

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: January 28, 2026

TO: Planning Commission

FROM: Planning Staff

SUBJECT: EXECUTIVE SUMMARY: Consideration of an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit, and adoption of a Mitigated Negative Declaration, to allow a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel, and legalize a five-stall carport structure and three cargo storage containers that support the dog walking operation located at located at 123 Seaside School Road in San Gregorio. The project is located in the Cabrillo Highway State Scenic Corridor, and the CDP is appealable to the California Coastal Commission.

County File Number: PLN2021-00432 (Smilin Dogs)

PROPOSAL

The applicant is seeking an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit to allow a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel located in San Gregorio. The dog walking operation supports a dog daycare business, Smilin Dogs, located in the City of San Carlos. The subject San Gregorio project site is a day-use exercise/walking venue for the business. The project includes legalizing a five-stall carport structure and three cargo storage containers that support the dog walking operation. A regularly-serviced portable toilet is onsite for staff use. No grading and no tree removal is involved.

No changes to existing agricultural use on the property are proposed. An existing legal cottage onsite is being redesignated as an affordable housing unit in the northern portion of the property to relinquish a density credit for the Smilin Dogs operation; no physical site or building changes are proposed for the living unit redesignation.

RECOMMENDATION

That the Planning Commission adopt the Mitigated Negative Declaration and approve the After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit, PLN2021-00432, by making the required findings and adopting the conditions of approval in Attachment A.

SUMMARY

The 150-acre project parcel is located approximately 1/2-mile south of La Honda Road (Highway 84) and 1.3 miles east of Cabrillo Highway (Highway 1) in the San Gregorio area of San Mateo County. The parcel supports two residences and miscellaneous accessory agricultural buildings (i.e., barns, sheds) in the northern portion of the property, active agricultural crop fields in the middle section of the property, and an adjacent man-made irrigation pond to the south of the ag fields. In the southern portion of the property is the approximately 23-acre fenced project site that consists of grassy, sloped, open fields. An intermittent stream with riparian corridor runs north of the irrigation pond and these features act as a visible delineation between the active agricultural fields and the southern dog walking fields.

As proposed and conditioned, the project complies with all applicable Local Coastal Program Policies, General Plan Policies, Zoning Regulations, and Kennel Permit requirements.

An Initial Study (IS) and Mitigated Negative Declaration (MND) were prepared and circulated from September 17, 2025, to October 6, 2025. Comments were received from the California Department of Fish and Wildlife (CDFW) requesting additional mitigations to more sufficiently mitigate the potential project impacts to California red-legged frog and San Francisco garter snake to a less-than-significant level for activities including biannual mowing and the presence of dogs and humans in and related to the project scope. A revised IS/MND was prepared and recirculated from November 19, 2025, to December 18, 2025 to address CDFW's additional recommended mitigations. The California Department of Fish and Wildlife staff acknowledged concurrence with the revised IS/MND on December 5, 2025. The revised IS/MND mitigation measures have been included in the project conditions of approval.

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: January 28, 2026

TO: Planning Commission

FROM: Planning Staff

SUBJECT: Consideration of an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit, pursuant to Sections 6328.4 and 6353 of the Zoning Regulations, Section 261 of the California Streets and Highways Code, and Section 6.20.040 of the County Ordinance Code, respectively, and adoption of a Mitigated Negative Declaration, pursuant to the California Environmental Quality Act, to allow a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel, and legalize a five-stall carport structure and three cargo storage containers that support the dog walking operation located at located at 123 Seaside School Road in San Gregorio. The project is located in the Cabrillo Highway State Scenic Corridor and the CDP is appealable to the California Coastal Commission.

County File Number: PLN2021-00432 (Smilin Dogs)

PROPOSAL

The applicant is seeking an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit to allow a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel located in San Gregorio. The dog walking operation supports a dog daycare business, Smilin Dogs, located in the City of San Carlos. The subject San Gregorio project site is a day-use exercise/walking venue for the business. The project includes legalizing a five-stall carport structure and three cargo storage containers that support the dog walking operation. A regularly-serviced portable toilet is onsite for staff use. No grading and no tree removal is involved.

No changes to existing agricultural use on the property are proposed. An existing legal cottage onsite is being redesignated as an affordable housing unit in the northern portion of the property to relinquish a density credit for the Smilin Dogs operation; no physical site or building changes are proposed for the living unit redesignation.

Dog Walking Operation

Each weekday approximately five converted Smilin Dog passenger vans, each containing approximately 10 to 15 medium- to large-size dogs (in excess of 25 pounds) travel from their licensed San Carlos dog daycare to the project site for off-leash walking within the six fenced upland fields consisting of approximately 23 acres. The dogs stay in groups with a staff handler as they move between the upland exercise fields. Dog waste is collected daily and taken to San Carlos for disposal offsite. The exercise fields are mowed each spring and no grading or tilling is necessary to accommodate the operation. Each field contains one or two small, simple strawbale and post shade structures for the dogs. Small plastic drinking water basins are filled only when the fields are in use and feeding is conducted at the San Carlos facility. No utilities are involved to support the onsite operation.

An existing dirt and gravel access road crosses the property from Seaside School Road to a level carport parking area. The access road was improved in the 1990s for irrigation pond construction access and staging.

After arrival, the dogs are unloaded into an enclosed covered pen where the dogs are provided water and allowed to relieve themselves before walking. One employee walks a pack of dogs through a fenced alleyway to one of six fenced fields. At separate intervals, five packs of dogs are each moved to their fields, which are rotated daily to reduce overuse. The fields are all enclosed with 6 feet tall woven wire fencing. The dogs are always supervised.

Staff walk the same dogs on a weekly recurring schedule and in an orderly manner. The dogs are under voice control and positive reinforcement is used to keep the individual groups with their walkers. Each dog must pass a temperament test at the Smilin Dogs facility in San Carlos before being eligible for walking at the project site; this includes testing for recall and shyness/skittishness.

RECOMMENDATION

That the Planning Commission adopt the Mitigated Negative Declaration and approve the After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit, PLN2021-00432, by making the required findings and adopting the conditions of approval in Attachment A.

BACKGROUND

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

Applicant: Smilin Dogs, Konrad Thaler

Owner: Peter Marchi & Son Farms

Public Notification: Ten-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 a newspaper (San Mateo County Times) of general public circulation on January 17, 2026.

Location: 123 Seaside School Road, San Gregorio

APN: 081-250-030

Size: 150 acres

Existing Zoning: PAD/CD (Planned Agricultural District/Coastal Development)

General Plan Designation: Agriculture

Local Coastal Plan Designation: Agriculture

Williamson Act: Not contracted

Existing Land Use: Residential, agricultural crops

Water Supply: The applicant transports water onsite for daily use associated with dog walking. Existing residential units in the northern portion of the parcel are served by a private onsite well.

Sewage Disposal: N/A; a regularly-serviced portable toilet is onsite for dog walking staff use. Existing residential units in the northern portion of the parcel are served by a private onsite septic system.

Flood Zone: Zone A (one-percent annual chance of flood) and Zone X (area of minimal flood), FEMA Map Panels 06081C0380E and 06081C0359F, effective October 16, 2012 and August 2, 2017, respectively.

Environmental Evaluation: A revised Initial Study (IS) and Mitigated Negative Declaration (MND) were prepared and circulated from November 19, 2025 to December 18, 2025, State Clearinghouse No. 2025-090853. See Section D for further discussion.

Setting: The project parcel is located approximately ½-mile south of La Honda Road (Highway 84) and 1.3 miles east of Cabrillo Highway (Highway 1) in the San Gregorio area of San Mateo County. The 150-acre parcel consists of two residences and miscellaneous accessory agricultural buildings (i.e., barns, sheds) in the northern portion of the property, active agricultural crop fields in the middle section of the property, and an adjacent man-made irrigation pond to the south of the ag fields. In the southern portion of the property is the approximately 23-acre fenced project site that consists of grassy, sloped, open fields. An intermittent stream with riparian corridor runs north of the irrigation pond and these features act as a visible delineation between the

active agricultural fields and the southern dog walking fields. The project site is a former agricultural field that is fenced. An existing access road leads from Seaside School Road to the project area.

Chronology:

<u>Date</u>	<u>Action</u>
November 5, 2021	- Subject application received.
December 3, 2021	- Application deemed incomplete.
December 3, 2021 to August 28, 2025	- Numerous agency review/resubmittal cycles.
September 4, 2025	- Application deemed complete.
September 17, 2025 to October 6, 2025	- Initial Study/Mitigated Negative Declaration public review period. Comments received from California Department of Fish and Wildlife.
October 20, 2025	- Agricultural Advisory Committee (AAC) meeting; AAC recommends approval.
November 19, 2025 to December 18, 2025	- Revised Initial Study/Mitigated Negative Declaration public review period.
January 28, 2026	- Planning Commission hearing.

DISCUSSION

A. KEY ISSUES

1. Conformance with the General Plan

Staff has determined that the project conforms with all applicable General Plan Policies, including:

a. Vegetative, Water, Fish and Wildlife Resources

Policy 1.23 (Regulate Development to Protect Vegetative, Water, Fish and Wildlife Resources), Policy 1.24 (Regulate Location, Density and Design of Development to Protect Vegetative, Water, Fish and Wildlife Resources), Policy 1.28 (Regulate Development to Protect Sensitive Habitats), and Policy 1.29 (Establish Buffer Zones) seek to regulate land use, location, density, and design of development activities to

prevent, and if infeasible minimize and mitigate to the extent possible, significant adverse impacts on vegetative, water, fish, and wildlife resources.

The 23-acre project site area consists of ruderal, nonnative grassland and coyote brush/poison oak scrub. Four special-status animal species and no special-status plants were determined to have potential for occurrence in the project area according to a biological resources survey by Coast Ridge Ecology (2024). Special-status animals with some potential for occurrence include the California red-legged frog, San Francisco garter snake, and western pond turtle that may utilize the nearby irrigation pond and adjacent hillsides within the fenced walking fields. However, these fields do not provide suitable upland cover for these species and the limited use of the fields for dog walking is not expected to present significant impacts to these species according to Coast Ridge Ecology. Additionally, two San Francisco dusky-footed woodrat middens were observed outside of the 23-acre project area but within 20 feet of the carport parking area. Staff has included a condition of approval requiring implementation of mitigation measures as recommended by Coast Ridge Ecology and California Department of Fish and Wildlife (CDFW) to ensure potential impacts to these special-status species are minimized, including but not limited to focused surveys for California red-legged frog (CRLF) and San Francisco garter snake (SFGS), keeping the walking fields free of straw bales that could otherwise attract wildlife, implementing a worker education program for the potential presence of wildlife species, and no disturbance buffers from woodrat nests.

Coast Ridge Ecology reports that San Gregorio Creek is located 400 feet to the north of the project area, at its closest point, and is over 1800 feet (0.35 miles) from the project area's eastern edge near the covered parking area. Between the creek and the Smilin Dogs operation is an active agricultural field. A 3-acre man-made agricultural irrigation pond/reservoir is approximately 40 feet north of the project site area at its closest point. The pond is used for irrigation and is encircled by dense freshwater emergent marsh vegetation (i.e., cattail). The pond is perennial and the water level fluctuates based on water usage for agriculture and season. An unnamed seasonal drainage that is partially vegetated with freshwater riparian scrub is located along the northern boundary of the project area, runs north of the irrigation pond, and flows to San Gregorio Creek. These features are located outside the project area and Coast Ridge Ecology concludes that no impacts from project activities were observed during the site visit, and none are expected based on project activities and distance to these features.

b. Soil Resources

Policy 2.20 (*Regulate Location and Design of Development in Areas With Productive Soil Resources*) seeks to regulate location and design of development to protect productive soil resources, including but not limited to, measures requiring clustering of structures.

According to the General Plan's Productive Soil Resources Map, the project site area consists of soil suitable for grazing. While the project site area has been grazed in the past, such activity ceased after the irrigation pond was constructed in 1988. Nonetheless, the proposed project is a low-impact use that would not prohibit future reuse of the area for grazing.

c. Visual Quality

Policy 4.15 (*Appearance of New Development*), Policy 4.22 (*Scenic Corridors*), and Policy 4.24 (*Rural Development Design Concept*) seek to regulate development to promote and enhance good design, site relationships, and other aesthetic considerations.

The project consists of low-intensity use of open sloped land for dog walking. The walking fields are enclosed by 6 feet tall woven wire fencing. The carport structures are simple, metal carport-kit structures with forest green roofing color and the cargo containers are earth-toned beige and brown colors. Due to their location on site and distance from public roadways, visibility of the structures from public viewpoints is negligible and the structures blend in with the natural rural setting of the area.

d. Historical and Archaeological Resources

Policy 5.20 (*Site Survey*) requires determination if sites proposed for new development contain archaeological/paleontological resources and if so, require mitigation to protect the resource.

A Phase I Cultural Resource Inventory prepared by Albion Environmental, Inc. concluded that the project site area contains no historical, archaeological, or paleontological resources.

e. Rural Land Use

Policy 9.23 (*Land Use Compatibility in Rural Lands*) and Policy 9.30 (*Development Standards to Minimize Land Use Conflicts With Agriculture*) seek to encourage compatibility of land uses in order to promote the health, safety, and economy and to maintain the scenic and harmonious nature of the rural lands, and locate non-agricultural activities in areas on agricultural parcels which cause the least disturbance to feasible agricultural activities, including through the use of physical buffers.

The project takes advantage of the non-prime soil sloped area in the southern portion of the property that was long ago used for grazing but ceased after the nearby irrigation pond was constructed in 1988. While the project entails the use of approximately 23 acres of land suitable for agriculture, this area is distinguished from the ongoing agricultural crops in the northern half of the parcel by an irrigation pond and access road between the two areas of use. Furthermore, there is minimal structural development and no grading proposed, therefore, the project site area will be maintained as open rural fields.

2. Conformance with the Local Coastal Program (LCP)

Staff has determined that the project conforms with all applicable LCP Policies, including:

a. Locating and Planning New Development

Policy 1.8 (*Land Uses and Development Densities in Rural Areas*) requires density credits for all new or expanded non-agricultural land uses in rural areas, including all residential uses, except affordable housing and farm labor housing, among other exceptions.

The property supports two existing residences built in the early 1900s. A density analysis for the property concluded the property has two density credits. An existing legal cottage onsite is being redesignated as an affordable housing unit in the northern portion of the property to relinquish a density credit for the Smilin Dogs operation; no physical site or building changes are proposed for the living unit redesignation. A condition of approval is included to require an affordability agreement to be executed between the County and property owner. See also Section A.3.c. (Maximum Density of Development) below.

b. Housing

Policy 3.24 (*Density Bonus for Affordable Housing in Rural Areas*) allows 30 affordable housing units in the rural areas of the South Coast, in addition to the number of density credits permitted by zoning regulations.

Based on zoning regulations, the property has two density credits, which are allocated to the two existing residences on the property. Redesignation of one of the residences to an affordable unit, as proposed and conditioned, would provide a density credit for the proposed dog walking operation. Additionally, the affordable unit would constitute the twenty-fifth affordable unit in the South Coast, thus falling within the 30-unit limit.

c. Agriculture

The County Zoning Regulations are the implementing plan for the LCP. As such, Chapter 21A (Planned Agricultural District) of the zoning regulations mirrors this Agriculture Component of the LCP, but with greater detail. Therefore, analysis of the project against the LCP's agriculture policies is discussed in Section A.3 below.

d. Sensitive Habitats

LCP Policy 7.3 (*Protection of Sensitive Habitats*), Policy 7.5 (*Permit Conditions*), Policy 7.11 (*Establishment of Buffer Zones*), and Policy 7.12 (*Permitted Uses in Buffer Zones*) seek to prohibit land uses or development which would have significant adverse impact on sensitive habitat areas, including by requiring a biological assessment from a qualified professional to determine project impacts to sensitive habitat and mitigation, and development restrictions in proximity to riparian habitat.

A biological assessment by Coast Ridge Ecology determined that the project does not have any impact on sensitive vegetation or habitat resources. With proper mitigation as recommended by Coast Ridge Ecology and the CDFW, the project will have minimal impacts on wildlife species. All recommended mitigation measures from the Initial Study/Mitigated Negative Declaration have been included as project conditions of approval. See also staff's discussion in Section A.1.a. (Vegetative, Water, Fish and Wildlife Resources) above.

e. Visual Resources

LCP Policy 8.5 (*Location of Development*), Policy 8.18 (*Development Design*), and Policy 8.31 (*Regulation of Scenic Corridors in Rural Areas*) seek to regulate development in scenic corridors to best preserve the natural visual qualities of the area through appropriate siting and design.

The project site is more than .35 miles from La Honda Road and .75 miles from Cabrillo Highway scenic roads. Visibility of the project site from La Honda Road and Cabrillo Highway is minimal due to distance, travel speed, intervening vegetation, and topography. See also staff's discussion in Section A.1.c. (Visual Quality) above.

3. Conformance with the Planned Agricultural District (PAD) Regulations

The project conforms with the applicable zoning development standards discussed below:

a. Use and Development Standards

The project site area is designated as lands suitable for agriculture according to the General Plan Agricultural Lands map. The proposed dog walking operation meets the definition of a kennel pursuant to County Ordinance Code Section 6.20.010(b)(3). Kennels are a permissible use on lands suitable for agriculture in the PAD zoning district subject to a PAD permit. The five carports and three cargo containers that support the dog walking operation comply with Section 6358 and Section 6359 of the Zoning Regulations for height and setbacks of structures, as shown in the table below:

	Development Standard	Proposed	Project Compliance
Minimum Front Setback	50 ft.	+ 600 ft.	Yes
Minimum Rear Setback	20 ft.	+ 600 ft.	Yes
Minimum Side Setbacks	20 ft.	+ 600 ft.	Yes
Maximum Height	3 stories / 36 ft.	1 story / 15 ft.	Yes

b. Substantive Criteria

The project conforms to the substantive criteria for issuance of a PAD Permit in Section 6355, including the following applicable criteria:

(1) General Criteria

- (a) *The encroachment of all development upon land which is suitable for agricultural use shall be minimized.*

The relatively level prime soil areas of the property will continue to support commercial crop production, including brussels sprouts, peas, string beans, artichokes, pumpkins, corn, and potatoes. The remainder of the property is considered land suitable for agriculture according to the General Plan. The project takes advantage of the non-prime soil sloped area to the south that was long ago used for grazing, but such activity ceased after the irrigation pond was constructed in 1988. While the project entails the use of approximately 23 acres of land suitable for agriculture, there is minimal structural development and no grading proposed that would inhibit future potential reuse of the area for agricultural activity.

- (b) *All development permitted on a site shall be clustered.*

Existing residential and agricultural development is clustered in the northern farm center portion of the parcel. The dog walking operation is located in the southern portion of the parcel to minimize conflicts with productive agriculture uses on the site and to utilize land not in agricultural production. Additionally, the carports and cargo containers are clustered in the northeast corner of the dog walking lease area.

- (c) *Every project shall conform to the Development Review Criteria contained in Chapter 20A.2 of the San Mateo County Ordinance Code.*

The project will comply with the applicable Development Review Criteria contained in Chapter 20.A.2 of the County Ordinance Code for environmental quality, site design, water resources, and primary scenic resources, as the project is a low-intensity land use that does not involve any grading, tree removal, utilities, or lighting. The project will utilize an existing access road and involves simple structures to support the operation. Furthermore, visibility of the project site from La Honda Road and Cabrillo Highway is minimal due to distance, travel speed, intervening vegetation, and topography.

(2) Water Supply Criteria

Adequate and sufficient water supplies needed for agricultural production and sensitive habitat protection in the watershed are not diminished.

The project will not require groundwater or surface water that could affect agricultural production or sensitive habitat protection. The dogs are fed offsite, and the applicant transports water onsite for daily use associated with dog walking. A serviced portable toilet is also maintained on site for staff use.

(3) Criteria for the Conversion of Lands Suitable for Agriculture and Other Land

Lands suitable for agriculture and other lands within a parcel shall not be converted to uses permitted by a PAD Permit unless all of the following criteria are met:

- (a) *All agriculturally unsuitable lands on the parcel have been developed or determined to be undevelopable.*

Approximately 50 acres of the 150-acre parcel are considered suitable for active agricultural production and are utilized for commercial crop production. The remainder of the land is designated as suitable for agriculture and consists of gentle to moderate sloped terrain. The project site is in the southern portion of the parcel with existing physical barriers (i.e., irrigation pond, access road) buffering the project from agricultural uses onsite. The parcel does not contain any lands designated unsuitable for agriculture.

- (b) *Continued or renewed agricultural use of the soils is not capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.*

The sloping non-prime soil areas to the east and south, including the project site area, were tilled and planted with hay, fava beans, and peas many years ago, but active production has ceased, and no tilling occurs to preserve the natural vegetative cover. These areas were at one time grazed; however, after the construction of the water reservoir in 1988, grazing ceased. The project consists of

a low-intensity use that is not expected to change the condition of the soil or its potential to support future agricultural use of the area.

- (c) *Clearly defined buffer areas are developed between agriculture and non-agricultural uses.*

Access roads through the property and an irrigation pond constructed in 1988 south of the active crop fields provide a buffer between the project site area and active agricultural activities onsite.

- (d) *The productivity of any adjacent agricultural lands is not diminished, including the ability of the land to sustain dry farming or animal grazing.*

The dog walking operation is entirely within the project parcel boundaries and would not have any effect on the productivity of any adjacent agricultural lands.

- (e) *Public service and facility expansions and permitted uses do not impair agricultural viability either through increased assessment costs or degraded air and water quality.*

No public service or facility expansions are necessary to support the project.

c. Maximum Density of Development

Pursuant to Section 6356 of the Zoning Regulations, non-agricultural uses shall only be permitted on a parcel when there are enough density credits available to the parcel to meet the density credit requirements for both existing and additional uses. A density analysis completed for the parcel in 2014 (PLN2014-00437) concluded the parcel has two density credits. Existing development on the property includes two residences, each consuming a density credit. The property owner is proposing to redesignate one of the existing residences, a 532 sq. ft. one bed/one bath unit, to affordable housing. The redesignation would make a density credit available for the proposed kennel operation as affordable housing units do not require a density credit. A condition of approval is included to require an affordability agreement to be executed between the County and the property owner.

d. Agricultural Land Management Plan

An agricultural land management plan for parcels greater than 20 acres in size shall demonstrate how the agricultural productivity of the land will be fostered and preserved.

The project will not interfere with or disrupt the ongoing agricultural activities or productivity of the parcel. A narrative and map identifying the ongoing agricultural use and extent of use on the parcel are included in Attachment F.

4. Conformance with the Regulations for Kennels

Pursuant to Section 6353.B.14. of the PAD Zoning Regulations, the proposed use requires a Kennel Permit. Pursuant to Section 6.20.060 of the County Ordinance Code for Kennels, the following findings must be made:

a. General Requirements for Kennels

- (1) That the keeping and maintenance of the animals will not create a nuisance or endanger the public health, safety, or welfare.
- (2) That facilities exist at the proposed location to safely and adequately secure, feed, house, exercise, and maintain the animals.
- (3) That facilities exist at the proposed location to provide adequate light, ventilation and space for each animal to move, stand, and sit.
- (4) That possession and maintenance of the animals at the proposed location will not result in the animals being subject to discomfort, neglect, suffering, cruelty, or abuse.
- (5) That the permit holder agrees to make every effort to keep all animals free of disease and parasites and provide adequate veterinary care as needed.
- (6) Where permanent buildings are constructed for the keeping of animals, they shall be of Type V or better construction as defined in the County Building Regulations (Division 7 of this Ordinance Code).
- (7) That the keeping of the animals at the facility will not violate any federal, state or local law.

- (8) That the applicant has not had any animal license or permit revoked or been convicted of violating any provision of Chapters 6.04, 6.12, or 6.16 of this Ordinance Code, or any other federal, state or local animal control law, within the past year.

b. Specific Requirements for Kennels.

- (1) That any building, pen, run, or other enclosure housing dogs is at least 300 feet from any residence on a neighboring property, unless an exception is granted pursuant to Section 6.20.130.
- (2) That all outdoor dog pens and runs are kept free of standing water and are enclosed with a substantial fence which adequately secures the dogs.

Based on the rural project location and proposed operation of daily dog walking visits, there is no evidence to suggest that the proposed use will create a nuisance or endanger the public health, safety, or welfare, or cause discomfort, neglect, or abuse for the animals. The proposed operation will provide open rural fenced fields located more than 300 feet from the nearest residence for daily exercise with minimal impacts to the surrounding area, including sensitive habitat areas, neighbors, or productive agricultural activities. The project will comply with all federal, state and local laws for the care of animals, and the applicant has not had any animal license or permit revoked. Therefore, the proposed project complies with the General and Specific Requirements for Kennels as specified above.

B. ARCHITECTURAL REVIEW PERMIT

The project is in compliance with the architectural design standards for the Cabrillo Highway State Scenic Corridor as regulated by the policies and criteria within the General Plan Visual Quality Policies, Local Coastal Program Visual Resources Component, and Planned Agricultural District General Criteria as discussed above. Visual impacts from Cabrillo Highway will be minimal due to the project's distance from Cabrillo Highway, travel speed, intervening vegetation, and topography.

C. REVIEW BY THE AGRICULTURAL ADVISORY COMMITTEE

The Agricultural Advisory Committee (AAC) considered this project at their October 20, 2025 meeting and recommended approval of the project.

D. ENVIRONMENTAL REVIEW

An Initial Study (IS) and Mitigated Negative Declaration (MND) were prepared and circulated from September 17, 2025 to October 6, 2025, State Clearinghouse No. 2025-090853. Comments were received from the California Department of Fish and Wildlife (CDFW) requesting additional mitigation to sufficiently mitigate the potential project impacts to CRLF and SFGS to a less-than-significant level for activities including biannual mowing and the presence of dogs and humans in and related to the project scope. A revised IS/MND were prepared and recirculated from November 19, 2025, to December 18, 2025 to address CDFW's additional recommended mitigation. The California Department of Fish and Wildlife staff acknowledged concurrence with the revised IS/MND on December 5, 2025, Attachment I. The revised IS/MND mitigation measures have been included in the project conditions of approval in Attachment A.

E. REVIEWING AGENCIES

Building Division
Department of Public Works
Environmental Health Services
San Mateo County Fire Department

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Operational Statement
- D. Project Plans
- E. Site Photos
- F. Agricultural Land Management Plan
- G. Revised Initial Study/Mitigated Negative Declaration, November 19, 2025
- H. Biological Report by Coast Ridge Ecology, February 2024
- I. California Department of Fish and Wildlife Concurrence, December 5, 2025
- J. California Department of Fish and Wildlife Comment Letter, September 29, 2025



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT A

County of San Mateo
Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN2021-00432 Hearing Date: January 28, 2026

Prepared By: Summer Burlison, For Adoption By: Planning Commission
Senior Planner

RECOMMENDED FINDINGS

For the Environmental Review, Find:

1. That the Revised Initial Study and Mitigated Negative Declaration are complete, correct, and adequate, and prepared in accordance with the California Environmental Quality Act (CEQA) and applicable State and County Guidelines. A Revised Initial Study and a Mitigated Negative Declaration were prepared and issued with a public review period from November 19, 2025, to December 18, 2025.
2. That, on the basis of the Initial Study, comments received, and testimony presented and considered at the public hearing, there is no substantial evidence that the project will have a significant effect on the environment. The Revised Initial Study and Mitigated Negative Declaration identify potentially significant impacts to biological resources. The mitigation measures contained in the Mitigated Negative Declaration have been imposed as conditions of approval in this attachment. As proposed and mitigated, the project will not result in any significant environmental impacts.
3. That the mitigation measures identified in the Mitigated Negative Declaration have been agreed to by the applicant and imposed as conditions of project approval.
4. That the Initial Study and Mitigated Negative Declaration reflect the independent judgment of the County.

For the Coastal Development Permit, Find:

5. 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 LCP, specifically with regard to the Locating and Planning New

Development, Housing, Agriculture, Sensitive Habitats, and Visual Resources Components of the Local Coastal Program.

6. That the project 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) since the project is not located between the nearest public road and the sea, or the shoreline of Pescadero Marsh.
7. That the project conforms to specific findings required by policies of the San Mateo County LCP with regard to the Locating and Planning New Development, Housing, Agriculture, Sensitive Habitats, and Visual Resources Components. Specifically, as proposed and conditioned, the project will not have any significant adverse impacts on coastal resources, including biological resources, or diminish the agricultural productivity of land; development is minimal and preserves the rural natural setting of the area, and the project will include redesignation of an existing residence to an affordable unit in order to comply with the density allowance for the property.
8. That the number of affordable housing units in the rural South Coast area does not exceed the 30-unit limit pursuant to LCP Policy 3.24 as approval of the proposed unit constitutes the twenty-fifth affordable unit in the South Coast.

For the Planned Agricultural District, Find:

General Criteria

9. That the encroachment of all development upon land which is suitable for agriculture is minimized as the project area does not contain prime soils; that the proposed development is clustered and avoids areas of the site used for agricultural activities; and that the project complies with the Development Review Criteria contained in Chapter 20A.2 of the San Mateo County Ordinance Code for as the project is a low-intensity land use that does not involve any grading, tree removal, utilities, or lighting and utilizes an existing access road, involves simple structures and would be minimally visible from scenic roadways.

Water Supply Criteria

10. That adequate and sufficient water supplies needed for agricultural production and sensitive habitat protection in the watershed are not diminished as the project does not require groundwater or surface water that could affect agricultural production or sensitive habitat protection.

Criteria for the Conversion of Lands Suitable for Agriculture and Other Lands

11. That all agriculturally unsuitable lands on the parcel have been developed or determined to be undevelopable, as the project avoids suitable land and prime soil areas that are utilized for commercial crop production; continued or renewed agricultural use of the soils is not capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors as agricultural activity in the project site area of the parcel ceased in the late 1980s, nevertheless, the proposed project is not expected to change the condition of the land in a manner that would prohibit its potential to support future agricultural use of the area; that clearly defined buffer areas are provided between agriculture and non-agricultural uses and that the productivity of any adjacent agricultural lands is not diminished, as the project site area is buffered from agricultural use on the site by an existing access road and irrigation pond constructed in the late 1980s, and the proposed project is contained entirely within the project parcel boundaries; and that public service and facility expansions and permitted uses will not impair agricultural viability either through increased assessment costs or degraded air and water quality as public service expansions are not required for the development and the project will not adversely impact the present or future agricultural viability of the land.

