



LOCAL AGENCY FORMATION COMMISSION

455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849

REGULAR MEETING

AGENDA

Wednesday, September 16, 2026

2:30 pm

San Mateo County Board of Supervisors Chambers

500 County Center

Redwood City, CA 94063

This meeting of the San Mateo Local Agency Formation Commission (LAFCo) will be in person at 500 County Center Redwood City, CA 94063. Members of the public may participate in the meeting remotely via the Zoom platform or in person. For information regarding how to participate in the meeting, please refer to the instructions at the end of the agenda.

Hybrid Public Participation

The September 16, 2026, LAFCo regular meeting may be accessed through Zoom online at <https://smcgov.zoom.us/j/96442908061>. The webinar ID is 964 4290 8061. The meeting may also be accessed by telephone by dialing +1 669 900 6833 (local) and entering webinar ID then #. Members of the public may also attend this meeting physically in the Board of Supervisors Chambers at 500 County Center, Redwood City, CA 94063.

* Written public comments may be emailed to lafco@smcgov.org, and should reference the specific agenda item on which you are commenting.

* Spoken public comments will be accepted during the meeting in person or remotely through Zoom. Public comments via Zoom will be taken first, followed by speakers in person.

***Please see instructions for written and spoken public comments at the end of this agenda.**

ADA Requests

Individuals who require special assistance or a disability-related modification or accommodation to participate in this meeting, or who have a disability and wish to request an alternative format for the agenda, meeting notice, agenda packet or other writings that may be distributed at the meeting, should contact LAFCo staff as early as possible but no later than 10:00 a.m. the day before the meeting at lafco@smcgov.org. Notification in advance of the meeting will enable Staff to make reasonable arrangements to ensure accessibility to this meeting, the materials related to it, and your ability to comment.

(OVER)

COMMISSIONERS: VIRGINIA CHANG KIRALY, CHAIR, SPECIAL DISTRICT • ANN DRAPER, VICE CHAIR, PUBLIC • KATHRYN SLATER-CARTER, SPECIAL DISTRICT • DAVID J CANEPA, COUNTY • DEBBIE RUDDOCK, CITY • STEPHEN RAINALDI, CITY • JACKIE SPEIER, COUNTY

ALTERNATES: NOELIA CORZO, COUNTY • VACANT, SPECIAL DISTRICT • GREG WRIGHT, CITY • VACANT, PUBLIC

STAFF: ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK

*All items on the consent agenda may be approved by one roll call vote unless a request is made at the beginning of the meeting that an item be withdrawn. Any item on the consent agenda may be transferred to the regular agenda.

1. Roll Call and Oath of Office
2. Public Comment for Items Not on the Agenda and on the Consent Agenda
3. Consent Agenda*
 - a. Approval of Action Minutes: July 15, 2026
 - b. Consideration of LAFCo File No. 26-04 - Proposed Outside Service Agreement for water by the City of Redwood City to an undeveloped parcel on Wilmington Way (APN: 068-221-100), Unincorporated Redwood City
 - c. Consideration of LAFCo File No. 26-06 – Proposed Outside Service Agreement for a water connection by the City of Redwood City to an undeveloped parcel on Lakeview Way (APN 057-122-350), Unincorporated Redwood City
 - d. Consideration of LAFCo File No. 26-07 – Proposed Annexation of 3530 Alpine Road, Portola Valley (APN 077-281-020) to West Bay Sanitary District

Public Hearings

4. Consideration of Circulation Draft Municipal Service Review and Sphere of Influence Updates for the Town of Atherton, Atherton Channel Drainage District, and the City of Menlo Park
5. Consideration of Adoption of a Provisional Sphere of Influence for the Edgewood Sewer Maintenance District

Regular Agenda

6. Appointment of Alternate Public Member
7. CALAFCO
 - a. CALAFCO 2026 Annual Conference – Information Only
8. Fiscal Year 2025-26 Year End and Fiscal Year 2026-27 Quarterly LAFCo Budget Update - Information Only
9. Legislative and Policy Committee
 - a. Legislative Report – Information Only
10. Commissioner/Staff Reports – Information Only
11. Adjournment

***Instructions for Public Comment During Teleconference Meetings**

During the LAFCo hybrid meeting, members of the public may address the Commission via

a) Written Comment: Written public comment may be emailed in advance of the meeting.

1. Written comment should be emailed to lafco@smcgov.org.
2. Email should include the specific agenda item on which you are commenting or note that your comment concerns an item that is on the consent agenda, or is not on the agenda.
3. Members of the public are limited to one comment per agenda item.
4. The length of the emailed comment should be commensurate with the two minutes allowed for verbal comments, which is approximately 250-300 words.
5. If your emailed comment is received by 5:00 p.m. on the day before the meeting, it will be provided to the Commission and made publicly available on the agenda website under the specific item to which your comment pertains. If emailed comments are received after 5:00 p.m. on the day before the meeting, the Clerk will make every effort to either (i) provide such emailed comments to the Commission and make such emails publicly available on the agenda website prior to the meeting, or (ii) read such emails during the meeting. Regardless of whether such emailed comments are forwarded and posted or are read during the meeting, they will still be included in the administrative record.

b) Spoken Comment:

In-Person Participation: If you wish to speak to the Commission, please fill out a speaker's slip located at the entrance. If you have anything that you wish distributed to the Commission and included in the official record, hand it to the Clerk who will distribute the information to the Commission members and staff.

Via Teleconference (Zoom):

1. Access the Commission meeting through Zoom online <https://smcgov.zoom.us/j/96442908061>. The webinar ID is 964 4290 8061. The Commission meeting may also be accessed via telephone by dialing +1 669 900 6833 (local). Enter the webinar ID, then press #.
2. You may download the Zoom client or connect to the meeting using an internet browser. If using your browser, make sure you are using a current, up-to-date browser: Chrome 30+, Firefox 27+, Microsoft Edge 12+, Safari 7+. Certain functionality may be disabled in older browsers including Internet Explorer.
3. You will be asked to enter an email address and name. We request that you identify yourself by name as this will be visible online and will be used to notify you that it is your turn to speak.
4. When the Commission Chair or Clerk calls for the item on which you wish to speak, click on "raise hand." Speakers will be notified shortly before they are called to speak.

***Additional Information:**

For any questions or concerns regarding Zoom, including troubleshooting, privacy, or security settings, please contact Zoom directly.

Public records that relate to any item on the open session agenda for a regular Commission meeting are available for public inspection. Those records that are distributed less than 72 hours prior to the meeting are available for public inspection at the same time they are distributed to all members or a majority of the members of the Commission.

NOTICE: State law requires that a participant in a LAFCo proceeding who has a financial interest in the decision and who has made a campaign contribution of more than \$250 to any Commissioner in the past year must disclose the contribution. If you are affected, please notify the commission staff before the hearing.

Agendas and meeting materials are available at www.sanmateolafco.org

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LOCAL AGENCY FORMATION COMMISSION

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Action Minutes

San Mateo Local Agency Formation Commission Meeting

July 15, 2026

The regular meeting of the San Mateo Local Agency Formation Commission (LAFCo) was held on Wednesday, July 15, 2026, at 2:30 pm in the San Mateo Board of Supervisors Chambers, 500 County Center, Redwood City, CA 94063. Members of the public were also able to participate in the meeting remotely via Zoom.

Call to Order

The meeting was called to order at 2:30 p.m. by Chair Virginia Chang Kiraly.

1. Roll Call

Members Present: Commissioners David Canepa, Virginia Chang Kiraly, Ann Draper, Kati Martin, Stephen Rainaldi, Debbie Ruddock, and Jackie Speier (via Zoom)

Members Absent: None

Alternate Members Present: Greg Wright and Kathryn Slater-Carter

Staff Present: Sarah Flamm, Management Analyst

Timothy Fox, Legal Counsel

Diane Estipona, Clerk

2. Public Comment

Alan Moss, Member of the public

3. Consent Agenda

a) Approval of Action Minutes: May 20, 2026

b) Consideration of LAFCo File No. 26-05 - Proposed Outside Service Agreement for water by the City of Redwood City to an undeveloped parcel on Lakeview Way (APN: 057-091-030), Unincorporated Redwood City

Commission Action

The Commission approved the consent agenda.

Public Speakers: None.

Motion: Commissioner Canepa/ Second: Commissioner Rainaldi

Ayes: Commissioners Canepa, Chang Kiraly, Draper, Martin, Rainaldi, Ruddock, and Speier

Motion passed 7-0 by roll call vote.

Public Hearings

4. Consideration of the Final Municipal Service Review for the Ladera Recreation District and Highlands Recreation District

The Commission received the final Municipal Service Reviews (MSRs) for the Ladera and Highlands Recreation Districts following the public review period. No comments were received on the Ladera Recreation District MSR. Two comment letters were received regarding the Highlands Recreation District MSR, resulting in minor revisions to staffing data and clarification regarding the District's undeveloped land. No changes were made to the recommendations or determinations in either report. LAFCo staff thanked the respective General Managers and Boards of Directors for their review and feedback.

Summary of Commission Comments

No further discussion occurred on this item.

Public Speakers: None.

Commission Action

The Commission approved the Final Municipal Service Reviews for the Ladera Recreation District and Highlands Recreation District.

Motion: Commissioner Rainaldi/ Second: Commissioner Ruddock

Ayes: Commissioners Canepa, Chang Kiraly, Draper, Martin, Rainaldi, Ruddock, and Speier

Motion passed 7-0 by roll call vote.

Regular Agenda

5. CALAFCO

a. CALAFCO 2026 Annual Conference – Information Only

The annual CALAFCO Conference will be held in Sacramento, California, from October 21–23, 2026. LAFCo encouraged Commissioners to attend, noting that the adopted budget includes funding for both Commissioners and staff to participate.

b. CALAFCO Nominations for 2026-2027 Board Members

The Commission was informed that CALAFCO has opened nominations for all 16 seats on the 2026–27 Board of Directors, marking the first election under the Board's restructured governance

adopted in February 2026. Each of CALAFCO's four regions will elect four Board members, with candidates declaring whether they are seeking an initial one-year or two-year term to establish staggered terms. Eligible candidates include LAFCo Commissioners, Alternate Commissioners, and Executive Officers. LAFCo staff noted that San Mateo LAFCo is part of the Coastal Region, which is currently represented by Virginia Chang Kiraly, Wendt Root Askew, Roger Anderson, and Rosemary Kamei.

