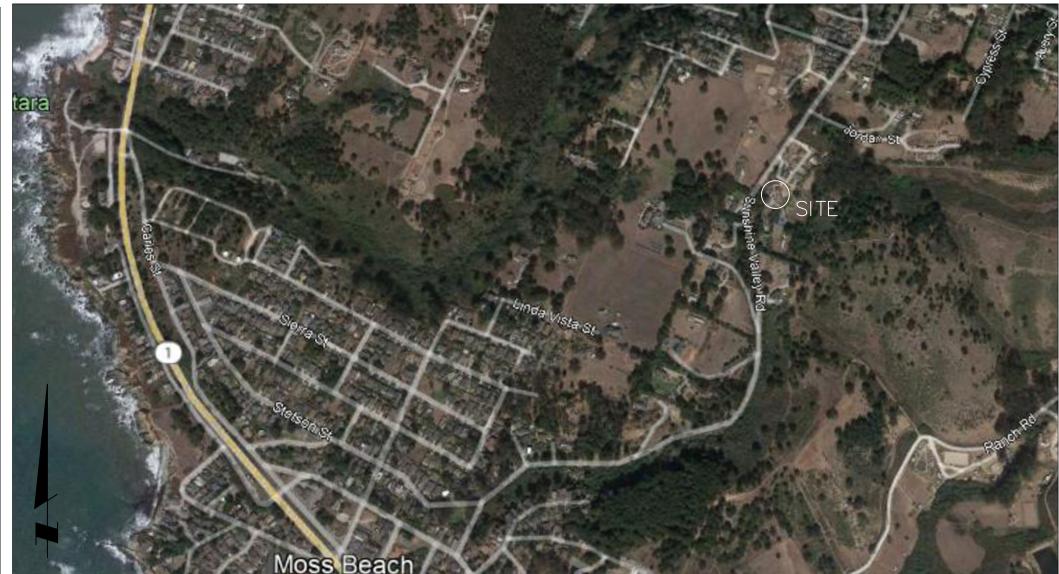




COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT C





LOCATION MAP (Not to Scale)

PROJECT DESCRIPTION

ZONING: RM-CZ LOT SIZE: 50,000 SQUARE FEET +/-

TWO MOBILE HOMES WILL BE PLACED ON THE PARCEL AS SHOWN AS PART OF THE SAN MATEO COUNTY FARM WORKER HOUSING PILOT PROGRAM. ONE UNIT AT 3 BEDROOM 1 BATH THE OTHER ONE BEDROOM 1 BATH. A SEPTIC SYSTEM WILL BE INSTALLED AS SHOWN AND THE EXISTING DOMESTIC WELL WILL BE USED WITH ADDED STORAGE AND TREATMENT AS NECESSARY. THE MOBILE HOMES WILL BE ALL ELECTRIC WITH SEPARATE SERVICE TO EACH UNIT.

GENERAL NOTES

- PLANS PREPARED AT THE REQUEST OF: THERESE SMITH, OWNER
- 2. TOPOGRAPHY BY BGT SURVEYING, SURVEYED JUNE, 2005. UPDATED JUNE, 2022.
- 3. THIS IS NOT A BOUNDARY SURVEY.
 4. ELEVATION DATUM NAVD88.

FEMA FLOOD ZONE NOTES

- 1. A LETTER OF MAP AMENDMENT HAS BEEN APPROVED BY FEMA APRIL, 2016. 2. THE APPROVED BASE FLOOD ELEVATION IS 194.8 FEET.
- 3. THE PROPOSED FF ELEVATIONS OF THE MOBILE HOMES WILL BE SEVERAL FEET ABOVE THE BASE FLOOD ELEVATION.



