CEQA Response To Comments Memorandum

Entrada Way Culvert Slip-Out Bank Stabilization Project

San Mateo County, CA

February 2026

Prepared for:

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Response To Comments Memorandum

Date: February 2026

To: County of San Mateo Department of Public Works

From: Montrose Environmental

Subject: Response to Comments on the Draft Initial Study/Mitigated Negative Declaration for the Entrada Way Culvert Slip-Out Bank Stabilization Project

1. INTRODUCTION

Montrose Environmental has prepared this memorandum to respond to comments received by the County of San Mateo Department of Public Works (County) on the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Entrada Way Culvert Slip-Out Bank Stabilization Project (Proposed Project), dated December 2025. An IS/MND is an informational document prepared by a Lead Agency, in this case, the County, that provides environmental analysis for public review and for the agency decision-makers to consider before taking discretionary actions related to any project that could have a significant effect on the environment.

The Draft IS/MND provided analysis of the impacts that would result from the implementation of the Proposed Project. Mitigation measures were identified, as applicable, to minimize the impacts to a less-than-significant level.

The County Board of Supervisors must certify that the Draft IS/MND adequately discloses the environmental effects of the Proposed Project prior to approval. Additionally, the County Board of Supervisors must confirm that the IS/MND is the appropriate environmental document for the Proposed Project and that the IS/MND has been completed in conformance with the California Environmental Quality Act (CEQA).

This memorandum for the Entrada Way Culvert Slip-Out Bank Stabilization Project Draft IS/MND presents:

- Names of persons and/or organizations commenting on the Draft IS/MND,
- Responses to the received comments, and
- Text revisions to the Draft IS/MND, dated December 2025.

Together with the Draft IS/MND, this memorandum constitutes the Final IS/MND for the Entrada Way Culvert Slip-Out Bank Stabilization Project.

2. CEQA PROCESS AND SUMMARY OF COMMENTS RECEIVED

In accordance with Section 15073 of the CEQA Guidelines, the County uploaded the Draft IS/MND to the Office of Planning Research (OPR) State Clearinghouse using the "CEQA Submit." The 37-day review period started on December 10th, 2025 and concluded on January 16th, 2026. The County circulated a Notice of Availability/Notice of Intent (NOA/NOI) to interested agencies and individuals. The NOA/NOI was also posted at the Proposed Project website: https://www.smcgov.org/publicworks/entrada-way-slip-out-project. During the public review period, the County received two comment letters on the Draft IS/MND. Additionally, the County received one comment letter following the formal closure of the public review period. The following table contains a list of comments received on the Draft IS/MND.

Table 1: Public Comments

Letter	Comment Entity	Date of Letter	Page Number
1	California Department of Transportation	January 14, 2026	3
2	California Department of Fish and Wildlife	January 13, 2026	11
3	Carrie Ferguson & Kevin Pinger, La Honda Creek West Bank Property Owners	January 30, 2026	19

This document provides responses to comments received on the Draft IS/MND that address the contents of the environmental analysis. Numbered responses correspond to the comments in each letter. Copies of each comment letter are attached.

In summary, the comments received on the Draft IS/MND did not raise any new issues about the Proposed Project's environmental impacts, or provide information indicating the Proposed Project would result in new environmental impacts or impacts substantially greater in severity than disclosed in the Draft IS/MND. CEQA does not require formal responses to comments on an IS/MND, only that the lead agency consider the comments received [CEQA Guidelines §15074(b)]. Nevertheless, responses to the comments are included in this document to provide a complete environmental record.

This document contains a list of the agencies and persons that submitted comments on the Draft IS/MND and the County's responses to comments received on the Draft IS/MND. The specific comments have been excerpted from the letters and are presented as "Comment" with each response directly following as "Response." Copies of the comments submitted to the County have been inserted into this document.

Comment Letter 1

Response to Letter 1 – California Department of Transportation, January 14, 2026

Comment 1-1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Entrada Way Culvert Slip-Out Bank Stabilization Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the December 2025 Draft IS/MND.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding. The proposed project will repair the left bank of La Honda Creek directly upstream from Entrada Way. In addition to the repair of the severe streambank erosion along the left bank, the project will protect critical infrastructure, improve water quality, and enhance the riparian habitat. Project activities include construction of an engineered log cribwall, regrading and recontouring of the channel to reestablish the thalweg to its pre-erosional alignment, construction of a retaining wall, improvements to the Entrada Way roadway and stormwater drainage, and site revegetation. The project site is adjacent to State Route (SR) 84.

Response 1-1: The commenter acknowledges receipt of the NOA/NOI for the Proposed Project and presents their understanding of the Project. No response is required.

Comment 1-2: Hydrology. Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on Project site, and metered to preconstruction levels. Any floodplain impact must be documented and mitigated.

Response 1-2: The Project would not increase impervious surface area or result in an increase in stormwater runoff entering La Honda Creek at Entrada Way. Drainage improvements within the Project footprint are limited to rerouting the existing roadway storm drain that currently outlets on the north side of Entrada Way to a new outlet located south of the roadway, downstream of the culvert, thereby avoiding the existing failed slope. Under existing conditions, stormwater from the failed slope area flows through a concrete ditch, into a temporary sandbag channel, and then through an above-ground plastic drain pipe that discharges directly to La Honda Creek. The proposed improvements would replace this configuration with new storm drain inlets and a new storm drain outfall pipe, including installation of a connector pipe screen within the new inlet structure along the westbound shoulder of Entrada Way to prevent trash and debris from entering the creek. The realigned outfall has also been designed to include a rock apron with vegetated slide slopes to aid with energy dissipation to minimize erosion and avoid potential impacts to the creek.

The Project would not create or replace more than 2,500 square feet of impervious surface and therefore is not subject to post-construction stormwater treatment requirements under Provision C.3 (Regulated Projects) of the California Regional Water Quality Control Board San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP). In addition, Lotus Water conducted hydraulic modeling of existing and proposed conditions for La Honda Creek using the HEC-RAS program and determined that the proposed improvements would result in a “no-rise” condition, meaning the Proposed Project would not increase

water surface elevations during the 1-percent annual chance (100-year) flood event. Additional details are provided in the "La Honda Creek No-Rise Analysis" technical memorandum dated December 10, 2025 and included as **Appendix E** to the Project IS/MND.

Comment 1-3: Construction-Related Impacts. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (link).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Response 1-3: Project construction activities requiring the transport of materials or equipment on State roadways will comply with all applicable Caltrans requirements. State Route 84 is a designated truck route and is capable of accommodating construction-related vehicles. Construction hauling would utilize 65-foot California Legal (CA Legal), kingpin-to-rearmost-axle distance (KPRA) Advisory-compliant trucks, consistent with applicable State regulations. If additional oversized or excessive load vehicles are required for construction, the construction contractor will obtain the appropriate Caltrans transportation permits prior to use.

Traffic Control and Public Safety best management practices are identified in the Project Description under BMP GEN-18 and will be implemented during construction to minimize temporary traffic disruptions and maintain safe travel conditions on the State Transportation Network. The Proposed Project would not modify traffic circulation along SR-84 and would only involve placement of temporary construction signage along SR-84, as needed. Traffic control measures associated with construction would be limited to Entrada Way within the Project footprint. If additional coordination with Caltrans is required, the contractor will comply with applicable permit conditions or Transportation Management Plan requirements. Implementation of BMP GEN-18 and adherence to Caltrans requirements would ensure that construction traffic is appropriately managed, and no revisions to the impact analysis are necessary.

Comment 1-4: Equitable Access. If any Caltrans facilities are impacted by the project, those facilities must meet Americans with Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Response 1-4: The Project vicinity contains limited existing pedestrian infrastructure, with pedestrians forced to utilize roadway shoulders in the surrounding area. There are currently no marked bicycle lanes within the immediate Project vicinity. However, portions of Entrada Way and La Honda Road/State Route 84 are identified in applicable planning documents as potential corridors for future bikeway improvements.

The Proposed Project would not remove or modify existing pedestrian or bicycle facilities, nor would it preclude implementation of planned future bikeways. The Project does not include the addition of new sidewalk or pedestrian facilities and would not conflict with

applicable ADA accessibility standards. Construction activities would be temporary and managed in accordance with applicable traffic control and public safety measures to maintain access and minimize disruption. Therefore, the Project would not result in adverse impacts to pedestrian or bicycle circulation, and no revisions to the impact analysis are necessary.

Comment 1-5: Encroachment Permit. Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway Rights-of-Way (ROW) requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist (link)
- Caltrans Encroachment Projects Processes – Information Video (link)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (link)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

Response 1-5: The Project Applicant acknowledges that any temporary or permanent work, including traffic control activities, within, under, or over State highway right-of-way would require a Caltrans encroachment permit. Since the planned Project construction activities would encroach into State Route 84 right-of-way for the placement of construction signage, it is anticipated that Caltrans encroachment permit would be required for the Project. The construction contractor will obtain the appropriate encroachment permit from Caltrans prior to initiating such work. The County, in coordination with the chosen construction contractor, will prepare and submit complete design plans and supporting documentation consistent with Caltrans requirements for obtaining an encroachment permit.

The Applicant recognizes that permit processing timelines may vary depending on the completeness of the submittal and Project-specific considerations, including compliance with applicable standards and policies. Compliance with Caltrans encroachment permitting requirements would occur prior to construction and would ensure that any work within State right-of-way is conducted in accordance with State regulations. Therefore, no revisions to the impact analysis are required.

Comment 1-6: To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (*link*).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Response 1-6: The commenter provided a link to the Caltrans encroachment permit application and Caltrans contact information. Additionally, the commentor indicates an appreciation for the opportunity to comment and assist on the Project. No response is required.

Comment Letter 2

Response to Letter 2 – California Department of Fish and Wildlife, January 13, 2026

Comment 2-1: The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from San Mateo County Department of Public Works (County) for the Entrada Way Culvert Slip-out Bank Stabilization Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

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.

> **Response 2-1**: T he commenter acknowledges receipt of the NOA/NOI for the Proposed Project and thanks for the opportunity for Project input. No response is required.

Comment 2-2: 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.

> **Response 2-2**: The commenter clarified their role as a Trustee and Responsible Agency for fish and wildlife resources conservation, protection, and management. No response is required.

Comment 2-3: 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 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.

Response 2-3: The commenter clarified the requirements of the California Endangered Species Act and Native Plant Protection Act and their role in administrating these policies. No response is required.

Comment 2-4: Lake and Streambed Alteration. CDFW requires an 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.

Response 2-4: T he commenter clarified the requirements of Lake and Streambed Alteration Agreements and their role in administrating this policy. No response is required.

Comment 2-5: 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.