Summary of Commission Comments

The Commission discussed the upcoming CALAFCO Board of Directors election under the new Board structure. Chair Chang Kiraly announced her intention to seek nomination for one of the initial two-year terms and highlighted her current service on the CALAFCO Board and as Chair of the Finance Committee. LAFCo staff clarified that nominations were being considered at this meeting because the application deadline falls before the Commission's next regular meeting. It was also noted that multiple nominees, including alternate commissioners, are eligible for nomination. Chair Chang Kiraly expressed interest in being nominated, and no other Commissioners indicated interest.

Commission Action

The Commission nominated Chair Chang Kiraly to serve a two-year term on the CALAFCO Board of Directors.

Motion: Commissioner Martin/ Second: Commissioner Rainaldi

Ayes: Commissioners Canepa, Chang Kiraly, Draper, Martin, Rainaldi, Ruddock, and Speier

Motion passed 7-0 by roll call vote.

c. Voting Delegates at 2026 California Association of LAFCOs (CALAFCO) Annual Conference

The Commission considered the appointment of a voting delegate and alternate delegate for the 2026 CALAFCO Annual Conference in Sacramento. LAFCo staff explained that every LAFCo is required to designate a delegate to vote at the conference and recommended appointing a delegate and alternate while authorizing the Executive Officer to complete the necessary documentation.

Commission Action

The Commission appointed Chair Chang Kiraly as the voting delegate and Executive Officer Rob Bartoli as the alternate delegate for the 2026 CALAFCO Conference.

Motion: Commissioner Rainaldi/ Second: Commissioner Ruddock

Ayes: Commissioners Canepa, Chang Kiraly, Draper, Martin, Rainaldi, Ruddock, and Speier

Motion passed 7-0 by roll call vote.

d. CALAFCO Member Update – Information Only

Chair Chang Kiraly recognized Mr. Bartoli for his active involvement and efforts to keep the Commission informed of CALAFCO activities. She also encouraged Commissioners interested in attending the conference to notify staff promptly to facilitate travel and lodging arrangements.

6. Legislative Report – Information Only

The Commission received a brief legislative update on SB 994, which LAFCo staff is monitoring. The bill would prohibit local government officials, including LAFCo Commissioners, from entering into non-disclosure agreements that restrict communication among agency officials, employees, and governing bodies. Chair Chang Kiraly also provided an update on SB 1312 related to cemeteries, noting that CALAFCO has changed its position to oppose unless amended due to concerns that LAFCo-related issues have not been addressed. Additional information will be provided as it becomes available.

7. Commissioner/Staff Reports – Information Only**a. Update on Election for Regular Special District Member**

The Commission received an update on the election for the Regular Special District Member seat. LAFCo staff reported that ballots were distributed on April 29, but fewer than half of the County's 20 independent special districts had responded. Due to the lack of a quorum, the ballot deadline was extended to August 3. Commissioner Speier asked staff what sort of outreach had been done to the independent special districts to encourage voting. Chair Chang Kiraly said Mr. Bartoli had circulated a reminder email to district general managers. Election results will be available once the voting process is complete.

8. Adjournment

The Commission adjourned at 2:57 PM.

Approved on September 16, 2026

Virginia Chang Kiraly, Chair

Local Agency Formation Commission of the County of San Mateo

Prepared by: _____

Diane Estipona, LAFCo Clerk

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LOCAL AGENCY FORMATION COMMISSION

455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849

September 9, 2026

To: LAFCo Commissioners

From: Rob Bartoli, Executive Officer
Sarah Flamm, Management Analyst

Subject: Consideration of LAFCo File No. 26-04 - Proposed Outside Service Agreement for water by the City of Redwood City to an undeveloped parcel on Wilmington Way (APN: 068-221-100), Unincorporated Redwood City

Summary

Pursuant to Government Code Section 56133, Commission approval is required for the extension of service by local agencies to territory outside the agency's boundaries. This section requires that the public agency apply to LAFCo by resolution on behalf of the landowner. In this case, the property owner of a vacant lot on Wilmington Way (APN: 068-221-100) is seeking a new water connection for a proposed new two-story single-family home with an attached garage and ADU. The parcel is currently vacant. The County has issued the property owner a planning permit (PLN2025-00306) and County building permits for the new single-family residence are under review. The property will receive a sewer connection from the Emerald Lake Heights Sewer Maintenance District.

The parcel is within the Sphere of Influence and water service area of the City of Redwood City. Despite the fact that the property is contiguous to a City boundary, the City of Redwood City's Community Development Department does not annexation of the parcel at this time given that there are no other residential lots within the immediate vicinity that are within the City limits. The City also notes that the parcels that are within the City limits in the immediate vicinity are serving larger private properties/facilities and the City's Wilmington Reservoir. In addition, the immediately adjacent parcel at 3908 Bret Harte Drive does not take access from Wilmington Way. As an annexation of this parcel would not enhance the server delivery pattern in the area

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STAFF: ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK

and would not create logical boundaries for the City of Redwood City, LAFCo staff supports an Outside Service Agreement (OSA) in lieu of annexation.

Departmental Reports

County Assessor: The total net assessed land valuation for the parcel (APN: 068-221-100) shown in the County Assessor records is \$969,000. The boundaries of the OSA will conform to the lines of assessment and ownership of the subdivided parcel.

County Clerk: The territory has no registered voters as it is currently vacant land. The proposed OSA would not change or conflict with any political subdivision boundaries. If the parcel is annexed by the City of Redwood City, it would then need to be changed from an unincorporated area precinct to a precinct within the City of Redwood City.

County Environmental Health: Recommends approval. The City of Redwood City and Emerald Lake Heights Sewer District provide the available water and sewer service in the area. The proposal appears appropriate and will not create any unusual health hazards or problems. There is no septic tank in operation in the area.

City of Redwood City: The City recommends approval of the OSA. The City's General Plan designation is Residential-Low Density. The City staff report that the proposed OSA is compatible with the City's General and Specific Plans. The OSA for a water connection requires an authorization letter from the City of Redwood City, which is expected to be transmitted by the date of this meeting.

County Public Works: This property is in the Emerald Lake Heights Sewer Maintenance District and the Emerald Lake Heights Highway Lighting District. The proposed new water line and associated appurtenances to be constructed shall not conflict with or impact the existing sanitary sewer and streetlight facilities of the District. Specific comments regarding future development will be provided when such plans are submitted.

County Planning: Recommends approval. The County's land use designation is low density residential. The proposal is consistent with the County's General Plan and zoning. Considering the proposal of a 2-story single-family residence with attached garage and attached ADU (PLN2026-00291), there will be a minimal impact of this proposal on regional resources.

Executive Officer's Report

This proposal submitted by the City of Redwood City is to connect a new single-family residence parcel to City water. The subject property is within the Sphere of Influence of the City. While the property is contiguous to the Redwood City boundary, the City does not support annexation at this time since there are no other residential lots within the immediate vicinity that are within the City limits. The annexation of this parcel at this time would not assist in creating logical boundaries or service areas for the City of Redwood City. LAFCo staff supports an Outside Service

Agreement (OSA) in lieu of annexation. A deferred annexation will be required to be executed as part of this approval.

California Environmental Quality Act

The proposal is categorically exempt from the environmental review requirements of the California Environmental Quality Act (CEQA) exempt under State CEQA Guidelines Section 15319(a) & (b) (Annexations of Existing Facilities and Lots for Exempt Facilities).

Recommended Commission Action

By motion, approve LAFCo File No. 26-04 - Proposed Outside Service Agreement for water by the City of Redwood City to a parcel on Wilmington Way (APN: 068-221-100), Unincorporated Redwood City pursuant to Government Code Section 56133 with the following condition of approval:

- 1) The applicant shall record the deferred annexation agreement with the San Mateo County Recorder's Office and provide a copy of the recorded document to LAFCo, prior to the issuance of the approval letter for the Outside Service Agreement for one vacant lot on Wilmington Way (APN: 068-221-100), Unincorporated Redwood City.

Attachments

- A. OSA application for File No. 26-04- Proposed Outside Service Agreement for water by the City of Redwood City to a parcel on Wilmington Way (APN: 068-221-100), Unincorporated Redwood City
- B. Vicinity Map
- C. Authorization Letter from the City of Redwood City (pending)

cc: Christian Craig, City of Redwood City
Ed Diaz, San Mateo County Environmental Health
Chephren Goree, San Mateo County Clerk
Andrew Smith, San Mateo County Assessor
Tiffany Gee, San Mateo County Planning & Building
Stella and Joe Ravella, Property Owners

**APPLICATION FOR A CHANGE OF ORGANIZATION, REORGANIZATION, OR OUTSIDE
SERVICE AGREEMENT
TO THE SAN MATEO LOCAL AGENCY FORMATION COMMISSION**

A. GENERAL INFORMATION

1. Briefly describe the nature of the proposed change of organization, reorganization, or outside service agreement. Include the address and APN of the area.

- **APN # 068-221-100. Parcel is in an unincorporated area, undeveloped, and does not have an address yet. We are requesting to obtain water from the City of Redwood City via a new service connection, while the parcel remains unincorporated.**

2. An application for a change of organization or reorganization may be submitted by individuals in the form of a petition or by an affected public agency in the form of a certified resolution. This application is submitted by (check one):

☐ Landowners or registered voters, by petition
☒ An affected public agency, by resolution

(If this application is submitted by petition of landowners or registered voters in the affected territory, complete the petition form.)

3. What are the reasons for the proposal?

- **We want to build a residential home with a water connection to a public water system.**

4. Does this application have 100% consent of landowners in the affected area?

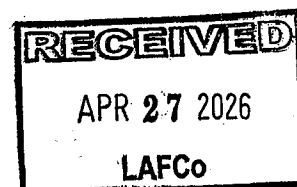
☒ Yes ☐ No

5. Estimated acreage: **The gross lot area of the parcel is 8507 square feet. No neighboring parcels are affected.**

B. SERVICES

1. List the name or names of all existing cities and special districts whose service area or service responsibility would be altered by the proposed change of organization or reorganization.

- **Redwood City Water's service area would increase by one service connection.**



2. List all changes to the pattern of delivery of local services to the affected area. For each service affected by the proposed change(s) of organization, list the present source of service (state "none" if service is not now provided), the proposed source of service and the source of funding for construction of necessary facilities (if any) and operation. Example is given on the first two lines of the space provided for your response.