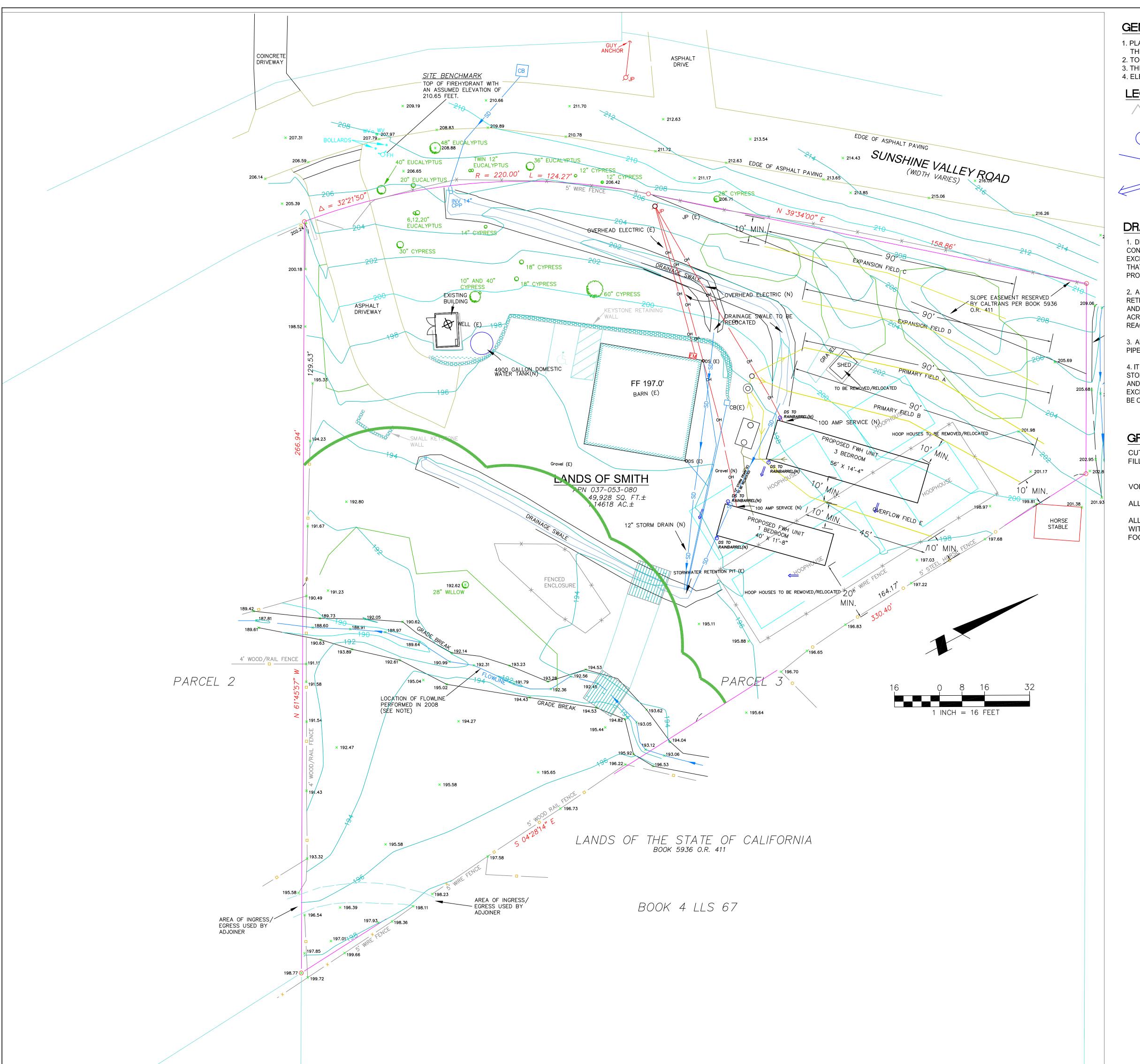
6-2022

BY: CMK
SIGMA PRIME GEOSCIENCES, INC. 332 PRINCETON AVENUE HALF MOON BAY, CA 94019 (650) 728-3590 sigmaprm@gmail.com

DRAWN BY: AZG
CHECKED BY: CMK
REV. DATE: 6-22-22
REV. DATE:

SITE PLAN
SMITH PROPERTY
SUNSHINE VALLEY ROAD

SHEET



GENERAL NOTES

- 1. PLANS PREPARED AT THE REQUEST OF:
- THERESE SMITH, OWNER
- 2. TOPOGRAPHY BY BGT SURVEYING, SURVEYED JUNE, 2005. UPDATED JUNE, 2022.
- THIS IS NOT A BOUNDARY SURVEY.
 ELEVATION DATUM NAVD88.

LEGEND

// EXISTING CONTOURS



4" SOLID DRAIN PIPE



DRAINAGE NOTES

1. DRAINAGE INTENT: IT IS THE INTENT OF THE DRAINAGE SYSTEM TO CONVEY ROOF RUNOFF TO A SAFE LOCATION, AND TO MINIMIZE EXCESSIVE MOISTURE AROUND FOUNDATIONS. DIRECT SLOPES SUCH THAT STORMWATER WILL NOT BE DIVERTED ONTO ADJACENT PROPERTIES.

2. ALL NEW DOWNSPOUT DRAIN LINES SHALL LEAD TO EXISTING RETENTION PIT, AS SHOWN. TOTAL COMBINED VOLUME OF RETENTION PIT AND DRAINAGE SWALE IS ABOUT 550 CUBIC FEET. THEY OVERFLOW ACROSS ABOUT 5600 SQUARE FEET OF LANDSCAPED AREA BEFORE REACHING THE CREEK.

3. ALL ROOF DRAINAGE PIPES SHALL BE 4" DIAMETER MINIMUM SOLID PIPE, SLOPED AT 1% MINIMUM.

4. IT IS THE PROPERTY OWNER'S RESPONSIBILITY TO CHECK ON ALL STORMWATER FACILITIES SUCH AS ROOF GUTTERS, DOWNSPOUT LINES, AND THE RETENTION PIT TO BE SURE THAT THEY ARE CLEAR OF EXCESSIVE DEBRIS AND OPERATING EFFICIENTLY. THE FACILITIES SHALL BE CHECKED EVERY FALL AND PERIODICALLY DURING THE RAINY SEASON.

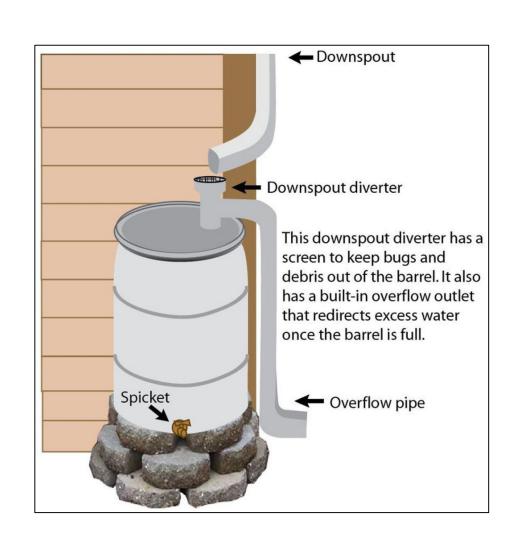
GRADING NOTES

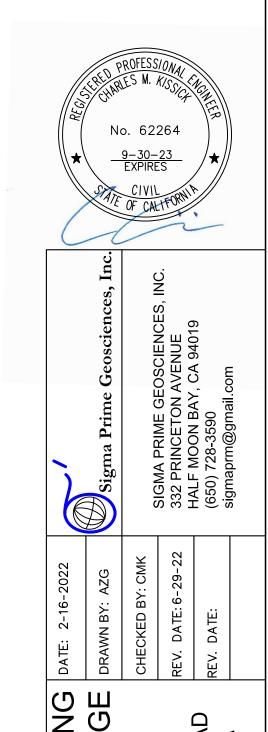
CUT VOLUME: 25 CY (FOR MOBILE HOME PADS)
FILL VOLUME: 10 CY (DRAIN ROCK FOR POSITIVE DRAINAGE AT MOBILE
HOME PAD AREA)

VOLUMES ABOVE ARE APPROXIMATE.

ALL GRADING SHALL CONFORM TO LOCAL CODES AND ORDINANCES.