Response 2-5: The commenter clarified their obligation to protect raptors and other nesting birds from unauthorized take. No response is required.

Comment 2-6: Fully Protected Species. Fully protected species, such as San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) 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.

Response 2-6: The commenter clarified their obligation to protect fully protected species, including the San Francisco garter snake from unauthorized take. No response is required.

Comment 2-7: PROJECT DESCRIPTION SUMMARY

Proponent: San Mateo County Department of Public Works

Objective: The Proposed Project involves a biotechnical approach to stabilize and repair the left bank of La Honda Creek directly upstream (north) from Entrada Way in the unincorporated community of La Honda in San Mateo County, California. The bank failure threatens existing infrastructure, including stormwater infrastructure, the Entrada Way roadway, and overhead utility poles located at the top of the bank. The Proposed Project includes construction of an engineered log structure (cribwall) along the lower bank with vegetated soil lifts (VSLs) on the upper slopes above the cribwall. The existing culvert headwall parallel to the roadway would be extended approximately 22 linear feet (LF) toward the left bank. The Proposed Project also includes repositioning the creek thalweg to its original pre-erosional alignment away from the left bank and closer to the center of the channel in line with the culvert. Other Project activities include realignment of an associated storm drainpipe to discharge downstream of Entrada Way and minor roadway improvements.

Location: La Honda, San Mateo County, at the cross between Entrada Way and La Honda Road, and Latitude 37.318984, Longitude -122.273702.

Response 2-7: The commenter provided a brief summary of the Project details. No response is required.

Comment 2-8: 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: Bats

Section 3.4, Page 3-47

Issue: The MND states that "suitable habitat is present in the Project area for Townsend's big-eared bat," though "adequate roosting sites were not observed in the Project area" and "it is unlikely this species would be roosting in the vicinity of the Project area." A Biological Resources Report for the Project prepared by Montrose Environmental provides information that it is possible for Townsend's big-eared bat (*Corynorhinus townsendii*) to occur in the Study Area, and that the species "may forage in Study Area or roost in structures in or adjacent."

Response 2-8: The Biological Resources Report and the IS/MND prepared for the project consistently disclose that Townsend's big-eared bat (*Corynorhinus townsendii*) may occur within the Project area. As described in both documents, suitable foraging habitat is potentially present within the Project area, and it is possible that individuals could forage or temporarily roost in structures located in or adjacent to the Project area. However, habitat assessment and site surveys conducted for the Project did not identify suitable structures or roosting features typically associated with maternity or long-term roosting sites for this species within or adjacent to the Project footprint.

Both the Biological Resources Report and the IS/MND explain that Townsend's big-eared bat is highly sensitive to human disturbance, particularly at maternity and hibernation roosts, and that such breeding roosting is not anticipated within the Project area or immediate vicinity. Therefore, while occasional foraging or temporary roosting is possible, the Project area is not expected to support breeding or nursery colonies. Additionally, BMP BIO-14 (Measures to Protect Bat Colonies) is incorporated into the Project to minimize anticipated Project impacts to bats. Therefore, the IS/MND appropriately evaluates this potential impact and concludes that with implementation of the appropriate BMPs, impacts would be less than significant. No revisions to the impact analysis are required.

Comment 2-9: Specific impact, why impact would occur, and evidence impact would be significant: Townsend's big-eared bat are a California Species of Special Concern. Bats, including Townsend's big-eared bat, play an important role in Bay Area ecosystems, through pest control, pollination and seed dispersal. Recent studies estimate that bat consumption of insect pests results in more than $3 billion in agricultural production savings per year in the U.S. (USFWS 2025). Bats are known to roost under bridges, in caves and mines, on buildings, in cliff crevices, in tree foliage, bark, and hollows, and in riprap, with habitat use varying temporally and seasonally. Suitability of bat roosting habitat is dependent on temperature, protection from predators and inclement weather, and proximity to foraging sites. Habitat reduction and disruption of hibernation and maternity roosts due to human development and activity have contributed to steep population declines in California and across the globe. Many bat species are long lived, with most females birthing only one to two young per year. Due to low reproductive rates and sensitivity of breeding females to disruption, maternity colonies affected by human activities that temporarily reduce fecundity or mortality may require multiple years to recover following disturbance events (Caltrans 2019).

While no bats were observed on the biological reconnaissance survey performed by Montrose Environmental on December 4, 2024, it is possible Townsend's big-eared bats may forage in the

Project area or roost in structures within or adjacent to the Project. And while occurrence of breeding roosts in the Project vicinity is unlikely due to the proximity of the Project to roadways, riparian trees in and adjacent to the Project area could provide non-breeding roost habitat for this species. If bats are roosting in trees slated for removal, or in structures or vegetation near areas proposed for construction, eviction from roosts or excessive noise could impact this special-status species, a potentially significant impact under CEQA.

Response 2-9: As described in Response 2-8, above, the Biological Resources Report and the IS/MND prepared for the Project consistently disclose that Townsend's big-eared bat may occur within the Project area. As described in both documents, suitable foraging habitat is potentially present within the Project area, and it is possible that individuals could forage or temporarily roost in structures located in or adjacent to the Project area. However, habitat assessment and site surveys conducted for the Project did not identify suitable structures or roosting features typically associated with maternity or long-term roosting sites for this species within or adjacent to the Project footprint. The Project incorporates BMP BIO-14 (Measures to Protect Bat Colonies) into the Project Description to avoid and minimize anticipated Project impacts to bats that would forage or utilize the Project site for temporary roosting. The recommended language provided by CDFW in Comment 2-10 has been incorporated into the language of BMP BIO-14. Therefore, the IS/MND appropriately evaluates this potential impact and concludes that with implementation of the appropriate BMPs, impacts would be less than significant. No additional revisions to the impact analysis are required.

Comment 2-10: Recommendation 1: CDFW recommends Measure BIO-14 be updated to include the following details to reduce potentially significant impacts to bats to a less-than-significant level:

Recommended Bat Mitigation Measure: Pre-construction surveys for special-status and non-listed bat species shall be performed by a qualified biologist if any trees are to be removed, or underutilized or vacant buildings are to be demolished, or if any suitable habitat including buildings, trees, rock outcrops, bridges, or culverts are present within 100 feet of proposed construction. If any active maternity or hibernation roosts are identified within 100 feet of areas proposed for development, an agency-approved qualified biologist shall establish site-specific protective buffers around roosts, sized with consideration for the species that are present and the time of year bats are roosting, as well as levels of construction noise and light emission from Project activities.

If bats are identified during pre-construction surveys and are roosting in vegetation slated for removal or within structures that will be demolished, CDFW shall be consulted. Any removal of trees shall occur after a qualified biologist confirms day roosting bats are not present. Tree removal shall be phased; where selected limbs and branches not containing cavities are removed using hand equipment on the first day, with the remainder of the tree removed using chainsaws or other equipment the second day. Trees and structures supporting day roosting bats shall not be removed until the lead agency consults with CDFW and receives written confirmation that project activities may proceed.

Response 2-10: CDFW's recommended measures to avoid and minimize impacts to bats have been incorporated into the language of the Project's BMP BIO-14 (Measures to Protect Bat Colonies). The revised measure includes appropriate pre-construction survey requirements, work buffers, and avoidance procedures to address the potential presence of non-breeding roosts, consistent with CDFW guidance. Incorporation of this language ensures that potential impacts to roosting and foraging bat species would be avoided or minimized to the extent feasible, and that implementation would occur under the oversight of a qualified biologist. No additional revisions to the impact analysis are required.

Comment 2-11: Comment 2: Roadway Drainage. Section 3.4, Page 3-45 and Section 3.10, Page 3-92.

Issue: The MND describes installation of a storm drainpipe that would discharge stormwater from Entrada Way to La Honda Creek downstream of the roadway. While the Project would include Best Management Practices (BMPs) during construction to reduce the potential for erosion and hazardous material spills, as well as provisions for excluding uncured concrete from the stream, the Project has potential to cause significant impacts to salmonids and/or other aquatic life from impacts to water quality from polluted road run-off.

Response 2-11: The Project would not increase impervious surface area or result in an increase in stormwater runoff entering La Honda Creek at Entrada Way. Drainage improvements within the Project footprint are limited to rerouting the existing roadway storm drain that currently outlets on the north side of Entrada Way to a new outlet located south of the roadway, downstream of the culvert, thereby avoiding the existing failed slope. Under existing conditions, stormwater from the failed slope area flows through a concrete ditch, into a temporary sandbag channel, and then through an above-ground plastic drain pipe that discharges directly to La Honda Creek, north of Entrada Way. The proposed improvements would replace this configuration with new storm drain inlets and a new storm drain outfall pipe, including installation of a connector pipe screen within the new inlet structure along the westbound shoulder of Entrada Way to prevent trash and debris from entering the creek. The realigned outfall has also been designed to include a rock apron with vegetated slide slopes to aid with energy dissipation to minimize erosion and avoid potential impacts to the creek. The Project would not create or replace more than 2,500 square feet of impervious surface and therefore is not subject to post-construction stormwater treatment requirements under Provision C.3 (Regulated Projects) of the County's MRP. Although not required by the MRP, the Project does provide added water quality treatment measures through the inclusion of a connector pipe screen within the large drain inlet structure.

Although not specifically related to the scope of the Project and associated CEQA analysis, the County has a robust stormwater pollution prevention program in compliance with the MRP. County stormwater pollution prevention measures are specifically aligned to MRP Provisions such as: C.2 Municipal Operations (e.g., Municipal Maintenance BMPs, Corporation Yard inspections and BMPs, street sweeping along Entrada Way once per month - https://www.smcgov.org/publicworks/street-sweeping-maps-and-schedules); C.3 New and Redevelopment Controls, C.6 Construction Site Controls, C.7 Public Information and Outreach. C.18 - Control of Sediment Discharges. For more information on the

Countywide Pollution Prevention Program, please visit - SMCWPPP - https://flowstobay.org/, Sustainability Department webpage - Keeping Our Waterways Clean - Sustainability Department - San Mateo County , and County stormwater ordinance - Stormwater-Pollution-Prevention-Ordinance-No.-4913_20251104.pdf.

Comment 2-12: Specific impact, why impact would occur, and evidence impact would be significant: La Honda Creek may provide suitable habitat for Coho salmon (*Oncorhynchus kisutch*) – central California coast Evolutionarily Significant Units (ESU), an endangered species under the California Endangered Species Act (CESA). Though no Coho salmon were observed during surveys conducted between 1950 to 1997, La Honda Creek is designated critical habitat for Coho salmon, and ongoing stream restoration efforts in the watershed may aid this species' recovery. Steelhead (*Oncorhynchus mykiss*) – central California coast ESU, listed as threatened under the federal Endangered Species Act (ESA), are known to occur in La Honda Creek, which is designated critical steelhead habitat and is one of the principal steelhead creeks in the County.