SERVICE	PRESENT SOURCE	PROPOSED SOURCE	FUNDING SOURCE	
			CONSTRUCTION	OPERATING
<i>Police (example)</i>	<i>Co. Sheriff</i>	<i>City Police</i>	<i>N/A</i>	<i>Taxes</i>
<i>Sewer (example)</i>	<i>None</i>	<i>City of . . .</i>	<i>Proponent</i>	<i>Fees</i>
WATER	NONE	CITY OF REDWOOD CITY (RWC)	Landowner will pay for work involved with connecting parcel to existing water main. No change to existing RWC mains necessary. Owner will pay for water as a RWC Water customer.	""

C. PROJECT PROPOSAL INFORMATION

1. Please describe the general location of the territory which is the subject of this proposal. Refer to major highways, roads and topographical features.
 - **Parcel is located on County-owned Wilmington Way near the intersection with Emerald Estates Ct. Back of parcel is contiguous to City of Redwood City boundary, but does not have road access. Parcel is in a residential neighborhood.**

2. Describe the present land use(s) in the subject territory.

- **Vacant lot surrounded by other residential homes in a residential neighborhood.**

3. How are adjacent lands used?

North: **Residential neighborhood**

South: **Residential homes and commercial buildings**

East: **Golf course**

West: **Residential**

4. Will the proposed change of organization result in additional development? If so, how is the subject territory to be developed?

- **To be developed to a residential home (a new 2-story single family residence with attached garage & ADU).**

5. What is the general plan designation of the subject territory?

- **Low density Residential.**

6. What is the existing zoning designation of the subject territory?

- **RH/DR residential Hillside/Design review.**

7. What rezoning, environmental review or development approvals have already been obtained for development in the subject territory?

- **Only design review.**

changed to
PLN2026-00291

8. What additional approvals will be required to proceed?

- Water service (we have a will serve letter). Planning permit ~~PLN2025-00306~~ and Building Permit. Sewer Connection from ELHSD.

9. Does any portion of the subject territory contain any of the following --agricultural preserves, sewer or other service moratorium or wetlands subject to the State Lands Commission jurisdiction?

- No

10. If no specific development projects are associated with this proposal, will the proposal increase the potential for development of the property? If so, how?

- Development is associated.

LAFCo will consider the person signing this application as the proponent of the proposed action(s). Notice and other communications regarding this application (including fee payment) will be directed to the proponent at:

NAME: Joe Ravella EMAIL: Jravellaconst@aol.com

ADDRESS: 940 Washington St San Carlos

TELEPHONE: 650-714-4702 ATTN: Joe Ravella

Signature of Proponent: 

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September 9, 2026

To: LAFCo Commissioners
From: Rob Bartoli, Executive Officer
 Sarah Flamm, Management Analyst

Subject: Consideration of LAFCo File No. 26-06 - Proposed Outside Service Agreement for water by the City of Redwood City to a new vacant parcel on Lakeview Way (APN: 057-122-350), Emerald Lake Hills.

Summary

Pursuant to Government Code Section 56133, Commission approval is required for the extension of service by local agencies to territory outside the agency's boundaries. This section requires that the public agency apply to LAFCo by resolution on behalf of the landowner. In this case, the property owner is seeking a new water connection for a new vacant 0.5 acre parcel (APN 057-122-350) following an SB-9 lot split at 543 Lakeview Way (APN: 057-122-200). The property owner plans to build a single-family home on the newly created parcel (PLN2025-00167 is pending). No building permits have been submitted yet. The property would receive a sewer connection from the Emerald Lake Heights Sewer Maintenance District.

The parcel is within the Sphere of Influence and water service area of the City of Redwood City. As an annexation of this parcel would not enhance the service delivery pattern in the area and would not create logical boundaries for the City of Redwood City, LAFCo staff supports an Outside Service Agreement (OSA) in lieu of annexation.

Departmental Reports

County Assessor: The total net assessed land valuation for the parcel (APN: 057-122-350) shown in the County Assessor records is \$110,826. The boundaries of the OSA will conform to the lines of assessment and ownership of the subdivided parcel.

County Clerk: The territory has one registered voter. The proposed OSA would not change or conflict with any political subdivision boundaries. If the parcel is annexed by the City of Redwood City, it would then need to be changed from an unincorporated area precinct to a precinct within the City of Redwood City.

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STAFF: ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK

County Environmental Health: Recommends approval. The City of Redwood City and Emerald Lake Heights Sewer District provide the available water and sewer service in the area. The proposal appears appropriate and will not create any unusual health hazards or problems. There is no septic tank in operation in the area.

City of Redwood City: The City recommends approval of the OSA. The City's General Plan designation is Residential-Low Density. The City staff report that the proposed OSA is compatible with the City's General and Specific Plans. The OSA for a water connection requires an authorization letter from the City of Redwood City, which is expected to be transmitted by the date of this meeting.

County Public Works: This property is in the Emerald Lake Heights Sewer Maintenance District and the Emerald Lake Heights Highway Lighting District. The proposed new water line and associated appurtenances to be constructed shall not conflict with or impact the existing sanitary sewer and streetlight facilities of the District. Specific comments regarding future development will be provided when such plans are submitted.

County Planning: Recommends approval. The County's land use designation is low density residential. The proposal is consistent with the County's General Plan and zoning. Considering the potential of two housing units on this property, there will be a minimal impact of this proposal on regional resources.

Executive Officer's Report

This proposal submitted by the City of Redwood City is to connect a newly created parcel that will have a single-family residence parcel to City water. The subject property is within the Sphere of Influence of the City, but not contiguous to City boundaries. The annexation of this parcel at this time would not assist in creating logical boundaries or service areas for the City of Redwood City. LAFCo staff supports an Outside Service Agreement (OSA) in lieu of annexation. A deferred annexation will be required to be executed as part of this approval.

California Environmental Quality Act

The proposal is categorically exempt from the environmental review requirements of the California Environmental Quality Act (CEQA) exempt under State CEQA Guidelines Section 15319(a) & (b) (Annexations of Existing Facilities and Lots for Exempt Facilities).

Recommended Commission Action

By motion, approve LAFCo File No. 26-06 - Proposed Outside Service Agreement for water by the City of Redwood City to a parcel on Lakeview Way (APN: 057-122-350), Unincorporated Redwood City pursuant to Government Code Section 56133 with the following condition of approval:

- 1) The applicant shall record the deferred annexation agreement with the San Mateo County Recorder's Office and provide a copy of the recorded document to LAFCo prior to the issuance of the approval letter for the Outside Service Agreement for one vacant lot on Lakeview Way (APN: 057-122-350), Unincorporated Redwood City.

Attachments

- A. OSA application for File No. 26-06- Proposed Outside Service Agreement for water by the City of Redwood City to a parcel on Lakeview Way (APN: 057-122-350), Unincorporated Redwood City
- B. Vicinity Map
- C. Authorization Letter from the City of Redwood City (pending)

cc: Christian Ochoa, City of Redwood City
Ed Diaz, San Mateo County Environmental Health
Chephren Goree, San Mateo County Clerk
Andrew Smith, San Mateo County Assessor
Tiffany Gee, San Mateo County Planning & Building
Alexander Lehr, Applicant

JUL -1 2026

**APPLICATION FOR A CHANGE OF ORGANIZATION, REORGANIZATION OR OUTSIDE SERVICE AGREEMENT
TO THE SAN MATEO LOCAL AGENCY FORMATION COMMISSION**

A. GENERAL INFORMATION

1. Briefly describe the nature of the proposed change of organization, reorganization, or outside service agreement.

Outside service agreement for water from the City of Redwood City for new vacant parcel (APN 057-122-350 following an SB9 lot split at 543 Lakeview Way (APN 057-122-200), Emerald Lake Hills.

2. An application for a change of organization or reorganization may be submitted by individuals in the form of a petition or by an affected public agency in the form of a certified resolution. This application is submitted by (check one):

☐ Landowners or registered voters, by petition

☒ An affected public agency, by resolution

(If this application is submitted by petition of landowners or registered voters in the affected territory, complete the petition form.)

3. What are the reasons for the proposal?

Would like to obtain water service for vacant lot following SB9 lot split in unincorporated San Mateo County Emerald Lake Hills area.

4. Does this application have 100% consent of landowners in the affected area?

☒ Yes ☐ No

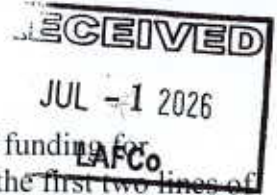
5. Estimated acreage: 0.5

B. SERVICES

1. List the name or names of all existing cities and special districts whose service area or service responsibility would be altered by the proposed change of organization or reorganization.

The City of Redwood City

2. List all changes to the pattern of delivery of local services to the affected area. For each service affected by the proposed change(s) of organization, list the present source of service (state "none")



if service is not now provided), the proposed source of service and the source of funding for construction of necessary facilities (if any) and operation. Example is given on the first two lines of the space provided for your response.

SERVICE	PRESENT SOURCE	PROPOSED SOURCE	FUNDING SOURCE	
			CONSTRUCTION	OPERATING
<i>Police (example)</i>	<i>Co. Sheriff</i>	<i>City Police</i>	<i>N/A</i>	<i>Taxes</i>
<i>Sewer (example)</i>	<i>None</i>	<i>City of . . .</i>	<i>Proponent</i>	<i>Fees</i>
Water	None	Redwood City	Proponent	Fees

C. PROJECT PROPOSAL INFORMATION

1. Please describe the general location of the territory which is the subject of this proposal. Refer to major highways, roads and topographical features.

APN 057-122-350 is an undeveloped parcel

On the south side of the 500 Block of Lakeview way in Emerald Hills, between to 541 Lakeview and 549 lakeview

2. Describe the present land use(s) in the subject territory.

Vacant Land

3. How are adjacent lands used?

North: Single Family

South: Single Family

East: Single Family

West: Single Family

4. Will the proposed change of organization result in additional development? If so, how is the subject territory to be developed?