For the Architectural Review Permit, Find:

12. That the project is in compliance with the architectural design standards for the Cabrillo Highway State Scenic Corridor as regulated by the policies and criteria within the General Plan Visual Quality Policies, Local Coastal Program Visual Resources Component, and Planned Agricultural District General Criteria. As discussed in the associated staff report dated January 28, 2026, visual impacts from Cabrillo Highway will be minimal due to the project's distance from Cabrillo Highway, travel speed, intervening vegetation, and topography.

For the Kennel Permit, Find:

13. That the project complies with the General Requirements and Specific Requirements outlined in Section 6.20.060 of the County Ordinance Code for Kennels, as listed below and discussed in Section A.4. of the staff report.
 - a. General Requirements for Kennels
 - (1) That the keeping and maintenance of the animals will not create a nuisance or endanger the public health, safety, or welfare.
 - (2) That facilities exist at the proposed location to safely and adequately secure, feed, house, exercise, and maintain the animals.

- (3) That facilities exist at the proposed location to provide adequate light, ventilation, and space for each animal to move, stand, and sit.
- (4) That possession and maintenance of the animals at the proposed location will not result in the animals being subject to discomfort, neglect, suffering, cruelty, or abuse.
- (5) That the permit holder agrees to make every effort to keep all animals free of disease and parasites and provide adequate veterinary care as needed.
- (6) Where permanent buildings are constructed for the keeping of animals, they shall be of Type V or better construction as defined in the County Building Regulations (Division 7 of this Ordinance Code).
- (7) That the keeping of the animals at the facility will not violate any federal, state or local law.
- (8) That the applicant has not had any animal license or permit revoked or been convicted of violating of any provision of Chapters 6.04, 6.12, or 6.16 of this Ordinance Code, or any other federal, state or local animal control law, within the past year.

b. Specific Requirements for Kennels

- (1) That any building, pen, run or other enclosure housing dogs is at least 300 feet from any residence on a neighboring property, unless an exception is granted pursuant to Section 6.20.130.
- (2) That all outdoor dog pens and runs are kept free of standing water and are enclosed with a substantial fence which adequately secures the dogs.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

- 1. The approval applies only to the proposal as described in this report and materials submitted for review and approval by the Planning Commission on January 28, 2026. The Director of Planning and Building may approve minor revisions or modifications to the project if they are found to be consistent with the intent of and in substantial conformance with this approval. Any project changes or change in intensity of use may require an amendment to the permits. Amendments not

determined by the Director of Planning and Building to be minor require an application for amendment, payment of applicable fees, and consideration at a public hearing.

2. These permits shall be valid for one year from the date of final approval, in which time a building permit shall be issued and a completed inspection (to the satisfaction of the Building Inspection Section) shall have occurred within one year of issuance. Any extension of the permits shall require submittal of an application for permit extension and payment of applicable extension fees 60 days prior to the expiration date.
3. The kennel permit shall be renewed on an annual basis. Renewals shall be applied for (3) months prior to expiration to the Planning and Building Department and shall be accompanied by the renewal application and fees applicable at that time.
4. The applicant shall submit the following to the Current Planning Section: Within **four working days of the final approval date for this project**, the applicant shall pay an environmental filing fee of \$3,093.75, as required under Fish and Game Code Section 711.4, which includes a \$50.00 recording fee. A check made payable to "San Mateo County Clerk" shall be submitted to the project planner to file with the Notice of Determination. Please be aware that the Department of Fish and Game environmental filing fee increases starting the 1st day of each new calendar year (i.e., January 1, 2027). The fee amount due is based on the date of payment.
5. Prior to the issuance of a building permit, the applicant shall execute an agreement with the County, and record a deed restriction to the satisfaction of the Director of Planning and Building, binding current and future property owners to comply with income and rent controls for affordable housing units, as follows: rented by and at a rental rate that is affordable to a household that qualifies as low-income or below as defined by the California Department of Housing and Community Development and determined by the San Mateo County Housing Department. The agreement shall include adequate monitoring and enforcement mechanisms to ensure continued compliance with income/rent restrictions for at least the duration that the dog walking use is operating onsite.
6. Should the dog walking operation terminate, its density credit would become available for the property to be utilized in a manner consistent with the County's Local Coastal Program and Zoning Regulations.
7. Prior to the issuance of a building permit, the applicant shall pay all applicable Affordable Housing Impact Fees, pursuant to San Mateo County Ordinance No. 4758. The impact fees shall be assessed at \$5.00 per sq. ft. over 3,500 sq. ft. of net new non-residential floor area. The redesignated affordable housing unit is exempt from an Affordable Housing Impact Fee.

8. The permit holder shall comply with all requirements for kennels, as specified in Ordinance Code Section 6.20.060.
9. The permit holder shall post the issued kennel permit as provided herein in a conspicuous place in the facility or provide it for inspection upon request.
10. The portable toilet shall be regularly serviced by a certified San Mateo County Septic Pumping Company.

Mitigation Measures from the Revised IS/MND

11. **Mitigation Measure 1:** Prior to commencement of Project activities, focused surveys for California red-legged frog (CRLF) and San Francisco garter snake (SFSG) shall be conducted by a California Department of Fish and Wildlife (CDFW)-approved qualified biologist experienced with CRLF and SFSG identification and life histories. Surveys shall follow protocols approved by the California Department of Fish and Wildlife.

If the results of focused surveys indicate CRLF and/or SFSG are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid all impacts to state and federally listed and fully protected species and their habitat.

12. **Mitigation Measure 2:** Prior to project mowing activities, an SFSG avoidance plan shall be prepared for implementation in coordination with CDFW. The SFSG avoidance plan shall be prepared by a qualified biologist experienced in the natural life history requirements of SFSG. At a minimum, the SFSG avoidance plan shall include the following elements:
 - a. Depict locations of mowing with respect to grasslands, wetlands, riparian vegetation, and dense vegetation surrounding any ponds on a map. Create habitat buffers and avoid mowing areas that are sensitive or have increased potential for SFSG presence, such as dense wetland vegetation areas;
 - b. Require a biological monitor on-site proficient in SFSG identification to walk ahead of the mower if mowing occurs during the months of February - November;
 - c. Avoid mowing during peak active SFSG periods to the greatest extent feasible. SFSG are less active and often underground during late fall to early spring months;
 - d. Increase mowing blade heights to cut grass as high as possible, i.e., eight inches;
 - e. Limit mowing speed to a sufficiently slow rate to allow any undetected SFSG to leave on its own volition unharmed; and
 - f. Implement sensitive species worker education for project staff and workers.

If any CRLF or SFGS take occurs or if either of these species is detected, CDFW shall be contacted immediately, and location information and photo documentation of the individual(s) shall be provided.

13. **Mitigation Measure 3:** Prior to Project construction or continuation of ongoing Project activities, including dog walking and mowing in uplands adjacent to riparian areas and the irrigation pond, focused surveys for Northwestern pond turtle (NWPT) shall be conducted by a CDFW-approved qualified biologist experienced with NWPT identification and life histories. Surveys shall follow protocols approved by the California Department of Fish and Wildlife.

If the results of focused surveys indicate NWPT are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid, minimize, and mitigate all impacts to NWPT and their habitat. These measures could include, at a minimum, establishing best management practices for ongoing Project operations, creating buffers of sufficient size to protect habitat resources, and implementing worker education programming for construction workers, dog walkers, and all individuals who would be accessing and working in the Project site area.

14. **Mitigation Measure 4:** The dog walking fields shall be maintained free of straw bales to avoid attracting wildlife and reduce the likelihood of attracting protected wildlife species such as the California red-legged frog and San Francisco garter snake. The fields shall also be kept clear of clutter, pipes, tarps, wood, or other objects that could attract wildlife.
15. **Mitigation Measure 5:** A worker education program shall be conducted for each project-related staff person, including but not limiting construction workers, dog walkers, and all individuals who would be accessing and working on the project site that includes training on California red-legged frog (CRLF), San Francisco garter snake (SFGS), and western pond turtle (WPT) identification, penalties for harming these species or their habitat, and the protocol to be followed should these species be encountered. The worker education program should include color photo cards of CRLF, SFGS, and WPT that remain on the project site.
16. **Mitigation Measure 6:** A 10-foot radius no disturbance buffer from San Francisco dusky-footed woodrat nests shall be maintained at all times.

Building Division

17. Building permits shall be obtained to legalize the carport structures.

Environmental Health Services

18. At the building permit stage, the onsite wastewater treatment system (OWTS) for the affordable housing unit will need to be staked out by the registered professional (this may involve minor excavation exposing elements of the system for verification) and field inspected with Environmental Health. In addition, the registered professional must complete a deep hole test pit in the area designated as reserve to verify depth to groundwater and limiting soil conditions.

San Mateo County Fire Department

19. 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 that is contrasting with the background. Such letter/numerals shall be illuminated and facing the direction of access.

<u>Distance from Road</u>	<u>Address No. Size</u>
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.

20. 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.
21. An address shall be required for both the new affordable housing unit (123B Seaside School Road.) and for Smiling Dogs location. Smiling dogs shall be 125 Seaside School Road., unless another address is requested.
22. Vegetation Management (SRA) - The 2019 California Fire Code Chapter 49 and Public Resources Code 4291.
 - a. 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.
 - b. 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.

- c. 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.

23. A Knox padlock or key switch will be required.

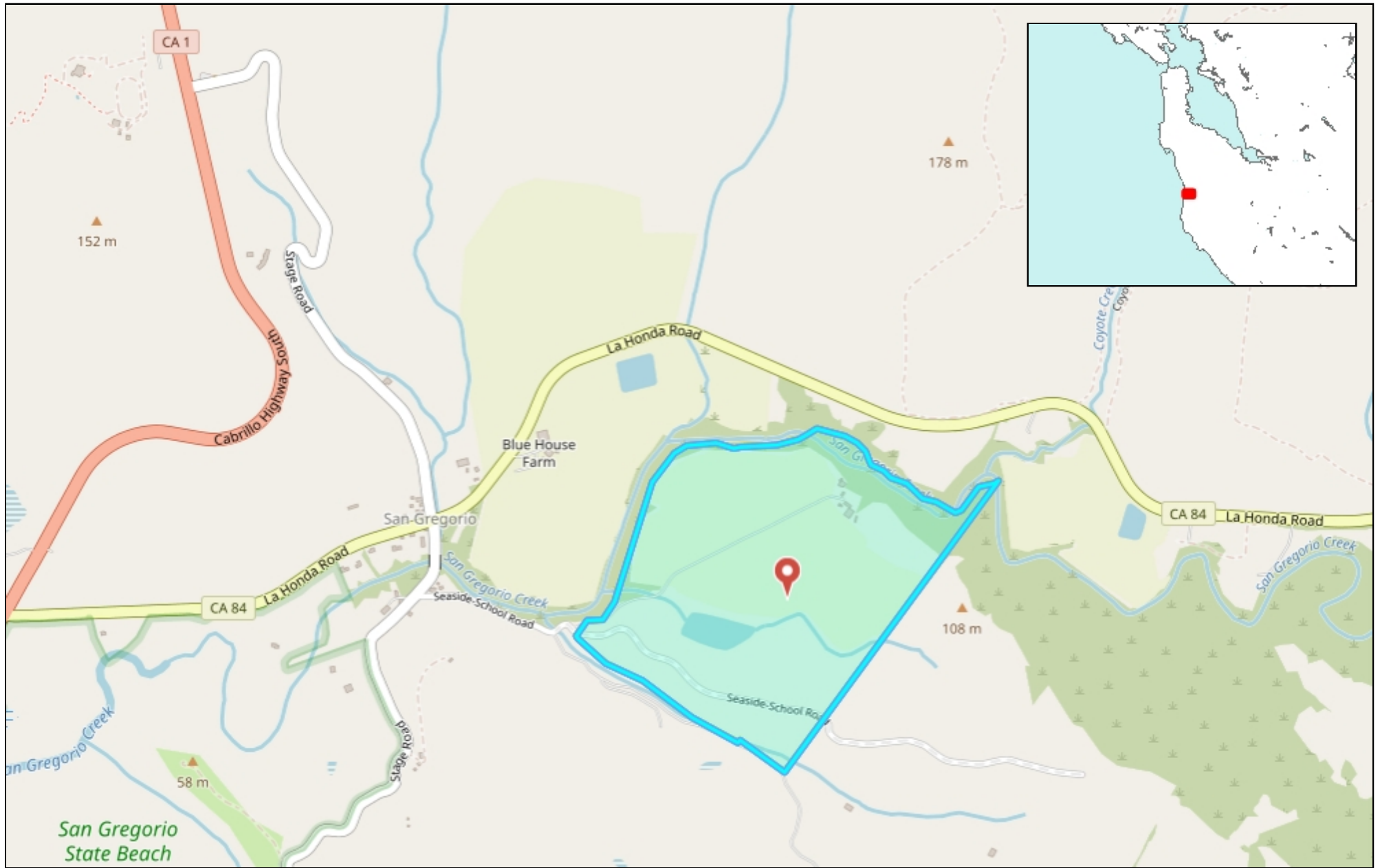


COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT B



San Mateo County



0.57 0 0.28 0.57 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
© Latitude Geographics Group Ltd.

1: 18,056



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT C

Revised Submittal Package

**Smilin Dogs Outdoor Dog Hiking Operation
at 123 Seaside School Road, San Gregorio, CA**



December 22, 2022

REVISED SUPPLEMENTAL STATEMENT

The owners of Smilin Dogs, a licensed dog daycare business with a primary kennel facility operating within the jurisdiction of the City of San Carlos, are applying for an after-the-Fact PAD Permit, Coastal Development Permit & Kennel Permit to allow for a dog hiking operation consisting of a maximum of 75 dogs per day (Monday through Friday from 10 AM to 3 PM, no weekends) on a 24-acre non-prime soil portion of a 155-acre parcel, including a 5-stall carport structure. No changes to existing agricultural uses and no grading are proposed. The property is located at 123 Seaside School Road in the unincorporated San Gregorio area of San Mateo County. The application has been assigned record number PLN2021-00432.

Location

Site Address See Figure 1: Location Map	123 Seaside School Road, San Gregorio, 94074
Assessor Parcel Number See Figure 2: Assessor's Parcel Map	APN 081-250-030
Parcel Size	Approximately 155 acres (including a 5-acre parcel previously legalized with COC in PLN2012-00257)
City	San Gregorio (rural unincorporated area)
County	San Mateo

Land Use and Zoning Information

General Plan Designation	Agriculture
Zoning Designation	Planned Agricultural District (PAD)
Overlay District	Coastal Development District (CD)
Highway 84 / Highway 1 Scenic Corridors See Attachment 1 for Photos	Most of the Property is located within the State Highway 1 and County Highway 84 Scenic Corridors (Source: County GIS data). The property forms part of the general rural agricultural backdrop to Highway 84 and Highway 1. Existing development is, and any new development would be, minimally visible, due to the distance,

	travel speed, vegetation, and the relative prominence of foreground development.
Density Credits	The 2014 County density analysis determined that the property is eligible for two density credits (refer to PLN2014-00437).
Williamson Act	The Property is not subject to a California Land Conservation (Williamson Act) Contract.
Flood Hazard Area	<p>The Property's north and west boundaries are defined by the centerline of San Gregorio Creek and portions of the site lie within the creek's 100-year floodplain. The Federal Emergency Management Agency (FEMA) has designated the 100-year flood plain as a Special Flood Hazard Area Zone A, per FIRM Panels 06081C0380E (2012) and 06081C0359F (2017). No base flood elevation is designated.</p> <p>The balance of the property is designated Zone X – Areas determined to be outside the 0.2% annual chance floodplain.</p>

Existing Site Conditions and Features

<p>Existing Setting</p> <p>See Figure 3: Property Overview</p>	<p>The 155-acre property is located within a fertile rural valley bisected by San Gregorio Creek within the rural community of San Gregorio, on the south coast of San Mateo County.</p> <p>The property is accessed via an existing gravel driveway that branches off Seaside School Road. Elevations range from 300 feet at the northeastern property corner, to 20 feet at San Gregorio Creek.</p> <p>The majority of the property is farmed in row crops. The San Gregorio Creek riparian corridor is continuous on both sides of the creek and supports a dense cover of woody riparian species with an herbaceous understory. The remaining property is primarily non-native annual grassland with occasional coastal scrub.</p>
Agricultural Activities and Facilities	Approximately 50 acres of the 155-acre subject property are considered suitable for active agricultural production, as defined by the farm plan developed by the property owner and the Natural Resource Conservation Service (NRCS).

	<p>Prime Soils, classified as the Dublin Clay Series and Tunitas Loam / Clay Loam Series total approximately 56 acres. None of the other soil types are considered prime.</p> <p>The farming ground has been in commercial production for many years. Crops are rotated for good agricultural hygiene and have included row crops such as brussels sprouts, peas, string beans, artichokes, pumpkins, corn, and potatoes. The agricultural products are sold into the wholesale market.</p> <p>The sloping non-prime soils to the east and south were many years ago tilled and planted with hay, fava beans and peas, but active production has now ceased, and no tilling occurs to preserve vegetative cover. These areas were at one time grazed, however, after construction of the water reservoir in 1988, grazing ceased.</p> <p>Outside of the cultivated fields, the farm center and field margins are developed with agricultural accessory facilities including a barn, equipment storage, sheds, fences, material stockpiling / storage, water storage tanks, and an irrigation water reservoir.</p>
<p>Existing Structures and Development See Figure 3: Property Overview</p>	<p>The existing development on the property is comprised of a clustered farm center with a single-family residence, a small cottage residence, and the agricultural outbuildings described above. Both residences were built in approximately 1900, before the establishment of County subdivision, planning, and building permit regulations.</p>
<p>Existing Water Rights</p>	<p>Under the San Gregorio Water Rights Adjudication, the Property is authorized to divert up to 336,200 gallons per day from San Gregorio Creek for agricultural irrigation on the property between April 1 and November 1 of each year, as well as water for domestic and stockwatering purposes incidental to irrigation. The groundwater well used as the domestic water supply is not subject to the San Gregorio Water Rights Adjudication.</p>
<p>Existing Domestic Water System</p>	<p>The property is served by an existing domestic groundwater well, and the water is regularly tested for potability.</p> <p>Five water tanks are present, with one serving the Smilin Dogs dog hiking operation.</p>
<p>Surrounding Uses</p>	<p>North and west: San Gregorio Creek. East: Agriculture, residential, and open space uses.</p>

	South: Agriculture, residential, and open space uses.
--	---

Proposed Project

The dog hiking service operates Monday through Friday from 10:00 a.m. to 3:00 p.m. There is no use of the property on weekends. The business proposes a kennel operation for a maximum of 75 dogs through this application. Each weekday approximately five converted passenger vans, each containing a pack of 10-15 medium to large dogs (in excess of 25 pounds), are transported by Smilin Dogs employees from the San Carlos dog daycare location and/or clients' residences to the project site for off-leash hiking.

As shown in Figures 3 and 4, the total area used by Smilin Dogs totals approximately 24.8 acres. The off-leash dog hiking fields comprise an area of approximately 23 acres, with all Smilin Dogs use confined to non-prime soils and open grassy slopes. Photos of the proposed project area are provided in Attachment 1. No grading was required and no tilling occurred to accommodate the dog hiking operation. The grassy slopes are mowed each spring. All enclosures housing dogs are at least 300 feet from any residence on a neighboring property. All activity is limited to the project limits shown, and neither Smilin Dogs employees nor the dogs have access to the remainder of the property.

Smilin Dogs uses the existing dirt and gravel roads to access the property from Seaside School Road, and parks their vans in an existing 1 ½ acre level area. The access road and level area proposed for use by Smilin Dogs was improved in the 1990s for irrigation reservoir construction access and staging.

After arrival, the dogs are unloaded into an enclosed covered pen (“base camp”) where the dogs are offered water and allowed to relieve themselves before hiking. One employee walks a pack through a fenced alleyway to one of six fenced fields. At separate intervals, five packs of dogs are each moved to their fields, which are rotated daily to reduce overuse. The fields are all enclosed with a 5-foot-tall woven wire fencing. Dogs are always supervised in any enclosure on the property.

Dogwalkers hike the same dogs on a weekly recurring schedule. They hike in an orderly manner, staying together with their group and their hiker. The dogs are under voice control and they use positive reinforcement to keep the individual groups with their hiker. Each dog must pass a temperament test at the Smilin Dogs facility in San Carlos before being deemed eligible for hiking which includes testing for recall and shyness / skittishness. Dogs that do not stay with their hiker are not allowed to hike.

While on site, Smilin Dogs uses water from an existing potable water tank on the property’s upper elevations. This 4,995-gallon tank is filled from the existing groundwater well, and the tank is refilled approximately once per month, for an overall use rate of about 150 gallons per day. Water is consumed by the dogs, and rinsing the animals for cleanliness. Employees are provided with a regularly-serviced portable toilets.

No permanent structures are proposed for the kennel operation. Five aluminum carports and three storage containers have been placed on gravel pads for use as a staging “base camp”. These temporary structures cover an area of approximately 4,800 square feet. Materials and finishes of all structures are muted and unobtrusive. Plans, elevations and photos of the carports and containers are provided in Attachment 1.

Density Credits

The proposed project would entail redesignation of the density credit currently assigned to the existing cottage residence to apply to the kennel use. The property owners, under separate application, intend to convert the cottage to farmworker housing (see PLN2022-00326), which does not require a density credit under County regulations. Upon approval, if the kennel / dog hiking use ceases in the future, the property owners wish to ensure the density credit applied to the kennel use would again be available for use elsewhere on the property.

Stormwater and drainage management plan

The natural drainage patterns in the dog hiking area slope towards the existing irrigation reservoir and ephemeral stream. The dog walking operation footprint has been designed to avoid over-concentration of use and to maintain these existing natural runoff patterns.

Stormwater and drainage best management practices include:

- Carefully locating fenced dog enclosures in naturally sloped areas so that they are kept free of standing water.
- Rotating field use daily to maintain vegetative cover, reducing potential for erosion and sedimentation.
- Maintaining natural vegetation and set-back buffers from waterways and the irrigation reservoir.
- Maintaining the staging area, access road and parking area with a gravel surface to prevent erosion and slow stormwater runoff.

Dogs are rinsed with water only (no soap) before departure. Dog rinse water is confined to bins that drain to a 2” pipe that conveys the water under the gravel parking area and discharges to an armored outfall at the nearby ephemeral drainageway. The small amount of roof stormwater runoff is retained in a gravel trench at the roofline and percolates slowly into the ground.

The C3/C6 Development Review Checklist for the project limits will be provided under separate cover.

Waste management plan

Dog waste is collected from the enclosures and hiking route on a real-time basis by the handlers, and temporarily stored in covered bin at the carport enclosures. All dog waste is removed from the site each day and taken to the primary Smilin Dogs kennel in San Carlos for

disposal. All care and feeding of the animals takes place in San Carlos. (See Attachment 3 for dumpster information for the San Carlos Facility).

About Smilin Dogs

Smilin Dogs is owned and managed by Konrad Thaler and Diana Ungersma. Konrad, originally an organic farmer from Germany, started Smilin Dogs in 2000. Smilin Dogs offers dog daycare, training, hiking and boarding based out of their facility in San Carlos. They have a conditional use permit for their kennel from the City of San Carlos.


Their clients are professional San Mateo County residents who depend on Smilin Dogs to exercise their dogs while they are at work. In many cases, these are high energy dogs who cannot be left home alone all day. Unfortunately, there are few options in San Mateo County where owners can allow a large dog to run. Smilin Dogs provide a valuable service to the dog-owning citizens of San Mateo County with breeds who require significant exercise.

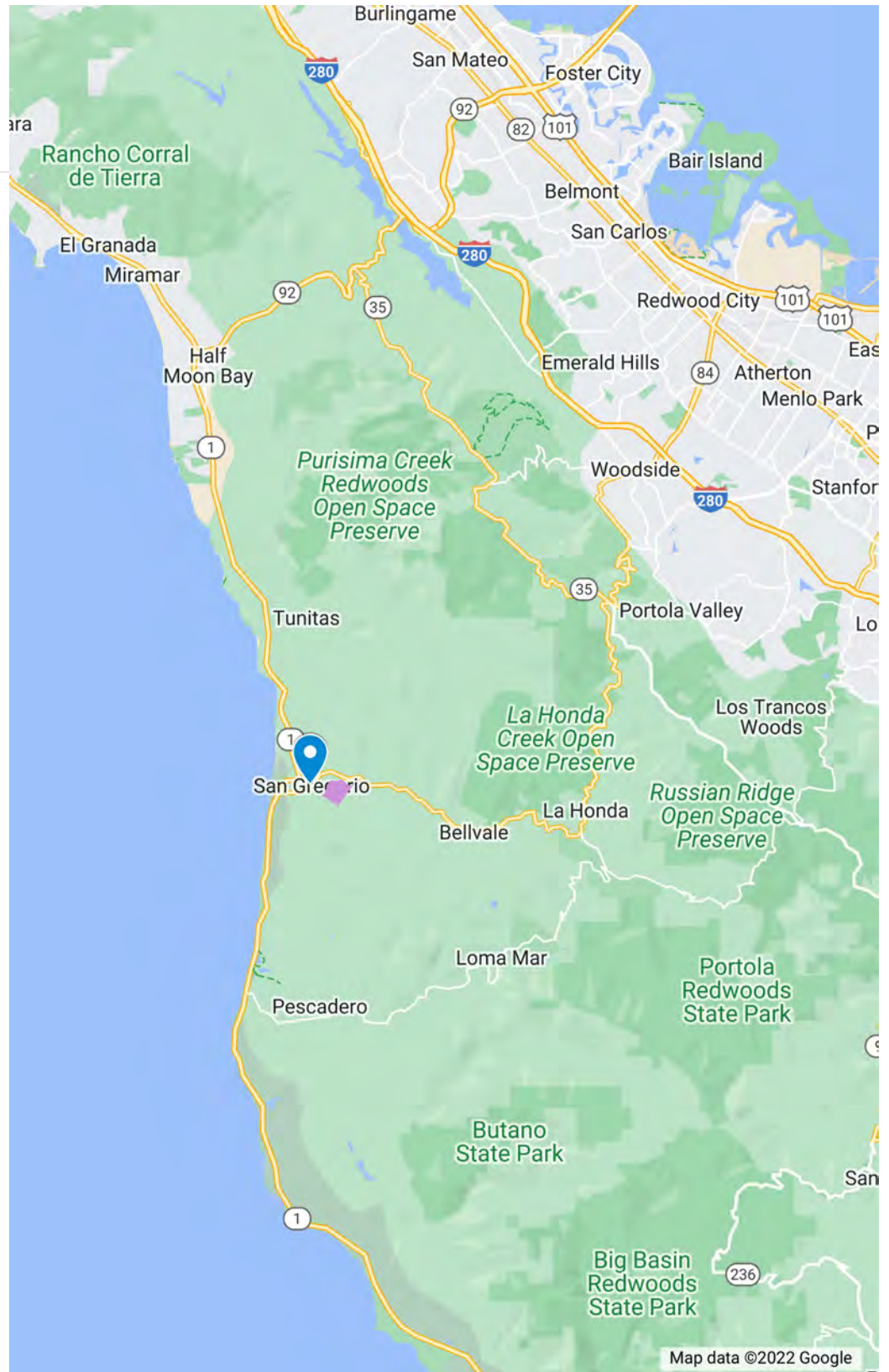
FIGURE 1

Smilin Dogs Location

Marchi Property

 Parcel boundary

 San Gregorio General Store





COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT D

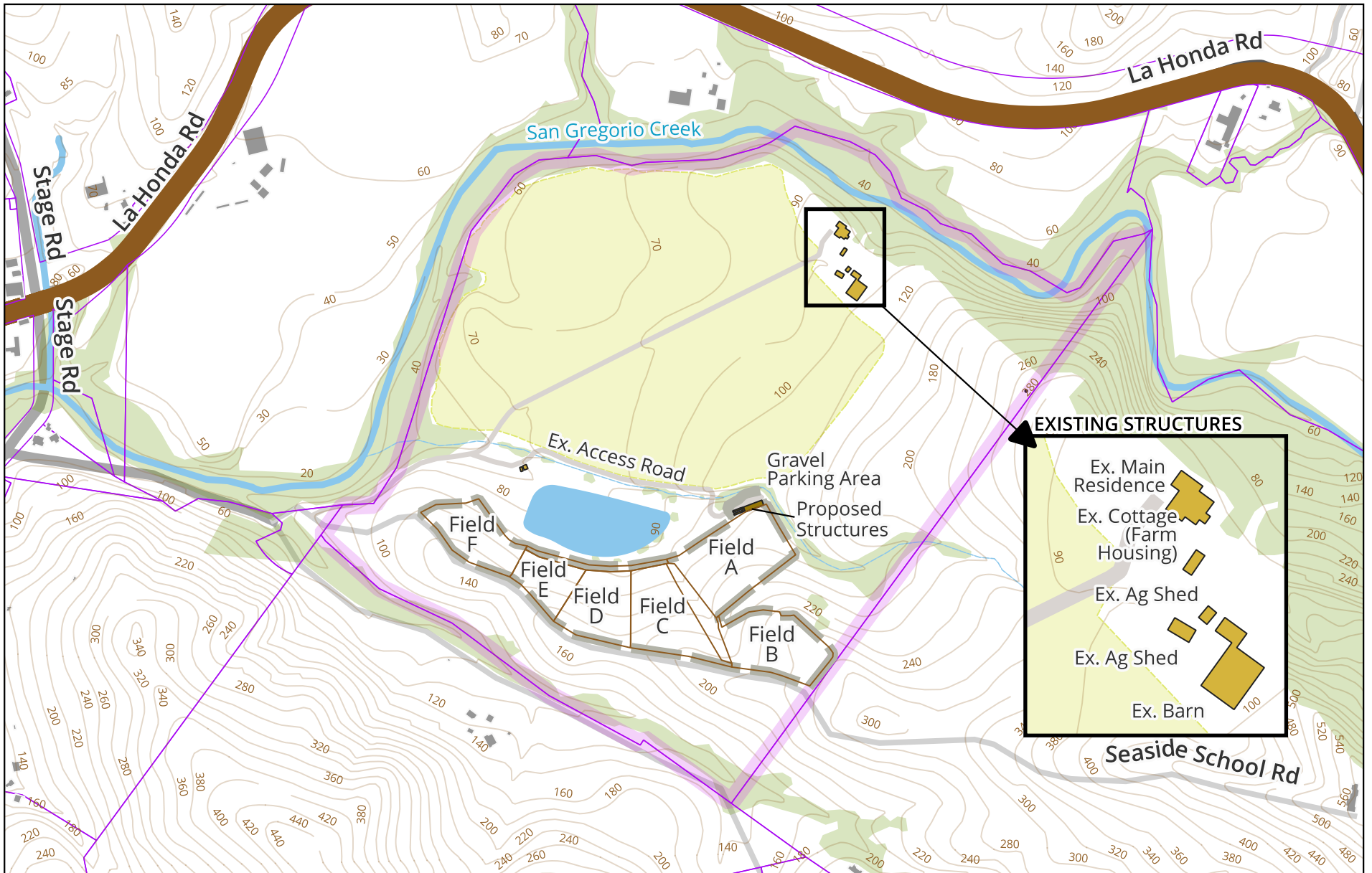
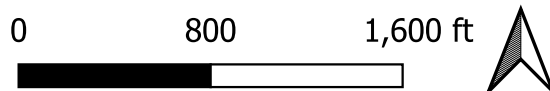


FIGURE 3
Smilin' Dogs / Marchi Property Overview

12/21/2022

LEGEND

- 20' Contours
- Farmland
- Project Limits
- Subject Property
- Trees and Scrub

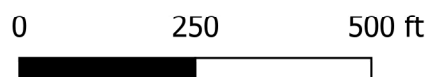


Sandra Sommer
 AICP, ASLA
 Landscape Planner

661 Pettis Ave.
 Mountain View, CA 94041
 sandysommer@dslextreme.com
 510-541-8514



FIGURE 4 - revised
Smilin' Dogs Site Plan



LEGEND

- 20' Contours
- Subject Property
- Farmland
- Trees and Scrub
- Project Limit

01/16/2025



Sandra Sommer
 AICP, ASLA
 Landscape Planner

661 Petris Ave.
 Mountain View, CA 94041
 sandysommer@dslosterre.com
 510-541-8514



REGULAR / A-FRAME 16'-0" WIDE CARPORT STYLE BUILDINGS

DESIGN NOTES

1. ALL CONSTRUCTION SHALL BE PROVIDED IN ACCORDANCE WITH IBC 2018, OSHA, AISC 360, AISI 100, ASCE 7-16, AWS D 1.3 CODES AND ALL APPLICABLE LOCAL REQUIREMENTS.
2. BASE CONNECTIONS SHALL BE PROVIDED AS SHOWN ON FOUNDATION DETAILS SHEET.
3. ALL MATERIALS IDENTIFIED BY MANUFACTURER NAME MAY BE SUBSTITUTED WITH MATERIAL EQUAL OR EXCEEDING ORIGINAL.
4. ALL SHOP CONNECTIONS SHALL BE WELDED CONNECTIONS.
5. ALL FIELD CONNECTIONS SHALL BE #12X1" SDS (ESR-2196 OR EQ).
6. STEEL SHEATHING SHALL BE 29GA CORRUGATED GALV. OR PAINTED STEEL - MAIN RIB HT. 3/4" (FY=80KSI) OR EQ.
7. ALL STRUCTURAL LIGHT GAUGE TUBING AND CHANNELS SHALL BE GRADE 50 STEEL.
8. STRUCTURAL TUBE TS2 1/2"x2 1/2" - 14GA IS EQUIVALENT TO TS2 1/4"x2 1/4" - 12GA AND EITHER ONE MAY BE USED IN LIEU OF THE OTHER.
9. ALL DESIGN CRITERIA MUST BE INCREASED TO THE NEXT HIGHER INCREMENT BASED ON THE TABLES ON PAGE 4. NO INTERPOLATION IS ALLOWED.