Recent studies out of the Pacific Northwest have described significant mortality (92 percent - 100 percent mortality) of juvenile and adult Coho salmon when exposed to roadway runoff, even when runoff was diluted by as much as 95 percent clean water (French et al. 2022). Steelhead trout juvenile and adult mortality occurs at intermediate levels (4 percent - 42 percent mortality) when trout are exposed to undiluted roadway runoff. Severe urban runoff mortality syndrome in salmonids is primarily caused by exposure to the chemical 6PPD-quinone, which is derived from vehicle tires and therefore ubiquitous in roadway runoff. Urban runoff mortality syndrome is characterized by progression of behavioral symptoms in affected fish, including circular surface swimming and gaping, a loss of equilibrium, immobility and ultimately death (Scholtz et al. 2011, Chow et al. 2019). Stormwater-driven die-offs pose a significant threat to near-term and long-term efforts to conserve wild salmonid populations.

The MND states that "the Proposed Project would not impact water quality over the long-term" (page 3-94), though the Project describes installation of roadway stormwater conveyance structures, including a new asphalt dike along the north side of the roadway adjacent to the creek bank stabilization measures, a 12-inch drop inlet into a 24-inch HDPE pipe underneath the roadway, and a new outfall with a crushed rock and larger boulder stone apron on the south side of the roadway. The apparatus would convey stormwater directly from the roadway into La Honda Creek, without applying any methods to filter runoff of roadway pollutants before stormwater enters the creek.

Though untreated roadway runoff is generally lethal to salmonids, acute mortality is diminished if not eliminated when runoff is filtered through bioretention soil media (McIntyre et al. 2015). Bioretention involves the use of shallow landscaped depressions integrated into sites at small scales, are designed to mimic the soil structure and vegetation of native habitat, and promote the infiltration, storage, filtration, and slow release of stormwater flows (Washington Department of Ecology, 2024). Bioretention is a relatively inexpensive, readily transferable green infrastructure approach to treating polluted runoff, and proves effective in reducing severe urban runoff mortality syndrome in salmonids (McIntyre et al. 2023).

Steelhead trout and Coho salmon 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 steelhead or coho are injured or

killed, or the quality of their habitat diminished 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).

Response 2-12: As described in Responses 2-11, the Project would not change the existing stormwater drainage area, increase impervious surface area, or alter peak flow rates or runoff volumes entering La Honda Creek. The proposed drainage improvements are limited to rerouting an existing roadway outfall to address slope instability and improve long-term infrastructure function. The Project does not introduce new sources of roadway runoff, expand the contributing drainage area, or increase the volume or pollutant load of stormwater discharged to the creek. Accordingly, the Project would not result in measurable negative changes to water quality conditions in La Honda Creek and would not create new or intensified impacts to aquatic habitat or special-status fish species, including Central California Coast steelhead (*Oncorhynchus mykiss*) or Central California Coast coho salmon (*Oncorhynchus kisutch*). Implementation of the Project is actually anticipated to result in improvements to water quality by providing outlet energy dissipation, thereby reducing sediment/erosion and reduction in trash/debris loading via the connector pipe screen. Additionally, although not specifically related to the scope of this project and associated CEQA analysis, the County has a robust stormwater pollution prevention program in compliance with the MRP. County stormwater pollution prevention measures are specifically aligned to MRP Provisions such as: C.2 Municipal Operations (e.g., Municipal Maintenance BMPs, Corporation Yard inspections and BMPs, street sweeping along Entrada Way once per month - https://www.smcgov.org/publicworks/street-sweeping-maps-and-schedules); C.3 New and Redevelopment Controls, C.6 Construction Site Controls, C.7 Public Information and Outreach. C.18 - Control of Sediment Discharges. For more information on the Countywide Pollution Prevention Program, please visit - SMCWPPP - https://flowstobay.org/, Sustainability Department webpage - Keeping Our Waterways Clean - Sustainability Department - San Mateo County , and County stormwater ordinance - Stormwater-Pollution-Prevention-Ordinance-No.-4913_20251104.pdf.

The comment references studies documenting acute salmonid mortality associated with untreated roadway runoff. While the cited research highlights potential risks in urbanized watersheds where new or increased roadway runoff is introduced, the Project does not increase roadway surface area or stormwater discharge. Additionally, the Project area is not considered an urbanized area, and rather is zoned for Low Density Residential and Neighborhood Commercial uses, with portions of La Honda Creek downstream of the Project area being designated for Open Space and Park uses. The proposed improvements maintain existing hydrologic conditions, and therefore, do not exacerbate exposure of aquatic species to roadway-derived pollutants. In addition, the Project incorporates multiple BMPs designed to avoid and minimize both direct and indirect impacts to fish species and aquatic habitat. These include implementation of construction-phase erosion and sediment control BMPs, turbidity controls, biological monitoring, protective buffers, timing restrictions, and installation of a trash and debris screen within the new drainage structure to prevent trash and debris from entering the creek. A list of the applicable BMPs identified to avoid direct or indirect impacts to fish species and aquatic habitats, includes:

- BMP BIO-1 (Environmental Awareness Training);
- BIO-2 (Minimize Injury or Mortality of Fish and Amphibian Species during Dewatering);
- BIO-19 (Restore Channel Features);
- BMP GEN-1 (Staging and Access);
- BMP GEN-2 (Minimize the Area of Disturbance and Site Maintenance);
- BMP GEN-5 (Non-Hazardous Materials);
- BMP GEN-6: (Hazardous Materials Storage/Disposal);
- BMP GEN-7 (Spill Prevention and Control);
- BMP GEN-22 (Site Stabilization); and
- BMP EC-10 (Erosion Control Blankets & Mats), as mentioned above.

Importantly, the Project is anticipated to provide an overall benefit to aquatic habitat conditions. The incorporation of bioengineered slope stabilization, channel realignment to address the existing failed slope, and revegetation with native riparian species would enhance bank stability, reduce the potential for future sediment inputs, and improve long-term channel function. Stabilization of the currently unstable slope is expected to reduce chronic sediment delivery to La Honda Creek, which benefits aquatic habitat quality for salmonids and other aquatic species. These improvements represent a net enhancement of in-channel conditions compared to existing conditions.

Because the Project does not change the existing stormwater drainage area or water quality conditions, incorporates comprehensive avoidance and minimization BMPs, and is expected to improve long-term aquatic habitat quality, the IS/MND appropriately concludes that impacts to water quality and special-status fish species would be less than significant. The Project would not result in a substantial reduction in the number or range of steelhead or coho salmon, and no revisions to the document are required.

Comment 2-13: Recommendation 2: CDFW recommends the MND include additional analysis on the potential impacts of road runoff and the Project's stormwater discharge on stream health. CDFW also recommends the MND include the following mitigation measure to reduce potentially significant impacts to Coho salmon and steelhead to less-than-significant levels:

Recommended Roadway Drainage Measure: The Project shall not allow unfiltered runoff from roadways to enter any salmonid-bearing streams. The Project shall incorporate methods to slow, spread, and sink road runoff prior to discharging into any streams. Runoff treatment may include constructing bioretention basins of sufficient size for the drainage catchment area and may be created using a drainage layer of gravel aggregate overlain by local bioretention soil media comprised of sand and compost, topped with mulched bark, and planted with native perennial and herbaceous flowering plants, shrubs, and/or trees. The Project shall monitor the effectiveness of the selected runoff treatment method and shall establish success criteria and incorporate monitoring timelines.

Response 2-13: The Project Applicant considered the feasibility of incorporating additional roadway runoff treatment features, including bioretention basins, as part of the drainage improvements. However, bioretention facilities of sufficient size to effectively treat stormwater from the contributing drainage area are not feasible within the constrained Project footprint due to topography, limited available right-of-way, proximity to La Honda Creek, and the need to avoid additional ground disturbance in environmentally sensitive areas. Installation of appropriately sized basins would require expansion beyond the existing disturbed roadway prism, potentially resulting in greater biological and riparian impacts than the proposed improvements.

Additionally, as described in Responses 2-11 and 2-12, the Project would not increase impervious surface area, alter peak flows, or change the volume or characteristics of stormwater discharges entering La Honda Creek. Under the MRP, the County enforces the inclusion of source control and low intensity development (LID) measures in new and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows. The Proposed Project is not adding any impervious surface and is replacing less than 2,500 sf of pavement, so it is not required to treat the runoff from these altered impervious surfaced under the MRP requirements. The drainage improvements included in the Proposed Project are limited to rerouting an existing outfall to address slope instability, and the proposed drainage facilities would incorporate trash and debris screening, add outfall energy dissipation, and would not introduce new untreated runoff to the creek. As such, the Project would not change existing water quality conditions or associated impacts to aquatic resources or special-status species. Construction-phase best management practices will be implemented to prevent temporary pollutant discharge during construction. Because the Project maintains existing runoff conditions and does not increase stormwater-related impacts, the findings presented in the IS/MND remain appropriate, and no revisions to the document are required per MRP Provision C.3 requirements and thresholds. As described in detail above in Response 2-12, the County has a robust pollution reduction program that is specifically designed to comply with MRP requirements.

Comment 2-14: Environmental Setting 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 USFWS?

COMMENT 3: Baseline Conditions and Potential Cumulative Impacts

Issue: The Project aims to correct streambank erosion upstream of a culvert under Entrada Way by constructing a log crib-wall and VSLs along the eroding streambank. CDFW appreciates that the Project proposes a bio-technical design which will avoid or minimize use of hard-scape materials such as boulders or concrete. However, work will require La Honda Creek to be temporarily dewatered and diverted to allow operation of heavy equipment on the creek bed and banks. An existing culvert at the Project location may be contributing to streambank erosion via channel constriction, resulting in changes to natural stream processes such as partially obstructed streamflow, sediment deposition at the inlet, and movement of the channel thalweg toward the left bank.

Although the MND includes avoidance and minimization measures to reduce the impacts of work activities, the MND does not disclose if the culvert is contributing to streambank erosion or if recurring channel re-alignment work will be needed. The description of the environmental setting establishing baseline physical conditions at the Project site is therefore insufficient because it does not consider existing geological and hydrological conditions related to the existing culvert, nor does it provide analysis of the Project's potentially significant impacts on the environment due to cumulative impacts that may occur if repeat disturbance is required.