Build a single family home here



5. What is the general plan designation of the subject territory?
Medium low density residential
6. What is the existing zoning designation of the subject territory?
RH residential hillside
7. What rezoning, environmental review or development approvals have already been obtained for development in the subject territory?
San Mateo County SB9 Lot Split Approval. Under California SB9 law, the project is ministerially approved and exempt from CEQA (California Environmental Quality Act) review
8. What additional approvals will be required to proceed?
San Mateo LAFCo approval for an Outside Service Agreement to extend utilities, followed by standard San Mateo County building, grading, and design review permits for the future home. Redwood City must provide will-serve letter for new water connection, and City may also require property owner to sign a deferred annexation agreement. PLN2025-00167 is approved. No other permits opened for this property
9. Does any portion of the subject territory contain any of the following --agricultural preserves, sewer or other service moratorium or wetlands subject to the State Lands Commission jurisdiction?
No
10. If no specific development projects are associated with this proposal, will the proposal increase the potential for development of the property? If so, how?
N/A

* * * * *

LAFCo will consider the person signing this application as the proponent of the proposed action(s). Notice and other communications regarding this application (including fee payment) will be directed to the proponent at:

NAME: Alexander Lehr EMAIL: alehr308@gmail.com ; nsj1214@gmail.com

ADDRESS: 1042 Whipple Ave Redwood City CA TELEPHONE: 6508636657

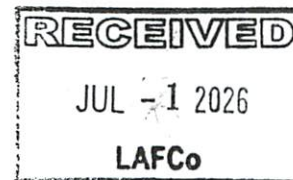
ATTN: _____

Addendum to Application titled LAFCo File No. 26 -- 06
Proposed of/for (Address)

APN's (List) 057-122-350
to

As part of above noted application submitted by petition, the Chief Applicants, (Name of Applicants) as Applicants and subject landowner(s), real parties in interest, agree to defend, indemnify, hold harmless, and release the San Mateo LAFCO, its agents, Commissioners, Executive Officer, attorneys, and employees from any claim, action, proceeding brought against any of them, the purpose of which is to attack, set aside, void, or annul the approval of this application or adoption of the environmental document which accompanies it. This indemnification obligation shall include, but not be limited to, damages, costs, and expenses, including attorney fees. The person signing this addendum to above noted application will be considered the proponent for the proposed action(s) and will receive all related notices and other communications.

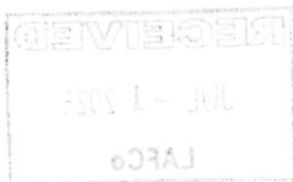
AG Whit Date 6/25/2026



_____ Date _____

_____ Date _____

_____ Date _____





0.07 0 0.04 0.07 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
© Latitude Geographics Group Ltd.

1:2,257



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

THIS MAP IS NOT TO BE USED FOR NAVIGATION

SAN MATEO



LOCAL AGENCY FORMATION COMMISSION

455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849

September 9, 2026

To: LAFCo Commissioners
From: Rob Bartoli, Executive Officer
 Sarah Flamm, Management Analyst

Subject: Consideration of LAFCo File No. 26-07 – Proposed Annexation of 3530 Alpine Road, Portola Valley (APN 077-281-020) to West Bay Sanitary District

Summary

This proposal, submitted by landowner petition, requests annexation of 3530 Alpine Road, Portola Valley (APN 077-281-020) to West Bay Sanitary District and connection to the District's sewer main. The property owner, Stanford University, has proposed the development of 27 market-rate single family residences and 12 affordable multifamily units (3 buildings with 4 units per building). The proposed annexation area is approximately 10.8 acres of the 75.2 acre parcel. The annexation area is inclusive of the proposed development area and associated road Right-of-Way along Alpine Road, for a total annexation area of 17.15 acres. The majority of the parcel, 64 acres, is proposed to remain undeveloped open space and is not included in the annexation area. The proposal has 100 percent landowner consent and waiver of conducting authority proceedings is also requested. Commission approval is recommended.

Departmental Reports

County Assessor: The total net assessed land valuation for the parcel (APN 077-281-020) shown in the County Assessor records is \$216,026.

County Clerk: The territory has zero registered voters. If the annexation is approved, the parcel would need to be assigned to a precinct that includes West Bay Sanitary District.

County Environmental Health: The California Water Service Company and West Bay Sanitary District provide the available water and sewer service in the area.

Town of Portola Valley: On December 5, 2024, the Town Council approved the Portola Terrace Residential Development Project (Final EIR Resolution No. 2955-2024 and Conditional Use Permit Resolution No. 2956-2024). This approval included certification of the Final Environmental Impact Report (EIR), adoption of the CEQA Findings and Mitigation Monitoring and Reporting Program,

COMMISSIONERS: VIRGINIA CHANG KIRALY, CHAIR, SPECIAL DISTRICT • ANN DRAPER, VICE CHAIR, PUBLIC • KATHRYN SLATER- CARTER, SPECIAL DISTRICT
 DAVID J CANEPA, COUNTY • DEBBIE RUDDOCK, CITY • STEPHEN RAINALDI, CITY • JACKIE SPEIER, COUNTY •
ALTERNATES: NOELIA CORZO, COUNTY • VACANT, SPECIAL DISTRICT • GREG WRIGHT, CITY • COLLEEN YOU, PUBLIC
STAFF: ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK

and approval of the Conditional Use Permit for establishment of a Planned Unit Development, Vesting Tentative Map, Architectural Review, Site Development Permit, State Density Bonus, Affordable Housing Plan, and Affordable Housing Agreement. The annexation of the property to the West Bay Sanitary District was evaluated as part of the EIR and other entitlements that the Town approved.

The Town has approved a demolition permit and rough grading permit for the project and is reviewing the building permit, encroachment permit, landscaping permit, and final subdivision map.

West Bay Sanitary District: Currently, there is a gravity sewer main at the frontage of the parcel along Alpine Road. Annexation to the On-Site Wastewater Disposal Zone is not required as part of this project.

Executive Officer's Report

This proposal has been submitted by landowner petition. The territory proposed for annexation to West Bay Sanitary District (WBSD) is located at 3530 Alpine Road, Portola Valley (APN 077-281-020). Stanford University, the property owner, is proposing to develop a portion of the property with 27 market-rate single-family 2-story residences as part of a planned unit development and 12 affordable multifamily units (configured as 3 lots, each with a 2-story, 4-unit building), as well as a picnic and play area and stormwater detention and bioretention treatment facilities. There will remain 64.4 acres of land under Stanford University ownership that will be preserved as open space.

The annexation area for this proposal includes 10.8 acres of the parcel and approximately 7 acres of road Right-of-Way on Alpine Road, for a total area of 17.15 acres to be annexed to WBSD. The remaining 64 acres of the parcel, which will be designated as open space, will remain outside of WBSD as sewer services will not be required for this portion of the parcel.

The annexation area is within the sphere of influence of WBSD adopted by the Commission in 1984 and is consistent with the District's plans for extending service. Approval of the annexation is recommended.

California Environmental Quality Act

On December 5, 2024, the Town of Portola Valley, as Lead Agency, adopted a Final Environmental Impact Report (Final EIR) and mitigation monitoring and reporting program under California Environmental Quality Act (CEQA) guidelines and approved the subdivision and development. The annexation of the development area to WBSD was evaluated as part of the Final EIR.

As responsible agency under CEQA, in considering the annexation, the Commission must certify that it has considered the contents of the EIR prepared by the Town of Portola Valley. Pursuant to Sections 15096(g)(2) and 15096(h) of the State CEQA Guidelines, the Commission as responsible agency must consider the Final EIR. It is recommended that the Commission make the following finding regarding the Final EIR:

The Commission has reviewed and considered the Final EIR including any findings and the mitigation and monitoring program, prepared by the Town of Portola Valley as lead agency and

that mitigation measures are within the responsibility and jurisdiction of the Town of Portola Valley (Section 15091(a)(2)).

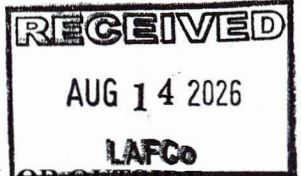
Recommended Commission Action

By resolution, approve File No. 26-07 – Proposed Annexation of 3530 Alpine Road, Portola Valley (APN 077-281-020) to West Bay Sanitary District and Waiver of Conducting Authority Proceedings.

Attachments

- A. Annexation Application for 3530 Alpine Road, Portola Valley (APN 077-281-020) to West Bay Sanitary District
- B. Vicinity Map
- C. Resolution No. 1358
- D. Portola Valley Resolution 2955-2024 – Certification of Final Environmental Impact Report

cc: Sergio Ramirez and Mark Robert Robles, West Bay Sanitary District
Town of Portola Valley
Ed Diaz, San Mateo County Environmental Health
Chephren Goree, San Mateo County Clerk
Andrew Smith, San Mateo County Assessor
Steve Elliott, Property Owner Representative
Shauntae Bronner, Project Service Manager, Stanford University



**APPLICATION FOR A CHANGE OF ORGANIZATION, REORGANIZATION, OR OUTSIDE
SERVICE AGREEMENT
TO THE SAN MATEO LOCAL AGENCY FORMATION COMMISSION**

A. GENERAL INFORMATION

1. Briefly describe the nature of the proposed change of organization, reorganization, or outside service agreement.

Annexation of a residential subdivision into the West Bay Sanitary District. Subject property is currently within the sphere of influence of the District.

2. An application for a change of organization or reorganization may be submitted by individuals in the form of a petition or by an affected public agency in the form of a certified resolution. This application is submitted by (check one):

xxx Landowners or registered voters, by petition
 _____ An affected public agency, by resolution

(If this application is submitted by petition of landowners or registered voters in the affected territory, complete the petition form.)

3. What are the reasons for the proposal?

Provide sanitary sewer service to the future project.

4. Does this application have 100% consent of landowners in the affected area?

xxx Yes _____ No

5. Estimated acreage: 17.15

B. SERVICES

1. List the name or names of all existing cities and special districts whose service area or service responsibility would be altered by the proposed change of organization or reorganization.

West Bay Sanitary District

2. List all changes to the pattern of delivery of local services to the affected area. For each service affected by the proposed change(s) of organization, list the present source of service (state "none")

if service is not now provided), the proposed source of service and the source of funding for construction of necessary facilities (if any) and operation. Example is given on the first two lines of the space provided for your response.

SERVICE	PRESENT SOURCE	PROPOSED SOURCE	FUNDING SOURCE	
			CONSTRUCTION	OPERATING
<i>Police (example)</i>	<i>Co. Sheriff</i>	<i>City Police</i>	<i>N/A</i>	<i>Taxes</i>
<i>Sewer (example)</i>	<i>None</i>	<i>City of . . .</i>	<i>Proponent</i>	<i>Fees</i>
Sewer	N/A	West Bay Sanitary District	Proponent	Fees

C. **PROJECT PROPOSAL INFORMATION**

1. Please describe the general location of the territory which is the subject of this proposal. Refer to major highways, roads and topographical features.

The project site is located at 3530 Alpine Road on a 75.4-acre parcel (APN 077- 281-020) that forms a triangular shape between Alpine Road, and developments along Westridge Drive and Minocca Road in Portola Valley, California. The approximately 7.4-acre northeastern portion of the project site (10% of the total site area) is proposed for development.

The annexation area is a portion of APN 077-281-020 and which totals 17.15 acres.

2. Describe the present land use(s) in the subject territory.

The property is currently vacant. The previous land use was horse stables that occupied approximately 5 acres of the site.