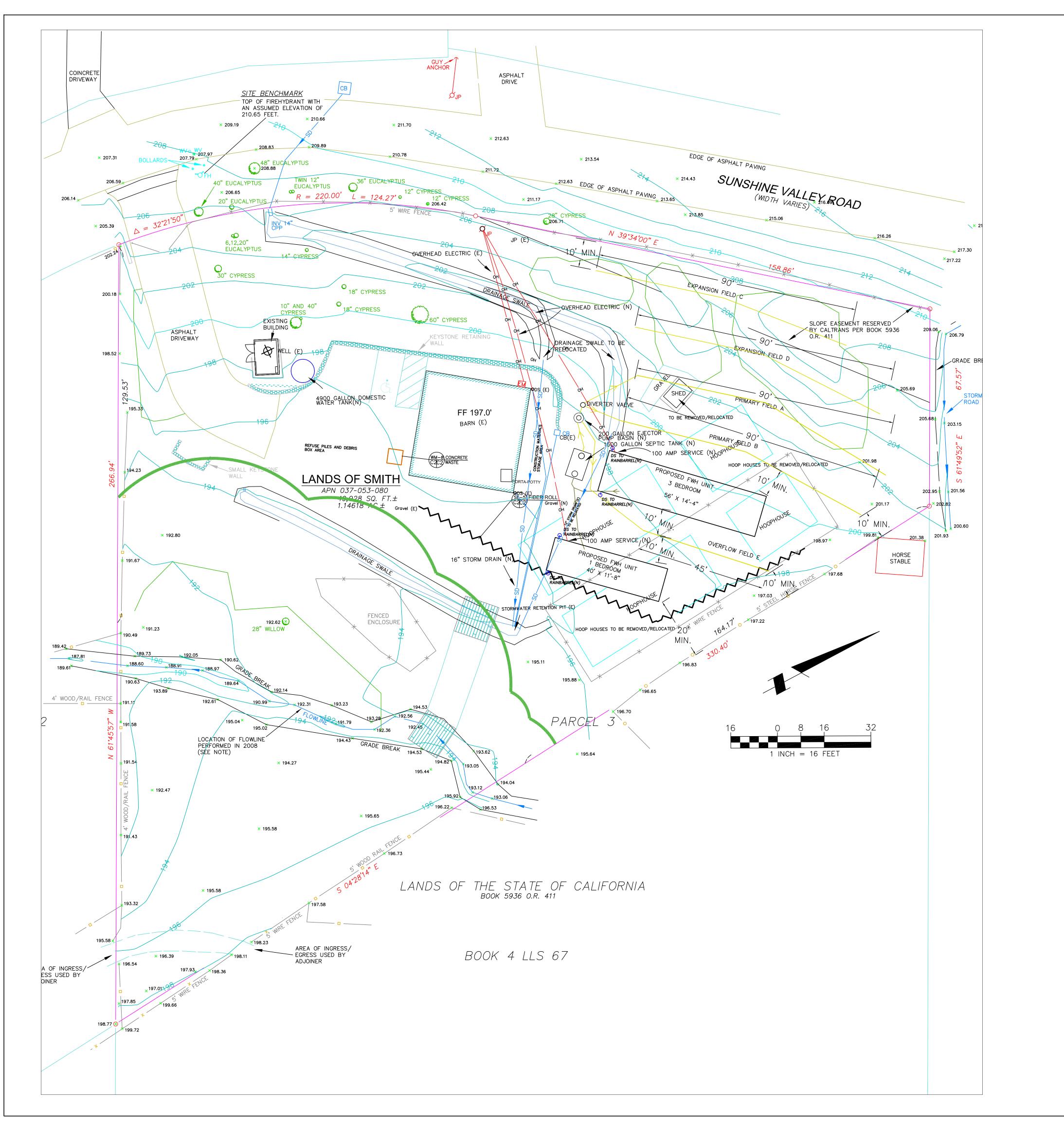
ALL TRENCHES IN PROPOSED LANDSCAPE AREAS SHALL BE BACKFILLED WITH COMPACTED APPROVED GRANULAR MATERIAL TO WITHIN ONE FOOT OF FINISHED GRADE, AND THEN FILLED WITH HAND TAMPED SOILS.





FARM WORKER I GRADING AND D

SHEET



GENERAL EROSION AND SEDIMENT CONTROL NOTES

FIBER ROLL
INSTALL AT LOCATIONS SHOWN.
AFIX AS SHOWN IN DETAIL SE-5

- There will be no stockpiling of soil. All excavated soil will be hauled off-site as it is excavated.
- Perform clearing and earth-moving activities only during dry weather. Measures to ensure adequate erosion and sediment control shall be installed prior to earth-moving activities and construction.
- Erosion control materials to be on-site during off-season.
- Measures to ensure adequate erosion and sediment control are required year-round.
 Stabilize all denuded areas and maintain erosion control measures continuously between October 1 and April 30.
- Store, handle, and dispose of construction materials and wastes properly, so as to prevent their contact with stormwater.
- Control and prevent the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- · Avoid cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- · Limit and time applications of pesticides and fertilizers to prevent polluted runoff.
- · Limit construction access routes to stabilized, designated access points
- Avoid tracking dirt or other materials off-site; clean off-site paved areas and sidewalks using dry sweeping methods.
- Train and provide instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and construction Best Management Practices.
- · Placement of erosion materials is required on weekends and during rain events.
- The areas delineated on the plans for parking, grubbing, storage etc., shall not be enlarged or "run over."
- Dust control is required year-round.
- Erosion control materials shall be stored on-site.
- There are no trees or driplines near the construction site.

EROSION CONTROL POINT OF CONTACT

THIS PERSON WILL BE RESPONSIBLE FOR EROSION CONTROL AT THE SITE AND WILL BE THE COUNTY'S MAIN POINT OF CONTACT IF CORRECTIONS ARE REQUIRED.

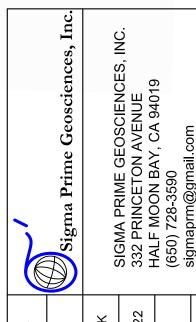
NAME: THERESE SMITH

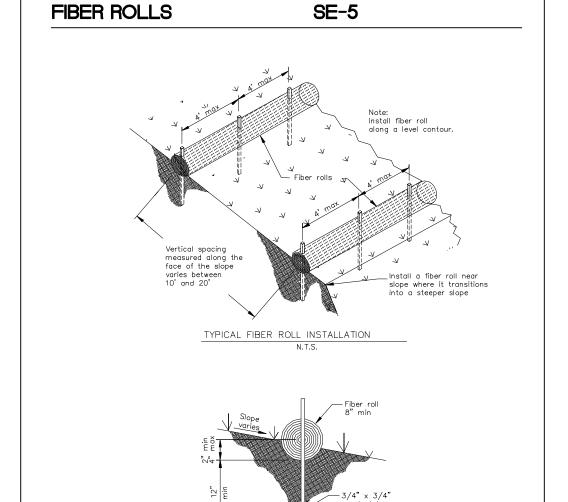
TITLE/QUALIFICATION: OWNER

PHONE: 650-279-4397

PHONE:

E-MAIL: KITTYWAKE@SBCGLOBAL.NET



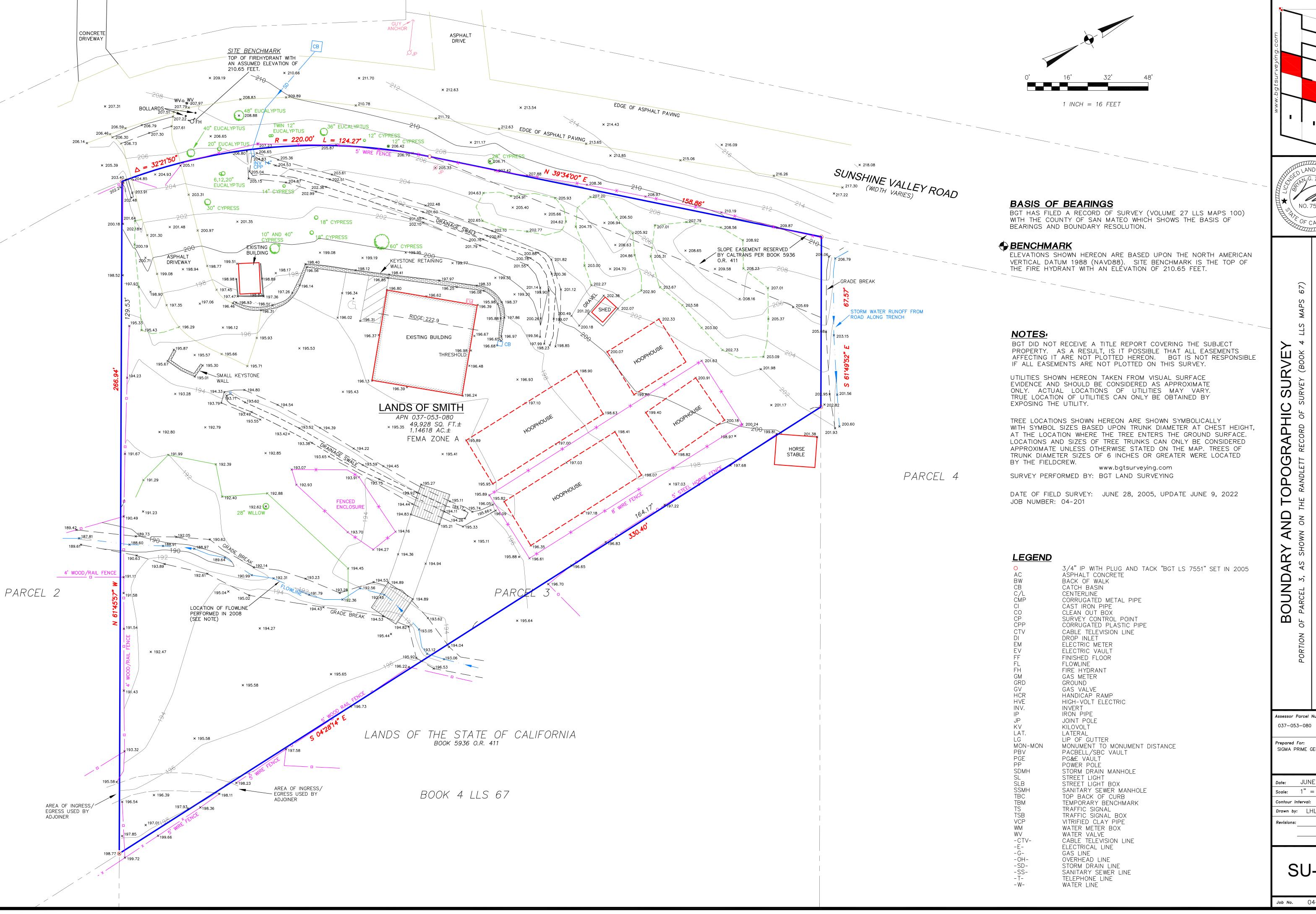


ENTRENCHMENT DETAIL N.T.S.

If more than one fiber roll is placed in a row, the rolls must be overlapped, not abutted.

FARM WORKER EROSION & SE CONTROL F

SHEET





SUNSHINE SAN MATER 5 58

Assessor Parcel Number:

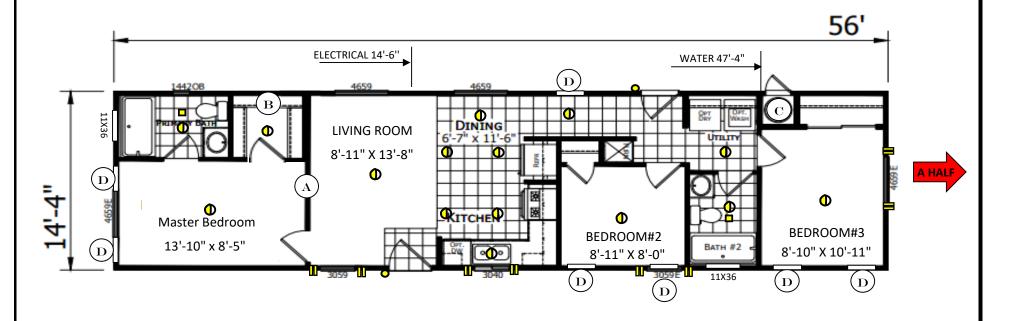
Prepared For: SIGMA PRIME GEOSCIENCES

Date: JUNE 2022

Scale: 1" = 16' Contour Interval: 2' Drawn by: LHL

Job No. 04-201





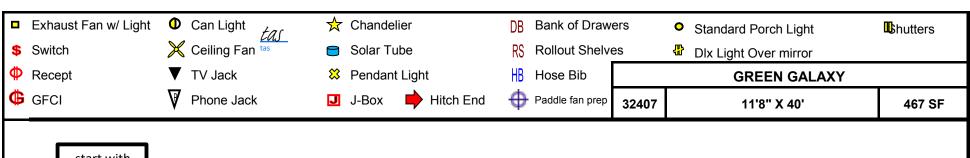
A MOVE WALL 2' INTO LIVING ROOM MAKING CLOSET 2' LARGER

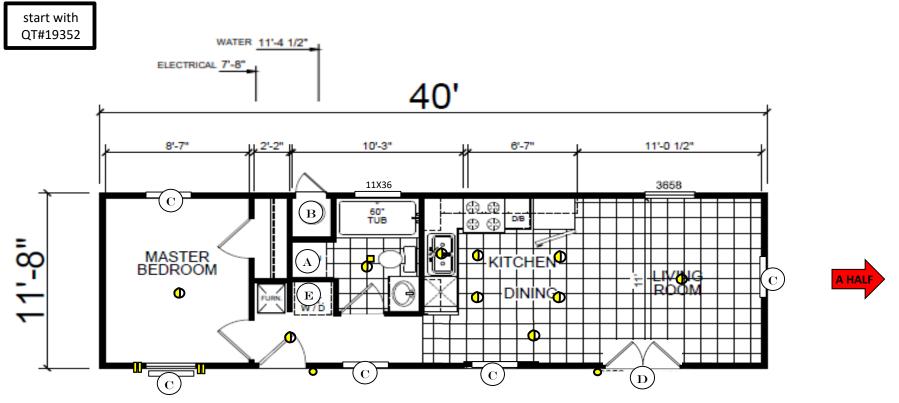
B EXTENDED CLOSET

C 30 GAL ELECTRIC WATER HEATER

D TRANSOM WINDOW

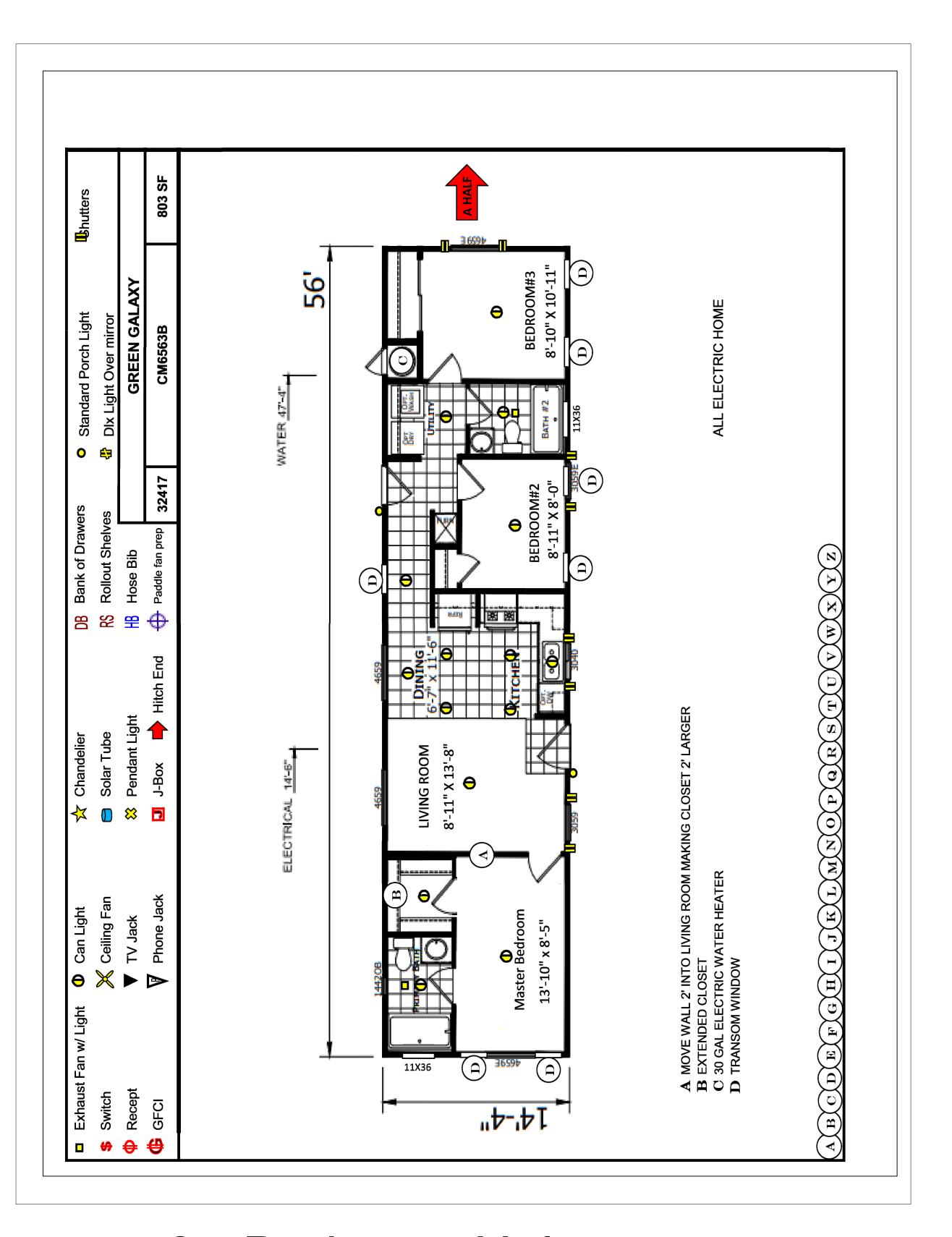