Response 2-14: The County recognizes that the existing culvert contributes to localized channel behavior; however, replacement or modification of the culvert is outside the scope of the proposed bank stabilization Project. The Project's work related to the culvert is limited to extending the existing headwall toward the left bank to prevent further slope erosion and protect Entrada Way, and realigning the creek thalweg closer to its pre-erosional position near the center of the channel in alignment with the culvert. The Project does not alter the culvert structure itself or change its long-term hydraulic function as those were not specified objectives of the Proposed Project. The specific objective of the Proposed Project is to stabilize the left streambank, protect critical infrastructure, improve water quality, and enhance riparian habitat.

Hydraulic modeling and no-rise analysis prepared for the Project demonstrate that the proposed creek realignment and grading would not worsen existing hydrologic conditions. The analysis indicates a slight improvement in hydraulic conveyance, including a marginal lowering of modeled water surface elevations during the 1-percent annual chance flood event. The implementation of the Project elements would not increase peak flows, modify watershed-scale hydrology, or create new downstream erosive forces.

The bioengineered slope stabilization design, including log crib-wall construction, vegetated soil lifts (VSLs), channel realignment, and native revegetation, is intended to provide long-term bank stability and reduce chronic sediment inputs to La Honda Creek. As such, recurring channel realignment is not anticipated, and the Project is expected to improve existing geomorphic and hydrologic conditions rather than contribute to cumulative impacts. Temporary dewatering and diversion during construction will be short-term and subject to comprehensive avoidance and minimization measures identified in the IS/MND, including biological monitoring, erosion control BMPs, turbidity management, and habitat protection measures.

Because the Project does not intensify existing hydrologic constraints, does not modify the culvert's structural function, and is designed to stabilize and improve channel conditions, the IS/MND appropriately characterizes baseline conditions and concludes that impacts, including cumulative impacts, to special-status species and aquatic habitat would be less than significant. No revisions to the document are required.

Comment 2-15: Specific impact, why impact would occur, and evidence impact would be significant:

CEQA Guidelines section 15130 describes cumulative impacts as impacts that are created as a result of the combination of the project with other projects causing related impacts, and discussion should be guided by practicable and reasonable standards. Adequate discussion of cumulative impacts should include a list of past, present, and probable future projects producing related or cumulative impacts, a summary of expected environmental effects to be produced by those projects, and a reasonable analysis of the cumulative impacts of the relevant projects, along with feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Per CEQA Guidelines section 15063 (a)(d), the lead agency shall conduct an initial study to determine if a project may have a significant effect on the environment, and the initial study shall contain an identification of the environmental setting. CEQA Guidelines section 15125 (a) identifies the environmental setting as baseline physical conditions by which a lead agency determines whether an impact is significant, the purpose of which is to give the public and decision makers the most accurate and understandable picture practically possible of the Project's likely near-term and long-term impacts.

Response 2-15: As discussed in Response 2-14, as part of the design process, a detailed existing conditions and geomorphic assessment, hydraulic modeling and no-rise analysis were prepared for the Project and demonstrate that the proposed creek realignment and grading would not worsen existing hydrologic conditions. In addition, the IS/MND does include a list of past, present, and probable future projects producing related or cumulative impacts related to those discussed for the Proposed Project. The Proposed Project does not modify watershed-scale drainage patterns, increase impervious surface area, alter peak flows, or change the long-term hydraulic function of the existing culvert at Entrada Way. Rather, it is limited to localized bank stabilization, minor channel realignment to its pre-erosional position, and extension of the existing headwall to protect Entrada Way. Hydraulic modeling and no-rise analysis confirm that the Project would not worsen existing hydrologic conditions and would result in a slight improvement in conveyance within the Project reach.

With respect to cumulative impacts under CEQA Guidelines section 15130, the IS/MND appropriately evaluates the Project's incremental contribution in the context of existing environmental conditions. Because the Project does not intensify existing drainage constraints, increase runoff, or degrade water quality, it does not combine with other past, present, or reasonably foreseeable future projects to create cumulatively considerable hydrologic or aquatic resource impacts. To the contrary, the bioengineered slope stabilization, channel realignment, and native revegetation components are intended to reduce ongoing erosion and chronic sediment inputs, thereby improving overall channel stability and aquatic habitat conditions relative to the existing baseline. Recurring channel realignment is not anticipated as a result of Project implementation, and therefore, is not considered cumulatively considerable.

Therefore, the environmental setting described in the IS/MND provides a sufficient and accurate baseline for evaluating potential impacts consistent with CEQA Guidelines sections 15063 and 15125. Given that the Project maintains or results in a slight decrease in water

surface elevation compared to existing hydrologic conditions, and incorporates avoidance and minimization measures during construction, the IS/MND appropriately concludes that impacts, including cumulative impacts, would be less than significant. No revisions to the document are required.

Comment 2-16: Recommendation 3: CDFW recommends the MND include a more complete description of the Project's environmental setting, which should address the baseline hydrological and geologic conditions that have contributed to streambank erosion at the Project site. Consideration of the effects of the culvert on streamflow should be included when establishing baseline conditions.

Once baseline environmental conditions are adequately described in the MND, the County should identify whether there exists reasonably foreseeable potential for future streambank modifications at the Project location and discuss the cumulative impacts of the Project and potential future projects. The discussion of cumulative impacts should include feasible options for mitigating or avoiding the Project's contribution to any significant cumulative impacts on habitat quality and quantity in the stream. The MND should describe possible project alternatives which may address the root cause of streambank erosion at the Project site and which could preclude the need for future modifications to the stream bed, banks or channel. Alternatives to address the issue of streambank erosion upstream of the culvert may include upsizing the existing culvert or replacing it with a free span bridge.

The CDFW Fisheries Restoration Grant Program (FRGP)

(https://wildlife.ca.gov/Grants/FRGP) funds a wide range of projects that focus on, or lead to, restoring, enhancing, or protecting salmonid habitat in anadromous watersheds of California. The County may consider contacting the FRGP to determine if funding for any of the Project alternatives identified in the MND is available.

Response 2-16: As discussed in Responses 2-14 and 2-15, as part of the design process, a detailed existing conditions and geomorphic assessment, hydraulic modeling and no-rise analysis were prepared for the Project and demonstrate that the proposed creek realignment and grading would not worsen existing hydrologic conditions. The County recognizes that the culvert functions as a localized hydraulic constriction and has influenced channel behavior; however, replacement or upsizing of the culvert, or conversion to a free-span bridge, is outside the scope and objectives of the proposed bank stabilization Project. The Project is specifically intended to address the immediate risk posed by the actively eroding streambank threatening the roadway and does not modify the culvert's structural configuration or long-term hydraulic function.

Hydraulic modeling and no-rise analysis confirm that the Project would not worsen existing hydrologic conditions and would result in a slight improvement in hydraulic conveyance within the Project reach. The Project does not increase impervious surface area, alter watershed-scale drainage patterns, or intensify existing runoff conditions. As described in Response 2-15, recurring channel realignment is not anticipated, and the bioengineered slope stabilization, channel realignment to a more stable configuration, and native revegetation are intended to provide long-term bank stability and reduce chronic sediment inputs to La Honda Creek. Accordingly, the Project would improve upon existing conditions

rather than contribute to cumulatively considerable impacts on aquatic habitat.

With respect to cumulative impacts and alternatives, the IS/MND appropriately evaluates the Project's incremental contribution in the context of existing site conditions. Because the Project maintains or modestly improves hydrologic and geomorphic conditions, as identified in the no-rise analysis prepared for the Project, and incorporates avoidance and minimization measures, it would not combine with other reasonably foreseeable projects to result in significant cumulative impacts. While larger-scale structural modifications to the culvert could be considered as part of a separate future capital improvement effort, such actions are independent of the Proposed Project and are not required to avoid or reduce impacts associated with the bank stabilization work. The IS/MND therefore provides an adequate baseline description and cumulative impact analysis consistent with CEQA Guidelines sections 15063, 15125, and 15130. No revisions to the document are required.

Comment 2-17: 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 (CNDDB). The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

Response 2-17: The Project Applicant acknowledges the requirement under Public Resources Code Section 21003(e) regarding incorporation of environmental information into appropriate databases. Any special-status species or sensitive natural communities detected during pre-construction surveys or during construction monitoring will be reported to the California Natural Diversity Database (CNDDB) in accordance with CDFW submission guidelines. Submittals will be completed using the CNDDB online field survey form and will include the applicable information identified by CDFW. No revisions to the impact analysis are required.

Comment 2-18: 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; or Wesley Stokes, Senior Environmental Scientist (Supervisory), at Wesley.Stokes@wildlife.ca.gov.

Response 2-18: The commenter provided a summary of environmental data submittal and document filing fee requirements. Additionally, the commentor indicates an appreciation for the opportunity to comment and assist on the Project. No response is required.

Comment Letter 3

Response to Letter 3 – Carrie Ferguson & Kevin Pinger, January 30, 2026

Comment 3-1: Honorable Members of the San Mateo County Board of Supervisors, I submit this letter for your consideration regarding the Initial Study / Mitigated Negative Declaration (IS/MND) for the County of San Mateo Public Works Department's proposed Entrada Way Culvert Slip-Out Bank Stabilization Project. I respectfully urge the Board to reject adoption of the IS/MND and to not approve the project as currently proposed.

While I acknowledge the need to address the existing bank failure and protect public infrastructure, the proposed solution is far more damaging than necessary, relies on an undersized culvert system, misrepresents property ownership, evaluates an overly disruptive solution, does not adequately analyze feasible less damaging alternatives and fails to account for foreseeable climate-driven flood risks, contrary to the requirements of the California Environmental Quality Act (CEQA).

Response 3-1: The County appreciates the commenter's review of the IS/MND and their acknowledgment of the need to address the existing bank failure and protect public infrastructure. The County respectfully disagrees with the assertion that the IS/MND is inadequate or that the Proposed Project is more damaging than necessary.

As described in the IS/MND, the Project and its objectives are narrowly tailored to stabilize the actively failing streambank threatening Entrada Way and to protect public safety and infrastructure along the roadway. The proposed bioengineered design was specifically selected to minimize environmental impacts by avoiding extensive hardscape treatments and instead incorporating log crib-wall construction, vegetated soil lifts, channel realignment to a more stable configuration, and native revegetation. The Project does not modify the existing culvert structure or expand roadway infrastructure and does not increase impervious surface area, peak flows, or stormwater runoff volumes.

The IS/MND provides an adequate description of baseline environmental conditions for the Project site as required under CEQA and evaluates potential impacts consistent with CEQA Guidelines sections 15063 and 15125. As discussed in Responses 2-14 through 2-16, the no-rise analysis hydraulic modeling confirms that the Project would not worsen existing hydraulic conditions and would result in a slight improvement in hydraulic channel conveyance within the Project reach. Replacement or upsizing of the culvert, or conversion to a bridge structure, would constitute a separate capital improvement project with a substantially larger footprint, cost, and environmental disturbance, and is outside the scope and objectives of the proposed bank stabilization Project.