DESIGN CRITERIA

PREVAILING CODE: CBC 2019 (IBC 2018)
 USE GROUP: U (CARPORTS, BARNs)
 RISK CATEGORY: I

- | | | |
|----|--------------------------|---|
| 1. | DEAD LOAD (D) | D = 4 PSF |
| 2. | ROOF LIVE/SNOW LOAD (Lr) | Lr = 20 - 61 PSF
(AS PER SNOW LOAD
SEE TABLE 4) |
| 3. | SNOW LOAD (S) | |
| | GROUND SNOW LOAD | P _g = 20 - 90 PSF |
| | IMPORTANCE FACTOR | I _s = 0.8 |
| | THERMAL FACTOR | C _t = 1.2 |
| | EXPOSURE FACTOR | C _e = 1.0 |
| | ROOF SLOPE FACTOR | C _s = 1.0 |
| 4. | WIND LOAD (W) | |
| | BASIC WIND SPEED | V _{ULT} = 105 - 180 MPH |
| | EXPOSURE | C |
| 5. | SEISMIC LOAD (E) | |
| | DESIGN CATEGORY | D |
| | IMPORTANCE FACTOR | I _e = 1.00 |

LOAD COMBINATIONS:

1. D + (Lr OR S)
2. D + (0.6W OR ±0.7E)
3. D + 0.75 (0.6W OR ±0.7E) + 0.75 (Lr OR S)
4. 0.6D + (0.6W OR ±0.7E)

DRAWING INDEX

COVER SHEET	----	1
SCHEDULES & MEMBER -		
SECTIONS	----	2
FRAME SECTIONS & DETAILS	----	3
SPACING SCHEDULES -		
& ENCLOSURE NOTES	----	4
PURLIN & GIRT SCHEDULES	----	5
SHEATHING OPTIONS	----	6
SIDE WALL FRAMING		
& OPENINGS	----	7
END WALL FRAMING		
& OPENINGS	----	8-A, 8-B
CORNER BRACING DETAILS	----	9
OPTIONAL LEAN-TO ADDITION	----	10
FOUNDATION OPTIONS	----	11-A TO 11-D

MANUFACTURED BY:



457 N. Broadway,
 Joshua, TX 76058
 1-866-730-9865

ENGINEERED BY:



A&A ENGINEERING
 CIVIL + STRUCTURAL
 6063 Renaissance Place, Toledo, OH 43628
 Tel. 419-292-1083 • Fax. 419-292-0955
 www.a-a-engineers.com

DRAWING INFORMATION

PROJECT: 16'-0" WIDE BUILDINGS

LOCATION: STATE OF CALIFORNIA

PROJECT NO.: 233-21-0026

SHEET TITLE:

COVER SHEET

SHEET NO.: 1 / 11

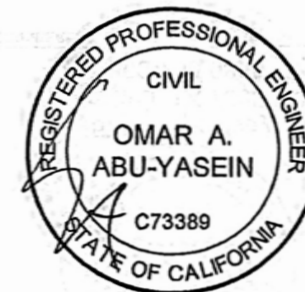
DRAWN BY: AW DATE: 1/15/21

CHECKED BY: OAA DATE: 1/15/21

LEGAL INFORMATION

- ANY DUPLICATION OF THIS DRAWING IN WHOLE OR PART IS STRICTLY FORBIDDEN. ANYONE DOING SO WILL BE PROSECUTED UNDER THE FULL EXTENT OF THE LAW.
 - DRAWINGS VALID UP TO 1 YEAR FROM DATE OF ISSUE.

SEAL:



CUSTOMER INFORMATION

OWNER:
 ADDRESS:

DESIGN LOADS

GROUND SNOW:
 ROOF LIVE LOAD:
 BASIC WIND SPEED:

BUILDING INFORMATION

WIDTH:
 LENGTH:
 HEIGHT:

FRAME TYPE: A-FRAME
 REGULAR
 ENCLOSURE TYPE: FULL
 PARTIAL
 OPEN

CERTIFICATION VALIDITY NOTICE

CERTIFICATION ON THESE DRAWINGS IS VALID FOR ONE YEAR FROM DATE OF ISSUE

STAMP EXPIRY: **DEC 31 2022**

DATE SIGNED: **JAN 31 2021**



457 N. Broadway,
Joshua, TX 76058
1-866-730-9865

ENGINEERED BY:



A&A ENGINEERING
CIVIL • STRUCTURAL
6063 Resurgence Place, Toledo, OH 43623
Tel. 419-292-1983 • Fax. 419-292-0955
www.aa-engineers.com

DRAWING INFORMATION

PROJECT: 16'-0" WIDE BUILDINGS

LOCATION: STATE OF CALIFORNIA

PROJECT NO.: 233-21-0026

SHEET TITLE:

FRAME SECTIONS & DETAILS

SHEET NO.: 3 / 11

DRAWN BY: AW DATE: 1/15/21

CHECKED BY: OAA DATE: 1/15/21

LEGAL INFORMATION

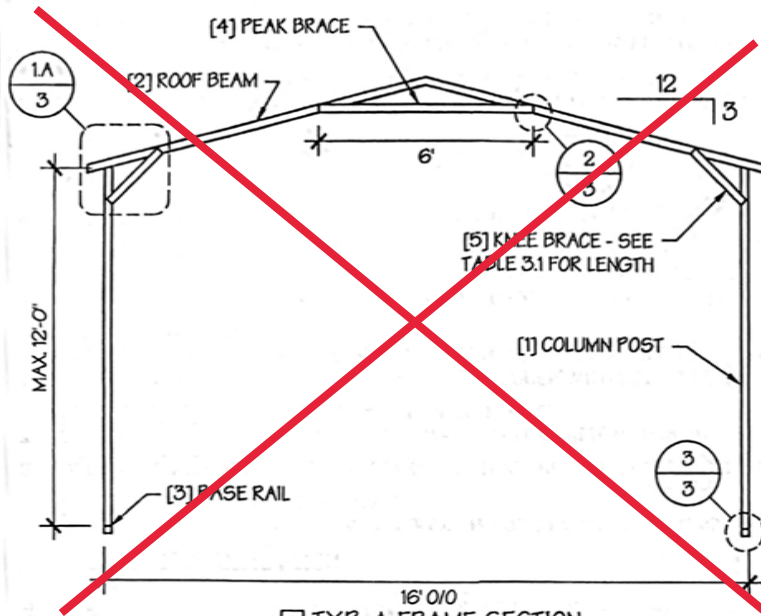
- ANY DUPLICATION OF THIS DRAWING IN WHOLE OR PART IS STRICTLY FORBIDDEN. ANYONE DOING SO WILL BE PROSECUTED UNDER THE FULL EXTENT OF THE LAW. - DRAWINGS VALID UP TO 1 YEAR FROM DATE OF ISSUE.

SEAL:

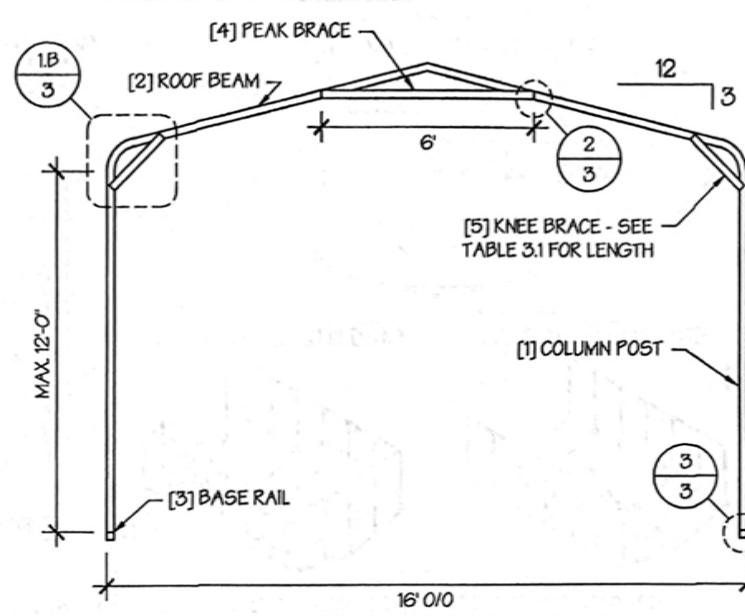


STAMP EXPIRY: **DEC 31 2022**

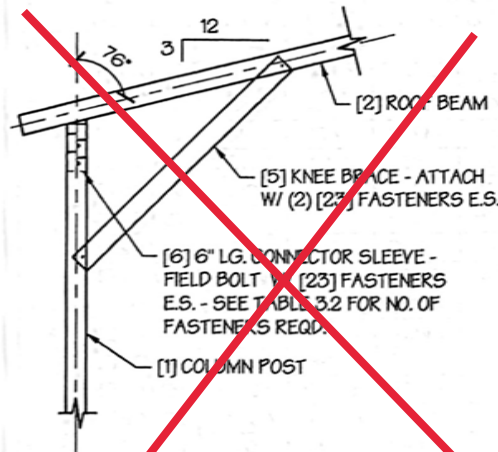
DATE SIGNED: **JAN 31 2021**



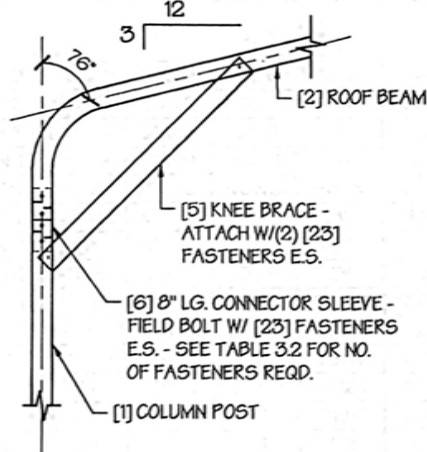
TYP. A-FRAME SECTION
SCALE: NTS



TYP. REGULAR FRAME SECTION
SCALE: NTS

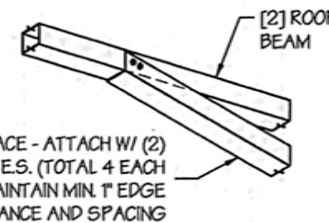


A. 'A'-FRAME



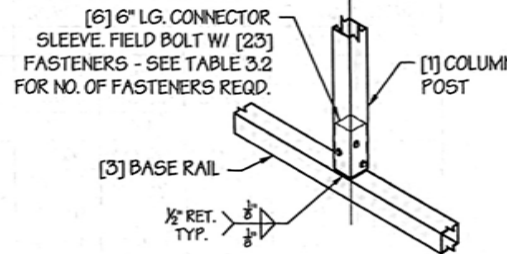
B. REGULAR FRAME

EAVE DETAIL 1
SCALE: NTS



[4] PEAK BRACE - ATTACH W/ (2) [23] FASTENERS E.S. (TOTAL 4 EACH END). MAINTAIN MIN. 1" EDGE DISTANCE AND SPACING

PEAK BRACE CONNECTION DETAILS 2
SCALE: NTS



BASE DETAIL 3
SCALE: NTS

TABLE 3.1: KNEE BRACE SCHEDULE

EAVE HEIGHT	KNEE BRACE LENGTH
<input type="checkbox"/> UP TO 8'	24"
<input type="checkbox"/> 9' TO 12'	36"

TABLE 3.2 FASTENER SCHEDULE

WIND SPEED (MPH)	NO. OF FASTENERS
<input type="checkbox"/> 105 TO 125	4
<input type="checkbox"/> 130 TO 155	6
<input type="checkbox"/> 160 TO 180	8

NOTE: COLUMN POST MAY BE ADJUSTED ±1" FOR LEVELING. MANUFACTURER IS NOT RESPONSIBLE FOR LEVELING OF GROUND AND/OR CONCRETE SURFACE PROVIDED BY OTHERS.

TABLE 4: FRAME SPACING CHART / SCHEDULE

GROUND SNOW / ROOF LIVE LOAD (PSF)	■ ENCLOSED BUILDINGS							■ OPEN BUILDINGS						
	WIND SPEED (MPH)							WIND SPEED (MPH)						
	□105	□115	□130	□140	□155	□165	□180	□105	□115	□130	□140	□155	□165	□180
□ 30 / 20	60	60	54/60	54	42	36	30	60	54/60	48/60	42/54	36/42	36	30
□ 40 / 27	48/60	48/60	42/60	42/54	42	36	30	48/60	48/60	42/60	42/54	36/42	36	30
□ 50 / 34	40/54	40/54	40/54	40/54	40/42	36	30	40/54	40/54	40/54	40/54	36/42	36	30
□ 60 / 41	36/48	36/48	36/48	36/48	36/42	36	30	36/48	36/48	36/48	36/48	36/42	36	30
□ 70 / 47	32/42	32/42	32/42	32/42	32/42	32/36	30	32/42	32/42	32/42	32/42	32/42	32/36	30
□ 80 / 54	30/42	30/42	30/42	30/42	30/42	30/36	30	30/36	30/36	30/36	30/36	30/36	30/36	30
□ 90 / 61	30/36	30/36	30/36	30/36	30/36	30/36	30	24	24	24	24	24	24	24
□ 30 / 20	60	60	54/60	54	48	42/48	42	60	54/60	48/60	42/54	36/48	36/48	36/42
□ 40 / 27	48/60	48/60	42/60	42/54	42/48	42/48	42	48/60	48/60	42/60	42/54	36/48	36/48	36/42
□ 50 / 34	40/54	40/54	40/54	40/54	40/48	40/48	40/42	40/54	40/54	40/54	40/54	36/48	36/48	36/42
□ 60 / 41	36/48	36/48	36/48	36/48	36/48	36/48	36/42	36/48	36/48	36/48	36/48	36/48	36/48	36/42
□ 70 / 47	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42
□ 80 / 54	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/36	30/36	30/36	30/36	30/36	30/36	30/36
□ 90 / 61	30/36	30/36	30/36	30/36	30/36	30/36	30/36	24	24	24	24	24	24	24
□ 30 / 20	60	60	54/60	54	48	42/48	42	60	54/60	54/60	42/54	36/48	36/48	36/42
□ 40 / 27	48/60	48/60	42/60	42/54	42/48	42/48	42	48/60	48/60	42/60	42/54	36/48	36/48	36/42
□ 50 / 34	40/54	40/54	40/54	40/54	40/48	40/48	40/42	40/54	40/54	40/54	40/54	36/48	36/48	36/42
□ 60 / 41	36/48	36/48	36/48	36/48	36/48	36/48	36/42	36/48	36/48	36/48	36/48	36/48	36/48	36/42
□ 70 / 47	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42	32/42
□ 80 / 54	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42	30/42
□ 90 / 61	30/36	30/36	30/36	30/36	30/36	30/36	30/36	30	30	30	30	30	30	30

NOTES:

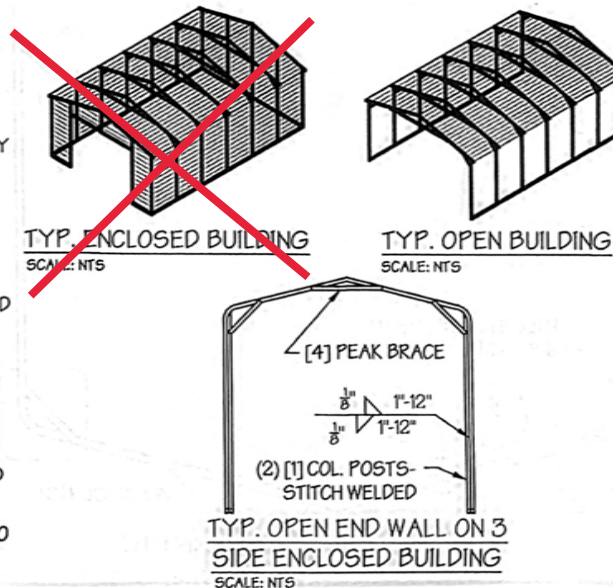
1. FRAME SPACINGS ARE IN UNITS OF INCHES (IN).
2. WHERE TWO VALUES ARE SHOWN, THE HIGHER VALUE CAN ONLY BE USED FOR VERTICAL SHEATHING.
3. SNOW LOADS AND ROOF LIVE LOADS ARE IN POUNDS PER SQUARE FOOT (PSF). WIND SPEED IS 3 SEC. GUST IN MILES PER HOUR (MPH).
4. FOR VALUES THAT LIE BETWEEN TWO CELLS, THE HIGHER (MORE STRINGENT) VALUE HAS TO BE USED. INTERPOLATION BETWEEN CELLS IS NOT ALLOWED.

ENCLOSURE CLASSIFICATION:

1. **ENCLOSED BUILDING** = ALL 4 WALLS FULLY ENCLOSED WITH DOORS/WINDOWS = USE ENCLOSED BUILDING SPACING CHART.
2. **OPEN BUILDING** = ALL 4 WALLS FULLY OPEN = USE OPEN BUILDING SPACING CHART.
3. **3FT PARTIALLY ENCLOSED** = BOTH END-WALLS FULLY OPEN, WITH BOTH SIDE-WALLS ONLY 3FT ENCLOSED = USE OPEN BUILDING SPACING CHART.
4. **PARTIALLY ENCLOSED** = BOTH END-WALLS FULLY OPEN, WITH BOTH SIDE-WALLS ENCLOSED MORE THAN 3FT = START WITH OPEN BUILDING SPACING CHART AND THEN REDUCE SPACING BY 6".
5. **3 SIDED ENCLOSED** = ALL WALLS ARE ENCLOSED EXCEPT FOR 1 END-WALL = START WITH ENCLOSED BUILDING SPACING + THE OPEN END FRAME MUST HAVE EITHER A GABLED END OR HAVE DOUBLED WELDED LEGS.
6. FOR ALL SHEATHING ENCLOSURES NOT LISTED ABOVE, REFER TO SHEET 5 FOR SPACING AND DESIGN REQUIREMENTS.

GENERAL NOTES:

1. THE MAX. BUILDING LENGTH FOR ENCLOSED BUILDINGS IS 50'-0". THIS CAN BE INCREASED BY ADDING A DOUBLE FRAME AT THE CENTER TO BREAK THE LENGTH OF THE BUILDING.
2. BUILDINGS WITH PARTIALLY ENCLOSED END WALLS NEED TO HAVE SIDE WALL BRACING TO SUPPORT THE PARTIALLY ENCLOSED END WALL. (SEE FIGURE A ON SHEET 5).



MANUFACTURED BY:



457 N. Broadway,
Joshua, TX 76058
1-866-730-9865

ENGINEERED BY:



A&A ENGINEERING
CIVIL • STRUCTURAL
6063 Renaissance Pkce, Toledo, OH 43623
Tel. 419-299-1983 • Fax. 419-292-0955
www.a-a-engineers.com

DRAWING INFORMATION

PROJECT: 16'-0" WIDE BUILDINGS

LOCATION: STATE OF CALIFORNIA

PROJECT NO.: 233-21-0026

SHEET TITLE:

SPACING SCHEDULES
& ENCLOSURE NOTES

SHEET NO.: 4 / 11

DRAWN BY: AW DATE: 1/15/21

CHECKED BY: OAA DATE: 1/15/21

LEGAL INFORMATION

- ANY DUPLICATION OF THIS DRAWING IN WHOLE OR PART IS STRICTLY FORBIDDEN. ANYONE DOING SO WILL BE PROSECUTED UNDER THE FULL EXTENT OF THE LAW.
- DRAWINGS VALID UP TO 1 YEAR FROM DATE OF ISSUE.

SEAL:



STAMP EXPIRY: DEC 31 2022

DATE SIGNED: JAN 31 2021

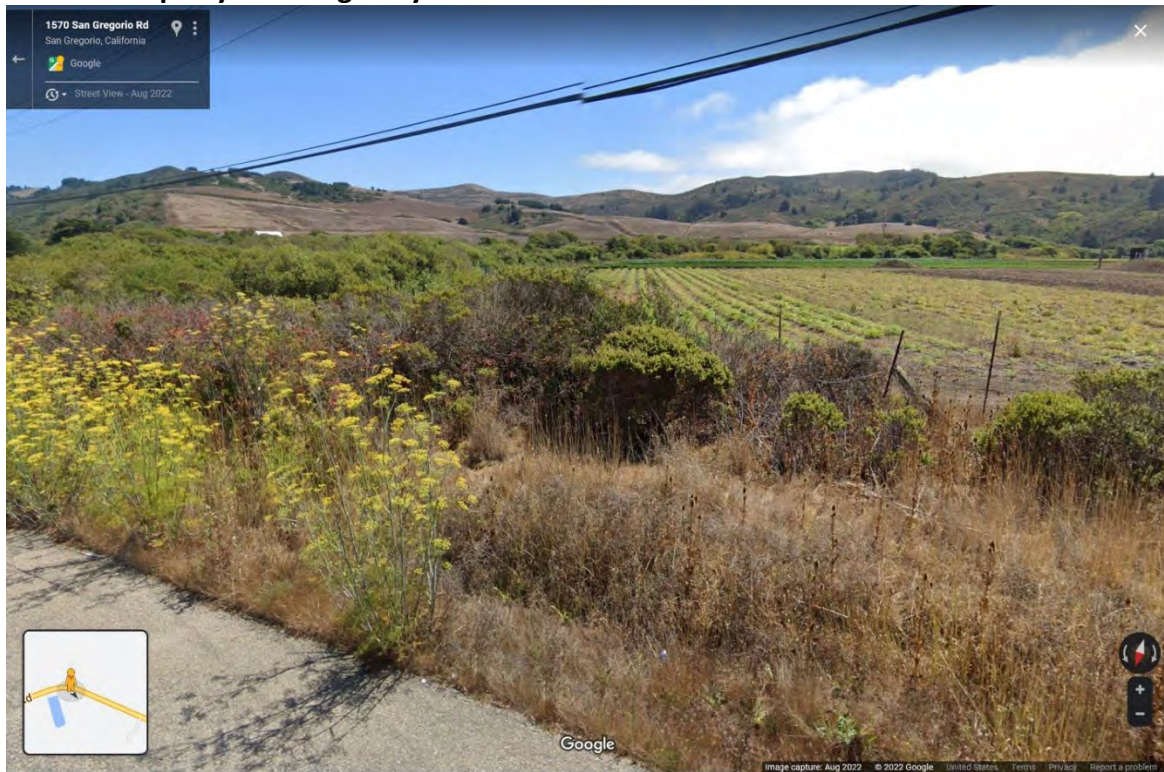


COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT E

ATTACHMENT 1: PHOTOS

Views of Property from Highways 84 and 1



Property in the distance as seen from Highway 84 (across creek) (source: Google Street View)



Property in the distance as seen from Highway 84 (across creek) (source: Google Street View)



Property in the distance as seen from Highway 1

(source: Google Street View)

Project Area Photos



Property View 1: Fenced dog hiking fields and irrigation reservoir, looking west



Property View 2: Fenced dog hiking fields and irrigation reservoir, looking north



Property View 3: Attendant hiking with dogs



Property View 4: Off-leash dogs in fenced enclosure



Property View 5: Dogs moving through fenced alleyway between fields. Note vegetative cover including mowed fields and margin at irrigation reservoir.



Staging Area View 1: Five aluminum carports being used as staging area for dog hiking operation



Staging Area View 2: Storage containers and carports as seen from gravel parking area



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT F

November 17, 2022

AGRICULTURAL LAND MANAGEMENT FOR 123 SEASIDE SCHOOL ROAD

Agricultural Activities and Facilities

Approximately 50 acres of the 155-acre subject property are considered suitable for active agricultural production, as defined by the farm plan developed by the property owner and the Natural Resource Conservation Service (NRCS).

The farming ground has been in commercial production for many years. Crops are rotated for good agricultural hygiene and have included row crops such as brussels sprouts, peas, string beans, artichokes, pumpkins, corn, and potatoes. The farming ground is currently being rested and is fallow. The agricultural products are sold into the wholesale market.