ALL ELECTRIC HOME



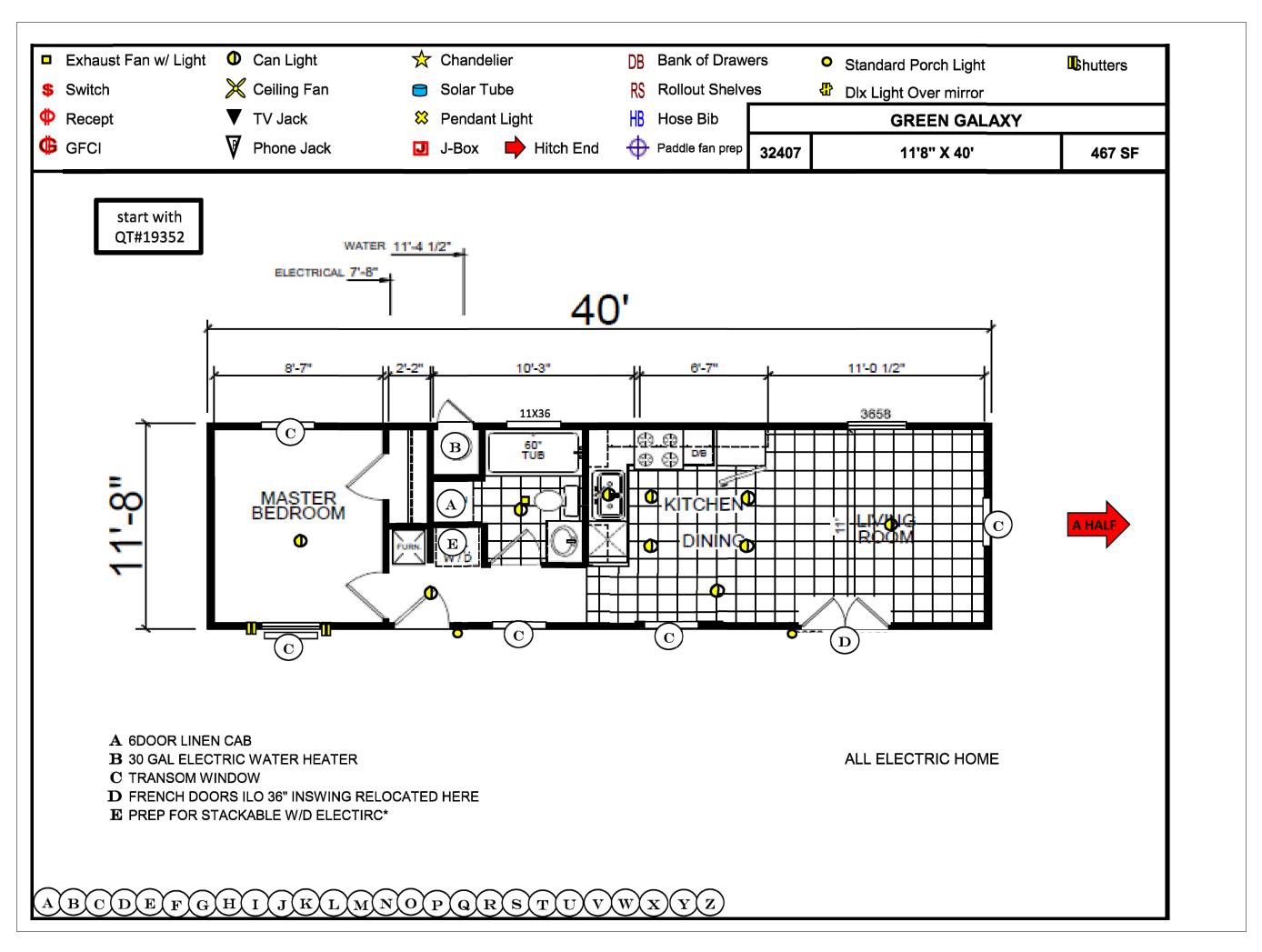


- A 6DOOR LINEN CAB
- **B** 30 GAL ELECTRIC WATER HEATER
- C TRANSOM WINDOW
- **D** FRENCH DOORS ILO 36" INSWING RELOCATED HERE
- E PREP FOR STACKABLE W/D ELECTIRC*

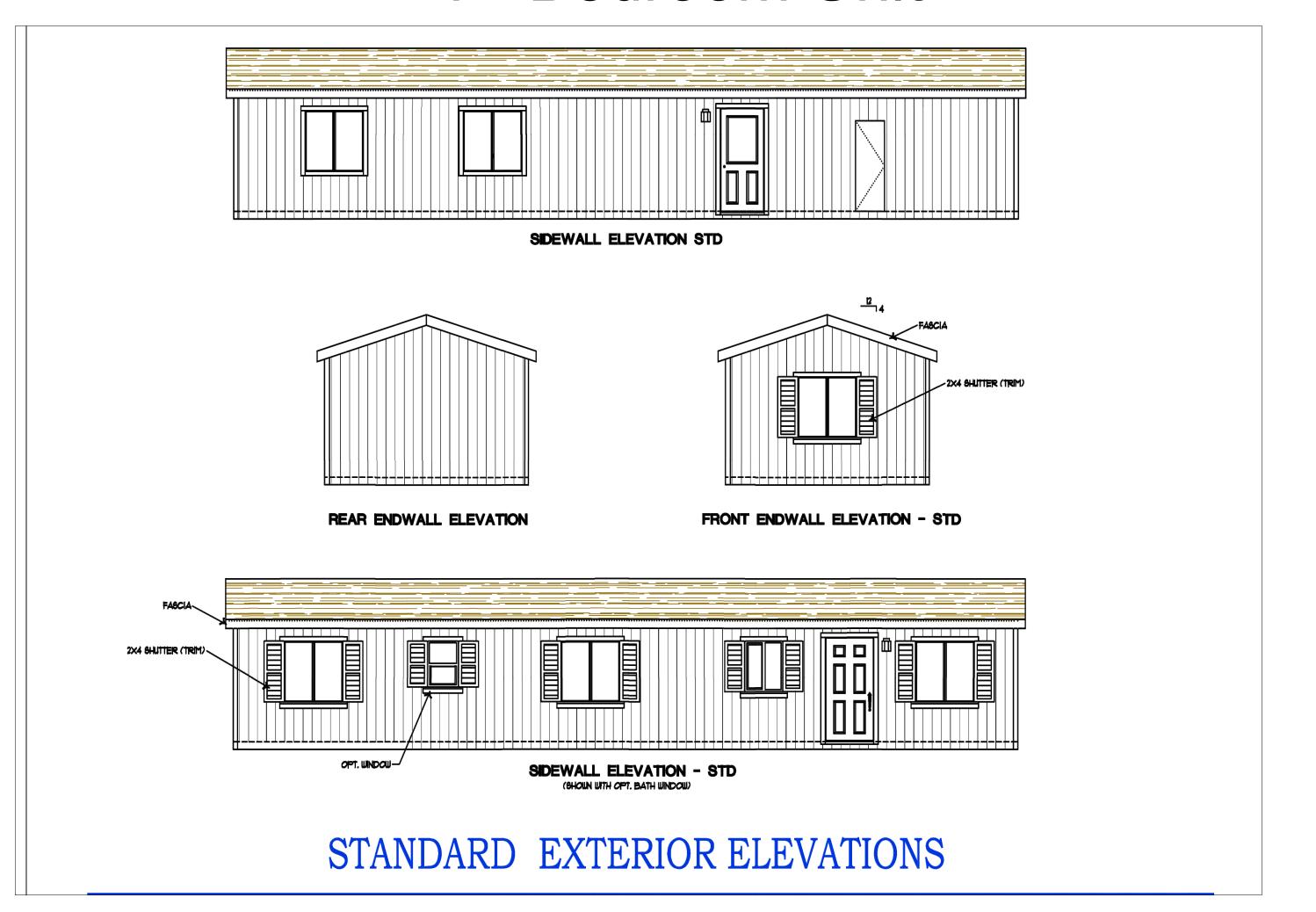
ALL ELECTRIC HOME



3 - Bedroom Unit



1 - Bedroom Unit





DRAWN BY: AZG

CHECKED BY: CMK

SIGMA PRIME GEOSCIENCES, INC.