The IS/MND also evaluates cumulative impacts consistent with CEQA Guidelines section 15130 and concludes that the Project would not result in cumulatively considerable impacts. The stabilization measures are intended to reduce ongoing erosion and sediment delivery to La Honda Creek, thereby improving channel stability relative to existing conditions. With respect to climate considerations, the hydraulic analysis incorporates the 1-percent annual chance flood event, and the no-rise analysis demonstrates that the Project would not increase flood elevations within the Project area.

Based on the analysis presented in the IS/MND and supporting technical and engineering studies prepared for the Project, the County has determined that the Project would not result in significant environmental impacts with implementation of identified avoidance and minimization measures. Therefore, the IS/MND is considered to provide an adequate and legally sufficient basis for Project approval.

Comment 3-2: A "Temporary" Project With Permanent Consequences. An interim solution would only temporarily alter hydrology but would permanently remove mature riparian habitat and permanently convert private, deeded property rights to public use. These outcomes are irreversible. A project with permanent physical and legal consequences cannot reasonably be treated as temporary. This mischaracterization undermines the validity of the environmental review presented to the Board. The IS/MND therefore fails to accurately describe the true scope of the project.

Response 3-2: The IS/MND does not describe the Project as temporary in nature; rather, the purpose of the Project is to implement a permanent bank stabilization improvement intended to address an active erosion hazard threatening Entrada Way and public safety. The environmental analysis accurately reflects the scope and long-term physical characteristics of the Project.

The Project would not alter watershed-scale hydrology or change stormwater drainage areas within La Honda Creek. While the Project would result in localized hydraulic adjustments at the stabilization site, the no-rise analysis hydraulic modeling demonstrates that these effects are modest, including a slight reduction in water velocities and water surface elevations within the Project reach. The channel realignment would direct flow more consistently with historic conditions and aligns the thalweg more centrally with the culvert, thereby reducing ongoing erosive forces acting on the failing bank. These improvements are intended to stabilize the channel and reduce chronic sediment inputs, and would not worsen existing hydrologic conditions and would result in a slight improvement in hydraulic channel conveyance within the Project reach.

With respect to riparian habitat, the IS/MND discloses and evaluates vegetation removal required to implement the stabilization measures and includes revegetation requirements to restore disturbed areas with native riparian species. The Project incorporates a bioengineered design specifically selected to minimize permanent habitat conversion and avoid extensive hardscape treatments. Over the long term, revegetation and improved bank stability are expected to enhance riparian function relative to existing eroding conditions.

Regarding property ownership, a detailed response is provided under Response 3-3; however, the IS/MND evaluates the physical environmental effects of the Project as required under CEQA. Property rights and legal interests are not environmental impacts under CEQA unless they result in a physical change to the environment. The environmental document accurately describes the physical footprint and improvements associated with the Project.

Because the Project does not permanently worsen hydrology, does not result in unmitigated loss of riparian habitat, and implements project elements in accordance with the limitations

of the Project's objectives, the IS/MND provides an accurate and adequate description of the Project and its environmental effects. No revisions to the document are required.

Comment 3-3: Misrepresentation of Property Ownership and Existing Conditions. The Proposed project relies on a 100-year-old boundary survey commissioned by Cuesta La Honda Guild. No boundary survey of the site has been conducted by the County. Our deed, as surveyed, recorded, and approved by the County, naturally extends to the centerline of La Honda Creek. Despite this documented fact, the County's project materials and public presentations misrepresent the west bank of the creek as belonging to the Cuesta La Honda Guild as "Lot 100" APN 083-051-150. This is incorrect. Logically, lots on either side of the creek extend to the centerline of the creek, wherever that may lie.

By inaccurately identifying land ownership, the IS/MND fails to establish an accurate baseline for environmental and property impact analysis. This misrepresentation obscures the fact that the Proposed Project would permanently disturb and appropriate privately owned land. CEQA requires an accurate description of existing conditions, including property boundaries, in order for decision-makers to understand the true scope and consequences of a proposed action. The Board should not rely on an environmental document that contains fundamental factual errors regarding land ownership.

Figure 1: (2025) From County's presentation "Entada Way Slip-Out" (Herrera). Project publicly and grossly misrepresents the impact to the Pinger land depicting lands west of the La Honda Creek, upstream of the culvert, as belonging to the Guild (Cuesta La Honda Guild). Pinger land as deeded extends to the centerline of the creek.

Response 3-3: The image referenced in this comment comes from an informational presentation conducted by the County for property owners in September 2025. The County has become aware of conflicting claims regarding the ownership of lands in and around the La Honda Creek. The CEQA documentation does not make any statements regarding private property ownership. The IS/MND evaluates the physical environmental effects of the engineering and construction requirements for the Project, as required under CEQA. Property rights and legal interests are not environmental impacts under CEQA unless they result in a physical change to the environment. The environmental document accurately describes the physical footprint and improvements associated with the Project.

Comment 3-4: Culvert Capacity Is Inadequate Under Existing Conditions and Foreseeably Worsened by Climate Change. The existing culvert at Entrada Way functions as a hydraulic constriction in the creek system. During high-flow events, culverts of this type and size inherently limit conveyance capacity, increase upstream water surface elevations, and concentrate erosive forces at the inlet and outlet. These hydraulic conditions directly contribute to bank instability and failure, which is already occurring at this site.

CEQA requires agencies to evaluate a project's impacts in light of reasonably foreseeable future conditions, including climate change. More frequent and intense storm events, higher peak flows, and longer-duration rainfall events are no longer speculative and are specifically identified in CEQA guidance as factors that must be considered when evaluating flood risk, infrastructure performance, and environmental impacts.

The IS/MND fails to demonstrate that the existing culvert has sufficient capacity to safely

convey future peak flows under projected climate conditions. Instead, the Proposed Project attempts to harden and redirect the creek while leaving the hydraulic bottleneck in place. This approach treats the visible failure rather than the underlying cause and increases the likelihood of continued flooding, debris accumulation, overtopping, and future structural failure.

Approving a stabilization project that assumes historical hydrologic conditions, while ignoring foreseeable increases in flood intensity, does not satisfy CEQA's requirement for a reasoned analysis based on substantial evidence.

Figure 2: (2025) From County's public presentation "Entada Way Slip-Out" (Herrera).

Photo 1: (2014) Upstream Entrada Way culvert. East bank intact with storm run off at culvert wall.

Photo 2: (2016) Upstream Entrada Way culvert. Further east bank storm runoff erosion but culvert wall still intact.

Photo 3: Upstream view of Entrada Way culvert (2017) demonstrating culvert-induced hydraulic constriction and backwater during storm events, a primary driver of bank saturation, erosion, and slip-out conditions.

Response 3-4: The County acknowledges the commenter's concerns regarding culvert capacity and climate-related hydrologic change; however, the Proposed Project and its objectives are not intended to address or modify the capacity of the existing culvert at Entrada Way. As explained in Response 3-1, the Project is narrowly focused on stabilizing the failed roadway embankment and reducing ongoing bank erosion that threatens public infrastructure.

Hydraulic modeling and no-rise analysis prepared for the Project demonstrate that the proposed improvements would not increase upstream water surface elevations or exacerbate flood conditions. To the contrary, the modeling shows a slight reduction in modeled water surface elevations within the Project reach during the 1-percent annual chance (100-year) flood event. The channel realignment and grading align the thalweg more centrally with the culvert opening, improving flow alignment and reducing localized erosive forces acting on the left bank. In addition, extension of the culvert headwall provides structural protection to the roadway embankment, reducing the likelihood of future failure at this location. The Project does not alter the culvert's structural dimensions, invert elevation, or conveyance characteristics that would reduce existing hydraulic capacity.

With respect to climate change considerations, the hydraulic analysis incorporates the 1-percent annual chance flood event, which represents an extreme design condition commonly used in evaluating infrastructure performance and flood risk under CEQA. The Project does not assume lower historical hydrology, nor rely on outdated baseline conditions. Because the Project does not increase impervious surface area, alter watershed-scale drainage patterns, worsen existing hydrologic conditions associated with the existing culvert, or intensify runoff conditions, it does not introduce additional hydrologic stress to the creek system under existing or foreseeable future storm conditions.

The assertion that the Project would increase the likelihood of flooding, debris accumulation, overtopping, or structural failure is not supported by the technical analysis. The Project does not harden or constrict the channel beyond existing conditions; rather, it stabilizes an actively eroding bank using bioengineered techniques and improves flow alignment within the existing hydraulic framework. Replacement or upsizing of the culvert would constitute a separate capital improvement project with a substantially larger footprint and environmental review, and is outside the scope and purpose of the current stabilization effort.

Accordingly, the IS/MND provides a reasoned analysis supported by substantial evidence demonstrating that the Project would not worsen existing hydraulic constraints or flood risk, and no revisions to the document are required.

Comment 3-5: Permanent Taking of Private Property Through Creek Relocation. The County proposes to relocate the creek channel approximately 30 feet to the west, outside the creek's historical alignment. This relocation would permanently convert private land to public use through condemnation. The natural course of the creek is and historically has been to the east on both sides of the culvert. Forcing the creek west introduces new impacts without resolving the fundamental capacity constraint caused by the culvert.

Photo 4: (2026) Aerial view of the Entrada Way culvert and La Honda Creek (blue line) depicts the channel lies east both upstream and downstream of the culvert. Red circle depicts west (right) bank of creek riparian trees on private land proposed for removal by the County.

Response 3-5: The County respectfully disagrees with the assertion that the Project would relocate La Honda Creek outside of its historical alignment. An Existing Conditions and Geomorphic Assessment was conducted as part of the Project's design process and the historic survey data and geomorphic records included in these reports indicated that the creek historically flowed further west and was originally aligned with the Entrada Way culvert when constructed. The proposed channel realignment is intended to restore the creek's historic centerline alignment with the culvert, reduce erosive forces acting on the roadway prism, and slightly improve and/or not worsen hydraulic conveyance within the Project area. The Project would not create a new channel outside its natural course.

The comment does not provide technical evidence contradicting the historical or hydraulic discussions included in the IS/MND. While impacts to private property are unavoidable to achieve the Proposed Project objectives, the environmental document accurately describes the Project footprint and associated impacts. No new environmental information has been presented that would alter the conclusions of the analysis. Accordingly, no revisions to the IS/MND are required.