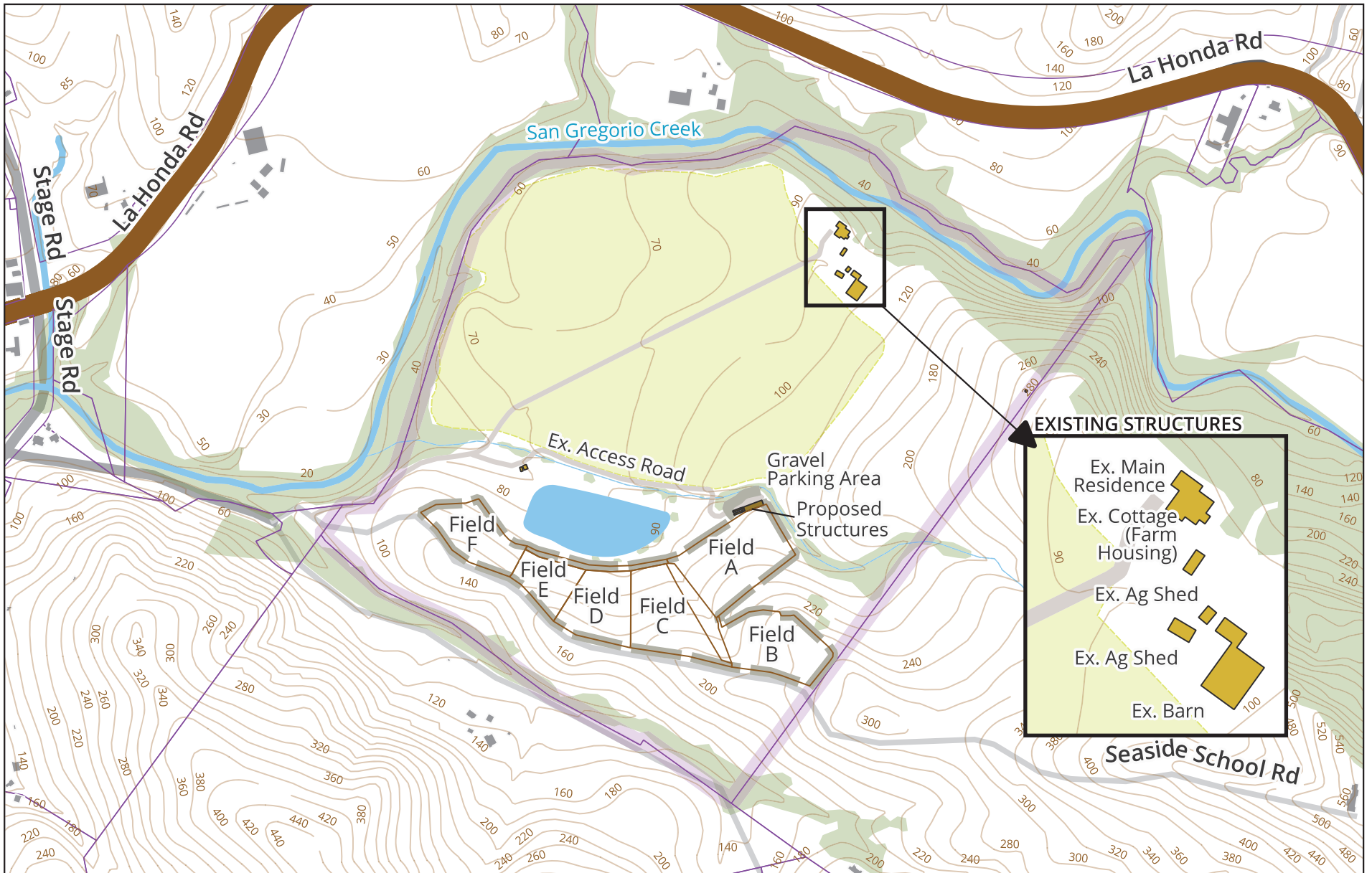
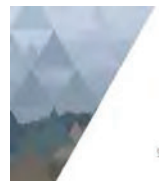


FIGURE 3
Smilin' Dogs / Marchi Property Overview

12/21/2022

LEGEND

- 20' Contours
- Farmland
- Subject Property
- Trees and Scrub
- Project Limits



Sandra Sommer
 AICP, ASLA
 Landscape Planner

661 Pettis Ave.
 Mountain View, CA 94041
 sandysommer@dslextrreme.com
 510-541-8514



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT G

COUNTY OF SAN MATEO, PLANNING AND BUILDING DEPARTMENT

**REVISED NOTICE OF INTENT TO ADOPT
MITIGATED NEGATIVE DECLARATION**

Changes from the original published Initial Study/Mitigated Negative Declaration (IS/MND), dated September 17, 2025, are shown in double underline and overstrike.

A notice, pursuant to the California Environmental Quality Act of 1970, as amended (Public Resources Code 21,000, et seq.), that the following project: Smilin Dogs, when adopted and implemented, will not have a significant impact on the environment.

FILE NO.: PLN2021-00432/~~PLN2022-00326~~

OWNER: Peter Marchi & Son Farms

APPLICANT: Smilin Dogs, Inc. (Konrad Thaler)

NAME OF PERSON UNDERTAKING THE PROJECT OR RECEIVING THE PROJECT APPROVAL (IF DIFFERENT FROM APPLICANT): N/A

ASSESSOR'S PARCEL NO.: 081-250-030

LOCATION: 123 Seaside School Road, San Gregorio

PROJECT DESCRIPTION

The applicant is seeking an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit to allow for a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel located in San Gregorio. The dog walking operation supports a doggy daycare business, Smilin Dogs, located in the City of San Carlos, California. The subject San Gregorio project site is a day-use exercise/walking venue for the business. The ~~project~~ applicant also proposes to legalize a five-stall carport structure and 3 cargo storage containers that support the dog walking activity. A regularly serviced portable toilet is onsite for staff use.

Walking Operation

Each weekday approximately five converted Smilin Dog passenger vans, each containing approximately 10-15 medium to large size dogs (in excess of 25 pounds), travel from their licensed San Carlos dog daycare to the project site for off-leash walking within the six fenced upland fields consisting of approximately 23-acres. The dogs stay in groups with a staff handler as they move between the upland exercise fields. Dog waste is collected daily and taken to San Carlos for disposal offsite. The exercise fields are mowed each spring, and no grading or tilling is necessary to accommodate the operation. Each field contains one or two small, simple strawbale and post shade structures for the dogs. Small plastic drinking water basins are filled only when the fields are in use and feeding is conducted at the San Carlos facility. No utilities are involved to support the onsite operation.

An existing dirt and gravel access road crosses the property from Seaside School Road to a level carport parking area. The access road was improved in the 1990s for irrigation pond construction access and staging.

After arrival, the dogs are unloaded into an enclosed covered pen where the dogs are provided water and allowed to relieve themselves before walking. One employee walks a pack of dogs through a fenced alleyway to one of six fenced fields. At separate intervals, five packs of dogs are each moved to their fields, which are rotated daily to reduce overuse. The fields are all enclosed with 5-foot tall woven wire fencing. The dogs are always supervised.

Staff walk the same dogs on a weekly reoccurring schedule and in an orderly manner. The dogs are under voice control and positive reinforcement is used to keep the individual groups with their walkers. Each dog must pass a temperament test at the Smilin Dogs facility in San Carlos before being eligible for walking at the project site; this includes testing for recall and shyness/skittishness.

No changes to existing agricultural use on the property are proposed. An existing cottage onsite is being redesignated as an affordable housing unit in the northern portion of the property to relinquish a density credit for the Smilin Dogs operation; no physical site or building changes are proposed for the living unit redesignation. The project involves no tree removal and no grading. The project site is located within the Cabrillo Highway State Scenic Corridor and La Honda Road County Scenic Corridor. The CDP is appealable to the California Coastal Commission.

FINDINGS AND BASIS FOR A MITIGATED NEGATIVE DECLARATION

The Current Planning Section has reviewed the initial study for the project and, based upon substantial evidence in the record, finds that:

1. The project will not adversely affect water or air quality or increase noise levels substantially.
2. The project will not have adverse impacts on the flora or fauna of the area.
3. The project will not degrade the aesthetic quality of the area.
4. The project will not have adverse impacts on traffic or land use.
5. In addition, the project will not:
 - a. Create impacts which have the potential to degrade the quality of the environment.
 - b. Create impacts which achieve short-term to the disadvantage of long-term environmental goals.
 - c. Create impacts for a project which are individually limited, but cumulatively considerable.
 - d. Create environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The County of San Mateo has, therefore, determined that the environmental impact of the project is insignificant.

MITIGATION MEASURES included in the project to avoid potentially significant effects:

Mitigation Measure 1: Prior to commencement of Project activities, focused surveys for California red-legged frog (CRLF) and San Francisco garter snake (SFGS) shall be conducted by a California Department of Fish and Wildlife (CDFW)-approved qualified biologist experienced with CRLF and SFGS identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate CRLF and/or SFGS are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid all impacts to state and federally listed and fully protected species and their habitat.

Mitigation Measure 2: Prior to project mowing activities, an SFGS avoidance plan shall be prepared for implementation in coordination with CDFW. The SFGS avoidance plan shall be prepared by a qualified biologist experienced in the natural life history requirements of SFGS. At a minimum, the SFGS avoidance plan shall include the following elements:

- a. Depict locations of mowing with respect to grasslands, wetlands, riparian vegetation, and dense vegetation surrounding any ponds on a map. Create habitat buffers and avoid mowing areas that are sensitive or have increased potential for SFGS presence, such as dense wetland vegetation areas;
- b. Require a biological monitor on-site proficient in SFGS identification to walk ahead of the mower if mowing occurs during the months of February - November;
- c. Avoid mowing during peak active SFGS periods to the greatest extent feasible. SFGS are less active and often underground during late fall to early spring months;
- d. Increase mowing blade heights to cut grass as high as possible, i.e., eight inches;
- e. Limit mowing speed to a sufficiently slow rate to allow any undetected SFGS to leave on its own volition unharmed; and
- f. Implement sensitive species worker education for project staff and workers.

If any CRLF or SFGS take occurs or if either of these species is detected, CDFW shall be contacted immediately, and location information and photo documentation of the individual(s) shall be provided.

Mitigation Measure 3: Prior to Project construction or continuation of ongoing Project activities, including dog walking and mowing in uplands adjacent to riparian areas and the irrigation pond, focused surveys for Northwestern pond turtle (NWPT) shall be conducted by a CDFW-approved qualified biologist experienced with NWPT identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate NWPT are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid, minimize, and mitigate all impacts to NWPT and their habitat. These measures could include, at a minimum, establishing best management practices for ongoing Project operations, creating buffers of sufficient size to protect habitat resources, and

implementing worker education programming for construction workers, dog walkers, and all individuals who would be accessing and working in the Project site area.

Mitigation Measure 14: The dog walking fields shall be maintained free of straw bales to avoid attracting wildlife and reduce the likelihood of attracting protected wildlife species such as the California red-legged frog and San Francisco garter snake. The fields shall also be kept clear of clutter, pipes, tarps, wood, or other objects that could attract wildlife.

Mitigation Measure 25: A worker education program shall be conducted for each project-related staff person, including but not limiting construction workers, dog walkers, and all individuals who would be accessing and working on the project site that includes training on California red-legged frog (CRLF), San Francisco garter snake (SFGS), and western pond turtle (WPT) identification, penalties for harming these species or their habitat, and the protocol to be followed should these species be encountered. The worker education program should include color photo cards of CRLF, SFGS, and WPT that remain on the project site.

Mitigation Measure 36: A 10-foot radius no disturbance buffer from San Francisco dusky-footed woodrat nests shall be maintained at all times.

RESPONSIBLE AGENCY CONSULTATION

California Department of Fish and Wildlife

INITIAL STUDY

The San Mateo County Current Planning Section has reviewed the Environmental Evaluation of this project and has found that the probable environmental impacts are insignificant. A copy of the initial study is attached.

REVIEW PERIOD: November 19, 2025 to December 18, 2025

All comments regarding the correctness, completeness, or adequacy of this Mitigated Negative Declaration must be received by the County Planning and Building Department, 455 County Center, Second Floor, Redwood City, no later than **5:00 p.m.**, December 18, 2025.

CONTACT PERSON

Summer Burlison
Project Planner, 650/363-1815
sburlison@smcgov.org



Summer Burlison, Project Planner

County of San Mateo
Planning and Building Department

**REVISED INITIAL STUDY
ENVIRONMENTAL EVALUATION CHECKLIST**
(To Be Completed by Planning Department)

Changes from the original published Initial Study/Mitigated Negative Declaration (IS/MND), dated September 17, 2025, are shown in double underline and overstrike.

1. **Project Title:** Smilin Dogs
2. **County File Number:** PLN2021-00432 & ~~PLN2022-00326~~
3. **Lead Agency Name and Address:** County of San Mateo, Planning & Building Department, 455 County Center, 2nd Floor, Redwood City, CA 94063
4. **Contact Person and Phone Number:** Summer Burlison, Senior Planner, 650/ 363-1815
5. **Project Location:** 123 Seaside School Road, San Gregorio
6. **Assessor's Parcel Number and Size of Parcel:** 081-250-030, 150 acres
7. **Project Sponsor's Name and Address:** Konrad Thaler, Smilin Dogs, 251 Old County Road, San Carlos, CA 94070
8. **Name of Person Undertaking the Project or Receiving the Project Approval (if different from Project Sponsor):** N/A
9. **General Plan Designation/Local Coastal Plan Designation:** Agriculture
10. **Zoning:** Planned Agricultural District/Coastal Development (PAD/CD)
11. **Description of the Project:**

The applicant is seeking an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit to allow for a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel located in San Gregorio. The dog walking operation supports a doggy daycare business, Smilin Dogs, located in the City of San Carlos, California. The subject San Gregorio project site is a day-use exercise/walking venue for the business. The ~~project~~ applicant also proposes to legalize a five-stall carport structure and 3 cargo storage containers that support the dog walking activity. A regularly serviced portable toilet is onsite for staff use.

Walking Operation

Each weekday approximately five converted Smilin Dog passenger vans, each containing approximately 10-15 medium to large size dogs (in excess of 25 pounds), travel from their licensed San Carlos dog daycare to the project site for off-leash walking within the six fenced upland fields consisting of approximately 23-acres. The dogs stay in groups with a staff handler as they move between the upland exercise fields. Dog waste is collected daily and taken to

San Carlos for disposal offsite. The exercise fields are mowed each spring, and no grading or tilling is necessary to accommodate the operation. Each field contains one or two small, simple strawbale and post shade structures for the dogs. Small plastic drinking water basins are filled only when the fields are in use and feeding is conducted at the San Carlos facility. No utilities are involved to support the onsite operation.

An existing dirt and gravel access road crosses the property from Seaside School Road to a level carport parking area. The access road was improved in the 1990s for irrigation pond construction access and staging.

After arrival, the dogs are unloaded into an enclosed covered pen where the dogs are provided water and allowed to relieve themselves before walking. One employee walks a pack of dogs through a fenced alleyway to one of six fenced fields. At separate intervals, five packs of dogs are each moved to their fields, which are rotated daily to reduce overuse. The fields are all enclosed with 6-foot-tall woven wire fencing. The dogs are always supervised.

Staff walk the same dogs on a weekly reoccurring schedule and in an orderly manner. The dogs are under voice control and positive reinforcement is used to keep the individual groups with their walkers. Each dog must pass a temperament test at the Smilin Dogs facility in San Carlos before being eligible for walking at the project site; this includes testing for recall and shyness/skittishness.

No changes to existing agricultural use on the property are proposed. An existing legal cottage onsite is being redesignated as an affordable housing unit in the northern portion of the property to relinquish a density credit for the Smilin Dogs operation; no physical site or building changes are proposed for the living unit redesignation. The project involves no tree removal and no grading. The project site is located within the Cabrillo Highway State Scenic Corridor and La Honda Road County Scenic Corridor. The CDP is appealable to the California Coastal Commission.

12. **Surrounding Land Uses and Setting:** The project parcel is located approximately ½-mile south of La Honda Road (Highway 84) and 1.3 miles east of Cabrillo Highway (Highway 1) in the San Gregorio area of San Mateo County. The 150-acre parcel consists of two residences and miscellaneous accessory agricultural buildings (i.e., barns, sheds) in the northern portion of the property, active agricultural crop fields in the middle section of the property and an adjacent man-made irrigation pond to the south of the ag fields. In the southern portion of the property is the approximately 23-acre fenced project site that consists of grassy, gently sloped, open fields. An intermittent stream with riparian corridor runs north of the irrigation pond and these features act as a visible delineation between the active agricultural fields and the southern dog walking fields. The project site is a former agricultural field that is fenced and includes a five-stall metal carport structure and three cargo containers used for storage. An existing access road leads from Seaside School Road to the project area. Surrounding properties include large rural parcels used for active crop fields, rural residential development, and open sloped terrain; the nearest neighboring residence is over 500 feet to the south of the project site area.
13. **Other Public Agencies Whose Approval is Required:** California Department of Fish and Wildlife (Responsible Agency)
14. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the**

determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?: No California Native American tribes have requested consultation for the project pursuant to Public Resources Code Section 21080.3.1. Furthermore, the result of a Sacred Lands File check by the Native American Heritage Commission was negative.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Significant Unless Mitigated” as indicated by the checklist on the following pages.

	Aesthetics		Energy		Public Services
	Agricultural and Forest Resources		Hazards and Hazardous Materials		Recreation
	Air Quality		Hydrology/Water Quality		Transportation
X	Biological Resources		Land Use/Planning		Tribal Cultural Resources
	Climate Change		Mineral Resources		Utilities/Service Systems
	Cultural Resources		Noise		Wildfire
	Geology/Soils		Population/Housing	X	Mandatory Findings of Significance

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact”

to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in 5. below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources. Sources used or individuals contacted should be cited in the discussion.

1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
1.a. Have a substantial adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?			X	
<p>Discussion: The project property forms part of the general rural agricultural backdrop to La Honda Road (Highway 84) and Cabrillo Highway (Highway 1). The site is more than 0.35 miles from La Honda Road and further from Cabrillo Highway. The dog walking operation involves low-intensity activities and minimal development that are compatible with the rural agricultural character of the area and would be minimally visible from any public view points due to the distance, travel speed, vegetation and topography, and relative prominence of foreground development. Therefore, the project would not have a substantial adverse effect on the aesthetic character of the area.</p> <p>Source: Project location; Project plans.</p>				

1.b. Substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
<p>Discussion: The project site is located in the Cabrillo Highway State Scenic Corridor; however, the project does not involve substantial impact to scenic resources. The project involves minimal development and activities that are compatible to the rural character of the area. Therefore, no mitigation is necessary.</p> <p>Source: Project location; Project plans.</p>				
1.c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
<p>Discussion: The project site is in the rural San Gregorio area of San Mateo County. The project involves low-impact activities related to the use of existing open fields for daily dog walking, along with limited support structures. The project does not substantially degrade the existing visual character or quality of public views or its surroundings. No grading or vegetation removal, beyond routine mowing of the walking fields, has been or would be required for the project.</p> <p>Source: Project location; Project plans.</p>				
1.d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				X
<p>Discussion: The project does not involve any new sources of light or glare that could adversely impact views in the area as no lighting is proposed for the dog walking operation. Dog walking occurs during weekday hours between 10:00 a.m. to 3:00 p.m. Additionally, the limited support structures (i.e., carports, cargo containers, and porta-potty) consist of non-reflective finishes.</p> <p>Source: Project location; Project plans.</p>				
1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?			X	
<p>Discussion: The project site is located in the Cabrillo Highway State Scenic Corridor and the La Honda Road County Scenic Corridor. Due to the project's low impact activities, limited supporting structures, distance from scenic corridor roadways, and topography, the project would not have any substantial adverse impacts to the natural scenic quality of the area.</p>				

Source: Project location; Project plans; San Mateo County GIS, Scenic Corridor Map.					
1.f.	If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?				X
Discussion: The project site is not located in a Design Review District. Source: San Mateo County GIS, Zoning Map.					
1.g.	Visually intrude into an area having natural scenic qualities?			X	
Discussion: See staff's response to Question 1.a. through 1.e. Source: Project Location; project plans; San Mateo County GIS, Scenic Corridor Map.					

<p>2. AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2.a.	For lands outside the Coastal Zone, 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?				X
Discussion: The project site is not located outside the Coastal Zone. Source: Project location; San Mateo County GIS, Coastal Zone Map.					
2.b.	Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?				X
Discussion: The project parcel is not encumbered by an Open Space Easement or Williamson Act contract. The parcel is zoned Planned Agricultural District/Coastal Development (PAD/CD). The General Plan Agricultural Lands Map classifies the project site area as Lands Suitable for					

<p>Agriculture. According to the PAD zoning regulations, the proposed commercial recreation use of the project site for dog walking is a conditionally permissible use on lands suitable for agriculture, subject to a PAD permit which is being sought by the business operator.</p> <p>Source: Project location; Project plans; San Mateo County Zoning Map, Zoning Ordinance, and General Plan Agricultural Lands Map.</p>					
2.c.	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 forestland to non-forest use?				X
<p>Discussion: The project involves the use of open fields in the southern portion of the property for weekday dog walking. According to the Department of Conservation Farmland Mapping and Monitoring Program map viewer, the project site area is designated as grazing lands. While the sloped project site area had been used for grazing long ago, such activities ceased around the late 1980's. Furthermore, the project site area does not contain prime soil. Therefore, the project would not result in the conversion of Farmland to non-agricultural use.</p> <p>Source: Project plans; Department of Conservation Farmland Mapping and Monitoring Program, California Important Farmland Finder.</p>					
2.d.	For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?				X
<p>Discussion: The project parcel is located in the coastal zone; however, the project site area does not involve Class I or Class II soils, or Class III soils rated good or very good for artichokes or Brussels sprouts.</p> <p>Source: Project plans; Natural Resources Conservation Service, Web Soil Survey.</p>					
2.e.	Result in damage to soil capability or loss of agricultural land?				X
<p>Discussion: The project introduces a low-impact activity on land designated as grazing; however, the project site area has not been actively grazed for many decades. The exercise fields are mowed each spring, and no grading or tilling is necessary to accommodate the operation. Dog walking will rotate between fields daily to reduce overuse or permanent impacts to the natural condition of the soil or vegetation. Therefore, the project is not expected to result in damage to soil capability or loss of the land for future agricultural use.</p> <p>Source: Project plans.</p>					
2.f.	Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland				X

Production (as defined by Government Code Section 51104(g))? <i>Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.</i>				
Discussion: The project site is not located on forestland or timberland property. Source: San Mateo County GIS, Zoning Map.				

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
	Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
3.a. Conflict with or obstruct implementation of the applicable air quality plan?				X
Discussion: The 2017 Clean Air Plan (CAP), developed by the Bay Area Air Quality Management District (BAAQMD), is the current regulating air quality plan for San Mateo County. The CAP was created to improve Bay Area air quality with its primary focus on protecting public health and the climate by reducing population exposure to air pollutants throughout the region and reducing greenhouse gas (GHG) emissions. The CAP includes control measures to be incorporated into projects, as applicable, to achieve the plan's goals that include, but are not limited to, transportation sector, buildings sector, energy sector, agriculture sector, and natural and working lands. The project has been evaluated for control measure applicability and determined that none apply given the scope of the project. Therefore, the project will not conflict with or obstruct the implementation of the BAAQMDs 2017 CAP. See also Section 8 (Climate Change) and Section 17 (Transportation). Source: Project location; Project plans; Bay Area Air Quality Management District, 2017 Clean Air Plan.				
3.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?			X	
Discussion: The San Francisco Bay Area Air Basin is currently designated as a nonattainment area for the California and national ambient air quality standards for ozone and particulate matter (PM2.5 and PM10). The project involves passenger van transportation of dogs to and from the project site in San Gregorio. Dogs will be walked across open vegetated fields; minimal disturbance or construction is proposed to support the activity that would generate fugitive dust. Additionally, vehicle emissions would be generated but limited to approximately 5 passenger vans per weekday traveling from the business headquarter in San Carlos to the fields in San Gregorio; thus, ozone and exhaust emission as a result of the project would not be significant. Additionally,				

the van vehicles used for transporting dogs are licensed with the State of California and therefore adhere to California Air Resources Board standards.

Source: Bay Area Air Quality Management District, 2022 CEQA Guidelines.

3.c. Expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District?				X
--	--	--	--	---

Discussion: Sensitive receptors include children, the elderly, and those with preexisting serious health problems. Land uses where sensitive receptors are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers and preschools, hospices, dormitories, prisons, nursing homes, hospitals, and residential communities. The project site is in the rural area of San Gregorio with nearby surrounding land uses consisting of agriculture, open space, and rural single-family residences on larger sized parcels; the nearest residence is approximately 600 feet away on an adjacent parcel to the south. An environmental youth camp is located over 3 miles from the project site. Furthermore, there are no nearby schools, public parks, or nursing homes or hospitals that could support sensitive receptors in the area.

Source: Project location; Bay Area Air Quality Management District 2017 Clean Air Plan.

3.d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X
---	--	--	--	---

Discussion: The project is not expected to result in other emissions, such as odors, adversely affecting a substantial number of people as the dog walking is proposed on a rural private parcel. No construction is proposed, and dog waste is collected in real time by dog walking staff and removed from the site daily.

Source: Project location; Project plans.

4. BIOLOGICAL RESOURCES. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
4.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 or National Marine Fisheries Service?		X		

Discussion: The 23-acre project site area consists of ruderal, nonnative grassland and coyote brush/poison oak scrub. Four special-status animal species and no special-status plants were

determined to have potential for occurrence in the project area according to a biological resources survey by Coast Ridge Ecology (2024). Special-status animals with some potential for occurrence include the California red-legged frog (CRLF), San Francisco garter snake (SFGS), and western pond turtle that may utilize the nearby irrigation pond and adjacent hillsides within the fenced walking fields.

CRLF is a species listed as threatened under the Federal Endangered Species Act (ESA) and is a California Species of Special Concern (SCC). SFGS is a fully protected species in California and listed as endangered under CESA and federal ESA. While no CRLF or SFGS were documented within the project site or adjacent aquatic habitat, the presence of burrowing mammals in the area indicate the project area may provide suitable foraging or breeding habitat for these species. Furthermore, CRLF and SFGS may migrate through and between suitable habitat in the area. Therefore, the project may result in the substantial reduction in the number or restriction in the range of a threatened or endangered species. If CRLF or SFGS are injured or killed, or their habitat is removed as a result of the project, the project may result in a substantial reduction in the number or restriction in the range of a threatened or endangered species.

Northwestern pond turtle (NWPT) is a state SCC and a candidate for listing under the federal ESA. The project site may provide suitable habitat for NWPT, therefore, ongoing dog-waling or related field mowing could potentially result in direct or indirect take of NWPT. Particularly mowing in the upland areas could injure or kill NWPT if they are basking or moving between upland and aquatic habitat, habitat loss or degraded site suitability due to mowing and the presence of dogs and people in the upland fields, and/or noise, could disrupt NWPT basking, nesting or foraging and ultimately prevent NWPT from completing all stages of their life cycle.

The following mitigation measures are recommended to ensure impacts to CRLF, SFGS, and NWPT are fully avoided:

Mitigation Measure 1: Prior to commencement of Project activities, focused surveys for California red-legged frog (CRLF) and San Francisco garter snake (SFGS) shall be conducted by a California Department of Fish and Wildlife (CDFW)-approved qualified biologist experienced with CRLF and SFGS identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate CRLF and/or SFGS are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid all impacts to state and federally listed and fully protected species and their habitat.

Mitigation Measure 2: Prior to project mowing activities, an SFGS avoidance plan shall be prepared for implementation in coordination with CDFW. The SFGS avoidance plan shall be prepared by a qualified biologist experienced in the natural life history requirements of SFGS. At a minimum, the SFGS avoidance plan shall include the following elements:

- a. Depict locations of mowing with respect to grasslands, wetlands, riparian vegetation, and dense vegetation surrounding any ponds on a map. Create habitat buffers and avoid mowing areas that are sensitive or have increased potential for SFGS presence, such as dense wetland vegetation areas;
- b. Require a biological monitor on-site proficient in SFGS identification to walk ahead of the mower if mowing occurs during the months of February - November;
- c. Avoid mowing during peak active SFGS periods to the greatest extent feasible. SFGS are less active and often underground during late fall to early spring months;
- d. Increase mowing blade heights to cut grass as high as possible, i.e., eight inches;

- e. Limit mowing speed to a sufficiently slow rate to allow any undetected SFGS to leave on its own volition unharmed; and
- f. Implement sensitive species worker education for project staff and workers.

If any CRLF or SFGS take occurs or if either of these species is detected, CDFW shall be contacted immediately, and location information and photo documentation of the individual(s) shall be provided.

Mitigation Measure 3: Prior to Project construction or continuation of ongoing Project activities, including dog walking and mowing in uplands adjacent to riparian areas and the irrigation pond, focused surveys for Northwestern pond turtle (NWPT) shall be conducted by a CDFW-approved qualified biologist experienced with NWPT identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate NWPT are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid, minimize, and mitigate all impacts to NWPT and their habitat. These measures could include, at a minimum, establishing best management practices for ongoing Project operations, creating buffers of sufficient size to protect habitat resources, and implementing worker education programming for construction workers, dog walkers, and all individuals who would be accessing and working in the Project site area.

~~However, these fields do not provide suitable upland cover for these species and the limited use of the fields for dog walking is not expected to present significant impacts to these species according to Coast Ridge Ecology.~~

Mitigation Measure 14: The dog walking fields shall be maintained free of straw bales to avoid attracting wildlife and reduce the likelihood of attracting protected wildlife species such as the California red-legged frog and San Francisco garter snake. The fields shall also be kept clear of clutter, pipes, tarps, wood, or other objects that could attract wildlife.

Mitigation Measure 25: A worker education program shall be conducted for each project-related staff person, including but not limiting construction workers, dog walkers, and all individuals who would be accessing and working on the project site that includes training on California red-legged frog (CRLF), San Francisco garter snake (SFGS), and western pond turtle (WPT) identification, penalties for harming these species or their habitat, and the protocol to be followed should these species be encountered. The worker education program should include color photo cards of CRLF, SFGS, and WPT that remain on the project site.

Additionally, two San Francisco dusky-footed woodrat middens were observed outside of the 23-acre project area but within 20 feet of the carport parking area. The following mitigation measures are recommended by Coast Ridge Ecology to ensure potential impacts to these special-status species are minimized:

Mitigation Measure 36: A 10-foot radius no disturbance buffer from San Francisco dusky-footed woodrat nests shall be maintained at all times.

Source: Biological Impact Form prepared by Coast Ridge Ecology, February 2024; California Department of Fish and Wildlife comment letter, dated September 29, 2025, for Smilin Dogs Mitigated Negative Declaration.