332 PRINCETON AVENUE

HALF MOON BAY, CA 94019

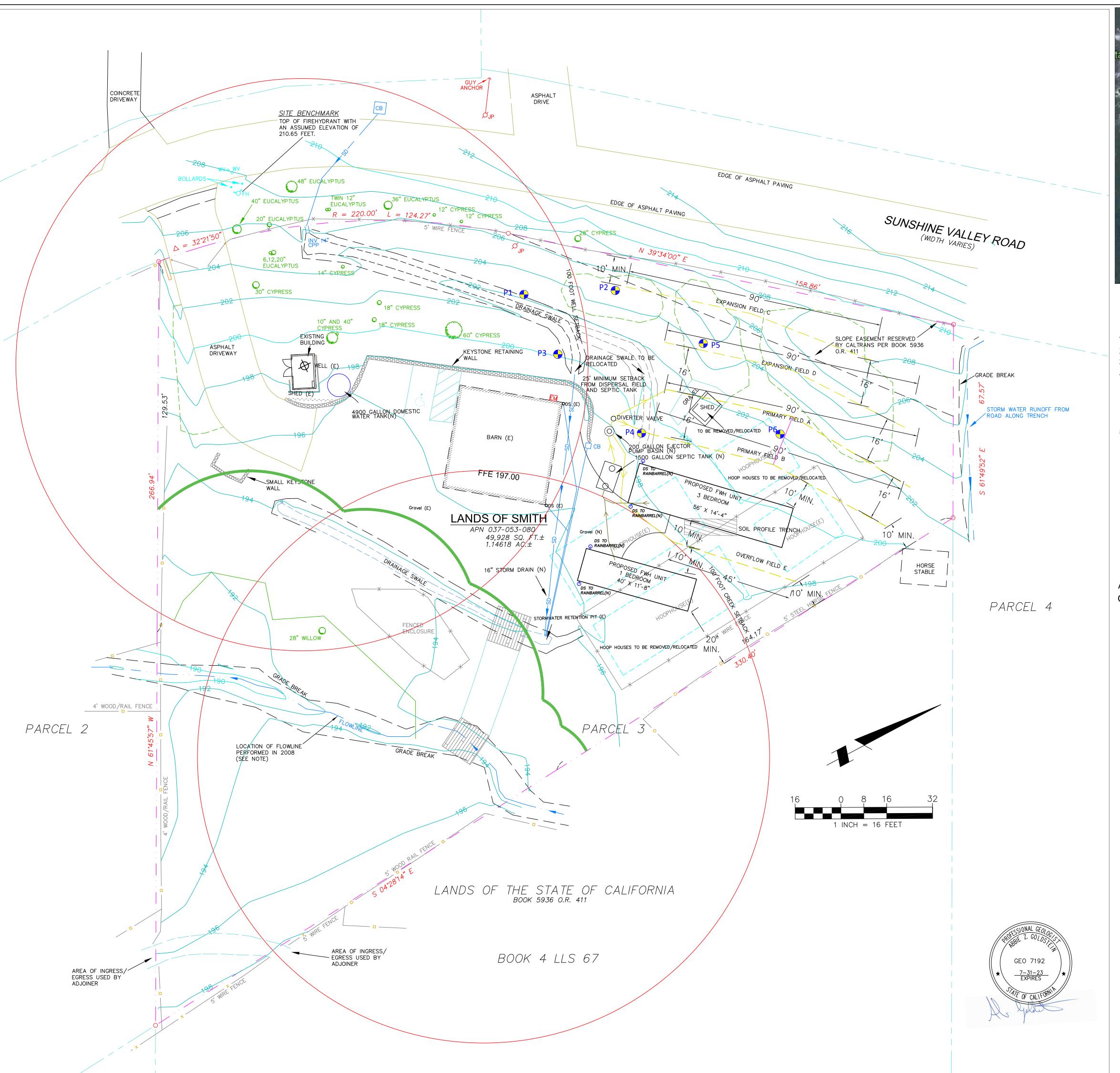
(650) 728-3590

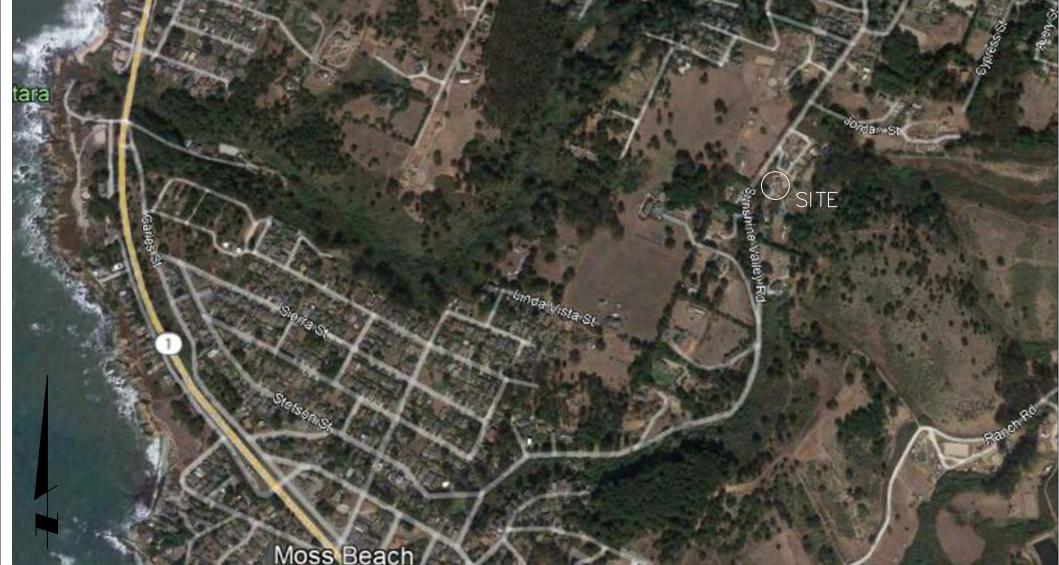
sigmaprm@gmail.com

SMITH PROPERTY
SUNSHINE VALLEY ROAD

SHEET

A-1





LOCATION MAP (Not to Scale)