Comment 3-6: Failure to Analyze Feasible, Capacity-Appropriate Alternatives. A feasible, commonly used, and engineering-standard alternative exists that would directly address the County's stated infrastructure concerns without relocating the creek or disturbing private land on the west side. Construction of a winged wall or abutment-style stabilization on the east side of the creek—similar to winged walls used at bridges throughout this area—is a well-established method for stabilizing roadway embankments and protecting utilities.

Such a structure could be constructed exclusively from the east bank of La Honda Creek and within or immediately adjacent to the existing roadway footprint. Properly designed, it would stabilize the slip-out, protect stormwater facilities, roadway edges, and overhead utilities, and safely convey flows through the existing natural channel alignment. This type of stabilization can function as an effective emergency measure while a long-term bridge replacement project is designed and permitted.

Importantly, this approach would:

- Address the County's stated safety concerns,
- Avoid creek relocation,
- Avoid permanent conversion of private land,
- Minimize riparian habitat removal,
- Reduce in-channel construction impacts, and
- Preserve future options for a properly aligned bridge.

For a long-term solution, a bridge or open-span structure aligned with the natural creek channel would eliminate the culvert bottleneck, increase hydraulic capacity, reduce flood risk under future storm conditions, and provide greater resilience under climate change. The Director of Public Works has acknowledged that a bridge is ultimately needed. The IS/MND does not meaningfully analyze this or similar less damaging or capacity-appropriate alternatives, which represents a fundamental CEQA deficiency.

Response 3-6: To determine a preferred alternative to advance to final design and construction, the County first conducted an existing conditions study and an alternatives development and analysis. Two of the alternatives considered, Alternative 3a and 3b, were a version of the commenter's aforementioned extended wingwall or abutment-style stabilization proposal.

Alternative 3a proposed construction of a retaining wall along Entrada Way with no additional instream or bank slope stabilization work. The retaining wall would extend vertically from bedrock to the top of bank and horizontally 22 feet along Entrada Way as an extension to the existing culvert headwall to reinforce the road embankment.

Alternative 3b proposed construction of a secant-style retaining wall along Entrada Way and the left (east) bank with no additional instream grading work. The retaining wall would extend vertically from bedrock to the top of bank, and the length extends 22 feet along Entrada Way and another 80 feet along the left (east) bank.

All alternatives were compared using evaluation criteria in a matrix form under three Project performance categories: habitat and geomorphic performance, impacts and risks to infrastructure, and Project implementation complexities and cost. Alternative 3a and 3b scored the lowest in every category. For the first category both alternatives would allow continued erosion of the left (east) bank and degradation of instream habitat quality. In the second category, although these alternatives would buy some time and stabilize the roadway embankment, they do not address the instability of La Honda Creek upstream of

Entrada Way, which would continue to put utilities and infrastructure at risk. In fact, these alternatives would exacerbate La Honda Creek geomorphic instabilities because they would do nothing to address the overall creek alignment while actually encouraging flow to continue channel migration to the left (east) bank through increased hydraulic smoothness. In the third category, the alternatives have high impacts, construction complexity, and mitigation requirements coupled with their low service life (due to Alternative 3a not addressing left (east) bank channel migration and erosion and Alternative 3b decreasing hydraulic roughness thereby encouraging flow to attack the wall). Additionally, it would be difficult to attain the appropriate permits and resulting mitigation requirements would be high.

The chosen Project alternative was selected as a result of the alternatives analysis as it was the only option that addressed all Project goals. The goal of the Project is not to replace the existing culvert. While the County is evaluating replacement of the culvert with a bridge in the future this alternative was eliminated early in the design development process as a bridge will require significant additional time to design and fund. The Proposed Project is required to prevent culvert and roadway failure which is an imminent threat that could impact the life safety of hundreds of residents that rely on this road as their only emergency access route. No new environmental information has been presented that would alter the conclusions of the environmental document. Accordingly, no revisions to the IS/MND are required.

Comment 3-7: Increased Flood Risk From Proposed Engineered Log Structure. The Proposed Project relies on an engineered log structure crib wall located upstream of an already constrained culvert. Placement of large woody material at the inlet increases the risk of debris accumulation and blockage during high-flow events. Under climate-driven increases in storm intensity, this design foreseeably elevates upstream flood risk and exacerbates bank instability. These risks are not adequately analyzed in the IS/MND.

Photo 5: Upstream view of Entrada Way culvert (2017) debris and log damming at the culvert.

Photo 6: Upstream view of Entrada Way culvert (2017) debris and log damming at the culvert.

Response 3-7: The County respectfully disagrees that the engineered log crib wall would increase flood risk or debris blockage at the culvert. As discussed in Responses 2-14 and 3-4, no-rise documentation and hydraulic modeling demonstrate that the Project would not worsen existing conditions and would result in a slight reduction in water surface elevations and flow velocities within the Project reach, including when accounting for increased channel roughness associated with the log crib structure.

The log crib wall is designed to function as a controlled grade stabilization and energy dissipation feature. By strategically installing and organizing woody material upstream in a stable configuration, it reduces the likelihood of uncontrolled debris accumulation at the culvert inlet, which represents an existing risk under current conditions. The IS/MND evaluates these hydraulic considerations, and no new technical evidence has been provided demonstrating an increased flood hazard. Accordingly, no revisions to the IS/MND are required.

Comment 3-8: Loss of Riparian Resilience Under Clearing and Grubbing. The removal of 30 or more mature riparian trees reduces system resilience. These trees reaching up to 80 feet tall reflect decades of stable riparian development, not recent creek migration. This riparian vegetation provides abundant and established habitat for many species, stabilizes banks, dissipates flood energy, and moderates erosion during high flows—functions that become increasingly critical under climate change. Their removal from the west bank undermines, rather than enhances, long-term stability.

Photo 7: West bank upstream Entrada Way culvert (2014). Some of the west bank riparian trees and vegetation scheduled to be removed under County proposal.

Response 3-8: As assessed in the IS/MND, implementation of the Project would require removal of trees and portions of riparian vegetation within the Project footprint. The trees proposed for removal are primarily relatively young, pioneer species established on recent sediment deposits, as supported by historical aerial imagery. Although some individuals have reached substantial height, rapid growth is characteristic of riparian species in creek valleys and does not necessarily indicate long-term geomorphic stability.

The IS/MND evaluates potential impacts associated with vegetation removal across multiple resource areas, including biological resources, hydrology and water quality, and geology and soils. The Project Description incorporates numerous best management practices (BMPs) to avoid and minimize impacts during construction, including BMP GEN-1 (Staging and Access), BMP GEN-2 (Minimize Area of Disturbance and Site Maintenance), BMP GEN-7 (Spill Prevention and Control), BMP GEN-22 (Site Stabilization), and BMP EC-10 (Erosion Control Blankets and Mats).

In addition, the Project includes native riparian revegetation within the creek corridor and along the stabilized bank to promote long-term bank stability and riparian resilience. By stabilizing the actively eroding slope and reducing chronic sediment inputs, the Project is expected to improve overall riparian function and channel stability over time. No new technical evidence has been provided demonstrating that the Project would undermine long-term ecological stability. Accordingly, no revisions to the IS/MND are required.

Comment 3-9: Lack of Mitigation on the West Side of the Creek. Despite the fact that private land on the west side of the creek would be permanently affected, the project proposes no mitigation measures on the right side of the bank. There is no replacement for the bank protection currently provided by the riparian corridor, leaving our property exposed to increased erosion and flood risk. This omission further demonstrates that impacts to private property are being disregarded rather than mitigated.

Response 3-9: As described in the IS/MND and Project Description, native riparian vegetation will be replanted in accordance with U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board requirements along both banks of the creek, including areas affected by construction. The County will be required to monitor and maintain the vegetation to ensure its establishment for a period of 5 years following the Project. The included Mitigation Monitoring and Reporting Plan (MMRP) provides additional details on the replacement of impacted vegetation.

As detailed in Responses 2-14 and 3-4, hydraulic modeling demonstrates that the Project would not worsen flood conditions and would result in a slight reduction in modeled water surface elevations within the Project reach, including on adjacent parcels. The combination of bank stabilization, revegetation, and long-term monitoring is intended to improve overall channel stability and reduce erosion risk relative to existing conditions. The comment does not provide new technical evidence demonstrating increased flood or erosion risk to private property. Accordingly, no revisions to the IS/MND are required.

Comment 3-10: Unaddressed Water Quality Impacts From County Runoff. A 30-inch County-owned drain pipe located at the slip-out discharges approximately 1,000,000 gallons per hour during peak flow of untreated street runoff directly into La Honda Creek immediately upstream of the culvert. La Honda Creek is a primary local water source for many residents and businesses. Re-routing the drain pipe to the downstream side of the culvert is needed, however, the proposed storm drain relocation includes no treatment or filtration of this runoff and does not adequately analyze water quality impacts.

Photo 8: Storm water runoff Entrada Way diverted upstream of the Entrada Way culvert.

Response 3-10: Hydrological analysis performed to support the Proposed Project indicates that approximately 0.9 cubic feet per second or 374,325 gallons per hour flow through the existing stormwater drainage system along the north side of Entrada Way and into the creek during 100-year design storm events. The Proposed Project relocates the stormwater pipe outfall to the south side of the culvert away from the existing failed slope, eliminates the complexity of routing the new storm drainpipe through the new engineered log structure, and improves access to pipe outlet for easier maintenance. The new roadway storm drainage system has been sized to account for estimated climate change impacts on precipitation patterns and the relocated 24-inch storm drainpipe outlet is sized to convey flow from the anticipated rainfall intensity of a 100-year storm event in year 2100 (24.2 cubic feet per second). In addition, the realigned outfall has also been designed to include a rock apron with vegetated slide slopes to aid with energy dissipation to minimize erosion and avoid potential impacts to the creek.

With regards to water quality, as is discussed in detail in Responses 2-11 and 2-12, the Project is not adding impervious area, increasing peak flow volumes or rates, or otherwise increasing stormwater flows into La Honda Creek at Entrada Way. Under the MRP, the County enforces the inclusion of source control and low intensity development measures in new and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows. As described in detail above in Response 2-12, the County has a robust pollution reduction program that is specifically designed to comply with MRP requirements. The Proposed Project is not adding any impervious surface and is replacing less than 2,500 sf of pavement, so it is not required to treat the runoff from these altered impervious surfaces under the MRP requirements. The Project does include construction stormwater BMP's, as identified in *Section 3.10 Hydrology and Water Quality* of the IS/MND, to prevent pollutants entering the creek during the construction phase in accordance with C.6 of the MRP. Additionally, a connector pipe screen is included within the relocated drain inlet on the south side of Entrada Way to prevent trash and debris from entering the creek at the new pipe outfall. Therefore, the comment does not provide new

technical evidence demonstrating increased water quality impacts that may result from the Proposed Project. Accordingly, no revisions to the IS/MND are required.