4.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			X	
--	--	--	---	--

Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?				
<p>Discussion: According to Coast Ridge Ecology, the project area does not provide suitable habitat for special-status plant species due to the dominance of the site by nonnative plant species, and lack of soils that favor special-status plants.</p> <p>Source: Biological Impact Form prepared by Coast Ridge Ecology, February 2024.</p>				
4.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?				X
<p>Discussion: There are no wetlands or water features inside the project area. San Gregorio Creek is located 400 feet to the north of the project area, at its closest point, and is over 1800 feet (0.35 miles) from the project area's eastern edge near the covered parking area. Between the creek and the Smilin' Dogs operation is an active agricultural field. A three-acre man-made agricultural irrigation pond/reservoir is approximately 40 feet north of the project site area at its closest point. The pond is used for irrigation and is encircled by dense freshwater emergent marsh vegetation (i.e., cattail). The pond is perennial and the water level fluctuates based on water usage for agriculture and season. An unnamed seasonal drainage that is partially vegetated with freshwater riparian scrub is located along the northern boundary of the project area, runs north of the irrigation pond, and flows to San Gregorio Creek. Both of these features, the wetland and intermittent stream features, are located outside the project area and Coast Ridge Ecology concludes that no impacts from project activities were observed during the site visit, and none are expected based on project activities and distance to these features.</p> <p>Source: Biological Impact Form prepared by Coast Ridge Ecology, February 2024.</p>				
4.d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
<p>Discussion: The 23-acre project site area consists of six fenced field areas for dog walking. According to Coast Ridge Ecology, these fences would prevent some larger wildlife species from moving through the walking fields, however, there is extensive open space surrounding the fields whereby wildlife can move freely between upland areas and San Gregorio Creek. Therefore, the project and activities would not present a significant barrier to wildlife movement within the surrounding area.</p> <p>Source: Biological Impact Form prepared by Coast Ridge Ecology, February 2024.</p>				
4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?		X		

<p>Discussion: There are no trees in the project area. Also, see staff's response to Questions 4.a through 4.d.</p> <p>Source: Project plans; Biological Impact Form prepared by Coast Ridge Ecology, February 2024.</p>					
4.f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?				X
<p>Discussion: The project site is not located in an area with an adopted Habitat Conservation Plan or Natural Conservation Community Plan, or other known approved regional or State habitat conservation plan.</p> <p>Source: California Department of Fish and Wildlife, Natural Community Conservation Plans map.</p>					
4.g.	Be located inside or within 200 feet of a marine or wildlife reserve?				X
<p>Discussion: The project site is not located inside or within 200 feet of a marine or wildlife reserve.</p> <p>Source: California Department of Fish and Wildlife, Ecological Reserves and Wildlife Areas of California Bay Delta Region map; U.S. Fish & Wildlife Service, National Wildlife Refuge System map.</p>					
4.h.	Result in loss of oak woodlands or other non-timber woodlands?				X
<p>Discussion: The project is located in open field areas that are void of trees, and therefore, no tree removal is necessary.</p> <p>Source: Project location.</p>					

<p>5. CULTURAL RESOURCES. Would the project:</p>					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5.a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
<p>Discussion: According to a search of the California Historical Resources Information System and the California Office of Historic Preservation, the project site does not contain any historical resources. Additionally, a Phase I Cultural Resource Inventory prepared by Albion Environmental, Inc. (2022) concluded the project site area contains no historical resources.</p> <p>Source: California Office of Historic Preservation, Northwestern Information Center; Phase I Cultural Resource Inventory, Albion Environmental, Inc, December 2022.</p>					

5.b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?				X
<p>Discussion: The project site contains no archaeological resources as concluded in a Phase I Cultural Resource Inventory prepared by Albion Environmental, Inc. (2022).</p> <p>Source: Phase I Cultural Resource Inventory, Albion Environmental, Inc, December 2022.</p>				
5.c. Disturb any human remains, including those interred outside of formal cemeteries?				X
<p>Discussion: Based on a cultural resource inventory for the project site, there is a low potential for human remains to exist in the project site area. Additionally, the project involves minimal ground disturbance.</p> <p>Source: Phase I Cultural Resource Inventory, Albion Environmental, Inc, December 2022.</p>				

6. ENERGY. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
6.a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
<p>Discussion: The project involves a low-intensity land use that is limited to five passenger vans transporting dogs from San Carlos to the project site on weekdays between the hours of 10:00 a.m. to 3:00 p.m. Additionally, the passenger vans are licensed vehicles regulated by the California Air Resources Board for vehicle emissions. Therefore, the project is not expected to result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources.</p> <p>Source: Project plans.</p>				
6.b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.				X
<p>Discussion: The project involves low-intensity land use that would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency as no energy resources are needed for the project.</p> <p>Source: Project plans.</p>				

7. GEOLOGY AND SOILS. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
7.a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:				
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? <i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i>				X
Discussion: The project involves low-intensity land use activity and minimal development or disturbance to land. Therefore, the project would not cause rupture of a known earthquake fault. Source: Project plans.				
ii. Strong seismic ground shaking?				X
Discussion: The project involves low-intensity land use activity and minimal development or disturbance to land. Therefore, the project would not cause strong seismic ground shaking. Source: Project plans.				
iii. Seismic-related ground failure, including liquefaction and differential settling?				X
Discussion: The project involves low-intensity land use activity and minimal development or disturbance to land. Therefore, the project would not cause seismic-related ground failure. Source: Project plans.				
iv. Landslides?				X
Discussion: The project is located on gently-rolling hills but involves low-intensity land use activity and minimal development or disturbance to land. Therefore, the project would not cause landslides. Source: Project plans.				
v. Coastal cliff/bluff instability or erosion?				X

<p><i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).</i></p>				
<p>Discussion: The project site is not located near a coastal cliff or bluff. Source: Project location.</p>				
<p>7.b. Result in substantial soil erosion or the loss of topsoil?</p>				X
<p>Discussion: The project site area consists of ruderal, nonnative grassland, vegetation with some coyote brush/poison oak scrub vegetation. The dog walking fields are mowed each spring but no grading or tilling of the area is performed or required to accommodate the dog walking operation. At separate intervals, five packs of dogs are each moved to their fields, which are rotated daily to reduce overuse. Therefore, the project would not result in substantial soil erosion or loss of topsoil. Source: Project plans.</p>				
<p>7.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, severe erosion, liquefaction or collapse?</p>				X
<p>Discussion: The project involves no permanent development or activities that would cause soil instability. Source: Project plans.</p>				
<p>7.d. Be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code, creating substantial direct or indirect risks to life or property?</p>				X
<p>Discussion: The project is not expected to be located on expansive soils. The project involves low-intensity use of the land for dog walking and would not create a substantial direct or indirect risk to life or property. Source: Project plans; Project location.</p>				
<p>7.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?</p>				X
<p>Discussion: The project does not involve the use of septic tanks or alternative onsite waste disposal systems. The project includes a portable toilet (i.e., porta-potty) located onsite for staff use and dog waste is collected in real time by staff and transported offsite daily. Source: Project plans.</p>				

7.f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
<p>Discussion: Based on a Phase I Cultural Resource Inventory prepared by Albion Environmental, Inc., the project site is not expected to support a unique paleontological resource or site, or unique geologic feature.</p> <p>Source: Phase I Cultural Resource Inventory, Albion Environmental, Inc, December 2022.</p>					

8. CLIMATE CHANGE. Would the project:					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
8.a.	Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?			X	
<p>Discussion: The project would not generate greenhouse gas emissions that could have significant impact on the environment; see staff's responses to Section 3 (Air Quality).</p> <p>Source: Project scope.</p>					
8.b.	Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
<p>Discussion: The County's 2022 Community Climate Action Plan (CCAP) identifies priority actions to achieve the County's updated goals of 45% reduction of greenhouse gas (GHG) emissions over 1990 levels by 2030 and carbon neutrality by 2040. To achieve these goals, the CCAP is structured to focus on: Building Energy, Transportation, Waste, and Working Lands. The project will not conflict with the applicable focus areas of the County's CCAP as the project will not result in significant traffic and the operation will collect dog waste and transport it offsite for proper disposal. Therefore, the project conforms with the County's Community Climate Action.</p> <p>Source: Project plans; San Mateo County Community Climate Action Plan, 2022.</p>					
8.c.	Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?				X
<p>Discussion: The project is proposed on an open unforested area of an agricultural property in San Gregorio and therefore will not result in the loss of forestland or conversion of forestland to non-forest use.</p>					

Source: Project location; Project plans.					
8.d.	Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?				X
Discussion: The project site is not located near coastal cliffs/bluffs. Source: Project location.					
8.e.	Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				X
Discussion: The project parcel is not located near the coast or in an area at risk of exposure to sea level rise. Source: Project location.					
8.f.	Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
Discussion: The project site is not located in a 100-year-flood hazard area. Source: FEMA Map Panels 06081C0359F and 06081C0380E, effective August 2, 2017, and October 16, 2012, respectively.					
8.g.	Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
Discussion: The project site is not located in a 100-year-flood hazard area. Source: FEMA Map Panels 06081C0359F and 06081C0380E, effective August 2, 2017, and October 16, 2012, respectively.					

9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
9.a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?				X

<p>Discussion: The project does not involve the routine use, transport, or disposal of hazardous materials.</p> <p>Source: Project plans.</p>					
9.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?				X
<p>Discussion: The project does not involve activities that would result in conditions involving the release of hazardous materials.</p> <p>Source: Project plans.</p>					
9.c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
<p>Discussion: The project is not located within one-quarter mile of an existing or proposed school; and the project does not involve emittance or handling of hazardous or acutely hazardous materials.</p> <p>Source: Project location; Project plans.</p>					
9.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?				X
<p>Discussion: The project parcel is not included on a list of hazardous materials sites.</p> <p>Source: Project location; California Department of Toxic Substances, Hazardous Waste and Substance Site List (EnviroStor).</p>					
9.e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?				X
<p>Discussion: The project site is not located within an airport land use plan or within 2 miles of any known public airport or public use airport.</p> <p>Source: Project location.</p>					

9.f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
<p>Discussion: The project parcel is accessed off of Seaside School Road and the project is entirely located on private property, therefore, would not interfere with any adopted emergency response or evacuation plan. The San Mateo County Fire Department has reviewed and conditionally approved the project for compliance with emergency access requirements.</p> <p>Source: Project plans; San Mateo County Fire Department.</p>				
9.g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X
<p>Discussion: The project parcel is located in a moderate fire hazard risk area, State Responsibility Area, for wildland fires. The project parcel is in the rural San Gregorio area of the County that consists of larger rural open agricultural land like the subject project parcel. The project has been reviewed and conditionally approved by the San Mateo County Fire Department to ensure health and safety risks are minimized.</p> <p>Source: Project plans; Project location; San Mateo County GIS; San Mateo County Fire Department.</p>				
9.h. Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
<p>Discussion: The project does involve the placement of housing within a 100-year flood hazard area.</p> <p>Source: FEMA Map Panels 06081C0359F and 06081C0380E, effective August 2, 2017, and October 16, 2012, respectively.</p>				
9.i. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p>Discussion: The project site is not located in a 100-year-flood hazard area.</p> <p>Source: FEMA Map Panels 06081C0359F and 06081C0380E, effective August 2, 2017, and October 16, 2012, respectively.</p>				
9.j. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X

Discussion: The project is not located in an area at risk of flooding. The dog walking operation is located on sloped terrain and not in the pathway of a levee or dam.

Source: Project location; San Mateo County General Plan, Natural Hazards Map; San Mateo County Local Coastal Program, South Coast Hazards Map.

9.k. Inundation by seiche, tsunami, or mudflow?

X

Discussion: According to the County General Plan and Local Coastal Program Natural Hazards Maps, the project site is not located in an area of risk of seiche, tsunami, or mudflow.

Source: Project location; San Mateo County General Plan, Natural Hazards Map; San Mateo County Local Coastal Program, South Coast Hazards Map.

10. HYDROLOGY AND WATER QUALITY. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
10.a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?			X	

Discussion: The project includes approximately 4,800 sq. ft. of impervious surface for five carports and three cargo containers and minimal drainage features are proposed for the impervious surface. Otherwise, the remaining project site area (of approximately 23 acres) will remain in its natural pervious condition. No grading is proposed, and the project operation is not expected to generate erosion or siltation. Furthermore, no work is being conducted in a watercourse.

Source: Project plans.

10.b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

X

Discussion: The project involves low intensity use of gently sloped land with minimal ground disturbance. Dog walking activities will rotate daily between the fenced fields to minimize overuse and potential impacts to natural vegetation cover or terrain. The dog walking operation does not use groundwater. Minimal impervious structures support the dog walking activity and site drainage will

continue to naturally infiltrate back into the ground. Furthermore, the existing cottage being converted to affordable housing will continue to use an existing onsite domestic well for which Environmental Health Services has reviewed and conditionally approved.

Source: Project plans; Environmental Health Services.

10.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 that would:				
i. Result in substantial erosion or siltation on- or off-site;			X	

Discussion: The project involves low intensity use of gently sloped land with minimal ground disturbance. Dog walking activities will rotate daily between the fenced fields to minimize overuse and potential impacts to natural vegetation cover or terrain. Dog rinsing will be confined to bins that drain to a 2-inch pipe that conveys water under the gravel parking area and discharges to a rock outfall for energy dissipation to minimize erosion or siltation. Runoff from impervious areas, including the carports and cargo containers, will be retained in a gravel trench and allowed to percolate into the ground. No physical changes are proposed to the affordable housing unit area.

Source: Project plans; Project location.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
---	--	--	---	--

Discussion: The project involves impervious area for carports and cargo containers to support dog walking; however, relative to the acreage of the project area, this impervious area is not significant. Nonetheless, drainage runoff from this added impervious surface area will be retained in a gravel trench and allowed to percolate back into the ground. Additionally, dog rinsing will be confined to bins and conveyed to an energy dissipator to minimize flooding or erosion.

Source: Project plans.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X
--	--	--	--	---

<p>Discussion: The project would not generate significant runoff as much of the land will be maintained in its natural vegetative open field condition where stormwater will continue to infiltrate and sheet flow over the acres of land. Impervious surface associated with the project includes five carports and several cargo containers in a relatively flat area of the fields to support the dog walking operation. Runoff from these structures will be accommodated through onsite retention features to allow stormwater to naturally percolate into the ground.</p> <p>Source: Project plans.</p>				
iv. Impede or redirect flood flows?				X
<p>Discussion: The dog walking operation is not in an area that would be prone to flooding due to its gently sloped terrain and will be predominantly maintained in its pre-existing open field condition.</p> <p>Source: Project plans; Project location.</p>				
10.d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
<p>Discussion: The project site is not in a flood hazard, tsunami, or seiche zone.</p> <p>Source: Project location; San Mateo County General Plan Natural Hazards Map; San Mateo County Local Coastal Program South Coast Hazards Map.</p>				
10.e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
<p>Discussion: The project is located across approximately 23 acres of open, undeveloped fields and involves minimal new impervious surface that will include features to collect and retain stormwater runoff. The project site is within the San Gregorio Valley watershed. Due to the project's low intensity use it will not conflict with the San Gregorio Creek Watershed Management Plan.</p> <p>Source: Project plans; Project location, San Gregorio Creek Watershed Management Plan.</p>				
10.f. Significantly degrade surface or groundwater water quality?				X
<p>Discussion: The project will not degrade surface or groundwater water quality as minimal physical changes are proposed, and the project does not introduce any uses that will significantly affect surface or groundwater. Also, see staff's response to Question 10.b.</p> <p>Source: Project plans.</p>				
10.g. Result in increased impervious surfaces and associated increased runoff?			X	
<p>Discussion: See staff's response to Questions 10.a., 10.c., and 10.f.</p> <p>Source: Project plans.</p>				

11. LAND USE AND PLANNING. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11.a. Physically divide an established community?				X
<p>Discussion: The project involves use of approximately 23 acres of open field for daytime dog walking. Minimal improvements are necessary to accommodate the operation. A majority of the parcel is used for crop production; however, this southern portion of the parcel contains gently sloped fields that have not been used for active agriculture for years. The project involves low intensity use of the open fields for dog walking and would not create a divide of land use in the San Gregorio area.</p> <p>Source: Project plans; Project location.</p>				
11.b. Cause 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?				X
<p>Discussion: The project does not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project does not encroach upon any land that is currently or recently in agricultural production and the dog walking operation involves minimal development.</p> <p>Source: Project plans; Project location.</p>				
11.c. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?				X
<p>Discussion: The project will not introduce any development or improvement to the land that could serve to encourage off-site development of presently undeveloped areas or support an increase in development intensity of already developed areas given the project's low intensity use and minimal supporting improvements.</p> <p>Source: Project plans; Project location.</p>				

12. MINERAL RESOURCES. Would the project:
--

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
12.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				X
<p>Discussion: The project site is not in any mapped mineral resources area.</p> <p>Source: San Mateo County General Plan, Mineral Resources map.</p>				
12.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?				X
<p>Discussion: See staff's response in Section 12.a. above.</p> <p>Source: San Mateo County General Plan, Mineral Resources map.</p>				

13. NOISE. Would the project result in:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
13.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?			X	
<p>Discussion: The project could generate short-term noise associated with dog barking during daily use of the fields for dog walking (Monday – Friday between the hours of 10:00 a.m. to 3:00 p.m.). The dog walking fields are sloped downward from west to east, towards the remaining +100 acres of the parcel. The nearest neighboring development in the area is over 500 feet away on a neighboring parcel to the southwest of the project parcel. Given the location for the dog walking activities on the project parcel and surrounding topography and distance from nearby development on neighboring properties, it is not expected that any short-term noise increases from dog barking would be substantial to the area.</p> <p>Source: Project location; Project plans.</p>				
13.b. Generation of excessive ground-borne vibration or ground-borne noise levels?				X

Discussion: The project consists of transporting dogs by passenger van to the project site and walking the dogs across the approximately 23-acres of fenced fields. The project would not generate excessive ground-borne vibrations or noise levels.

Source: Project plans.

13.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 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?				X
---	--	--	--	---

Discussion: The project site is not within the vicinity of any known private airstrip or an airport land use plan, or within 2 miles of a public airport or public use airport.

Source: Project location.

14. POPULATION AND HOUSING. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
14.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)?				X

Discussion: The project will not induce population growth in the area as the project is limited to daytime dog walking on the southern portion of the property. The dog walking activities are related to the primary dog care business located in the City of San Carlos. The project includes minimal improvements to support the operation, and no utilities are needed to serve the dog walking activity.

Source: Project scope.

14.b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
--	--	--	--	---

Discussion: The project does not propose to displace people or housing. The project involves conversion of an existing cottage unit into an affordable housing unit, therefore, maintaining it in the stock of rural agricultural residential housing supply.

Source: Project scope.

15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
15.a. Fire protection?				X
15.b. Police protection?				X
15.c. Schools?				X
15.d. Parks?				X
15.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?				X
<p>Discussion: The project does not introduce a use that would adversely impact public services. No new utilities are proposed to serve the dog walking operation, and no public facilities are needed as a result of the project. The use will not create a significant demand for public services. The San Mateo County Fire Department has reviewed the project and provided conditional approval.</p> <p>Source: Project plans.</p>				

16. RECREATION. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16.a. 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?				X
<p>Discussion: The project does not involve the use of existing neighborhood or regional parks or other recreational facilities.</p> <p>Source: Project plans.</p>				
16.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Discussion: The project involves the use of private land for recreational dog walking. The project does not involve any new utilities or significant development. Dog waste will be collected daily by staff in real time and transported offsite for disposal. As concluded in this environmental evaluation, the project would not have any adverse physical effect on the environment.

Source: Project plans; Subject Initial Study.

17. TRANSPORTATION. Would the project:				
	Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
17.a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking?				X
<p>Discussion: The project site is located in a rural area of the County. The project entails approximately five passenger vans traveling approximately 27 miles between the business's headquarter in San Carlos to the project site in San Gregorio each weekday during the hours of 10:00 a.m. to 3:00 p.m. which is outside of normal peak AM (7:00 a.m. to 9:00 a.m.) and PM hours (4:00 p.m. to 6:00 p.m.). These estimated 10 daily weekday trips would not significantly impact traffic conditions in San Mateo County. Additionally, the project will generate less than 100 average daily trips and therefore is not subject to the City/County Association of Governments of San Mateo County Transportation Demand Management Policy.</p> <p>Source: Project plans; Project location; City/County Association of Governments of San Mateo County Transportation Demand Management Policy.</p>				
17.b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) <i>Criteria for Analyzing Transportation Impacts?</i> <i>Note to reader: Section 15064.3 refers to land use and transportation projects, qualitative analysis, and methodology.</i>				X
<p>Discussion: Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Per Section 15064.3, an analysis of vehicle miles traveled (VMT) attributable to a project is the most appropriate measure of transportation impacts. Based on the County Department of Public Works' Inter-Departmental Correspondence on VMT for determining transportation impacts under CEQA analysis, the significance of VMT impacts in rural areas are set on a case-by-case basis. Based on the use and minimal increase in trips that will be generated by the project, the project is determined to screen out of the need for a VMT study as a "small project" as it generates fewer than 110 daily trips, is consistent with the General Plan, and there is no evidence indicating a potentially significant level of VMT would result from the project.</p>				

Source: Project plans; Project location; San Mateo County Department of Public Works Inter-Departmental Correspondence for Change to Vehicle Miles Traveled as Metric to Determine Transportation Impacts under CEQA Analysis, dated September 23, 2020.				
17.c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
Discussion: The project is located entirely on private property and does not propose or require changes to roadway access to the project site. Additionally, the dog walking activity will occur within fenced fields to avoid dogs interfering with any onsite or offsite access. Source: Project plans.				
17.d. Result in inadequate emergency access?				X
Discussion: The project has been reviewed and conditionally approved by the San Mateo County Fire Department for ensuring adequate emergency access to both the dog walking site and redesignated affordable housing unit will be provided and maintained. Source: Project plans; San Mateo County Fire Department.				

18. TRIBAL CULTURAL RESOURCES. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
18.a. 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 or 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 a local register of historical resources as defined in Public Resources Code section 5020.1(k)				X

Discussion: A Native American Heritage Commission Sacred Lands search was completed, and the results were negative. The Commission also provided the contact information for Native American tribes who could have knowledge of cultural resources in the project area. Staff have reached out to these tribes, along with outreach to the Tamien Nation for consultation; no consultation has been requested. Additionally, a cultural resources survey for the project site did not identify any resources that could qualify for listing in the California Register of Historical Resources or in a local register of historical resources. Furthermore, the project site is not listed or eligible for listing in the California Register of Historical Resources and is not listed in a local register of historical resources, pursuant to any local ordinances or resolution as defined in Public Resources Code Section 5020.1(k).

Source: Project location; Phase I Cultural Resource Inventory, Albion Environmental, Inc, December 2022; California Register of Historical Resources; San Mateo County Coastal Historical Resources Inventory.

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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)				X
--	--	--	--	---

Discussion: See staff's response to Question 18.a. Additionally, no grading and minimal land disturbance is proposed with the dog walking operation.

Source: Project plans.

19. UTILITIES AND SERVICE SYSTEMS. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
19.a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X

Discussion: The project does not involve the relocation or construction of new or expanded utilities. The dog walking operation includes an onsite porta-potty for staff that is regularly serviced, and water will be brought onto the site for the dogs. Stormwater runoff will continue to rely on sheet flow and natural infiltration with the proposal of some small drainage structures to help collect and

<p>convey to areas onsite that will minimize erosion and flooding. No utility changes are proposed for the existing cottage being redesignated to affordable housing.</p> <p>Source: Project plans.</p>				
19.b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
<p>Discussion: The project does not involve any new sources of water supply to the project site. The dog walking operation will transport water onsite for daily use associated with dog walking use of the fields. Additionally, an existing onsite domestic water well will continue to serve the redesignated affordable housing unit in the northern part of the parcel.</p> <p>Source: Project plans.</p>				
19.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?				X
<p>Discussion: The dog walking operation does not require wastewater treatment services. A portapotty is located onsite for use by dog walking staff and dog waste will be collected daily and contained and transported offsite for proper disposal. Additionally, the redesignated affordable housing unit will continue to be served by an onsite private septic system.</p> <p>Source: Project scope.</p>				
19.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?				X
<p>Discussion: The project is not expected to generate excessive solid waste. Dog waste will be picked up daily and transported offsite for proper disposal by staff.</p> <p>Source: Project plans.</p>				
19.e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				X
<p>Discussion: The project is not expected to generate excessive solid waste. Dog waste will be picked up daily and transported offsite for proper disposal by staff. Therefore, the project is expected to comply with applicable solid waste regulations.</p> <p>Source: Project plans.</p>				

20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
20.a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
<p>Discussion: The project site is located in a moderate fire hazard severity zone, state responsibility area. The project consists of a low-intensity use in open fields on the property that would not substantially impair an adopted emergency response plan or emergency evacuation plan. The San Mateo County Fire Department has reviewed and conditionally approved the project relative to fire risk and emergency service requirements.</p> <p>Source: Project plans; San Mateo County GIS; San Mateo County Fire Department.</p>				
20.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?				X
<p>Discussion: The project involves the use of open gently sloped fields for dog walking with some support accessory structures located on relatively flat terrain. The project site is in a moderate fire hazard severity zone, state responsibility area, and the project involves minimal disturbance or development. Therefore, the project would not result in exposure of project occupants to increased risks from wildfire.</p> <p>Source: Project location; Project scope.</p>				
20.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?				X
<p>Discussion: The San Mateo County Fire Department has reviewed and conditionally approved the project for emergency access and fire safety. A wet draft hydrant may be required but would be limited to use for emergency fire water. No infrastructure is proposed or required that would exacerbate fire risk or impacts to the environment.</p> <p>Source: Project plans.</p>				
20.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?				X

Discussion: The project has been reviewed and conditionally approved by the San Mateo County Fire Department for emergency access and fire safety. While the dog walking activity will occur on gently sloping terrain in the southern portion of the property, the project will not change existing natural topography of the area. Therefore, the project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability or drainage changes. No mitigation is necessary.

Source: Project location; Project plans.

21. MANDATORY FINDINGS OF SIGNIFICANCE.

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
21.a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		

Discussion: Special-status animal species have the potential to occur in the project area. As discussed in staff's responses in Section 4 (Biological Resources), mitigation measures 1 through 3 are recommended to reduce potential project impacts on California red-legged frog, San Francisco garter snake, western pond turtle, and San Francisco dusky-footed woodrat to less than significant levels.

Source: See source citations in Section 4.

21.b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
---	--	--	---	--

Discussion: The project is located in a rural area of the County and will be contained on private property. The use is low intensity and would not contribute to cumulatively considerable impacts beyond the individual potential impacts cited within this document.

Source: Project plans.

21.c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X
<p>Discussion: Based on the environmental analysis contained in this report, the project would not cause substantial adverse effects on human beings.</p> <p>Source: Subject Initial Study.</p>				

RESPONSIBLE AGENCIES. Check what agency has permit authority or other approval for the project.

AGENCY	YES	NO	TYPE OF APPROVAL
Bay Area Air Quality Management District		X	
Caltrans		X	
City		X	
California Coastal Commission	X		Appeals jurisdiction
California Department of Food and Agriculture		X	
County Airport Land Use Commission (ALUC)		X	
Other: _____		X	
National Marine Fisheries Service		X	
Regional Water Quality Control Board		X	
San Francisco Bay Conservation and Development Commission (BCDC)		X	
Sewer/Water District:		X	
State Department of Fish and Wildlife	X		Potentially Lake and Streambed Alteration and Take authorizations
State Department of Public Health		X	
State Water Resources Control Board		X	
U.S. Army Corps of Engineers (CE)		X	
U.S. Environmental Protection Agency (EPA)		X	
U.S. Fish and Wildlife Service		X	

MITIGATION MEASURES

	<u>Yes</u>	<u>No</u>
Mitigation measures have been proposed in project application.	X	
Other mitigation measures are needed.	X	

The following measures are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines:

Mitigation Measure 1: Prior to commencement of Project activities, focused surveys for California red-legged frog (CRLF) and San Francisco garter snake (SFGS) shall be conducted by a California Department of Fish and Wildlife (CDFW)-approved qualified biologist experienced with CRLF and SFGS identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate CRLF and/or SFGS are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid all impacts to state and federally listed and fully protected species and their habitat.

Mitigation Measure 2: Prior to project mowing activities, an SFGS avoidance plan shall be prepared for implementation in coordination with CDFW. The SFGS avoidance plan shall be prepared by a qualified biologist experienced in the natural life history requirements of SFGS. At a minimum, the SFGS avoidance plan shall include the following elements:

- a. Depict locations of mowing with respect to grasslands, wetlands, riparian vegetation, and dense vegetation surrounding any ponds on a map. Create habitat buffers and avoid mowing areas that are sensitive or have increased potential for SFGS presence, such as dense wetland vegetation areas;
- b. Require a biological monitor on-site proficient in SFGS identification to walk ahead of the mower if mowing occurs during the months of February - November;
- c. Avoid mowing during peak active SFGS periods to the greatest extent feasible. SFGS are less active and often underground during late fall to early spring months;
- d. Increase mowing blade heights to cut grass as high as possible, i.e., eight inches;
- e. Limit mowing speed to a sufficiently slow rate to allow any undetected SFGS to leave on its own volition unharmed; and
- f. Implement sensitive species worker education for project staff and workers.

If any CRLF or SFGS take occurs or if either of these species is detected, CDFW shall be contacted immediately, and location information and photo documentation of the individual(s) shall be provided.

Mitigation Measure 3: Prior to Project construction or continuation of ongoing Project activities, including dog walking and mowing in uplands adjacent to riparian areas and the irrigation pond, focused surveys for Northwestern pond turtle (NWPT) shall be conducted by a CDFW-approved qualified biologist experienced with NWPT identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate NWPT are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid, minimize, and mitigate all impacts to NWPT and their habitat. These measures

could include, at a minimum, establishing best management practices for ongoing Project operations, creating buffers of sufficient size to protect habitat resources, and implementing worker education programming for construction workers, dog walkers, and all individuals who would be accessing and working in the Project site area.

Mitigation Measure 14: The dog walking fields shall be maintained free of straw bales to avoid attracting wildlife and reduce the likelihood of attracting protected wildlife species such as the California red-legged frog and San Francisco garter snake. The fields shall also be kept clear of clutter, pipes, tarps, wood, or other objects that could attract wildlife.

Mitigation Measure 25: A worker education program shall be conducted for each project-related staff person, including but not limiting construction workers, dog walkers, and all individuals who would be accessing and working on the project site that includes training on California red-legged frog (CRLF), San Francisco garter snake (SFGS), and western pond turtle (WPT) identification, penalties for harming these species or their habitat, and the protocol to be followed should these species be encountered. The worker education program should include color photo cards of CRLF, SFGS, and WPT that remain on the project site.

Mitigation Measure 36: A 10-foot radius no disturbance buffer from San Francisco dusky-footed woodrat nests shall be maintained at all times.

DETERMINATION (to be completed by the Lead Agency).