3. How are adjacent lands used?

North: Residential homes

South: Glen Oaks equestrian facilities

East: Undeveloped

West: Residential homes

4. Will the proposed change of organization result in additional development? If so, how is the subject territory to be developed?

None beyond the approved project

5. What is the general plan designation of the subject territory?

Conservation - Residential (Town of Portola Valley)

6. What is the existing zoning designation of the subject territory?

Residential Estate (R-E)

7. What rezoning, environmental review or development approvals have already been obtained for development in the subject territory?

Approved by the Town of Portola Valley, Conditional Use Permit for establishment of a Planned Unit Development (PUD), a Vesting Tentative Map to subdivide the parcel, Architectural Review for construction of thirty (30) new residential lots and thirty-nine (39) new residential units, a Site Development Permit for tree removal and grading, State Density Bonus Law/Below Market Rate (BMR) Housing Plan and Agreement, Final EIR

8. What additional approvals will be required to proceed?

None beyond annexation.

9. Does any portion of the subject territory contain any of the following --agricultural preserves, sewer or other service moratorium or wetlands subject to the State Lands Commission jurisdiction?

No

10. If no specific development projects are associated with this proposal, will the proposal increase the potential for development of the property? If so, how?

None beyond approved residential project.

* * * * *

LAFCo will consider the person signing this application as the proponent of the proposed action(s). Notice and other communications regarding this application (including fee payment) will be directed to the proponent at:

NAME: STEVE ELLIOTT

EMAIL: STEVE.ELLIOTT@STANFORD.EDU

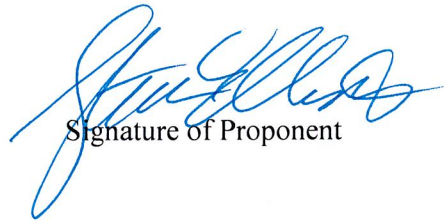
ADDRESS: 415 Broadway, Redwood City, CA 94063

TELEPHONE: (650) 520-4761

ATTN: Steve Elliott

Stanford University Real Estate

Applica_blk.doc
(10/6/2000)



Signature of Proponent

**PETITION
FOR PROCEEDINGS PURSUANT TO
THE CORTESE-KNOX-HERTZBERG LOCAL GOVERNMENT REORGANIZATION ACT
OF 2000**

The undersigned hereby petition(s) the Local Agency Formation Commission of San Mateo County for approval of a proposed change of organization or reorganization, and stipulate(s) as follows:

1. This proposal is made pursuant to Part 3, Division 3, Title 5 of the California Government Code (commencing with Section 56000, Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000
2. The specific change(s) of organization proposed (i.e., annexation, detachment, reorganization, etc. is/are:

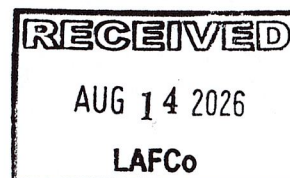
Annexation of the project located at 3530 Alpine Road, Portola Valley (APN 077- 281-020) into the West Bay Sanitary District.

3. The boundaries of the territory(ies) included in the proposal are as described in Exhibit(s) attached hereto and by this reference incorporated herein.
4. The territory(ies) included in the proposal is/are:

 __inhabited (12 or more registered voters) XX Uninhabited
5. This proposal is XX is not consistent with the sphere of influence of the affected city and/or district(s).
6. The reason(s) for the proposed ^{annexation} _____ (annexation, detachment, reorganization, etc.) is/are:
 To provide sanitary sewer service for the new Portola Terrace residential development.
7. The proposed _____ is requested to be made subject to the following terms and conditions:
 None

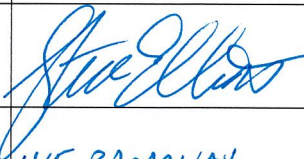
8. The persons signing this petition have signed as:

__registered voters **or** XX Owners of land (check one) within the subject territory.



Wherefore, petitioner(s) request(s) that proceedings be taken in accordance with the provisions of Section 56000, et seq. Of the Government Code and herewith affix signatures as follows:

Chief Petitioners (not to exceed three):

Date:	Printed Name:	Signature/Residence Address:	APN*
8/10/26	STEVE ELLIOTT	 415 BROADWAY	077-281-020
		REDWOOD CITY CA 94063	

*Assessor's Parcel Number of parcel(s) proposed for annexation.

EXHIBIT "A"
GEOGRAPHICAL DESCRIPTION
WEST BAY SANITARY DISTRICT ANNEXATION
PORTOLA VALLEY, CALIFORNIA

ALL THAT CERTAIN REAL PROPERTY IN THE RANCHO EL CORTE MADERA, TOWN OF PORTOLA VALLEY, COUNTY OF SAN MATEO AND STATE OF CALIFORNIA, BEING A PORTION OF THE RIGHT OF WAY FOR ALPINE ROAD, TOGETHER WITH PORTIONS OF THE LAND OWNED BY THE BOARD OF TRUSTEES OF LELAND STANFORD JR. UNIVERSITY, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE MOST SOUTHERLY CORNER OF LOT 8, AS SHOWN ON TRACT NO. 593 WESTRIDGE SUBDIVISION NO. 1, FILED IN BOOK 28 OF MAPS AT PAGES 20-22, SAN MATEO COUNTY RECORDS:

- (1) THENCE NORTH 69°05'00" EAST ALONG THE SOUTHEASTERLY LINES OF LOTS 8, 7 AND 5 OF SAID TRACT NO. 593, A DISTANCE OF 804.81 FEET TO AN INTERSECTION WITH THE WEST LINE OF ALPINE ROAD;
- (2) THENCE LEAVING SAID WEST LINE OF ALPINE ROAD, SOUTH 76°52'59" EAST A DISTANCE OF 80.00 FEET TO AN INTERSECTION WITH THE EAST LINE OF ALPINE ROAD;
- (3) THENCE LEAVING SAID EAST LINE OF ALPINE ROAD, SOUTH 76°52'59" EAST A DISTANCE OF 20.00 FEET;
- (4) THENCE SOUTH 13°07'01" WEST ALONG A LINE PARALLEL WITH AND 20 FEET EAST OF THE EAST LINE OF ALPINE ROAD (80' WIDE), A DISTANCE OF 906.76 FEET TO AN INTERSECTION WITH THE EAST LINE OF ALPINE ROAD;

THENCE SOUTH ALONG THE EAST LINE OF ALPINE ROAD, OVER THE FOLLOWING 3 COURSES;

- (5) THENCE SOUTH 00°55'09" EAST A DISTANCE OF 20.61 FEET;
- (6) THENCE SOUTH 13°07'01" WEST A DISTANCE OF 350.00 FEET;
- (7) THENCE SOUTH 21°38'51" WEST A DISTANCE OF 33.71 FEET;
- (8) THENCE LEAVING THE EAST LINE OF ALPINE ROAD, SOUTH 13°07'01" WEST ALONG A LINE PARALLEL WITH AND 10 FEET EAST OF THE EAST LINE OF ALPINE ROAD, A DISTANCE OF 1128.98 FEET TO A POINT OF CURVATURE OF A TANGENT CURVE, CONCAVE TO THE WEST;
- (9) THENCE SOUTH ALONG THE ARC OF SAID CURVE, TO THE RIGHT, WITH RADIUS OF 1260.00 FEET AND CENTRAL ANGLE OF 12°31'22", FOR AN ARC DISTANCE OF 275.39 FEET TO AN INTERSECTION WITH THE SOUTH LINE LANDS OF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JR. UNIVERSITY;
- (10) THENCE NORTH 41°37'59" WEST ALONG THE LAST DESCRIBED LINE, A DISTANCE OF 10.85 FEET TO AN INTERSECTION WITH THE EAST LINE OF ALPINE ROAD;
- (11) THENCE NORTH 40°39'19" WEST A DISTANCE OF 99.20 FEET TO A NON-TANGENT INTERSECTION WITH THE ARC OF A CURVE IN THE WEST LINE OF ALPINE ROAD;

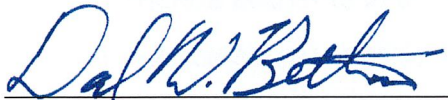
THENCE NORTH ALONG THE WEST LINE OF ALPINE ROAD, OVER THE FOLLOWING 6 COURSES:

- (12) THENCE NORTH ALONG THE ARC OF SAID CURVE TO THE LEFT, WHOSE CENTER BEARS NORTH 66°32'16" WEST FROM SAID POINT OF INTERSECTION, WITH RADIUS OF 1160.00 FEET AND CENTRAL ANGLE OF 10°20'43" FOR AN ARC DISTANCE OF 209.45 FEET TO A POINT OF TANGENCY;
- (13) THENCE NORTH 13°07'01" EAST A DISTANCE OF 562.50 FEET;
- (14) THENCE NORTH 01°48'21" EAST A DISTANCE OF 101.98 FEET;
- (15) THENCE NORTH 13°07'01" EAST A DISTANCE OF 100.00 FEET;
- (16) THENCE NORTH 24°25'41" EAST A DISTANCE OF 101.98 FEET;
- (17) THENCE NORTH 13°07'01" EAST A DISTANCE OF 508.63 FEET;
- (18) THENCE LEAVING THE WEST LINE OF ALPINE ROAD, NORTH 76°52'59" WEST A DISTANCE OF 313.62 FEET;
- (19) THENCE NORTH 20°55'00" WEST A DISTANCE OF 759.43 FEET TO AN INTERSECTION WITH THE SOUTH LINE OF THE AFOREMENTIONED LOT 8, AS SHOWN ON TRACT NO. 593 WESTRIDGE SUBDIVISION NO. 1:
- (20) THENCE SOUTH 67°30'00" EAST ALONG THE LAST DESCRIBED LINE, A DISTANCE OF 72.68 FEET TO THE POINT OF BEGINNING.

CONTAINING 747,054 SQUARE FEET MORE OR LESS, OR 17.150 ACRES.