Comment 3-11: Disruption and Potential Impacts to Sensitive and Protected Species. La Honda Creek supports sensitive aquatic and riparian habitat and provides migration corridors for many special-status species. Creek relocation, in-channel construction, vegetation removal, altered hydrology, and increased sedimentation would disrupt the mature robust habitat and degrade water quality.

Photo 9: Juvenile Giant Salamander species of special concern seen in Entrada Way/La Honda Creek culvert right bank riparian corridor.

Photo 10: California Newt species of special concern.

Photo 11: Red-legged Frog threatened species. Presently the species has been eradicated in the Sierras and Southern California.

Photo 12: San Francisco Garter snake species of special concern. considered to be one of the most beautiful snakes in North America.

Photo 13: Steelhead trout fry swim through La Honda Creek (Midpen Staff). Considered threatened, these fish use the La Honda Creek for spawning and rearing.

Photo 14: La Honda Creek is a critical habitat for the endangered Central California Coast coho salmon.

Response 3-11: Chapter 3.4 Biological Resources of the IS/MND discusses the known and potentially-occurring special-status wildlife species from the area. Giant salamander, California red-legged frog, San Francisco gartersnake, steelhead, and coho salmon are each analyzed in the chapter. California newt, also referred to as Coast range newt (*Taricha tarosa*) is not discussed because the population occurring in San Mateo County is not considered a special-status species. Only the population of *Taricha tarosa* from Monterey County south is designated by the California Department of Fish and Wildlife as a Species of Special Concern. This population does not overlap with the Project area and would not be impacted by the Project, and is therefore not included in Table 3.4-2.

Chapter 3.4 also discusses the riparian habitat that occurs in the Project area. The analysis is presented under the CEQA Biological Resources checklist question *b: would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the DFG or USFWS?* Based on the analysis it was determined that impacts to the habitat could be significant because there would be temporal loss associated with the time it takes the Project site to recover and vegetation to fully establish. Additionally, impacts could be significant if the area was not restored to equal or better conditions. Mitigation Measure MM BIO-1 *Prepare and Implement a Habitat Mitigation and Monitoring Plan* was incorporated to reduce impacts to a less than significant level through specified tree replacement ratios, establishing minimum success criteria, and requiring 5 years of monitoring and reporting.

Similarly, an analysis of potential impacts to wildlife movement and migratory corridors is included the CEQA Biological Resources checklist question *d: Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established*

native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? The analysis concluded that the implementation of the Best Management Practices (BMPs) incorporated into the Project [see further discussion of BMPs below] would prevent substantial interference of with wildlife movement, established wildlife corridors, or the use of native wildlife nursery sites during construction activities. However, the analysis includes that although riparian and upland areas would be revegetated, impacts to wildlife migration through the area post-construction may be significant if the area does not recover to equal or better conditions. The loss of vegetative cover for migrating wildlife along the creek corridor would decrease opportunities for shelter and could increase opportunities for predation. This potentially significant impact was reduced to a less than significant level with the incorporation of MM BIO-1 *Prepare and Implement a Habitat Mitigation and Monitoring Plan*, because it requires mitigation for tree and riparian habitat impacts and establishes a 5-year minimum success criteria for tree survival and overall vegetative cover.

Further, the Project's objectives are to stabilize and repair severe streambank erosion, improve water quality by reducing erosion and sediment loading to the channel, and enhance riparian habitat by providing instream habitat complexity, cover and refuge for aquatic species. Through the incorporate of biostabilization based design elements, the Project's long-term effects to water quality and wildlife habitat are anticipated to be overall beneficial.

Project BMPs that would reduce indirect impacts associated with increased erosion/sedimentation and potential contamination include:

- BMP GEN-1 (Staging and Access);
- BMP GEN-2 (Minimize the Area of Disturbance and Site Maintenance);
- BMP GEN-7 (Spill Prevention and Control);
- BMP GEN-22 (Site Stabilization); and
- BMP EC-10 (Erosion Control Blankets & Mats)

The CEQA document acknowledges that sensitive and protected species such as steelhead - central California coast DPS, giant salamander, and California red-legged frog, may occur within the Project area. Numerous BMPs are incorporated into the Project to protect these species and other special-status wildlife species.

See further discussion below of each of the species included in the comment letter photographs and photo captions.

Photo 9: Juvenile Giant Salamander species of special concern seen in Entrada Way/La Honda Creek culvert right bank riparian corridor.

The comment letter states that a juvenile giant salamander was seen at Entrada Way/La Honda Creek culvert right bank riparian corridor. The photo attached to the comment is not a juvenile California giant salamander species but appears to be a rough-skinned newt (*Taricha granulosa*), a non-special-status species.

However, the California giant salamander is an amphibian species that has the potential to occur within the Project area as discussed in Section *3.4.3 Biological Resources, Checklist*

Response a. of the IS/MND and *Table 3.4-2 Special-status Wildlife with Potential to Occur*. Pacific giant salamanders are associated with wet coastal forests near streams and seeps from Mendocino County south to Monterey County, and east to Napa County. Aquatic larvae are found in cold, clear streams, occasionally in lakes and ponds. Adults are found in wet forests, under rocks, and logs near streams and lakes. Within the Project area, Redwood and mixed riparian habitat provide suitable habitat for adults and juveniles. Perennial streams are suitable habitat for larvae. In addition, La Honda Creek, a perennial stream, provides potentially suitable breeding habitat for California giant salamander.

As stated in the *3.4.3 Checklist Response a.* in the IS/MND, temporary impacts to aquatic and riparian habitats that may support special-status amphibians would occur during Project implementation. Temporary impacts include removal of vegetation for construction staging and access, channel dewatering. Channel realignment and the biotechnical streambank stabilization would temporarily alter habitat in the Project site; however, upon Project completion, the area would be revegetated with native riparian species. Therefore, there would be no permanent loss of aquatic or upland habitat for the species. In the long-term, the Project is expected to improve beneficial uses associated with aquatic and semi-aquatic wildlife. Additionally, installation of the log cribwall structure will result in added habitat complexity for wildlife.

Implementation of the following BMPs would minimize potential direct and indirect impacts to giant salamander and other amphibian species:

- BMP GEN-1 (Staging and Access);
- BMP GEN-2 (Minimize Area of Disturbance and Site Maintenance);
- BMP GEN-16 (Timing of Work);
- BMP GEN-26 (Decontamination of Project Equipment and Vehicles);
- BMP BIO-1 (Environmental Awareness Training);
- BMP BIO-2 (Minimize Injury or Mortality to Fish and Amphibian Species during Dewatering);
- BMP BIO-6 (Measures to Protect the Foothill Yellow-legged Frog, California Giant Salamander, Santa Cruz Black Salamander, and Western Pond Turtle);
- BMP BIO-7 (Check for Wildlife in Pipes/Construction Materials);
- BMP BIO-21 (General Wildlife Protection Measures); and
- BMP BIO-24 (Pathogen Control)

Photo 10: California Newt species of special concern.

The comment states that California newt (*Taricha torosa*) is a Species of Special Concern. However, as previously stated in this comment response, within the Project area California newt (also referred to as Coast range newt) are not designated by CDFW as a Species of Special Concern.

The Coast range newt (*Taricha torosa*), Southern Populations from Salinas River in Monterey County south is a Priority 2 Species of Special Concern. A list of species current

statuses can be viewed https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals and information on Coast range newt can be viewed https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=190344 .

Although the California newt within the Project area are not considered special-status species, Project BMPs listed under California giant salamander (see comment above) would minimize potential impacts to all potential amphibian species that may occur in the Project area, including the California Newt.

Photo 11: Red-legged Frog threatened species. Presently the species has been eradicated in the Sierras and Southern California.

California red-legged frog is an amphibian species that is a considered a Species of Special Concern and is Federally listed as threatened. This species has the potential to occur within the Project area as discussed in Section *3.4.3 Biological Resources, Checklist Response a.* of the IS/MND and *Table 3.4-2 Special-status Wildlife with Potential to Occur.* California red-legged frog is associated with lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. They require access to estivation habitat and requires 11-20 weeks of permanent water for larval development. Within the Project area and La Honda Creek, a perennial stream and adjacent redwood and riparian woodland may provide suitable habitat for breeding, dispersal, and aestivation for California red-legged frog. Additionally, the Project is identified as being located within critical habitat for California red-legged frog.

As stated in the *3.4.3 Checklist Response a.* in the IS/MND, temporary impacts to aquatic and riparian habitats that may support special-status amphibians would occur during Project implementation. However, upon Project completion, the area would be revegetated with native riparian species. Revegetation and cribwall would provide instream habitat complexity, cover and refuge for aquatic species. Therefore, there would be no permanent loss of aquatic or upland habitat for the species. In the long-term, the Project is expected to benefit the beneficial uses associated with aquatic and semi-aquatic wildlife within La Honda Creek.

Implementation of BMP BIO-3 (California Red-legged Frog Protection Measures) would minimize direct impacts to California red-legged frog, by requiring pre-activity surveys no more than 24 hours prior to initial ground disturbance, and either monitoring to avoid take, or exclusionary fencing.

Implementation of the following BMPs would minimize potential indirect and potential direct impacts to California red-legged frog:

- BMP GEN-1 (Staging and Access);
- BMP GEN-2 (Minimize Area of Disturbance and Site Maintenance);
- BMP GEN-16 (Timing of Work);
- BMP GEN-26 (Decontamination of Project Equipment and Vehicles);
- BMP BIO-1 (Environmental Awareness Training);

- BMP BIO-2 (Minimize Injury or Mortality to Fish and Amphibian Species during Dewatering);
- BMP BIO-3 (California Red-legged Frog Protection Measures);
- BMP BIO-7 (Check for Wildlife in Pipes/Construction Materials);
- BMP BIO-21 (General Wildlife Protection Measures); and
- BMP BIO-24 (Pathogen Control).

Photo 12: San Francisco Garter snake species of special concern. Considered to be one of the most beautiful snakes in North America.

San Francisco Garter is federally- and state-listed as endangered and is a Fully Protected species under CDFW. The species is typically found in the vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. They prefer dense cover and water depths of at least one foot. Although, La Honda Creek may provide aquatic habitat, the lack of emergent vegetation, high stream velocities, and lack of adjacent open upland areas make the habitat marginal. As presented in *Section 3.4.3, Biological Resources*, known populations from La Honda are limited to stock ponds and lakes on a private ranch and the Russian Ridge Open Space Preserve, east of the Project area (USFWS 2020). As discussed in Section *3.4.3 Biological Resources, Checklist Response a.* of the IS/MND and *Table 3.4-2 Special-status Wildlife with Potential to Occur,* this species is not expected to occur.