On the basis of this initial evaluation:

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Planning Department.

X

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because of the mitigation measures in the discussion have been included as part of the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



(Signature)

Senior Planner

11/19/25

Date

(Title)

Attachments:

A. Vicinity Map

- B. Project Plans
- C. Project Description
- D. Biological Impact Form, prepared by Coast Ridge Ecology, dated February 2024
- E. Comment letter from California Department of Fish and Wildlife dated September 29, 2025



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT H

**Local Coastal Program Biological Impact Form
For
123 Seaside-School Road
San Gregorio, California**

**For compliance with San Mateo County
Local Coastal Program Policies**

PREPARED FOR:

Konrad Thaler
Smilin' Dogs
251 Old County Rd,
San Carlos, CA 94070

PREPARED BY:

Coast Ridge Ecology
1410 31st Avenue
San Francisco, CA 94122



February 2024

Applicant

Konrad Thaler
251 Old County Road, San Carlos, CA 94070
Planning Permit Number: Smiling Dogs PLN2021-00432

Owner/Applicant

Konrad Thaler
251 Old County Road, San Carlos, CA 94070

Project Location

The project area is 23 acres located at 123 Seaside-School Road in San Gregorio (San Mateo County), California (Figure 1). The project area is leased from a larger parcel that includes an active agricultural operation, and an irrigation pond. The project area is in a former agricultural field, with minimal infrastructure that includes a covered area for parking, storage containers, and sheds. Highway 84 is located approximately 0.56 miles to the north, and the Pacific Ocean is approximately 1.5 miles to the west. The site operates a licensed dog kennel and is a day-use area for dogs to exercise Monday through Friday between the hours of 10 am and 2 pm.

Assessor's Parcel Number and any applicable Planning Permit numbers

APN: 081-250-030; Planning Permit Number: Smiling Dogs PLN2021-00432

Principal Investigators

The biological survey and biological assessment report were completed by Patrick Kobernus and Liza Kachko of Coast Ridge Ecology (CRE). See Appendix A for a qualification summary.

Report Summary (briefly state the results of the report, habitat type, rare, endangered, or unique species present, anticipated impacts, and proposed mitigation measures.)

This report was prepared to provide a thorough evaluation of the biological resources for the project located at 123 Seaside-School Road, San Gregorio, California. The report is required by the County of San Mateo and is consistent with the format required for the Local Coastal Program (LCP) biological impact report (San Mateo County 2013). The report includes recommended mitigation measures to offset potentially adverse impacts from the project operation on the site.

The project utilizes a 23-acre area located off Seaside-School Road, south of Highway 84 in San Gregorio, San Mateo County, California (Figure 1). The project area was formerly an agricultural site, with a man-made irrigation pond adjacent to the northwest border of the project area, an active agricultural field to the north, and an intermittent stream with a riparian corridor running north of the project site. Stage Road borders the project area to the south, and there is one private residence to the southeast. Highway 84 is located approximately .56 miles to the north, and the Pacific Ocean is approximately 1.5 miles to the west. The site operates a licensed dog kennel and is a day-use area for dogs to exercise Monday through Friday between 10 am and 2 pm.

The site was surveyed for biological resources by Coast Ridge Ecology biologists Patrick Kobernus and Liza Kachko on December 28, 2023. The project area and the surrounding area, including an adjacent irrigation pond were visually inspected for sensitive habitats and special status species. No special-status species were observed on site. Plant and animal species detected on site are shown in Table 1.

The project area is largely on a slope, with the highest point along Stage Road in the southeast corner of the project area, sloping down to the north with the lowest point near the irrigation pond in the northwest corner (Figure 2). Vegetation communities on-site include ruderal, nonnative (weedy) grassland, and coyote brush/poison oak scrub.

Ruderal, nonnative grassland, vegetation is dominant in the six (6) open field sections with some coyote brush/poison oak scrub vegetation surrounded by fencing in between some of the fields. An irrigation pond bordering the northwest corner, located outside the project area, is surrounded by wetland vegetation dominated by California bulrush (*Schoenoplectus californicus*), and broad-leaf cattail (*Typha latifolia*).

A seasonal drainage vegetated with freshwater riparian scrub, located outside the project area, runs along the northern boundary (UFWs 2024), and north of the irrigation pond towards San Gregorio Creek. It is considered a Sensitive Habitat under the LCP (section 7.1).

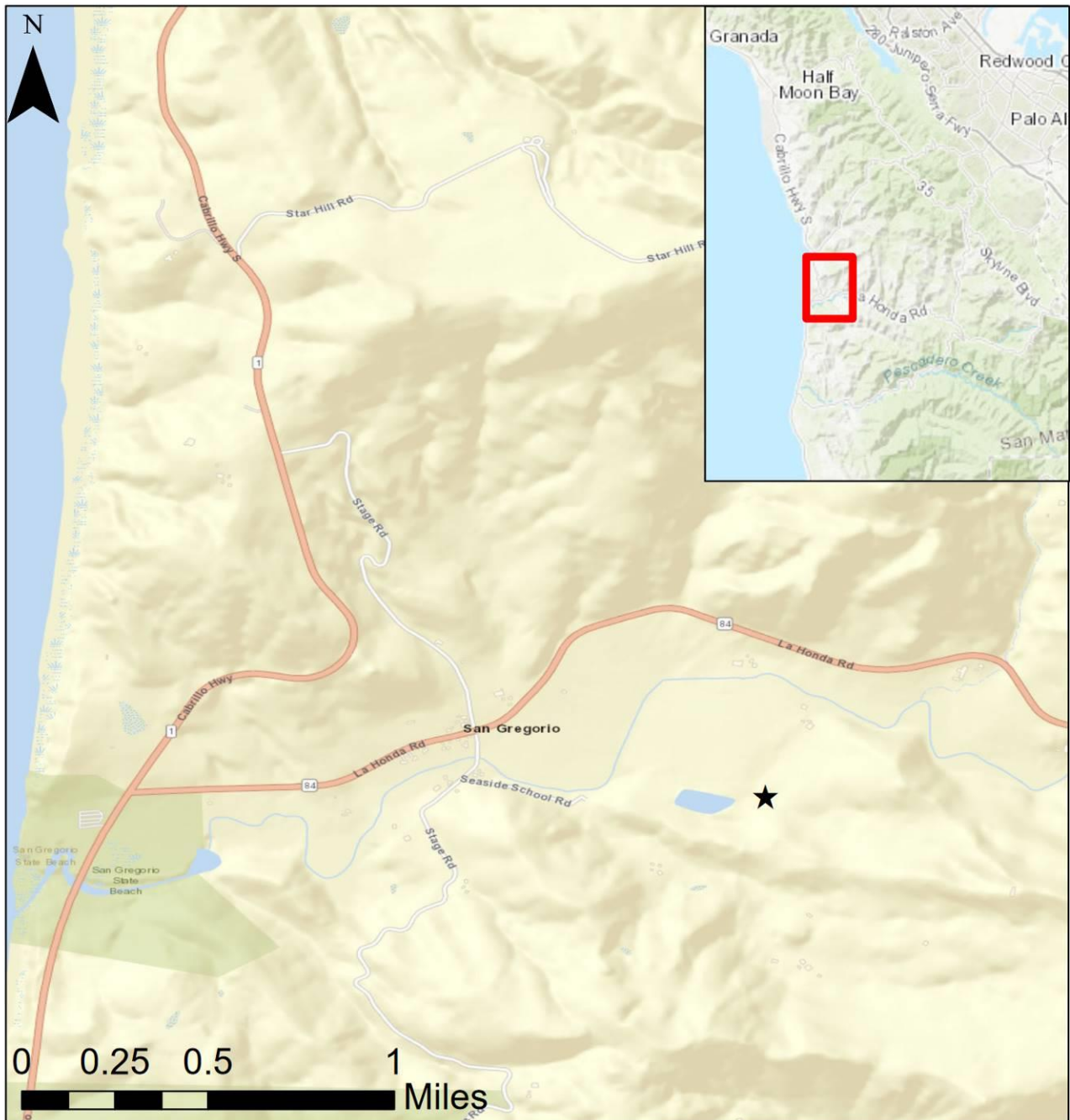
There are no significant or heritage trees in the project area, as defined by the County of San Mateo's Heritage Tree Ordinance.

Special status species were evaluated for their potential to occur on site based upon habitats observed on site and research using the California Natural Diversity Database (CNDDDB 2024), and the California Native Plant Society's Online Inventory of Rare and Endangered Plants (CNPS 2024), (Figure 3, Appendix C). Based on this evaluation, four (4) special-status animals and no special-status plants were determined to have the potential for occurrence in the project area.

Special status animal species that have some potential for occurrence in the project area are the California red-legged frog (*Rana draytonii*) a federally threatened and California species of special concern; the San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) a state and federally endangered species and California fully-protected species; Western pond turtle (*Actinemis marmorata*) a California species of special concern and proposed federally threatened species; San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) a California species of special concern.

Mitigation measures to reduce potential impacts from the project are provided in Table 2.

Figure 1. Location Map



Legend

★ **Project Location**

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance



Figure 2. Site Map

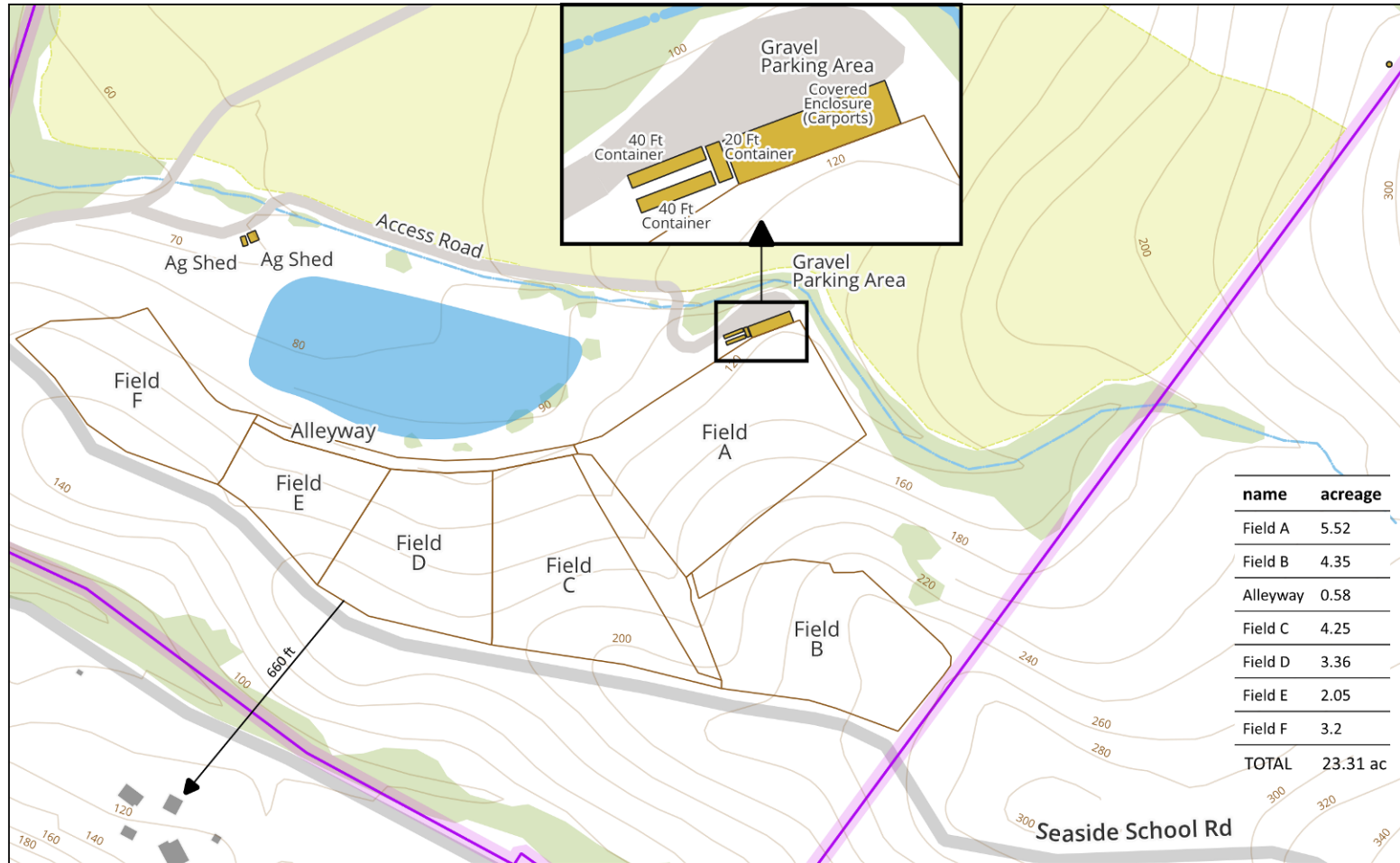
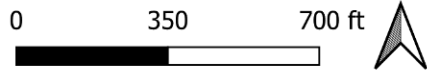


FIGURE 2
Smilin' Dogs Site Plan

11/22/2022



LEGEND

- 20' Contours
- Farmland
- Trees and Scrub
- Reservoir
- Subject Property



Sandra Sommer
AKCP, ASLA
Landscape Planner
661 Petrus Ave.
Millerton, CA 94041
sandy.sommer@delconera.com
510-541-8514

Figure 3. CNDDDB Special Status Species Occurrence Map

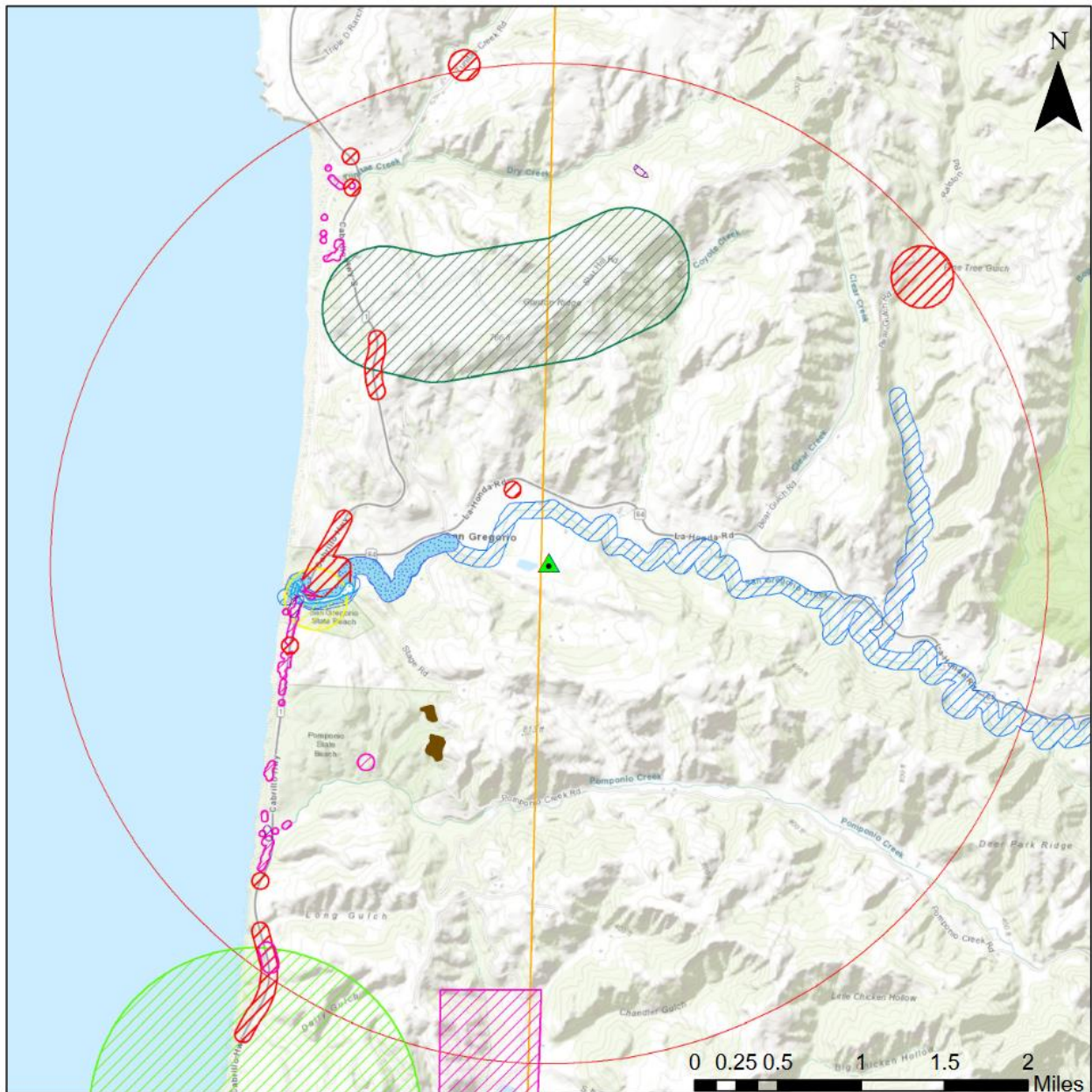


Figure 3. CNDDDB Special Status Species Map

Legend

- ▲ Project Location
- COMMON NAME
- American badger
- California red-legged frog
- Choris' popcornflower
- North Central Coast Steelhead/Sculpin Stream
- Sacramento-San Joaquin Coastal Lagoon
- San Francisco gartersnake* Locations not shown
- Valley Needlegrass Grassland
- bank swallow
- coastal marsh milk-vetch
- saltmarsh common yellowthroat
- steelhead - central California coast DPS
- tidewater goby
- 3 mile buffer



Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS,

1. Project and property description (describe the proposed project and property, including the size, topographic characteristics, water resources, soil types, and land uses on the property and in the vicinity up to a radius of one-quarter mile. Include a map of the area from the USGS 7.5-minute quadrangle series.

Project

The proposed project is the continued operation of the Smilin' Dogs Dog Ranch on the property at 123 Seaside-School Road, San Gregorio, California. The project area is 23 acres in size and is currently used to provide exercise for groups of dogs, approximately 75 dogs per day, Monday through Friday between the hours of 10 am and 2 pm. The dogs arrive in vans that are parked in a covered parking area, located in the northeast corner of the project area. The parking area, six (6) upland fields (exercise fields), and an alley between some of the fields are surrounded by fencing. The dogs stay in the groups with a handler as they move between the upland exercise fields. Dog waste is collected daily and taken to Redwood City for disposal offsite. The exercise fields are moved 2-3 times a year when the vegetation starts to dry out in the summer months. Each field contains one or two simple shade structures with strawbales for the dogs, and small plastic drinking water basins that are filled only when the fields are in use. In addition to the covered parking area, there are 3 storage containers and 2 smaller agricultural storage sheds in the project area, see Figure 2.

Land use

Land use in the immediate vicinity of the project area is primarily agricultural and ranching. One single-family residence is located southeast of the project area. Smilin Dog Kennel leases 23 acres from a larger parcel that is used primarily for agriculture (APN: 081-250-030).

Soils

The elevation of the project area is approximately 120-260 ft above Mean Sea Level (MSL). Several soil types are found in the project area (NRCS 2024). The most common soil type is Lobitos loam¹ (51.6%) found on moderately sloping to steep uplands between 200 and 1000 feet in elevation. The other soil types found, 5-10% of the site include Pomponio clay loam, Pomponio loam, and Tunitas loam. There are no serpentine, calcareous, or dune soils present in the project area.

Water Resources

There are no wetlands or water features inside the project area. San Gregorio Creek is located 400 feet to the north of the project area, at its closest point, and is over 1800 feet (0.35 miles) from the project area's eastern edge near the covered parking area (Google Earth 2024). Between the Creek and the Smilin' Dogs operation is an active agricultural field. The Pacific Ocean is located approximately 1.5 miles to the west.

The project area is bordered by a large man-made irrigation pond (reservoir) that is approximately 3 acres (134,000 square feet) in size. The pond is approximately 40 feet north of the project area fence at its closest point. The pond is used for irrigation and is encircled by dense stands of freshwater emergent marsh vegetation (i.e. cattail). The pond is perennial and the water level fluctuates based on water usage for agriculture and season.

¹ https://soilseries.sc.egov.usda.gov/OSD_Docs/L/LOBITOS.html

An unnamed seasonal drainage partially vegetated with freshwater riparian scrub is located along the northern boundary of the project area, runs north of the irrigation pond, and flows to San Gregorio Creek (USFWS 2024).

2. Methodology (briefly describe the survey methods used in preparing the report and show on an appropriately scaled map the location of sample points, transects, and any additional areas surveyed in the vicinity of the project.)

Coast Ridge Ecology biologists Patrick Kobernus and Liza Kachko surveyed the project site and adjacent surrounding areas for biological resources on December 28, 2023, between 9:00 am and 12:00 pm. Weather at the time of the survey was cloudy, with intermittent drizzle and temperatures in the high 50's (°F). All plant and animal species observed were documented and plant communities and habitats were assessed for their potential to support special status species. Plant and animal species detected in the project area are shown in Table 1.

The California Department of Fish and Wildlife (CDFW) Natural Diversity Database (CNDDDB) was consulted for known occurrences of sensitive plant, animal, and natural plant communities of concern found within San Gregorio and five surrounding 7.5' USGS topographic quadrangles (CNDDDB 2024). Data from CNDDDB, California Native Plant Society (CNPS) Online Inventory of Rare, Threatened, and Endangered Plants of California (CNPS 2024), and other relevant literature and databases, knowledge of regional biota, and observations made during the field survey were used to evaluate on-site habitat suitability for special status plant and wildlife species.

3. Results (at length, describe the botanical and zoological resources of the project site. To the extent possible, describe the food chain of the habitat and how the proposed project will impact those resources.)

Vegetation

The project site is comprised of two upland plant communities: ruderal, nonnative (weedy) grassland, and coyote brush/poison oak scrub. These plant communities are not considered rare in California. A list of all plant and animal species identified on site is provided in Table 1.

Ruderal

Ruderal vegetation covers about 75% of the six (6) exercise fields in the project area. The vegetation is comprised of poison hemlock (*Conium maculatum*), velvet grass (*Holcus lanatus*), Harding grass (*Phalaris aquatica*), bristly ox-tongue (*Helminthotheca echoides*), ribwort plantain (*Plantago lanceolata*), dock (*Rumex sp.*), hairy cat's ear (*Hypochaeris radicata*), and annual grasses. Some native plants observed include blue-eyed grass (*Sisyrinchium bellum*), common rush (*Juncus patens*), Pacific aster (*Symphyotrichum chilense*), and California horkelia (*Horkelia californica*).

Coyote Brush/Poison Oak Scrub

Coyote Brush/Poison Oak Scrub borders the fields in some areas and is present within an erosion feature that is fenced off in between fields A and C. There is another large area of scrub between fields A and B, see Figure 2: Site Map. The scrub areas are dominated by coyote brush (*Baccharis pilularis*), poison oak (*Toxicodendron diversilobum*), California blackberry (*Rubus ursinus*), poison hemlock (*Conium maculatum*), Pacific aster (*Symphyotrichum chilense*), bull thistle (*Cirsium vulgare*), and Harding grass (*Phalaris aquatica*).

Wetlands / Water Features

Wetlands and water features that border the project site include Freshwater Forested/Shrub Wetland² and an irrigation pond.

Freshwater Forested/Shrub Wetland is located within a seasonal drainage that borders the project area to the north and runs north of the irrigation pond to San Gregorio Creek. Overstory vegetation is dominated by arroyo willow (*Salix lasiolepis*), and the understory is dominated by California blackberry (*Rubus ursinus*).

The irrigation pond is located just north of the project area and is approximately 40 feet from the alleyway running north of Fields C-F (Figure 2). The pond has emergent vegetation surrounding it, dominated by California bulrush (*Schoenoplectus californicus*) and broad-leaf cattail (*Typha latifolia*). Two large arroyo willow (*Salix lasiolepis*) trees are located on the east side of the pond.

To meet the US Army Corps of Engineers (USACE) definition of a wetland, an area must demonstrate three critical characteristics: wetland vegetation, wetland hydrology, and wetland soils (Federal Interagency Committee for Wetland Delineation, 1989). Additionally, to fall under the jurisdiction of the USACE, a wetland must have some evident hydrological connection to other wetlands and/or waters of the United States. A formal wetland delineation is required to determine the presence of wetlands and/or waters of the U.S. The US Fish and Wildlife Service's definition of a wetland is similar: at least periodically, the land must support predominantly hydrophytes; the substrate must be predominantly undrained hydric soil; or the substrate is non-soil that is saturated with water or covered by shallow water at some time during the growing season of the year (Cowardin, et al., 1979).

The seasonal drainage, running just north of the site, connects to San Gregorio Creek. The vegetation is characterized as Freshwater Forested/Shrub Wetland (USFWS 2024), though it is actually an intermittent stream with a riparian corridor. The San Mateo County Local Coastal Program Policy 7.11 (a) states that “on both sides of riparian corridors, from the “limit of riparian vegetation” extend buffer zones 50 feet outward for perennial streams and 30 feet outward for intermittent streams”, and (b) states “Where no riparian vegetation exists along both sides of riparian corridors, extend buffer zones 50 feet from the predictable high water point for perennial streams and 30 feet from the midpoint of intermittent streams.” (San Mateo County 2013). The northeast section of this drainage is densely vegetated with riparian vegetation (willows), while the western section has extended stretches with no riparian vegetation, as shown in [Figure 2](#). The current landuse adjacent to the riparian corridor would be considered agricultural, which is a permitted use under policy 7.9: *Permitted Uses in Riparian Corridors* (b) (7) “agricultural uses, provided no existing riparian vegetation is removed, and no soil is allowed to enter stream channels.” The irrigation pond is not designated as a sensitive habitat; man-made irrigation ponds over 2,500 sq ft are exempt (San Mateo County 2013).

The wetland and intermittent stream features are both located outside the project area and no impacts from project activities were observed during the site visit, and none are expected based on project activities and distance to these features.

Food Chain Resources

The project area has potential foraging habitat for a variety of common wildlife species. Although vegetation in the project area is primarily ruderal grassland, the site has biological

² <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

value for local wildlife species due to the proximity to the irrigation pond and the Freshwater Forested/Shrub Wetland. The upland ruderal grassland and scrub vegetation provide some foraging habitat and cover for herbivorous mammals and birds. Mammal species observed onsite at the time of the field survey include black-tailed deer (*Odocoileus hemionus columbianus*), California meadow vole (*Microtus californicus*), Botta's pocket gopher (*Thomomys bottae*), and brush rabbit (*Sylvilagus bachmani*). Bird species observed included California quail (*Callipepla californica*), song sparrow (*Melospiza melodia*), yellow-rumped warbler (*Setophaga coronata*), western bluebird (*Sialia mexicana*), Say's phoebe (*Sayornis saya*), black phoebe (*Sayornis nigricans*), golden-crowned sparrow (*Zonotrichia atricapilla*), spotted towhee (*Pipilo maculatus*), and Cooper's hawk (*Accipiter cooperii*).

Although outside the project area, the nearby irrigation pond provides potential habitat for reptiles and amphibians as well as birds. Bird species observed include pie-billed grebe (*Podilymbus podiceps*), green heron (*Butorides virescens*), American Coot (*Fulica americana*), and ruddy duck (*Oxyura jamaicensis*). The pond may also provide a suitable breeding habitat for semi-aquatic amphibians such as the Sierran treefrog (*Pseudacris sierra*) and reptiles such as coast garter snake (*Thamnophis elegans terrestris*), bullfrog (*Lithobates catesbeianus*), and California newt (*Taricha torosa*). Special status species such as the California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) have the potential to use the irrigation pond, and there is potential for these species to disperse to and forage in the project area.

The presence of rodent and avian prey species means that the site attracts raptors such as great-horned owl (*Bubo virginianus*), red-tailed hawk (*Buteo jamaicensis*), and red-shouldered hawk (*Buteo lineatus*); snakes such as Pacific gophersnake (*Pituophis catenifer catenifer*), and carnivores such as bobcat (*Lynx rufus*), long-tailed weasel (*Mustela frenata*), and gray fox (*Urocyon cinereoargenteus*).

Bats are likely to forage through the project area for insects due to the presence of a pond, riparian woodland, and open grassland in the surrounding area, but they are unlikely to roost on site due to the lack of tree cavities or any structures (e.g. barns) to support roosting colonies of bats. The one large structure in the project area, the covered parking structure, is too open and therefore not a suitable habitat for roosting bats.

Wildlife Movement Corridors

Wildlife corridors are important for persistence of wildlife in the landscape and, therefore, conservation. Linkages between habitat types can extend for miles between primary habitat areas and occur on a large scale throughout California. Habitat linkages facilitate movement between populations located in discrete areas and populations located within larger habitat areas. Even where patches of pristine habitat are fragmented, as commonly occurs with riparian vegetation, wildlife movement between populations is facilitated through habitat linkages, migration corridors, and movement corridors. Wildlife movement includes migration (i.e., usually one direction per season), inter-population movement (i.e., long-term genetic exchange), and small travel pathways (i.e., daily movement within an animal's home range).

The area surrounding the project site is mainly private properties used for agriculture and ranching. The riparian corridor and the irrigation pond that borders the project area to the north, provide some shelter cover, food sources, and potential breeding areas for wildlife. Each of the exercise fields is fenced in to keep the dogs inside these enclosures. These fences would prevent some larger wildlife species from moving through the exercise fields, however, there is extensive open space surrounding the exercise fields whereby wildlife can move freely between

upland areas and San Gregorio Creek. Current project infrastructure and activities would not present a significant barrier to wildlife movement within the surrounding area.

Regulatory Setting

Federal and state-listed species (endangered, threatened, fully protected) receive various levels of legal protection under the federal and state endangered species acts and the California Fish and Wildlife Code. The federal Migratory Bird Treaty Act of 1918 and Section 3500 of the California Fish and Wildlife Code protect active nests of migratory and other birds, and provide criminal penalties for take of hawks, owls, and take or disturbance of all bird nests or eggs. Potential impacts to other special status or otherwise sensitive species must be disclosed and evaluated pursuant to the California Environmental Quality Act (CEQA). Additional protections for species and habitats that are applicable to the property are designated in the San Mateo County Local Coastal Program (LCP).