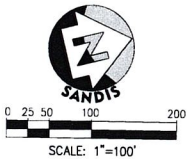
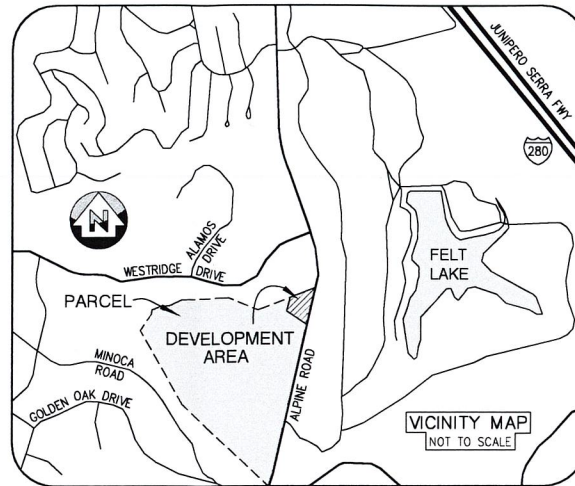
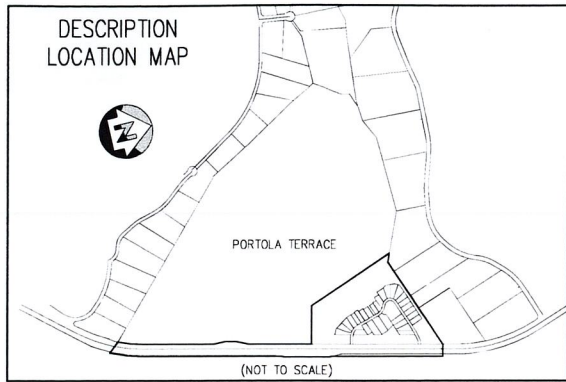
THE ANNEXATION DESCRIBED HEREON IS SHOWN ON THE ATTACHED PLAT, EXHIBIT "B", AND IS BY REFERENCE, MADE A PART THEREOF.

THIS GEOGRAPHICAL DESCRIPTION WAS PREPARED BY ME OR UNDER MY DIRECTION PURSUANT TO THE REQUIREMENTS OF THE PROFESSIONAL LAND SURVEYOR'S ACT.


DAVID W. BETHAM, PLS NO. 7047

June 29, 2026

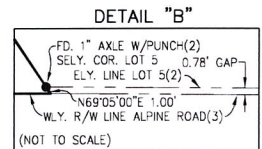




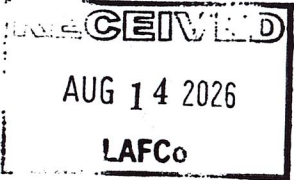
BASIS OF BEARINGS
THE BEARINGS SHOWN ON THIS LEGAL DESCRIPTION PLAT ARE RELATED TO THE BEARING OF N69°05'00"E BETWEEN FOUND MONUMENTS ON THE SOUTHEASTERN LINE OF LOTS 5, 7 AND 8, AS SHOWN ON TRACT NO. 593 WESTRIDGE SUBDIVISION NO. 1, FILED IN BOOK 28 OF MAPS AT PAGES 20-22, SAN MATEO COUNTY RECORDS.

RIGHT OF WAY EASEMENT NOTE
RIGHT OF WAY EASEMENTS ADJACENT TO ALPINE ROAD FOR PUBLIC STREET PURPOSES TO BE GRANTED TO THE TOWN OF PORTOLA VALLEY BY SEPARATE INSTRUMENT, RECORDED CONCURRENTLY WITH FINAL MAP, SUBJECT TO THE EXPRESS TERMS AND CONDITIONS THEREIN.

LEGEND
— DISTINCTIVE BOUNDARY LINE
— ROAD CENTERLINE
— AREA PROPERTY LINES
- - - TIE LINE OR DIMENSION LINE
• FOUND MONUMENT AS NOTED



LANDS OF THE BOARD OF TRUSTEES
OF LELAND STANFORD JR. UNIVERSITY
BOOK 82 OF DEEDS AT PAGE 264, RECORDED APRIL 29, 1899
3,275,400± SQUARE FEET OR 75.191 ACRES
APN 077-281-020
RECORD OF SURVEY NO. 4380
BOOK 58 LLS MAPS PAGES 54-57

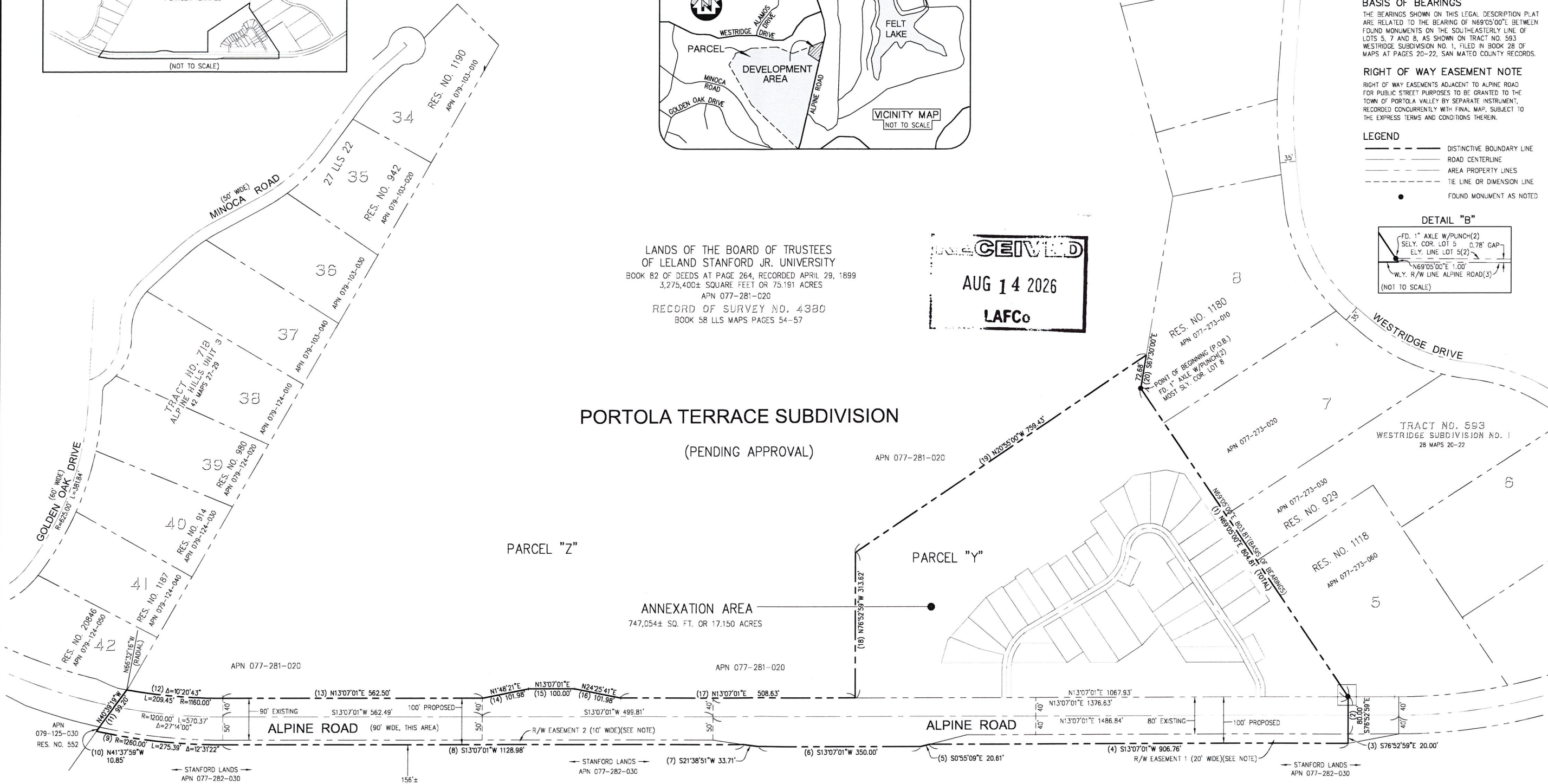


PORTOLA TERRACE SUBDIVISION
(PENDING APPROVAL)

PARCEL "Z"

PARCEL "Y"

ANNEXATION AREA
747,054± SQ. FT. OR 17.150 ACRES



PLAT TO ACCOMPANY LEGAL DESCRIPTION EXHIBIT "B"



BUILD ON.
SANDIS.NET

DATE: 3/2/2026
SCALE: 1"=100'
DRAWN BY: DWB
CHECKED BY: X.X
PROJECT No.: 217062

7-20-2026



No.	REVISION	DATE	BY
1	MAP ADDITIONS AS PER COMMENTS	6-12-2026	DWB
2	RES. NO. 1118 ADDED TO MAP	7-20-2026	DWB

LAFCo Meeting Packet Page 36

PORTOLA TERRACE
ALPINE ROAD
TOWN OF PORTOLA VALLEY

SAN MATEO COUNTY

CALIFORNIA

**LEGAL DESCRIPTION PLAT
FOR ANNEXATION
WEST BAY SANITARY DISTRICT**

SHEET
1
OF 1 SHEETS

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Stanford University

TO: Steven D. Elliott
Senior Managing Director, Development, Real Estate Operations

FROM: Jean G. Snider
Associate Vice President, Real Estate Operations

RE: Delegation of Signature Authority

DATE: June 1, 2026

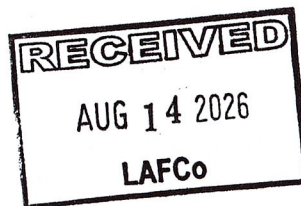
Pursuant to the authority delegated to me by the Vice President of Land, Buildings and Real Estate in a letter dated August 20, 2025, I hereby further delegate to you, as the above-named officer, the authority to sign and execute any and all documents on behalf of Stanford University related to the Portola Terrace Faculty Housing project located at 3530 Alpine Road in the Town of Portola Valley.

This delegation of signature authority shall be effective from the period beginning on June 1, 2026 and shall terminate upon execution of such documents.