Because this species is not expected to occur, no direct, or indirect impacts are anticipated. Therefore, no significant impacts to San Francisco Garter snake are anticipated.

Photo 13: Steelhead trout fry swim through La Honda Creek (Midpen Staff). Considered threatened, these fish use the La Honda Creek for spawning and rearing.

As discussed in Section *3.4.3 Biological Resources, Checklist Response a.* of the IS/MND and *Table 3.4-2 Special-status Wildlife with Potential to Occur,* Steelhead - central California coast DPS is known to be present in La Honda Creek. Suitable spawning, migration and rearing habitat are present. Furthermore, La Honda Creek is designated Critical Habitat for steelhead. Direct and indirect impacts to fish species would be minimized with the implementation of BIO BMPs including:

- BMP BIO-1 (Environmental Awareness Training);
- BIO-2 (Minimize Injury or Mortality of Fish and Amphibian Species during Dewatering); and
- BIO-19 (Restore Channel Features)

In addition, potential impacts to aquatic habitat associated with erosion, sedimentation and release of hazardous substances will be minimized through BMPs:

- BMP GEN-1 (Staging and Access);
- BMP GEN-2 (Minimize the Area of Disturbance and Site Maintenance);

- BMP GEN-5 (Non-Hazardous Materials);
- BMP GEN-6: (Hazardous Materials Storage/Disposal);
- BMP GEN-7 (Spill Prevention and Control);
- BMP GEN-22 (Site Stabilization); and
- BMP EC-10 (Erosion Control Blankets & Mats), as mentioned above.

BMP BIO-2 requires reasonable efforts be made to capture and relocate fish species to avoid direct mortality and minimize risk of accidental take. Because steelhead are known to be present, and work will occur within designated Critical Habitat, the species was included in the formal consultation request to the National Marine Fisheries Service (NMFS) under Section 7 of the Endangered Species Act, which was initiated by the U.S. Army Corps of Engineers (USACE) on December 31, 2025 through the Clean Water Act Section 404 permitting process. The Project is anticipated to receive coverage for steelhead under the NMFS Programmatic Biological Opinion (PBO) for the USACE's Bio-Engineered Bank Stabilization Permitting Program (WCRO-2020-00688).

Steelhead - central California coast DPS is known to be present in La Honda Creek, and while short-term construction-related impacts to critical habitat will occur, the Project effects are expected to be overall beneficial. With the implementation of erosion/sedimentation control BMPs, adherence to anticipated CDFW and USFWS permit requirements, and Project's overall benefits to aquatic habitat, impacts to Central California steelhead and its critical habitat would be less than significant.

Photo 14: La Honda Creek is a critical habitat for the endangered Central California Coast coho salmon.

Based on review of available scientific data and historical fish surveys, coho salmon (*Oncorhynchus kisutch*) is not expected to occur in La Honda Creek. Multiple surveys conducted between the 1950s through 1997 documented the presence of steelhead (*Oncorhynchus mykiss*) but did not record any coho salmon.[i] Additionally, the California Department of Fish and Wildlife's Coho Salmon Distribution dataset does not list La Honda Creek as a location with confirmed coho presence.[ii] Although La Honda Creek provides suitable steelhead habitat, factors appear to be limited for coho.

Although coho salmon are not anticipated to be present, the Project is within mapped Critical Habitat for the species, and therefore the species was included in the formal consultation request to the National Marine Fisheries Service (NMFS) under Section 7 of the Endangered Species Act, which was initiated by the U.S. Army Corps of Engineers (USACE) on December 31, 2025 through the Clean Water Act Section 404 permitting process. The Project is anticipated to receive coverage for coho salmon under the NMFS Programmatic Biological Opinion (PBO) for the USACE's Bio-Engineered Bank Stabilization Permitting Program (WCRO-2020-00688). If new information suggests that coho salmon are present in the portion of La Honda Creek that overlaps the Proposed Project site, the County would seek a consistency determination from the California Department of Fish and Wildlife (CDFW).

Coho salmon are not anticipated to be onsite and effects to designated Critical Habitat are expected to be overall beneficial. With the implementation of erosion/sedimentation control BMPs, adherence to anticipated CDFW and USFWS permit requirements, and the Project's overall benefits to aquatic habitat, impacts to Central California coho salmon Critical Habitat would be less than significant.

We support our conclusion that with the implementation of Project BMPs and MM BIO-1 impacts to special-status species and riparian habitat would be less than significant with mitigation measures incorporated. Further, any requirements set forth in anticipated CDFW, USFWS, and NMFS permits for the Project will be adhered to.

Comment 3-12: Conclusion. The IS/MND does not provide the Board with a complete or accurate basis for informed decision-making and fails to address the root cause of the east bank failure: inappropriate drainage worsened by inadequate hydraulic capacity in the face of increasing flood intensity driven by climate change. CEQA requires analysis of foreseeable future conditions and reasonable alternatives that reduce impacts. Approving a project that temporarily relocates the creek and takes private land while retaining an undersized culvert does not meet this standard.

I respectfully request that the Board of Supervisors reject the IS/MND and direct staff to pursue emergency stabilization measures that do not alter the creek or private property, and to develop a long-term, capacity-appropriate solution—such as a bridge—that reflects current CEQA climate guidance and undergoes appropriate environmental review.

Thank you for your careful consideration.

Response 3-12: The County respectfully disagrees that the IS/MND is inadequate The environmental document was based on thorough analyses of baseline conditions, including hydraulic modeling and technical analysis, and evaluates foreseeable future conditions consistent with CEQA requirements. As discussed in prior responses, the Project does not increase runoff, reduce culvert capacity, or worsen hydrologic conditions, and modeling demonstrates a slight improvement in water surface elevations within the Project reach.

Importantly, the comment does not present new environmental information supported by technical data or analysis that would contradict the findings of the IS/MND. The concerns raised regarding culvert capacity and climate-related flood intensity were considered in the environmental review, and the Project's limited scope does not exacerbate those conditions. Accordingly, the IS/MND remains adequate under CEQA, and no revisions are required.

3. TEXT CHANGES TO THE IS/MND

The following section shows text changes and clarifications based on the order that they appear in the Draft IS/MND. Newly added text is shown in underline, while deleted text is displayed in strikeout.

Subsection 1.3 on page 1-3 is amended as follows:

This IS/MND contains the following components:

Chapter 1, *Introduction*, provides a brief description of the intent and scope of this IS/MND, the public involvement process under CEQA, and the organization of and terminology used in this IS/MND.

Chapter 2, *Project Description*, describes the Proposed Project including its purpose and objectives, the site where the Proposed Project would be constructed, the construction approach and activities, operation-related activities, and related permits and approvals.

Chapter 3, *Environmental Checklist*, presents the checklist used to assess the Proposed Project's potential environmental effects, which is based on the model provided in Appendix G of the CEQA Guidelines. This chapter also includes a brief environmental setting description for each resource topic and identifies the Proposed Project's anticipated environmental impacts, as well as any mitigation measures that would be required to reduce potentially significant impacts to a less-than-significant level.

Chapter 4, *Environmental Factors Potentially Affected*. This chapter lists the environmental factors potentially affected by the ~~proposed~~ Proposed Project based on the environmental impact evaluation.

Chapter 5, *Determination*. This chapter contains a determination on the Project based on conclusions and recommendations of the environmental evaluation.

Chapter 6, *Preparers*. This chapter provides a list of persons involved in preparing this IS/MND.

Chapter 7, *References*. This chapter provides a bibliography of printed references, web sites, and personal communications used in preparing this IS/MND.

Appendix A Air Quality and GHC Emissions Calculations

Appendix B Biological Resources Report

Appendix C Cultural Resources Assessment Report

Appendix D Mitigation Monitoring and Reporting Plan

Appendix E La Honda Creek No-Rise Analysis

Subsection 2.7 on page 2-36 is amended as follows:

BIO-14: Measure to Protect Bat Colonies

If high-quality habitat for roosting bats (i.e., large trees with cavities of sufficient size to support

roosting bats, or buildings providing suitable roost sites, as determined by a qualified bat biologist) is present within 100 feet of a maintenance/construction site, a qualified bat biologist will conduct a pre-construction survey to look for evidence of bat use within two weeks prior to the onset of work activities. If evidence of bat occupancy is observed, or if high-quality roost sites are present in areas where evidence of bat use might not be detectable (such as a tree cavity), an evening survey and/or nocturnal acoustic survey may be necessary to determine if a bat colony is present and to identify the specific location of the bat colony.

- If no active maternity colony or non-breeding bat roost is located, project work can continue as planned.
- If an active maternity colony or non-breeding bat roost is located within 100 feet of the maintenance/construction site, an agency-approved qualified biologist shall establish site-specific protective buffers around roosts, sized with consideration for the species that are present and the time of year bats are roosting, as well as levels of construction noise and light emission from Project activities ~~the project work will be redesigned to avoid disturbance of the roosts~~, if feasible.
- If an active maternity colony is located, and the project cannot be redesigned to avoid removal or disturbance of the occupied tree or structure, disturbance will not take place during the maternity season (March 15 – July 31), and a disturbance-free buffer zone (determined by a qualified bat biologist) will be observed during this period.

If an active non-breeding bat roost is located in vegetation slated for removal or in structures that will be demolished, and the Project cannot be redesigned to avoid removal or disturbance of the occupied tree or structure, CDFW shall be consulted. Any removal of trees shall occur after a qualified biologist confirms day roosting bats are not present. Tree removal shall be phased so that the individuals will be safely evicted between August 1 and October 15 or between February 15 and March 15; where selected limbs and branches not containing cavities are removed using hand equipment on the first day, with the remainder of the tree removed using chainsaws or other equipment the second day. Trees and structures supporting day roosting bats shall not be removed until the lead agency consults with CDFW and receives ~~(as determined by~~ a Memorandum of Understanding ~~with CDFW)~~. Bats may be evicted through exclusion after notifying CDFW. Trees with roosts that need to be removed will first be disturbed at dusk, just prior to removal that same evening, to allow bats to escape during the darker hours.

4. CONCLUSION

The comments received during the public circulation period for the Draft IS/MND did not raise any new environmental issues or provide information signifying that the Proposed Project would result in additional impacts or impacts of greater severity than described in the circulated IS/MND. In conclusion, the IS/MND provides a legally adequate level of environmental review for the Proposed Project, pursuant to California Public Resources Code §21080(c) and 21081.1(a), and CEQA Guidelines §15070.