Federal and State Endangered Species Acts

The United States Endangered Species Act (ESA) is administered by the United States Fish and Wildlife Service (USFWS). The California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and CEQA afford protection to species of concern included on State-maintained lists. The California Department of Fish and Wildlife (CDFW) has statutory responsibility for the protection of State listed species and is a trustee agency under CEQA.

Both the Federal and State Endangered Species Acts provide protection for listed species. In particular, the federal act prohibits "take". "Take" is defined by the ESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect a federally listed, endangered species of wildlife, or to attempt to engage in any such conduct." While "take" is easily understood in the sense of deliberately capturing or killing individual animals, Federal regulations also define take to include the incidental destruction of animals in the course of an otherwise lawful activity, such as habitat loss due to development. Under those rules, the definition of take includes significant habitat modification or degradation that actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or shelter (50 CFR Section 17.3).

Section 10(a) of the ESA permits the incidental take of an endangered or threatened species. Similarly, Section 2081 of the CDFW Code or use of the CESA allows the Department to enter into management agreements that make lawful activities that may otherwise result in habitat loss or take of individuals of a state-listed species.

California Species of Special Concern

The California Department of Fish and Wildlife has designated certain animal species as "Species of Special Concern" due to concerns about declining population levels, limited ranges, and continuing threats that have made these species vulnerable to extinction. The goal of this designation is to bring attention to these species in the hope that their population decline will be halted through mitigation or project redesign to avoid impact. Species of special concern are protected only through environmental review of projects under CEQA. The California Department of Fish and Wildlife is a trustee agency and is solicited for its comments during the CEQA process.

Nesting Birds

Nesting birds, including raptors, are protected by the California Department of Fish and Wildlife Code 3503, which reads, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." Passerines and non-passerine landbirds are further protected under the Federal Migratory Bird Treaty Act.

California Native Plant Society and CEQA

The California Native Plant Society (CNPS) has developed a ranking system for the state's rare, threatened, and endangered plants. Plants rated by CNPS are subject to protection under CEQA, and may also be protected by state and federal endangered species laws if they are listed by the state or federal government.

San Mateo County Local Coastal Program

The property is subject to compliance with the San Mateo County Local Coastal Program (LCP), the municipal stormwater permits from the National Pollutant Discharge Elimination System (NPDES), and San Mateo County significant and heritage tree ordinances. The property is located within the Coastal Zone of San Mateo County, and proposed projects on the property may require a Coastal Development Permit. For a permit to be issued, the project must comply with the policies of the Local Coastal Program and those ordinances adopted to implement the LCP. In addition, any development on the subject property would need to incorporate appropriate stormwater pollution control measures determined by the County of San Mateo to comply with the NPDES municipal permit.

San Mateo County Significant and Heritage Tree Ordinances

Removal or pruning of significant and/or heritage trees on the property, and in the project area, is subject to the requirements of the County's significant and heritage tree ordinances³. No trees would be impacted by the project.

Section 12,012 of the San Mateo County Significant Tree Ordinance defines a "SIGNIFICANT TREE" to mean any live woody plant rising above the ground with a single stem or trunk of a circumference of thirty-eight inches (38") or more measured at four- and one-half feet (4 1/2') vertically above the ground or immediately below the lowest branch, whichever is lower, and having the inherent capacity of naturally producing one main axis continuing to grow more vigorously than the lateral axes.

Section 11,050 of the San Mateo County Heritage Tree Ordinance defines a "HERITAGE TREE" to mean any of the following:

Class 1 shall include any tree or grove of trees so designated after Board inspection, advertised public hearing, and resolution by the Board of Supervisors. The affected property owners shall be given proper written notice between 14 and 30 days prior to inspection and/or hearing by the Board.

Class 2 shall include any of the following trees, healthy and generally free from disease, with diameter equal to or greater than the sizes listed:

(1) Acer macrophyllum - Bigleaf Maple of more than 36 inches in d.b.h. west of Skyline Boulevard or 28 inches east of Skyline Boulevard.

³ <https://www.smcgov.org/planning/tree-regulations>

- (2) *Arbutus menziesii* - Madrone with a single stem or multiple stems touching each other 4 1/2 feet above the ground of more than 48 inches in d.b.h., or clumps visibly connected above ground with a basal area greater than 20 square feet measured 4 1/2 feet above average ground level.
- (3) *Chrysolepis chrysophylla* - Golden Chinquapin of more than 20 inches in d.b.h.
- (4) *Cupressus abramsiana* - All Santa Cruz Cypress trees.
- (5) *Fraxinus latifolia* - Oregon Ash of more than 12 inches in d.b.h.
- (6) *Lithocarpus densiflorus* - Tan Oak of more than 48 inches in d.b.h.
- (7) *Pseudotsuga menziesii* - Douglas Fir of more than 60 inches in d.b.h. east of Skyline Boulevard and north of Highway 92.
- (8) *Quercus agrifolia* - Coast Live Oak of more than 48 inches in d.b.h.
- (9) *Quercus chrysolepis* - Canyon Live Oak of more than 40 inches in d.b.h.
- (10) *Quercus garryana* - All Oregon White Oak trees.
- (11) *Quercus kelloggii* - Black Oak of more than 32 inches in d.b.h.
- (12) *Quercus wislizenii* - Interior Live Oak of more than 40 inches in d.b.h.
- (13) *Quercus lobata* - Valley Oak of more than 48 inches in d.b.h.
- (14) *Quercus douglasii* - Blue Oak of more than 30 inches in d.b.h.
- (15) *Umbellularia californica* - California Bay or Laurel with a single stem or multiple stems touching each other 4 1/2 feet above the ground of more than 48 inches in d.b.h., or clumps visibly connected above ground with a basal area of 20 square feet measured 4 1/2 feet above average ground level.
- (16) *Torreya californica* - California Nutmeg of more than 30 inches in d.b.h.
- (17) *Sequoia sempervirens* - Redwood of more than 84 inches in d.b.h. west of Skyline Boulevard or 72 inches d.b.h. east of Skyline Boulevard.

Table 1. Plants and animals observed in and adjacent to the project site.

	Common Name	Species
Plants		
<i>Ruderal Grassland</i>		
	Blue-eyed grass	<i>Sisyrinchium bellum</i>
	Bristly oxtongue	<i>Helminthotheca echoides</i>
	California horkelia	<i>Horkelia californica</i>
	Clover	<i>Trifolium</i> sp.
	Common buttercup	<i>Ranunculus californicus</i>
	Common rush	<i>Juncus patens</i>
	Dock	<i>Rumex</i> sp.
	Farewell to spring	<i>Clarkia rubicanda</i>
	Harding grass	<i>Phalaris aquatica</i>
	Lupin	<i>Lupinus</i> sp.
	Prickly sow thistle	<i>Sonchus asper</i>
	Scarlet pimpernel	<i>Lysimachia arvensis</i>
	Trefoil	<i>Acmispon</i> sp.
	Veldt grass	<i>Ehrharta erecta</i>
	Vetch	<i>Vicia</i> sp.
	Velvet grass	<i>Holcus lanatus</i>
<i>Coyote Brush/Poison Oak Scrub</i>		
	Bull thistle	<i>Cirsium vulgare</i>
	California bee plant	<i>Scrophularia californica</i>
	California blackberry	<i>Rubus ursinus</i>
	California mugwort	<i>Artemisia douglasiana</i>
	Coyote brush	<i>Baccharis pilularis</i>
	Jubata grass	<i>Cortaderia jubata</i>
	Lizard tail	<i>Eriophyllum staechadifolium</i>
	Pacific aster	<i>Symphyotrichum chilense</i>
	Pearly everlasting	<i>Anaphalis margaritacea</i>
	Poison oak	<i>Toxicodendron diversilobum</i>
	Poison hemlock	<i>Conium maculatum</i>
	Twinberry	<i>Lonicera involucrata</i>
<i>Wetland/Riparian</i>		
	Arroyo willow	<i>Salix lasiolepis</i>
	Broad-leaf cattail	<i>Typha latifolia</i>
	California bulrush	<i>Schoenoplectus californicus</i>
	Floating marsh pennywort	<i>Hydrocotyle ranuncyloides</i>
	Soft rush	<i>Juncus effuses</i>
Birds		
	American coot	<i>Fulica americana</i>
	Black-crowned night heron	<i>Nycticorax nycticorax</i>
	Black phoebe	<i>Sayornis nigricans</i>
	California quail	<i>Callipepla californica</i>
	Cooper's Hawk	<i>Accipiter cooperii</i>
	Golden-crowned sparrow	<i>Zonotrichia atricapilla</i>
	Green heron	<i>Butorides virescens</i>
	Pied-billed grebe	<i>Podilymbus podiceps</i>
	Ruddy ducks	<i>Oxyura jamaicensis</i>
	Say's phoebe	<i>Sayornis saya</i>
	Song sparrow	<i>Melospiza melodia</i>
	Spotted towhee	<i>Pipilo maculatus</i>

	Common Name	Species
	White-crowned sparrow	<i>Zonotrichia leucophrys</i>
	Western bluebird	<i>Sialia mexicana</i>
	Yellow-rumped warbler	<i>Setophaga coronata</i>
Mammals		
	Black-tailed deer	<i>Odocoileus hemionus columbianus</i>
	Botta's pocket gopher	<i>Thomomys bottae</i>
	Brush rabbit	<i>Sylvilagus bachmani</i>
	California meadow vole	<i>Microtus californicus</i>
	San Francisco dusky-footed woodrat	<i>Neotoma fuscipes</i>
Reptiles and amphibians		
	Newt	<i>Taricha sp.</i>
	Sierran treefrog	<i>Pseudacris sierra</i>

4. List all direct and indirect impacts of the proposed project on the habitat. Include within the discussion an evaluation of the perceived cumulative biological impacts associated with the project.

The proposed project is a dog kennel business that uses a 23-acre section of a larger property for a dog exercise area Monday through Friday between the hours of 10 am and 2 pm. The project area that is accessible to dogs is fenced off from the rest of the property. Dog waste is removed daily and taken off-site to a disposal facility in Redwood City. The six fields, where the dogs exercise, are mowed seasonally, about 2-3 times a year, starting in the summer when the grasses begin to dry out. Each field contains one or two simple shade structures for the dogs, and small drinking water basins that are filled with water only when the fields are in use. The shade structures have straw bales next to or underneath the structures.

The exercise fields are fenced in on all sides, and the dogs do not have access to coastal scrub vegetation that is located in between some of the fields. Similarly, the dogs are not able to access any of the wetland habitat or the irrigation pond to the north of the project area.

Special status species such as the California red-legged frog, the San Francisco garter snake, and western pond turtle may utilize the irrigation pond and the adjacent hillsides that are within the fenced exercise fields. However, the fields do not provide suitable upland cover for these species, due to the consistent usage of these fields by the dogs, and occasional seasonal mowing. Similarly, the mowing of the fields and the consistent usage of these fields by dogs reduce the potential for grassland nesting birds to utilize the site.

No significant impacts to habitat and no significant cumulative impacts are expected to occur from ongoing operations of the project.

5. List and discuss all probable impacts to threatened, rare, endangered, or unique species either listed or proposed by the Local Coastal Program, a Federal or State agency, or the California Native Plant Society, both on-site and within an area of one-quarter mile radius from the project location.

Special Status Plants

Special status plant species that occur in the region, their habitat requirements, and their potential for occurrence in the project area are shown in Appendix C. The project area does not provide suitable habitat for special status plant species due to the dominance of the site by nonnative plant species, and lack of soils that favor special status plants.

Valley Needlegrass Grassland

Valley Needlegrass Grassland is a designated vulnerable⁴ plant community (G3, S3.1) (CNDDDB, 2024). This plant community is characterized by dominant native, perennial bunchgrass purple needle grass (*Nassella pulchra*). There are two distinct patches of this type of grassland 1.25 miles southwest of the site at Pomponio State Beach, comprised of purple needle grass (*Nassella pulchra*) and California oatgrass (*Danthonia californica*). No native bunch grass-dominated grasslands were observed on site. Most of the grass species observed in the project area were non-native annual and perennial grasses. Based on these findings, this sensitive plant community is not expected to occur in the project area.

⁴ https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.684875/Nassella_pulchra_Grassland

California Red-legged Frog

The California red-legged frog (CRF) (*Rana draytonii*) is a federally listed threatened species and a California species of special concern. CRF is known to occur in freshwater ponds and marshes, grasslands, riparian woodlands, oak woodlands, and coniferous forests. The species is most frequently found in freshwater ponds, slow-flowing streams, and marshes with heavily vegetated shores for breeding. CRF is usually found within shoreline areas of aquatic habitats within 'one leaping distance' of water. CRF typically requires a permanent water source with a minimum depth of 0.7 meters (2.5 feet) for breeding (USFWS 2004). For successful reproduction, water bodies must last through the winter and spring (approximately 20 weeks) for development from egg to adult to be completed. Seasonal bodies of fresh or slightly brackish water provide important breeding habitat for the species and are critical for CRF survival. CRF can disperse up to 2 miles from breeding habitats during autumn, winter, and spring rains. CRF can move through a broad range of upland habitat types when dispersing to and from aquatic breeding habitats. Juveniles use the wet periods to expand outward from their pond of origin and adults may move between aquatic areas. It is speculated that CRF may lie dormant during dry periods of the year or drought, sometimes within upland habitats. CRF will utilize rodent burrows, debris piles, and other man-made structures for shelter during overland movements (USFWS 2004).

There are ten (10) recorded occurrences of California red-legged frogs within three miles of the project site. The closest location is 0.5 miles north of the site, across San Gregorio Creek (CNDDDB 2024). The irrigation pond adjacent to the project area and San Gregorio Creek north of the project area are potential breeding and foraging habitats for CRF, and there is a reasonable likelihood that CRF could occur in the project area's upland habitat during the rainy season. Rodent burrows were observed in the exercise fields, and the proximity to the irrigation pond makes it a possible area for CRF occurrence. When utilizing upland areas, CRF often take shelter in rodent burrows and do not travel overland during the middle of the day when the dogs would be present. Therefore, the ongoing usage of the site is not expected to impact this species.

San Francisco Garter Snake

The San Francisco garter snake (SFGS) (*Thamnophis sirtalis tetrataenia*) is a state and federal endangered species and a California fully-protected species. The USFWS has not designated Critical Habitat for the SFGS. Preferred habitat for the snake includes densely vegetated ponds near open, upland habitat supporting rodent burrows. Temporary ponds and other seasonal freshwater bodies are also used. SFGS occurs sympatrically with its primary prey species, the California red-legged frog; however, it will opportunistically prey on a variety of species including treefrogs, tadpoles, egg masses, newts, small fish, salamanders, reptiles, small mammals, birds and their eggs and several small invertebrates. Sierran tree frogs (*Pseudacris sierra*) are an important prey species for juvenile SFGS, while Ranid frogs (California red-legged frog and bullfrog (*Lithobates catesbeianus*)) have been identified as important prey for adult SFGS. SFGS prefer densely vegetated habitats close to water where they can retreat when disturbed (Stebbins 2003). Emergent and bankside vegetation such as cattails (*Typha spp.*), bulrushes (*Schoenoplectus spp.*), and spike rushes (*Juncus spp.*, *Eleocharis spp.*) are preferred and used for cover (USFS 1985). Adult snakes sometimes aestivate in rodent burrows during summer months when ponds are dry. SFGS breed from February to May, with most of the activity taking place in March as the temperatures warm, the females give birth to live young in July and August. Snakes may move over several hundred yards away from wetlands to hibernate in upland small mammal burrows (USFWS 2024).

There are six (6) recorded occurrences of SFGS within a 3-mile radius of the project (CNDDDB 2024). The nearest record is 0.3 miles north of the site along San Gregorio Creek. Due to the proximity of the riparian corridor and the irrigation pond to the project area, SFGS could use the project site during periods of upland movements in search of burrows for shelter and/or breeding. The potential for impacts to SFGS however from the ongoing operations is minimal due to the dogs being on site for only 4 hours per day on weekdays and the lack of suitable vegetative cover within exercise fields for SFGS to utilize during upland movements.

San Francisco Dusky-footed Woodrat

The San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) is a California species of special concern. San Francisco dusky-footed woodrat is a sub-species of the more widely distributed dusky-footed woodrat and is found in the Santa Cruz mountains and parts of the Bay Area. Its range is restricted to Alameda, Contra Costa, Santa Cruz, Santa Clara, and San Mateo Counties. The dusky-footed woodrat is generally a nocturnal mammal that occurs in a variety of brushy and wooded areas. The woodrat builds stick structures ('middens') for nesting up to 2 meters long and a meter in height. These elaborate dwellings include nesting, food storage, and latrine chambers, and help protect the woodrat from seasonal temperature extremes and predators. The dusky-footed woodrat eats primarily woody plants, including leaves, flowers, nuts, acorns, and berries.

During the biological survey of the project site and the surrounding area five (5) San Francisco dusky-footed woodrat middens were observed along the edge of the pond and within the woodland riparian area just north of the project area. The middens are all outside the project area and fenced off from dog activity. Two middens were observed within 20 feet of the parking area. It is recommended that no work occurs within a 10-foot radius buffer of the middens, to prevent impacts to this species.

Foothill Yellow-Legged Frog

The foothill yellow-legged frog (*Rana boylei*) is a federally threatened (Central Coast DPS)⁵ and a California Endangered species. It is a medium-sized frog that lives in rocky, shallow, slow-moving streams with sunny banks. This species is usually found near water, and they are not known to use upland habitats. The closest occurrences are documented 3 miles northeast of the project area (CNDDDB 2024). Due to the lack of observations of this species in San Gregorio Creek, and a lack of suitable habitat within and adjacent to the project area, this species is not expected to occur.

American badger

American badger (*Taxidea taxus*) is a California species of special concern, generally found in drier open stages of shrub, forest, and herbaceous habitats, with friable soils. There is a recorded occurrence of an American badger in open grassland habitat 1.2 miles north of the project area (CNDDDB 2024). There is a low potential for this species to occur in the project area due continuing presence of dogs. No large burrows that could potentially be utilized by badgers were observed in the project area. Badgers are highly sensitive to scents, and would likely avoid areas where dogs are frequently present. Based on these findings, the potential for this species to occur in the project area is low.

⁵ Foothill yellow headed frog Central Coast DPS has recently been designate as threatened by the UFWS. <https://www.fws.gov/species-publication-action/foothill-yellow-legged-frog-threatened-status-section-4d-rule-two-2>

Steelhead – Central California Coast DPS

Steelhead (*Oncorhynchus mykiss*) Central California Coast Distinct Population Segment (DPS) is a federally threatened species. The Central California Coast Steelhead DPS includes steelhead in streams and rivers originating below natural and manmade impassable barriers from the Russian River (Mendocino County) south through Napa, Sonoma, and Marin Counties, and all drainages of San Francisco and San Pablo Bay, and through and including some coastal drainages of Santa Cruz and Santa Clara counties. Steelhead require freshwater streams with beds of clean gravel for spawning and pools that last year-round for rearing. Often found in streams with dense riparian canopy and cool oxygenated water, they must have access to the San Francisco Bay or the Pacific Ocean for migration as they spend one to two years in the ocean before returning to spawn in their natal stream. Steelhead have been documented in San Gregorio Creek north of the project site (CNNDDB 2024). The project site is located approximately 400 to 1800 feet upslope from San Gregorio Creek. Due to the distance of the project site from San Gregorio Creek, ongoing operations of the project are not expected to impact this species.

Saltmarsh Common Yellowthroat

The saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*) is a native warbler that is a California species of special concern. This bird is a year-round resident in San Mateo County and utilizes dense vegetation in wetlands, marshes, estuaries, moist scrub, and riparian areas for nesting and foraging. The saltmarsh common yellowthroat has been recorded approximately 1.5 miles west of the project site (CNDDDB 2024). This species was not observed during field surveys of the project area, however, the riparian corridor, irrigation pond, and San Gregorio Creek just north of the project area is potential habitat. Due to the lack of suitable habitat for this species inside the project area, this species is not expected to occur within the project site.

Western Pond Turtle

The western pond turtle, (*Actinemis marmorata*), is a California species of special concern and proposed federally threatened species (USFWS 2024). It is the only freshwater turtle native to California and is distributed along much of the western coast from the Puget Sound in Washington south to the Baja Peninsula, Mexico. Overall, western pond turtles are habitat generalists, and have been observed in slow-moving rivers and streams (e.g. in oxbows), lakes, reservoirs, permanent and ephemeral wetlands, stock ponds, and sewage treatment plants. They prefer aquatic habitat with refugia such as undercut banks and submerged vegetation (Holland 1994), and require emergent basking sites such as mud banks, rocks, logs, and root wads to thermoregulate their body temperature (Holland 1994, Bash 1999). Pond turtles are omnivorous and feed on a variety of aquatic and terrestrial invertebrates, fish, amphibians, and aquatic plants.

Western pond turtles regularly utilize upland terrestrial habitats, most often during the summer and winter, especially for oviposition (females), overwintering, and overland dispersal (Reese 1996, Holland 1994). Females have been reported to range as far as 500 meters (1,640 feet) from a watercourse to find suitable nesting habitat (Reese and Welsh 1997).

No observations of this species have been recorded within a 3-mile radius of the project site (CNDDDB 2024), however, the irrigation pond, and San Gregorio Creek just north of the project site could provide suitable habitat for the western pond turtle. This species utilizes upland habitats for breeding and movement between aquatic habitats and there is moderate potential

for this species to utilize the exercise fields. Based on the limited times that dogs are present on the site however (4 hours per day on weekdays), impacts to this species are not expected.

Special Status Bats

No special status bat species were identified as having potential to roost in the project area. The project area is unlikely to support any special status bats, due to the lack of suitable structures, trees, rocky outcrops, or vegetative shrub cover for roosting. Common and special status bat species may forage over the grassland and scrub habitats on the property, as well as the nearby riparian corridor and irrigation pond.

Nesting Raptors and Birds Protected Under the MBTA

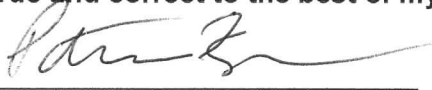
The riparian woodland, the marsh vegetation surrounding the irrigation pond, and the coastal scrub vegetation between the exercise fields provide potential nesting habitat for a variety of bird species protected under the Migratory Bird Treaty Act. Project activities however are not expected to impact any of these areas and therefore would not impact any nesting birds.

6. Tabulate by significant impact all feasible mitigation measures proposed to reduce the level of impact and explain how such measures will be successful.

Table 2. Impacts and Proposed Mitigation Measures to Reduce Impacts

Impact	Mitigation Measure	Effect
1) Potential for contamination from dog feces and impacts on water quality	Continue to pick up dog waste daily and take it off-site disposal facility.	Waterways and wetlands are protected from potential contamination.
2) Potential impacts on San Francisco dusky-footed woodrat	San Francisco dusky-footed woodrat nests have been observed within 20 feet of the project area. Woodrat nests should be avoided with a minimum 10-foot radius buffer.	San Francisco dusky-footed woodrats are protected from disturbance or harm.
3) Potential harassment or harm to California red-legged frog (CRF), San Francisco garter snake (SFGS), and/or western pond turtle (WPT)	<p>1) Remove straw bales from the exercise fields to avoid attracting wildlife, and reduce the likelihood of attracting protected species such as CRF and SFGS. Keep the area clear of clutter, pipes, tarps, wood, etc. that could attract wildlife.</p> <p>2) A worker education program should be conducted in which all crews to be working on site are trained on CRF, SFGS, and WPT identification, penalties for harming these species or their habitat, and the protocol to be followed should an SFGS, CRF, or WPT be encountered. The worker education program should include color photo cards of CRF, SFGS, and WPT that remain on the project site.</p>	California red-legged frogs, San Francisco garter snakes, and western pond turtles are protected from disturbance or harm.
4) Removal of Invasive Species (optional)	Following recommendations in the LCP (Section 7.51) landowners and managers are encouraged to voluntarily remove pampas grass, French and Scotch broom, Poison hemlock, and other invasive species to prevent their spread (San Mateo County 2013).	Overall habitat value of the site is improved for native wildlife.

7. **Certification.** I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological evaluation to the best of my ability and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.



Patrick Kobernus,
Principal Biologist
Coast Ridge Ecology, LLC

February 5, 2024

(415) 404-6757 office
(415) 404-6097 fax
(650) 269-3894 cell
PKobernus@crecology.com

REFERENCES

- Baicich, P.J. and C.J.O. Harrison. 2005. Nests, Eggs, and Nestlings of North American Birds. Second Edition. Princeton University Press. Princeton, New Jersey. 347 pp.
- California Cooperative Anadromous Fish and Habitat Data Program (Cal Fish) 2024. Steelhead (*Oncorhynchus mykiss*).
<https://www.calfish.org/FisheriesManagement/SpeciesPages/SteelheadTrout.aspx>
Accessed, January 20, 2024.
- California Department of Fish and Wildlife (CDFW) January 2024. Request for Suppressed CNDDDB data on San Francisco Garter Snake. Brian Accord, California Department of Fish and Wildlife. Sacramento.
- California Natural Diversity Database (CNDDDB) January 2024. Database accessed January 2024. California Department of Fish and Wildlife. Sacramento.
- California Native Plant Society (CNPS), 2024. Online Inventory for Rare and Endangered Plants in California. Database search January 2024
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish, and Wildlife Service, Washington, D.C. 131 pp. Available online at:
<http://www.npwrc.usgs.gov/resource/wetlands/classwet/index.htm>
- Federal Interagency Committee for Wetland Delineation. 1989. Federal manual for identifying and delineating jurisdictional wetlands. U. S. Army Corps of Engineers, U. S. Environmental Protection Agency, U. S. Fish and Wildlife Service, and U.S.D.A. Soil Conservation Service, Washington, D.C. Cooperative Technical Publication.
- Google Earth 2024. Maps showing the location of 123 Seaside-School Road. Accessed January 9, 2024.
- Holland, D.C. 1994. The Western Pond Turtle: Habitat and History. Final Report. Portland, OR: U.S. Department of Energy, Bonneville Power Administration.
- Holland, R.F., 1986. Preliminary descriptions of the terrestrial natural communities of California. State of California, The Resources Agency, Nongame Heritage Program, Dept. Fish & Game, Sacramento, Calif. 156 pp.
- Jennings, Mark, and Marc P. Hayes. 1994. Amphibian and reptile species of special concern in California. Report prepared for Calif. Dept. Fish and Game, Inland Fisheries Division, Rancho Cordova, CA. Contract #8023.
- NRCS, National Resource Conservation Service, Web Soil Survey National Cooperative Soil Survey, Accessed January 2024. <http://websoilsurvey.nrcs.usda.gov/app/>
- Reed, P.B., Jr. 1988. National List of Plant Species That Occur in Wetlands: National Summary. U.S. Fish and Wildlife Service. Biological Report. 88(24). 244 pp.
- Reese, D.A. 1996. Comparative Demography and Habitat use of Western Pond Turtles in Northern California: The Effects of Damming and Related Habitat Alterations. Unpublished. Ph.D. dissertation, University of California Berkeley, Berkeley, CA.
- Reese, D.A., and H. H. Welsh Jr. 1997. Use of Terrestrial Habitat by Western Pond Turtles, *Clemmys marmorata*: Implications for Management. Pp. 352-357. In J. Van Abbema (ed.), Conservation, Restoration, and Management of Tortoises and Turtles, An International Conference WCS Turtle Recovery Program and the New York Turtle and Tortoise Society, New York.

San Mateo County. 2013. Local Coastal Program Policies. Chapter 7, Sensitive Habitats Component. County of San Mateo Planning and Building Division. Accessed January 2024. <https://planning.smcgov.org/documents/local-coastal-program>

San Mateo County Planning and Building Division, 1977. Regulation of the Removal and Trimming of Heritage Trees on Public and Private Property (Ordinance No. 2427 - April 5, 1977).

Stebbins, R. C. 2003. A Field Guide to Western Reptiles and Amphibians. 3rd Edition. Houghton Mifflin Company. New York, New York. 533 pp.

United States Fish and Wildlife Service (USFWS) 1985. Recovery Plan for the San Francisco Garter Snake, *Thamnophis sirtalis tetrataenia*. U.S. Fish and Wildlife Service, Region 1, Portland, Oregon, 77 pp. http://ecos.fws.gov/docs/recovery_plan/850911.pdf

United States Fish and Wildlife Service (USFWS) 2004. Federal Register: Endangered and Threatened Wildlife and Plants; Proposed Designation of Critical Habitat for the California Red-legged Frog (*Rana aurora draytonii*); Proposed Rule. 50 CFR. Part 17. Vol. 69. No. 71: pp. 19620 – 19642.

United States Fish and Wildlife Service (USFWS) 2024. National Wetlands Inventory, Wetlands Mapper. Accessed January 9, 2024. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

United States Fish and Wildlife Service (USFWS) 2024. San Francisco Garter Snake - <https://www.fws.gov/species/san-francisco-garter-snake-thamnophis-sirtalis-tetrataenia>
Western Pond Turtle - <https://www.fws.gov/species/western-pond-turtle-actinemys-marmorata>
California red-legged frog - <https://www.fws.gov/species/california-red-legged-frog-rana-draytonii>
Accessed January 2024

Zeiner, et al 1990. California's Wildlife, Volume II: Birds. State of California, Department of Fish and Game, Sacramento, California. November.

Appendix A: Principal Investigator Qualifications

Patrick Kobernus, Wildlife Biologist

Patrick Kobernus is a Senior Biologist and Managing Member of Coast Ridge Ecology, LLC and has over 28 years of experience as a professional wildlife biologist. He currently manages a staff of nine biologists and environmental specialists. He is experienced in conducting wildlife surveys for mammals, birds, amphibians, reptiles, fish, insects; supervising biological monitoring crews, endangered species monitoring, and rare plant mapping; overseeing habitat management and restoration projects; and providing permitting assistance to a wide variety of public and private sector clients.