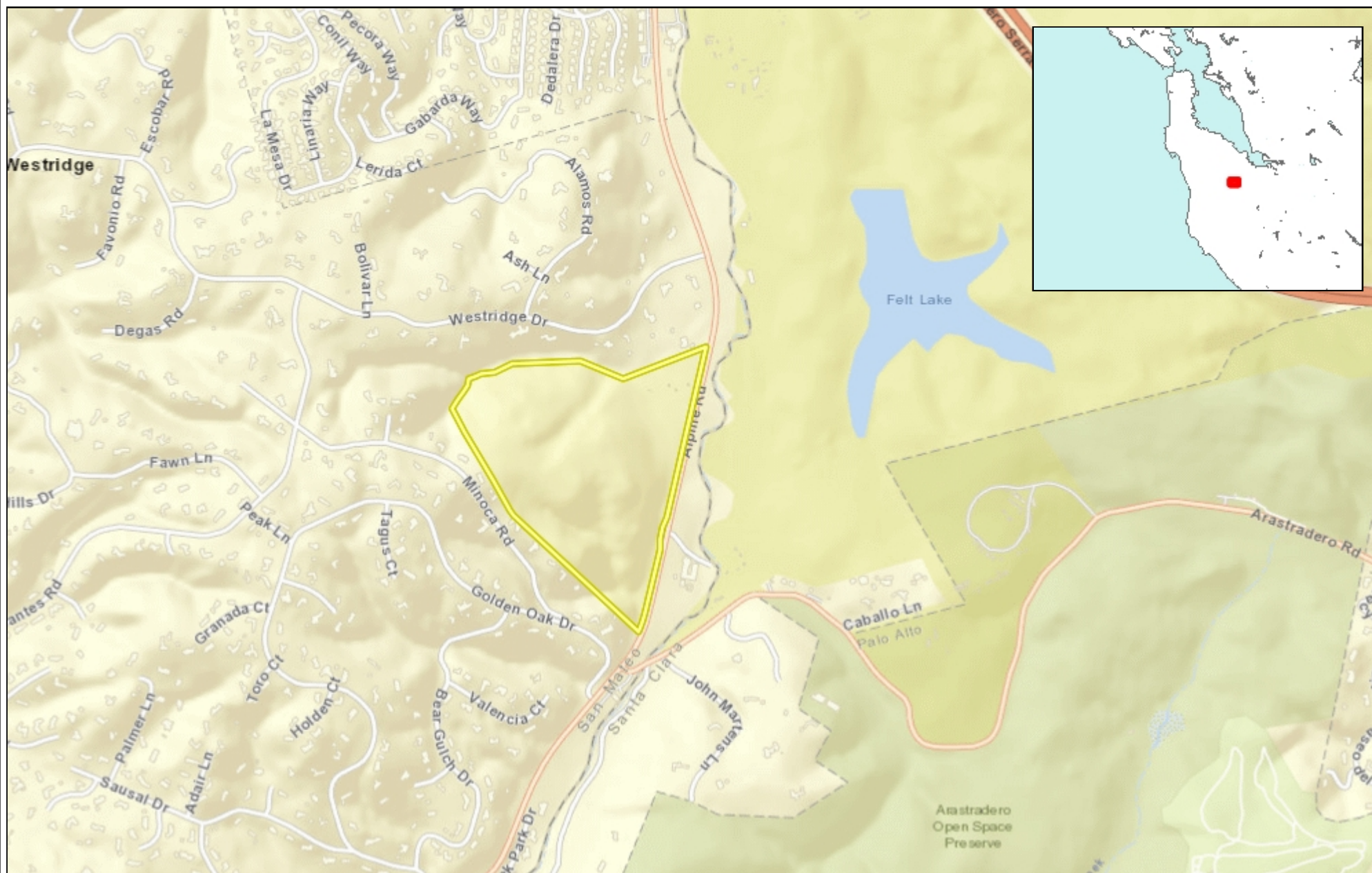
Signed by:

1150075DEF6A423...

Jean G. Snider
Associate Vice President, Real Estate Operations



STANFORD REAL ESTATE
415 Broadway, 3rd Floor • Redwood City • CA 94063 • T 650.723.8902



0.57 0 0.28 0.57 Miles

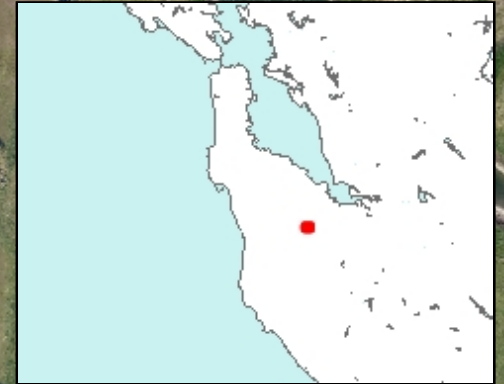
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1: 18,056



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THIS MAP IS NOT TO BE USED FOR NAVIGATION



0.28 0 0.14 0.28 Miles

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1:9,028



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LAFCo File No. 26-07

RESOLUTION NO. 1358

**RESOLUTION OF THE LOCAL AGENCY FORMATION COMMISSION
OF THE COUNTY OF SAN MATEO
MAKING DETERMINATIONS, APPROVING LAFCO FILE 26-07 -
ANNEXATION OF 3530 ALPINE ROAD, PORTOLA VALLEY (APN 077-281-020)
TO THE WEST BAY SANITARY DISTRICT AND
WAIVING CONDUCTING AUTHORITY PROCEEDINGS**

RESOLVED, by the Local Agency Formation Commission of the County of San Mateo, State of California, that

WHEREAS, a proposal for the annexation of certain territory to the West Bay Sanitary District in the County of San Mateo was heretofore filed with the Executive Officer of this Local Agency Formation Commission pursuant to Title 5, Division 3, commencing with Section 56000 of the Government Code; and

WHEREAS, the Executive Officer has reviewed the proposal and prepared a report, including the recommendations thereon, the proposal and report having been presented to and considered by this Commission; and

WHEREAS, it appears to the satisfaction of this Commission that all owners of the land included in the proposal consent to the proceeding; and

WHEREAS, a public hearing by this Commission was held on the proposal and at the hearing this Commission heard and received all oral and written protests, objections and evidence which were made, presented or filed, and all persons present were given an opportunity to hear and be heard with respect to the proposal and the Executive Officer's report; and

WHEREAS, the Town of Portola Valley, as Lead Agency, adopted a Final Environmental Impact Report (Final EIR) and mitigation monitoring and reporting program under California Environmental Quality Act (CEQA) guidelines and approved the subdivision and development on December 5, 2024. The annexation to WBSD of the development area was evaluated as part of the Final EIR; and

WHEREAS, San Mateo LAFCo, as a responsible agency under Sections 15096(g)(2) and 15096(h) of the State CEQA Guidelines, has reviewed and considered the Final EIR including any findings and the

mitigation and monitoring program, prepared by the Town of Portola Valley as lead agency and that mitigation measures are within the responsibility and jurisdiction of the Town of Portola Valley (Section 15091(a)(2)).

NOW, THEREFORE, the Local Agency Formation Commission of the County of San Mateo DOES HEREBY RESOLVE, DETERMINE AND ORDER as follows:

Section 1. This proposal is approved, subject to the following conditions: None.

Section 2. The boundaries as set forth in the application are hereby approved as submitted and are as described in Exhibit "A" attached hereto and by this reference incorporated herein.

Section 3. The territory consists of 17.15 acres, is found to be "uninhabited," and is assigned the following distinctive short form designation: Annexation of 3530 Alpine Road, Portola Valley to the West Bay Sanitary District.

Section 4. Conducting authority proceedings are hereby waived in accordance with Government Code Section 56662(a) and this annexation is hereby ordered.

Regularly passed and adopted this _ day of _____.

Ayes and in favor of said resolution:

Commissioners: _____

Noes and against said resolution:

Commissioner(s): _____

Absent and/or Abstentions:

Commissioner(s): _____

Chair
Local Agency Formation Commission
County of San Mateo
State of California

ATTEST:

Roberto J Bartoli Jr.
Executive Officer
Local Agency Formation Commission

Date: _____

I certify that this is a true and correct copy of the resolution above set forth.

Clerk to the Commission
Local Agency Formation Commission

Date: _____

RESOLUTION NO. 2955 - 2024**A RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF PORTOLA VALLEY CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT, AND ADOPT THE CEQA FINDINGS AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PORTOLA TERRACE RESIDENTIAL DEVELOPMENT PROJECT****SECTION I: PROJECT DESCRIPTION**

Application No: File # PLN_ARCH0021-2019

Applicant: Stanford University, John Donahoe

Location: 3530 Alpine Road, APN 077-281-020

SECTION II: ENVIRONMENTAL REVIEW PROCESS

WHEREAS, on September 19, 2019, the applicant submitted an application to the Town of Portola Valley proposing the Portola Terrace Residential Development project (commonly referred to as the "Portola Wedge") for a new single-family and multi-family residential development consisting of a total of 39 units and other associated site improvements ("Project") on an approximately 75.2 acre site at 3530 Alpine Road, Assessor Parcel Number: 077-281-020; and

WHEREAS, pursuant to the provisions and requirements of the California Environmental Quality Act of 1970 (Public Resources Code Section 21000 et seq.) ("CEQA") and the State CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations) ("CEQA Guidelines") (together "CEQA"), the Town of Portola Valley, as lead agency, prepared an Environmental Impact Report for the Portola Terrace Residential Project (SCH No. 2020010203) ("EIR" or "Final EIR"); and

WHEREAS, the City issued a Notice of Preparation (NOP) for the Project to receive comments on the scope of the EIR on January 16, 2020; and

WHEREAS, the NOP was circulated for review and comment by responsible and trustee agencies and the public for 30 days from January 17, 2020 through February 17, 2020; and

WHEREAS, a scoping meeting was held on January 30, 2020 to provide agencies and the public the opportunity to comment on the scope and content of the EIR; and

WHEREAS, on January 20, 2021 the Planning Commission held an informational study session to allow the public an additional opportunity to provide input on and ask questions about the Project, and received public testimony; and

WHEREAS, on January 25, 2021 the Architectural Site Control Commission held an informational study session to allow the public an additional opportunity to provide input on and ask questions about the Project, and received public testimony; and

WHEREAS, on June 30, 2021, the Planning Commission and the Architectural Site Control Commission held a special joint study session for discussion and decision on a story pole and staking plan and discussion of State Density Bonus Laws; and

WHEREAS, a Notice of Availability of the DEIR was sent to responsible agencies, organizations, and interested parties on March 29, 2022; and

WHEREAS, the Draft EIR, consisting of one volume (plus Appendices), was prepared and issued for public review and comment beginning on March 30, 2022 through May 13, 2022. The Draft EIR was filed with the State Office of Planning & Research under State Clearinghouse No. 2020010203 and filed with the San Mateo County Clerk's Office; and

WHEREAS, on May 4, 2022 the Planning Commission held a special meeting to receive comments on the Draft EIR; and

WHEREAS, the Final EIR Volume was published in August 2024 (Final EIR Volume); and

WHEREAS, the Final EIR consists of the August 2024 Final EIR Volume, the March 2022 Draft EIR, written responses to comments received on the Draft EIR, and text revisions that are not considered "significant new information" pursuant to CEQA Guidelines Section 15088.(a)(1)-(5) because these changes would not result in a new environmental impact or a substantial increase in the severity of an environmental impact identified in the Draft EIR, do not involve a considerably different feasible alternative or mitigation measure that would clearly lessen a significant environmental impact that the applicant declines to adopt, or that the Draft EIR was so fundamentally and basically inadequate or conclusory that meaningful public review and comment was precluded; and

WHEREAS, the City provided written responses to public agencies that commented on the Draft EIR at least 10 days in advance of certifying the EIR by sending them notice of the availability of the Final EIR Volume, which contains responses to comments; and

WHEREAS, all necessary public notices have been given as required by the procedural ordinances of the Town of Portola Valley and the Government Code, and the Planning Commission held a duly noticed public hearing on November 18, 2024 to receive comments on the Final EIR and the Proposed Project, and reviewed and considered the information contained in the Final EIR along with staff reports pertaining to the Project, all other pertinent documents, and all written and oral statements received by the Planning Commission at or prior to the public hearing.