PROJECT DESCRIPTION

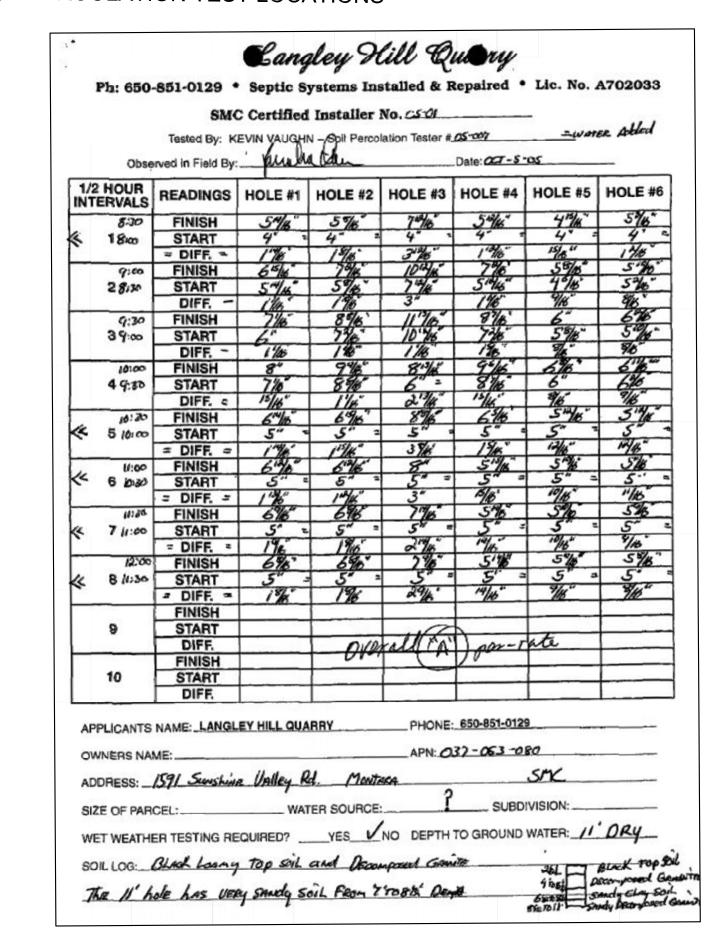
- Installation of new septic system for Farm Worker Housing (FWH) Units.
- 2. A percolation test was performed on October 5, 2005 by Langley Hill Quarry.
- Results show an "A" Percolation Rate.
- 4. OWTS design is for two FWH units one 3 bedroom, the other 1 bedroom. 180 linear feet of drain-field will be necessary for Primary and Expansion Fields with a 1,500 gallon septic tank. 2 leach fields are required, two fields "A" and "B" will be installed as the Primary leach fields. Two fields "C" and "D" are shown on the plan as Expansion leach fields. This area must be protected and land in this area dedicated for future use when necessary.
- 5. A 45' emergency leach field "E" will be installed in case of extended periods of power outage.

SCOPE OF WORK

- 1. Install new 1,500 gallon Don Chapin Pre-Cast septic tank or equivalent and ejector pump system as shown.
- 2. Install new primary leach trenches and overflow trench.
- 3. Install a new flow diversion valve and effluent filter (NSF/ANSI 46).
- 4. Connect new septic and ejector pump tank to diversion valve and valve to tight lines and leach trenches as shown.
- 5. Connect new sewer laterals to inlet of new tank.

All material and methods shall comply with San Mateo County Environmental Health regulations, San Mateo County Building codes, and 2019 CBC. All work must be inspected and approved before back-filling.

P1 • PERCOLATION TEST LOCATIONS



DATE: 2-16-2022

DRAWN BY: AZG

CHECKED BY: CMK

SIGMA PRIME GEOSCIENCES, INC.
332 PRINCETON AVENUE
HALF MOON BAY, CA 94019
(650) 728-3590
sigmaprm@gmail.com

SEPTIC SYSTEM
PLAN
SMITH PROPERTY
SMINSHINF VALLEY ROAD

SHEET
OWTS-



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT D



April 4, 2022

Therese Ambrosi Smith Highway 92 Succulents

RE: 1515 Sunshine Valley Road, Moss Beach, San Mateo County, CA (APN: 037-053-080)

Ms Smith,

This letter is intended to provide you with a summary of an updated site visit at your 1515 Sunshine Valley Road property (Attachment 1). It is WRA's understanding that the County of San Mateo requested an updated biological assessment for the property with regards to a newly proposed farm worker housing project. Please find the following and let me know if you have any questions or comments.

UPDATED SITE VISIT

A WRA biologist visited the subject property on March 30, 2022 to review existing conditions, with a particular focus on willow riparian area and an intermittent stream that was mapped on December 7, 2016 and reported by our office in a letter addressed to you, Therese Ambrosi Smith, on September 22, 2017. (A previous site visit was conducted by our office on December 31, 2009, followed by a letter addressed to John Kowtko on January 8, 2010). The riparian area and intermittent stream were again mapped with a sub-meter GPS unit on March 30, 2022. Likewise, general conditions of the site were evaluated to determine if substantive changes have occurred in the intervening years (i.e., 2016 and 2022) that would change the 2017 assessment for sensitive biological resources to occur on-site.

RESULTS

Subsequent from the 2016 site visit, there have been permitted improvements to the property (barn, garden beds, hoop houses). Several Monterey cypress (*Hesperocyparis macrocarpa*), Monterey pine(*Pinus radiata*), and blue gum (*Eucalyptus globulus*) were removed that fronted on Sunshine Valley Road. The intermittent stream course is unchanged from 2016, and the willow riparian canopy is virtually unchanged (Attachment 2). The property continues to lack essential habitat characteristics to potentially support special-status species. Birds considered under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) have the potential to nest in the site's remaining trees, as well as the willow riparian.

RECOMMENDATIONS

The intermittent drainage and adjoining riparian habitat are considered Sensitive Habitats in the LCP and buffer zones are required. The LCP requires thirty foot buffers be established from the edge of riparian vegetation along intermittent streams and 30 foot buffers from the centerline of intermittent streams where no riparian vegetation is present. Uses within these buffer areas are restricted.

The trees and shrubs that are present in the property may provide habitat for breeding birds which are protected under the MBTA and CFGC. To avoid potential impacts to breeding birds, it is recommended that any tree or shrub removal be conducted between September 1 and February 15, outside of the breeding season for birds (at this time, it is our understanding that no such removal is scheduled or required for this project). If it is not possible to conduct vegetation removal during this time period, preconstruction breeding bird surveys would be necessary to avoid potential impacts to breeding birds. If breeding birds protected by the MBTA and CFGC are observed during pre-construction surveys, no vegetation removal should occur within a 50-foot buffer surrounding the occupied nest. Buffers surrounding nesting birds may be larger or smaller as determined by a qualified biologist based on the location of the nest and species of bird.

It is WRA's understanding that you are proposing to develop two farm worker housing units in the northern portion of the property. In review of the design plans, if all of the abovementioned elements are located outside of the 30-foot buffer and installation conforms with the MBTA and CFGC noted above (i.e., no major vegetation removal February 1 through August 31), this project will not create impacts to sensitive natural resources located or potentially located on the property.

This letter reports the conditions observed on the property during the March 30, 2022 site visit. This memo is based on the data and information available at the time of the survey. A biological assessment is a general review of the site conditions; protocol-level surveys required to determine the definitive presence or absence of any sensitive species were not performed; however, based on habitat conditions observed during the assessment site visit, no protocol-level surveys are recommended.

If you have any questions or comments, please feel free to contact me. Sincerely,

Aaron Arthur Senior Biologist

WRA, Inc.

arthur@wra-ca.com

Attachments: Figures



Sources: National Geographic, WRA | Prepared By: aarthur, 4/4/2022

Attachment 1. Property Location







Sources: DigitalGlobe 2016 Aerial, WRA | Prepared By: aarthur, 4/4/2022

Attachment 2. Willow Riparian Extent