From 2010 to 2018, Mr. Kobernus served as a consulting biologist for the Crystal Springs /San Andreas Transmission System Upgrade project and the SFPUC Bioregional Habitat Restoration Program. Mr. Kobernus has conducted extensive surveys and consulted on mitigation efforts for nesting birds, roosting bats, California red-legged frog, California tiger salamander, San Francisco garter snake, western pond turtle, steelhead, San Francisco dusky-footed woodrat, and rare plants. Mr. Kobernus served as the Habitat Manager for the San Bruno Mountain Habitat Conservation Plan in San Mateo County for 13 years (1995-2007), where he supervised field crews monitoring the endangered mission blue, San Bruno elfin, and callippe silverspot butterflies and mapping of the butterflies' host and nectar plants. He has conducted focused population monitoring and presence/ absence surveys for the Bay checkerspot butterfly in the South San Francisco Bay Area and has conducted a research project for the USFWS on the distribution of the Lillian's silverspot butterfly in the North San Francisco Bay Area. He has conducted USFWS protocol surveys for California tiger salamander, and California red-legged frog, as well as electrofishing and trapping surveys for steelhead, and nesting bird surveys for raptors including burrowing owl, peregrine falcon, northern spotted owl, passerines and shorebirds, and acoustic and habitat surveys for bats within San Mateo, Santa Clara and San Francisco Counties. Mr. Kobernus holds a California Department of Fish and Wildlife scientific collecting permit and USFWS 10(a)(1)(A) Recovery Permit for the California red-legged frog, San Francisco garter snake, and the California tiger salamander.

Mr. Kobernus has extensive experience in preparing Local Coastal Program biological impact forms, Joint Aquatic Resource Permit Applications (JARPA), California Department of Fish and Wildlife 1602 Streambed Alteration Agreements, section 404 permit applications with the US Army Corps of Engineers (ACOE) and 401 certification applications with the California Regional Water Quality Control Board.

Mr. Kobernus is a trained wetland delineator in the ACOE delineation methodology (Wetland Training Institute, March 2001), and has received specialty training in applied hydric soils (WTI, May 2003) and in acoustic surveys and mist-netting bats (The Wildlife Society bat training, 2006, 2008, 2012; Wildlife Acoustics bat training, 2013); Bat Conservation and Management training, July 2015); and in special status amphibian surveys (California tiger salamander workshop (2013) and Aquatic Species Survey Techniques Workshop in 2008 and 2010).

Liza Kachko, Associate Biologist

Liza Kachko is a biologist with experience conducting biological construction monitoring, biological surveys, and mapping biological resources. She has experience working with California red-legged frog, San Francisco garter snake, central California coastal steelhead, Mission blue butterfly, San Bruno elfin butterfly, San Francisco dusky-footed woodrat, and surveying for nesting birds. Ms. Kachko is experienced with collecting GPS data and has conducted biological resource mapping, including the preparation of professional-grade maps for reporting purposes, and manipulation and management of geospatial data for focused biological studies. She has experience in vegetation management including surveys for rare plants, native plant propagation and seed collection, and invasive species mapping and management. Ms. Kachko holds a GIS Certificate from San Francisco City College and is a trained wetland delineator (Wetland Training Institute, April 2023).

APPENDIX B: Representative Photos of 123 Seaside-School Road



Figure B-1. Covered parking structure for Smilin' Dogs Dog Ranch. Photo date: 12/28/2024.



Figure B-2. Looking east over the exercise fields from the southeastern edge of the site. Photo date: 12/28/2024.



Figure B-3. Looking west over the exercise fields from the southwestern area of the site. The fenced off area of Coyote Brush/Poison Oak scrub between fields A and C is visible in the foreground. The shade structures inside the fields are also visible. Photo date: 12/28/2024.



Figure B-4. Shade structure with straw bales in the exercise field. Photo date: 12/28/2024.



Figure B-5. Looking northwest from the alley (pathway). Shade structure with straw bales, and turned over water basins in the exercise field. Photo date: 12/28/2024.



Figure B-6. Looking south, the irrigation pond surrounded by bulrush, the exercise fields are visible in the background. Photo date: 12/28/2024.



Figure B-7. Drainage with riparian corridor dominated by arroyo willow across from the covered parking area along Seaside-School Road. Photo date: 12/28/2024.



Figure B-8. San Francisco dusky-footed woodrat nest (midden) on the edge of the riparian area near the covered parking area along Seaside-School Road. Photo date: 12/28/2024.

Appendix C: Special Status Plant and Animal Species in the Vicinity of the Project Site

Table 1. Special-status plant and animal species considered for their potential to occur at 123 Seaside-School Rd, San Gregorio, CA

Species Name	Status	Habitat ⁶	Potential to Occur Onsite
MAMMALS			
American badger <i>Taxidea taxus</i>	SSC	Most abundant in drier open stages of shrub, forest, and herbaceous habitats, with friable soils.	Low potential. No burrows observed on site. Site is mostly grassland but has continuous presence by dogs.
San Francisco dusky-footed woodrat <i>Neotoma fuscipes annectens</i>	SSC	Forests with moderate canopies and moderate to dense understory.	Moderate potential. Suitable habitat is present for foraging. Middens observed greater than 20 feet away from the site.
BIRDS			
Bank swallow <i>Riparia riparia</i>	CT	Riparian ecosystems, forages in a variety of ecosystems, but primarily over water features. Colonial nester in vertical banks/cliffs with fine sandy soils.	No potential, foraging only. No nesting habitat present. Closest observation is 3 miles southwest of the site.
Saltmarsh common yellowthroat <i>Geothlypis trichas sinuosa</i>	SSC	Marshy, brushy vegetation in or near water or wet meadow/scrub habitat. Requires thick continuous cover for foraging. Nests in willow, tall grasses, scrub and tule patches.	No potential. No potential nesting or foraging habitat present.
AMPHIBIANS AND REPTILES			
California red-legged frog <i>Rana draytonii</i>	FT, SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation.	Moderate potential. Suitable breeding habitat nearby. Species could occur on-site during upland migratory movements.

⁶ Habitat requirements summarized from species accounts and descriptions of reported localities (Zeiner, et al., 1990; Jennings and Hayes, 1994; CNDDB, 2024; CNPS, 2024).

Species Name	Status	Habitat ⁶	Potential to Occur Onsite
Foothill yellow-legged frog <i>Rana boylei</i>	SSC	Partly shaded, shallow streams and riffles with a rocky substrate in a variety of habitats.	No potential. Suitable habitat not present.
San Francisco garter snake <i>Thamnophis sirtalis tetrataenia</i>	FE, CE, FP	Near freshwater marshes, ponds, and slow-moving streams. Prefers dense cover and water depths of at least one foot. Also found in upland habitats adjacent to water sources. Prefers south or west-facing slopes with open habitats with occasional shrubs for cover.	Moderate potential. Suitable aquatic foraging habitat just north of the site. Some potential for species to utilize the site when traveling between breeding/ foraging habitats.
Western pond turtle <i>Actinemys marmorata</i>	SSC, Proposed Threatened	Ponds, creeks in woodland, grassland. Species require deep water ponds, streams, or marshes with sunny, emergent basking sites and sunny upland habitat for nesting.	Moderate potential. Potential suitable aquatic habitat just north of the site. Some potential for species to utilize the site when traveling between breeding/ foraging habitats. No occurrence records within 3 miles of the site.
FISH			
Steelhead- central California coast DPS <i>Oncorhynchus mykiss irideus</i>	FT	Well-oxygenated, moderate to fast-flowing streams with woody debris, deep pools, riffles, and gravels.	No potential. No suitable habitat present. Present in San Gregorio Creek less than .5 miles away
Tidewater goby <i>Eucyclogobius newberryi</i>	FE, SSC	Shallow marine areas, lagoons, and adjacent streams	No potential. No suitable habitat present.
PLANTS			
Choris popcornflower <i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	CNPS 1B.2	Chaparral, Coastal prairie, Coastal scrub, mesic. Elevation: 15 - 160 meters. Blooming period: Mar. –June	No Potential. No suitable habitat on site.
Coastal marsh milk-vetch <i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	CNPS 1B.2	Moist dunes, marshes, streamsides, Wetland. Elevation: 0 - 30 meters. Blooming period: Apr.-Oct.	No Potential. No suitable habitat on site.

Species Name	Status	Habitat ⁶	Potential to Occur Onsite
<p>Valley Needlegrass Grassland <i>Nassella (Stipa) Pulchra</i></p>	G3, S3.1	Prairie dominated by <i>Nassella pulchra</i> , with up to 92% <i>N. pulchra</i> and <i>Danthonia californica</i> .	No Potential. No suitable habitat on site.

TABLE 1: KEY

- (FE) Endangered = Federally listed as Endangered.
- (FT) Threatened = Federal list, likely to become endangered in the foreseeable future.
- (FP) Proposed = Species or Critical Habitat proposed for official Federal listing.
- (FC) Candidate = Federal candidate to become a Proposed species.
- (FSC) Federal Species of Concern = May be endangered or threatened, but not enough biological information to list.
- (CE, CT, CR) State Listed = Listed as endangered, threatened, or rare by California.
- (CSC) California Species of Concern = CDFW concern for population trends.
- (CFP) California Fully Protected = Fish and Wildlife Code prohibits take of individuals
- (CNPS 1B) = California Native Plant Society: rare or endangered in CA or elsewhere.
 - 0.1: Seriously endangered in California
 - 0.2: Fairly endangered in California
- (CNPS 2) = California Native Plant Society: rare or endangered in CA but more common elsewhere.
- (CNPS 3) = California Native Plant Society: more information is needed to determine the degree of sensitivity.
- (CNPS 4) = California Native Plant Society: plant of limited distribution.
- CNPS Threat Ranks
 - 0.1 = Seriously threatened in California
 - 0.2 = Fairly threatened in California
 - 0.3 = Not very threatened in California
- (Sensitive) = CA Dept. of Forestry classification; deserves special consideration during timber harvest operations.
- (WBWG: M) = Western Bat Working Group: Medium Priority
- (WBWG: H) = Western Bat Working Group: High Priority
- (WL) Watch List California Department of Fish and Wildlife
- (D) = Delisted from Federal List. Status to be monitored for 5 years.

NatureServe Conservation Status Rankings

- (G1) = Globally Critically Imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
- (G2) = Globally Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
- (G3) = Globally Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
- (S1) = State Critically Imperiled. At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
- (S2) = State Imperiled. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
- (S3) = State Vulnerable. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT I

From: [Husband, Shannon@Wildlife](mailto:Husband_Shannon@Wildlife)
To: [Summer Burlison](mailto:Summer_Burlison)
Subject: RE: Secure Messaging Notification from The County Of San Mateo
Date: Friday, December 5, 2025 1:36:33 PM
Sensitivity: Private

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Good afternoon Summer,

I reviewed the revised MND for the Dog Walking Operation at 123 Seaside School Road, San Gregorio, and would like to thank the lead agency for including CDFW's comments in the revised CEQA document. We appreciate your attention to our feedback and your commitment to protecting sensitive habitats and species in San Mateo County.

Thanks again, and happy Friday,

Shannon Husband ([she/her](#))

Environmental Scientist
Habitat Conservation
California Department of Fish and Wildlife, Bay Delta Region
Shannon.Husband@Wildlife.ca.gov | (707) 337-1364

From: Husband, Shannon@Wildlife
Sent: Thursday, November 20, 2025 3:52 PM
To: 'Summer Burlison' <sburlison@smcgov.org>
Subject: RE: Secure Messaging Notification from The County Of San Mateo
Sensitivity: Private

Got it, thanks Summer!

Shannon Husband ([she/her](#))

Environmental Scientist
Habitat Conservation
California Department of Fish and Wildlife, Bay Delta Region
Shannon.Husband@Wildlife.ca.gov | (707) 337-1364

From: Summer Burlison <sburlison@smcgov.org>
Sent: Thursday, November 20, 2025 3:48 PM
To: Husband, Shannon@Wildlife <Shannon.Husband@Wildlife.ca.gov>
Subject: RE: Secure Messaging Notification from The County Of San Mateo
Sensitivity: Private

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hi Shannon,

Sorry about that and thanks for letting me know. This encrypted message was unintentional. Hopefully you received the separate email with the link to our online website where the docs can be obtained. I don't know if something in the document attachments may have caused the encryption. Here's the online link again:
<https://www.smcgov.org/planning/revised-mitigated-negative-declaration-dog-walking-operation-123-seaside-school-road-san>.

Regards,
Summer

Summer Burlison

Senior Planner

County of San Mateo

Planning & Building Department

455 County Center, 2nd Floor

Redwood City, CA 94063

(650) 363-1815

planning.smcgov.org

Please note that I am out of the office every other Friday.

From: Husband, Shannon@Wildlife <Shannon.Husband@Wildlife.ca.gov>

Sent: Thursday, November 20, 2025 8:12 AM

To: Summer Burlison <sburlison@smcgov.org>

Subject: RE: Secure Messaging Notification from The County Of San Mateo

Sensitivity: Private

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Good morning Summer,

I received the below encrypted message that I'm unable to access. Hoping you can troubleshoot or let me know the contents of the message.

Thanks,

Shannon Husband ([she/her](#))

Environmental Scientist

Habitat Conservation

California Department of Fish and Wildlife, Bay Delta Region

From: Summer Burlison <sburlison@smcgov.org>
Sent: Wednesday, November 19, 2025 12:35 PM
To: Husband, Shannon@Wildlife <Shannon.Husband@Wildlife.ca.gov>
Subject: Secure Messaging Notification from The County Of San Mateo
Sensitivity: Private

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Secure Messaging Notification

You have been sent a secure message by County Of San Mateo.

This encrypted email is intended for the recipient only and cannot be viewed by anyone other than the person receiving this email.

View the message by clicking [link](#). It has been classified as sensitive and may only be accessed from within this Secure Messaging service.

If this is your first encrypted email from our organization, follow these instructions:

1. Click link.
2. Provide the email address for your new Mimecast encryption account.
3. Provide a password for your new account.
Minimum password length is eight (8) characters.
Include at least one (1) lowercase alphabetical character (a-z).
Include at least one (1) uppercase alphabetical character (A-Z).
Include at least one (1) numeric character (0-9).

If you received encrypted email from our organization before, follow these instructions:

1. Click link.
2. Provide the email address for your Mimecast encryption account.
3. Provide the password you configured when you registered with Mimecast.

If you forgot your password, use the link at the log in page to reset your password or click [here](#) to request a new password.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT J



September 29, 2025

Summer Burlison, Senior Planner
San Mateo County Planning and Building Department
455 County Center, 2nd Floor
Redwood City, CA, 94063
SBurlison@smcgov.org

Subject: Smilin Dogs, Mitigation Negative Declaration, SCH No. 2025090853,
San Mateo County

Dear Summer Burlison:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from San Mateo County Planning and Building Department (County) for the Smilin Dogs Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

California Endangered Species Act and Native Plant Protection Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA or Native Plant Protection Act (NPPA), either during construction or over the life of the Project. Under CESA, take is defined as "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill." Issuance of an ITP is subject to CEQA documentation. If the Project will impact CESA or NPPA listed species, early consultation with CDFW is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. Issuance of an ITP is subject to

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Summer Burlison, Senior Planner
 San Mateo County Planning and Building Department
 September 29, 2025
 Page 2

CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. Fully protected species may not be taken or possessed at any time (Fish and Game Code, §§ 3511, 4700, 5050, and 5515).

CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially impact threatened or endangered species (Pub. Resources Code, §§ 21001(c), 21083, and CEQA Guidelines §§ 15380, 15064, 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code, § 2080 et. seq.

Lake and Streambed Alteration

CDFW requires a Lake and Streambed Alteration (LSA) Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Any impacts to the mainstems, tributaries and floodplains or associated riparian habitat would likely require an LSA Notification. CDFW, as a responsible agency under CEQA, will consider the MND for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA as the responsible agency.

Raptors and Other Nesting Birds

CDFW has authority over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include §§ 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

Fully Protected Species

Fully protected species, such as San Francisco garter snake (*Thamnophis sirtalis tetrataenia*, SFGS) may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process.

Summer Burlison, Senior Planner
San Mateo County Planning and Building Department
September 29, 2025
Page 3

PROJECT DESCRIPTION SUMMARY

Proponent: San Mateo County Planning and Building Department

Objective: The Project is seeking an After-the-Fact Coastal Development Permit (CDP), Planned Agricultural District Permit, Architectural Review Permit, and Kennel Permit to allow for a dog walking operation for a maximum of 75 dogs per day (Monday – Friday, 10:00 a.m. to 3:00 p.m., no weekends) within a fenced 23-acre portion of a 150-acre parcel located in San Gregorio. The dog walking operation supports a doggy daycare business, Smilin Dogs, located in the City of San Carlos, California. The subject San Gregorio project site is a day-use exercise/walking venue for the business. The project also proposes to legalize a five-stall carport structure and three cargo storage containers that support the dog walking activity. A regularly serviced portable toilet is onsite for staff use.

Location: Unincorporated San Gregorio, San Mateo County, La Honda Road and Seaside-School Road, and Latitude 37.322987, Longitude -122.376645.

Timeframe: To be determined

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Project Description and Related Impact Shortcoming

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife (USFWS)?

COMMENT 1: California Red-Legged Frog and San Francisco Garter Snake

Issue: The Project site is located in uplands adjacent to riparian and pond areas that may provide habitat for California red-legged frog (*Rana draytonii*, CRLF) and San Francisco garter snake. The Biological Impact Form prepared by Coast Ridge Ecology for the Project acknowledges the project site has potentially suitable habitat for these species but precludes or minimizes potential species presence due to project activities maintaining unfavorable upland habitat conditions ("due to the consistent usage of these fields by the dogs, and occasional seasonal mowing," page 15). The MND also appears to use a narrowly focused interpretation of species life-history requirements reliant on lack of cover without consideration to all aspects of species habitat usage (e.g., use of burrows, migration corridors, etc). Additionally, the project references limited survey efforts, relying on one 3-hour field survey in late December 2023. Without additional mitigation measures in place, the Project and its ongoing mowing and dog-walking activities would have potentially significant impacts on biological resources.

Ongoing dog-walking operations, field mowing and construction in and adjacent to suitable habitat could potentially result in direct and indirect take of CRLF or SFGS. Mowing in upland areas could injure or kill CRLF or SFGS if they are basking or moving between burrows and aquatic foraging habitat, which could potentially result in a substantial reduction of their populations. Indirect take may occur due to upland habitat loss and degraded site suitability due to the presence of dogs, people, and fencing, which could restrict CRLF and SFGS movement between upland and

Summer Burlison, Senior Planner
San Mateo County Planning and Building Department
September 29, 2025
Page 4

aquatic habitats and thus prevent these species from completing all stages of their life cycles.

The MND includes two mitigation measures intended to avoid Project impacts to CRLF and SFGS: Mitigation Measure 1 requires removal of straw bales and objects that could provide upland habitat refugia, and Mitigation Measure 2 establishes a worker education program to train each staff person working on the Project site in identifying CRLF and SFGS and the protocols to follow should these species be encountered. Information presented in the Biological Impact Form indicates there is potentially suitable CRLF and SFGS upland and aquatic habitat within and adjacent to the Project site that would remain even if straw bales and anthropogenic materials in uplands are removed from the site per Mitigation Measure 1. Mitigation Measure 2 does not describe the protocol that would be followed if CRLF or SFGS are encountered, and it is unclear who would be included as a "staff person" required to receive a worker education training. Further, there are no mitigation measures proposed to avoid potential impacts to CRLF and SFGS due to biannual mowing in uplands and the presence of dogs and humans in potentially suitable CRLF and SFGS habitat. For these reasons, Mitigation Measures 1 and 2 are not sufficient to mitigate potential project impacts to CRLF or SFGS to a less-than-significant level.

Specific impact, why impact would occur, and evidence impact would be significant: CRLF is a species listed as threatened under the Federal Endangered Species Act (ESA) and is a California Species of Special Concern (SSC), and SFGS is a State Fully Protected species and listed as endangered under CESA and federal ESA. CRLF and SFGS require a variety of habitats, including aquatic breeding habitat and upland dispersal habitat.

CRLF breeding sites occur in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds and lagoons. (USFWS 2002). Upland dispersal habitat includes nearly any area within one to two miles of a breeding site that stays moist and cool through the summer, such as aquatic habitat in pools of slow-moving streams, perennial or ephemeral ponds, and sheltering habitat in and amongst rocks, small mammal burrows, logs, densely vegetated areas, and even man-made structures (i.e., culverts, livestock troughs, spring-boxes, and abandoned sheds) (USFWS 2017). CRLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, mining, overgrazing by cattle, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators such as bullfrogs are the primary threats to the species (Thomson et al. 2016, USFWS 2017).

SFGS are endemic snakes with a highly limited range in the San Francisco Peninsula. They utilize a variety of habitats including upland sites for basking, rodent burrows for shelter and low-lying marsh for feeding and reproduction (USFWS 1985). In coastal areas, SFGS may hibernate during the winter in small mammal burrows (USFWS, 2007). SFGS are threatened by loss of habitat from agricultural, commercial, and urban development, illegal collection by reptile breeders, and decline of their prey species, California red-legged frog. Coastridge Ecology biologists documented the presence of fossorial and semi-fossorial mammals including California meadow vole and Botta's pocket gopher, which dig burrows in uplands, creating potential habitat for CRLF and SFGS. Further, Sierran treefrogs (*Pseudacris sierra*), a common prey species of SFGS, were observed in/adjacent to the Project site.

Though no CRLF or SFGS were documented within the Project site or adjacent aquatic habitat, the presence of burrowing mammals indicates the upland areas may provide suitable habitat for SFGS and CRLF, the presence of Sierran treefrogs in nearby aquatic habitat may provide SFGS forage, and the cattail-ringed irrigation

Summer Burlison, Senior Planner
San Mateo County Planning and Building Department
September 29, 2025
Page 5

pond could provide suitable CRLF breeding habitat. Sufficiently rigorous survey efforts at appropriate times of the year are essential to conclusively determine whether CRLF and/or SFGS utilize the habitat that exists within and adjacent to the Project site, particularly given the many factors indicating the potential suitability of the area to support CRLF and SFGS. CRLF and SFGS are known to migrate through and between suitable habitats and periodic surveys are necessary to accurately assess species presence on the landscape.

CRLF and SFGS are federally listed as threatened and CESA-listed as endangered species, respectively, and therefore are threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if CRLF or SFGS are injured or killed, or their habitat is removed as a result of the Project, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommendation 1: CDFW recommends that the MND include the following mitigation measure to ensure that impacts to CRLF and SFGS are fully avoided:

Recommended CRLF and SFGS Mitigation Measure: Prior to commencement of Project activities, focused surveys for CRLF and SFGS shall be conducted by a CDFW-approved qualified biologist experienced with CRLF and SFGS identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate CRLF and/or SFGS are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid all impacts to state and federally listed and fully protected species and their habitat.

Recommended SFGS Mitigation Measure: Prior to project mowing activities, a SFGS avoidance plan shall be prepared for implementation in coordination with CDFW. The SFGS avoidance plan shall be prepared by a qualified biologist experienced in the natural life history requirements of SFGS. At a minimum the SFGS avoidance plan shall include the following elements:

- Depict locations of mowing with respect to grasslands, wetlands, riparian vegetation and dense vegetation surrounding any ponds on a map. Create habitat buffers and avoid mowing areas that are sensitive or have increased potential for SFGS presence such as dense wetland vegetation areas;
- Require a biological monitor on-site proficient in SFGS identification to walk ahead of the mower if mowing occurs during the months February-November;
- Avoid mowing during peak active SFGS periods to the greatest extent feasible. SFGS are less active and often underground during late fall to early spring months;
- Increase mowing blade heights to cut grass as high as possible, i.e., eight inches;
- Limit mowing speed to a sufficiently slow rate to allow any undetected SFGS to leave on its own volition unharmed; and
- Implement sensitive species worker education for project staff and workers.

Summer Burlison, Senior Planner
 San Mateo County Planning and Building Department
 September 29, 2025
 Page 6

If any CRLF or SFGS take occurs or if either of these species are detected, CDFW shall be contacted immediately, and location information and photo documentation of the individual(s) shall be provided.

COMMENT 2: Northwestern Pond Turtle

Issue: The Project site is located in uplands adjacent to riparian and pond areas that may provide habitat for Northwestern Pond turtle (*Actinemys marmorata*, NWPT). Ongoing dog-walking operations, field mowing, and construction in and adjacent to suitable NWPT habitat could potentially result in direct and indirect take of NWPT. Mowing in upland areas could injure or kill NWPT if they are basking or moving between upland and aquatic habitat. Indirect take may occur due to upland habitat loss and degraded site suitability due to mowing and the presence of dogs and people. Resultant noise could disrupt NWPT basking, nesting, and foraging in aquatic or terrestrial habitat and prevent NWPT from completing all stages of their life cycle.

Mitigation Measures 1 and 2 in the Project MND are intended to reduce potential impacts to NWPT to less-than-significant levels. However, neither of these measures adequately describe how ongoing Project operations could disrupt NWPT basking and movement between aquatic and upland areas, nor how those potential impacts from ongoing operations would be avoided, minimized, and mitigated. Further, Mitigation Measure 2 does not describe the protocol that would be followed if NWPT are encountered, and it is unclear who would be included as a “staff person” required to receive worker education training. The Project mitigation measures, as proposed, would not reduce potential impacts to NWPT or their habitat to less-than-significant levels.

Specific impact, why impact would occur, and evidence impact would be significant: NWPT is a State SSC and a candidate for listing under the federal ESA. NWPT are semi-aquatic and occupy a variety of aquatic and terrestrial habitats (USFWS 2023). Terrestrial environments are required for nesting, overwintering and aestivation, basking, and overland dispersal. Aquatic environments are required for breeding, feeding, overwintering and sheltering, basking, and dispersal. NWPT basking is essential to their ability to thermoregulate and, in turn, perform physiological functions such as metabolism, digestion, reproduction, growth, and immune response. Local movements between aquatic and terrestrial habitats are typically less than 500 meters (Reese and Welsh Jr 1997), and thus contiguous, adjacent habitat types are highly important for NWPT to complete all stages of their life cycle. NWPT populations are experiencing a decline in resiliency due to impacts from land conversion, bullfrog predation, increasing drought, and anthropogenic environmental change (USFWS 2023).

The Biological Impact Form prepared by Coastridge Ecology for the Project states that the “irrigation pond and San Gregorio Creek just north of the project site could provide suitable habitat” for NWPT, and that there is “moderate potential” for this species to utilize uplands within the Project site (Local Coastal Program Biological Impact Form For 123 Seaside-School Road, page 18). Though the field survey performed by Coastridge Ecology did not result in any NWPT detections, this may be because the survey was performed on a drizzly, cool day in late December 2023, during a time of year unlikely to see NWPT basking or moving between aquatic and terrestrial habitats. Sufficiently rigorous survey efforts at appropriate times of the year are essential to conclusively determine whether NWPT occupy the habitat that exists within and adjacent to the Project site.

NWPT is a candidate for federal listing under the Federal ESA and therefore is considered to be a threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if NWPT are injured or killed, or their habitat is removed as a result of the Project, the Project may result in a substantial reduction in the

Summer Burlison, Senior Planner
San Mateo County Planning and Building Department
September 29, 2025
Page 7

number or restriction in the range of a threatened species or endangered species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommendation 2: CDFW recommends that the MND include the following mitigation measure to ensure that impacts to NWPT are fully avoided:

Recommended NWPT Mitigation Measure: Prior to Project construction or continuation of ongoing Project activities including dog walking and mowing in uplands adjacent to riparian areas and the irrigation pond, focused surveys for NWPT shall be conducted by a CDFW-approved qualified biologist experienced with NWPT identification and life histories. Surveys shall follow protocols approved by CDFW.

If the results of focused surveys indicate NWPT are present within or adjacent to the Project area, the Project proponent, in coordination with CDFW, shall create and implement additional measures to avoid, minimize, and mitigate all impacts to NWPT and their habitat. These measures could include, at a minimum, establishing best management practices for ongoing Project operations, creating buffers of sufficient size to protect habitat resources, and implementing worker education programming for construction workers, dog walkers, and all individuals who would be accessing and working in the Project site.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Shannon Husband, Environmental Scientist, at (707) 337-1364 or Shannon.Husband@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

Summer Burlison, Senior Planner
San Mateo County Planning and Building Department
September 29, 2025
Page 8

ec: Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

- Reese DA, Welsh Jr HH. 1997. Use of terrestrial habitat by western pond turtles (*Clemmys marmorata*): implications for management.
- Thompson, R.C., A.N. Wright, and H.B. Shaffer. 2016. California Amphibian and Reptile Species of Special Concern. University of California Press and California Department of Fish and Wildlife.
- U.S. Fish and Wildlife Service. 1985. Recovery Plan for the San Francisco Garter Snake (*Thamnophis Sirtalis Tetrataenia*). U.S. Fish and Wildlife Service, Portland, Oregon. 77 pp.
- U.S. Fish and Wildlife Service. 2002. Recovery Plan for the California Red-legged Frog (*Rana aurora draytonii*). U.S. Fish and Wildlife Service, Portland, Oregon. viii + 173 pp.
- U.S. Fish and Wildlife Service. 2007. Species Account San Francisco Garter Snake (*Thamnophis Sirtalis Tetrataenia*). U.S. Fish and Wildlife Service, Sacramento, California.
- U.S. Fish and Wildlife Service. 2017. Species Account for California Red-legged frog. December 2017. Zweifel, R. G. 1955. Ecology, distribution, and systematics of frogs of the *Rana boylei* group. University of California Publications in Zoology 54 (4):207–292. https://www.fws.gov/sacramento/es_species/Accounts/Amphibians/Reptiles/ca_red_legged_frog/
- U.S. Fish and Wildlife Service. 2023. Species status assessment report for the northwestern pond turtle (*Actinemys marmorata*) and southwestern pond turtle (*Actinemys pallida*), Version 1.1, April 2023. U.S. Fish and Wildlife Service, Ventura Fish and Wildlife Office, Ventura, California.