WHEREAS, on November 18, 2024 the Planning Commission adopted Resolution 2024-04, Recommending Town Council certification of the EIR by a vote of 2-1 (2 recused); and

WHEREAS, on November 18, 2024 the Planning Commission adopted Resolution 2024-05, Recommending Town Council approval of the Conditional Use Permit to establish a Planned Unit Development, Vesting Tentative Map, Architectural Review and a Site Development Permit by a vote of 3-0 (2 recused); and

NOW, THEREFORE, be it **RESOLVED** that the Town Council, having fully reviewed, considered, and evaluated all of the testimony and evidence submitted in this matter, hereby:

1. Certifies that the Final EIR for the Proposed Project, has been completed in compliance with CEQA and reflects the independent judgment and analysis of the Town as CEQA lead agency and the applicable provisions of the Portola Valley Municipal Code.
2. Finds the information added in the Final EIR does not constitute new significant

information requiring recirculation of the EIR.

3. Finds that the Final EIR reflects the City's independent judgment and analysis and has been found by the Town to be adequate to support the Town's consideration of the Project entitlements.
4. Adopts the CEQA Findings for the Proposed Project, attached hereto as Exhibit C and incorporated herein by reference.
5. Adopts and makes conditions of approval all of the mitigation measures for the Proposed Project that are within the responsibility and jurisdiction of the Town that are identified in the CEQA Findings.
6. Adopts the Mitigation Monitoring and Reporting Program, attached hereto as Exhibit D and incorporated herein, for the Proposed Project.

PASSED AND ADOPTED at a regular meeting of the Town Council of the Town of Portola Valley on December 5, 2024.

AYES, COUNCIL MEMBERS : AALFS, HASKO, HUFTY, TAYLOR, WERNIKOFF

NOES, COUNCIL MEMBERS : NONE

ABSENT, COUNCIL MEMBERS: NONE

By: _____

Sarah Wernikoff, Mayor

Attest: _____

Christine Boland, Clerk Consultant

Exhibit A: Final EIR and Responses to Comments

Exhibit B: Draft EIR and Technical Appendices

Exhibit C: CEQA Findings

Exhibit D: Mitigation Monitoring and Reporting Program (MMRP)

Exhibit A: Final EIR and Responses to Comments

Final EIR available at:

<https://www.portolavalley.net/home/showdocument?id=18580&t=638602880561407459>

Exhibit B: Draft EIR and Technical Appendices

Draft EIR available at:

<https://www.portolavalley.net/departments/planning-building-department/development-projects/stanford/stanford-eir>

Exhibit C: CEQA Findings

I. INTRODUCTION

The Town of Portola Terrace ("Town"), as the Lead Agency under California Environmental Quality Act ("CEQA"), Public Resources Code Section 21000 et seq., has prepared the Final Environmental Impact Report for the Portola Terrace Residential Development Project (State Clearinghouse No. 2020010203) ("Final EIR" or "EIR"). The Final EIR is a project EIR pursuant to section 15161 of the State Guidelines for implementation of the CEQA ("CEQA Guidelines"). The Final EIR consists of the May 2022 Environmental Impact Report ("Draft EIR") and the August 2024 Final Environmental Impact Report ("Final EIR Volume").

In determining to approve the Portola Terrace Residential Development Project, which is described in more detail in Section II, below, the Council makes and adopts the following findings of fact and adopts and makes conditions of approval the mitigation measures identified in the EIR, all based on substantial evidence in the whole record of this proceeding ("administrative record"). Pursuant to CEQA Guidelines § 15090(a), the EIR was presented to the Planning Commission of the Town, with a request that the Planning Commission review and consider the information contained in the EIR prior to making a recommendation to the Town Council. The conclusions presented in these findings are based upon the EIR and other evidence in the administrative record.

II. PROJECT DESCRIPTION

The Project site is located at 3530 Alpine Road on a 75.2-acre parcel (APN 077-281-020) that forms a triangular shape between Alpine Road, and developments along Westridge Drive and Minoca Road in Portola Valley, California. The site, commonly known as the Stanford Wedge property, is mostly undeveloped and is covered with grasses, shrubs, and trees. The approximately 10.8-acre northeastern portion of the Project site (8% of the total site area) is proposed as the residential area development. Alpine Rock Ranch, a horse boarding facility with stables, currently occupies this portion of the site and would be removed.

The Project would subdivide the development area into 30 residential lots, which would be developed with 27 market-rate single-family 2-story residences as part of a planned unit development and 12 affordable multifamily units (configured as 3 lots, each with a 2-story, 4-unit building), as well as a picnic and play area and stormwater detention and bioretention treatment facilities. The approximately 64.4 -acre remainder of the property, not included as part of the development site, is sloped and heavily wooded; it would remain in University ownership and preserved as open space enforceable through a legal instrument to be recorded against the property.

Within the approximately 68-acre open space hillside area, the Project would implement an ongoing Vegetation Management Plan (VMP) to reduce and manage wildfire risk on the property. As a part of these efforts, the Project proposes a permanent fire access road,

which would be used for ongoing vegetation management and fire access. A looped public trail is also proposed on this open space hillside, connecting to the existing Alpine Road Trail along the Project's site's frontage.

The Town of Portola Valley General Plan designates the Project site as Conservation-Residential, and the site is zoned Residential Estate (R-E). The Project site is subject to the 3.5A residential density combining district, the SD-2 slope-density combining district, and the D-R design review combining district. The Housing Element of the General Plan identifies the Stanford Wedge site (Site 40) as one that could accommodate a number of new homes, including affiliated affordable housing, and notes that such development would need to be clustered along Alpine Road given the site constraints. The proposed development is consistent with allowable site density under the Portola Valley General Plan and State Affordable Density Housing Bonus Law due to the amount and type of affordable housing proposed.

As set forth in Chapter 3, Project Description of the DEIR, the Town has identified the following objectives for the Project in coordination with the applicant:

- Maximize single-family housing opportunities in an area the Town has studied and identified for housing.
- Reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community.
- Include sufficient affordable housing to make progress toward the Town's fair share of low- income housing needs under the Housing Element of the Town's General Plan, enable a density bonus, and comply with the Town's inclusionary housing ordinance.
- Cluster development closest to existing infrastructure on relatively flat land, in a manner that avoids development of unstable ground, preserves substantial open space and steep slopes, minimizes grading, and fosters a sense of community.

The EIR identifies standard permit conditions and conditions of approval, which are part of the project description, in addition to identifying mitigation measures to be adopted. Standard permit conditions are measures required by laws and regulations (primarily, the Town of Portola Valley Municipal Code) or are required to comply with laws and regulations. While standard permit conditions are not mitigation measures, they may assist in reducing environmental impacts. Conditions of approval also are not mitigation measures. They are required of the project by the City, but do not necessarily reduce an environmental impact.

III. ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15082 of the CEQA Guidelines, the Town of Portola Valley prepared a Notice of Preparation ("NOP") of an EIR for the Portola Terrace Project. The NOP was sent to state and local responsible and trustee agencies on January 16, 2020. The 30-day comment period concluded on February 17, 2020. The NOP provided a description of the project and identified probable environmental effects that could result from implementation of the project. The City also held a public scoping meeting during the comment period on January 30, 2020 to discuss the project and solicit public input as to

the scope and content of the EIR. The meeting was held in the Historic Schoolhouse 765 Portola Road, Portola Valley.

The City prepared the Draft EIR for the Portola Terrace Project in compliance with CEQA and the CEQA Guidelines. The Draft EIR was circulated for public review and comment for 45 days from March 30, 2022 through May 13, 2022. During this period, the Draft EIR was available to the public and local, state, and federal agencies for review and comment. Notice of the availability and completion of the Draft EIR was sent directly to every agency, person, and organization that commented on the NOP, as well as to the Office of Planning and Research. Written comments from public agencies, organizations and individuals concerning the environmental review contained in the Draft EIR were sent to the Community Development Department of the Town of Portola Valley during and after the 45-day public review period on the Draft EIR. The City also held a Planning Commission meeting on May 4, 2022, to take written and oral comments on the Draft EIR.

The Draft EIR analyzed implementation of the Project; the proposal to subdivide the development area into 30 residential lots, which would be developed with 27 market-rate single-family 2-story residences as part of a planned unit development and 12 affordable multifamily units (configured as 3 lots, each with a 2-story, 4-unit building), as well as a picnic and play area and stormwater detention and bioretention treatment facilities. The approximately 68-acre remainder of the property, which is open space hillside area, the Project would implement an ongoing Vegetation Management Plan (VMP) to reduce and manage wildfire risk on the property. As a part of these efforts, the Project proposes a permanent fire access road, which would be used for ongoing vegetation management and fire access. A looped public trail is also proposed on this open space hillside, connecting to the existing Alpine Road Trail along the Project's site's frontage. It also analyzed three project alternatives: (1) No Project (2) Larger Setback From Nearby Lots and (3) No Clustering. This proposed project is described in the FEIR as "Modified Alternative 2" and is herein referred to as the "Proposed Project."

IV. FINDINGS

These findings summarize the environmental determinations of the EIR about project impacts before and after mitigation, and do not attempt to repeat the full analysis of each environmental impact contained in the EIR. Instead, these findings provide a summary description of and basis for each impact in the EIR, describe the applicable mitigation measures identified in the EIR, and state the City's findings and rationale therefore on the significance of each impact with the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the discussion and analysis in the EIR supporting the EIR's determinations regarding mitigation measures and the Project's impacts.

In adopting mitigation measures below, the City intends to adopt each of the mitigation measures identified in the Final EIR. Accordingly, in the event a mitigation measure identified in the Final EIR has been inadvertently omitted from these findings, such mitigation measure is hereby referred to, adopted, and incorporated in the findings below by reference. In addition, in the event the language of a mitigation measure set forth below fails to accurately reflect the mitigation measure in the Final EIR due to a clerical error, the language of the mitigation measure as set forth in the Final EIR shall control unless the language of the mitigation measure has been specifically and expressly modified by these findings.

Section V, below, provides brief descriptions of the impacts the Final EIR identifies as less than significant with adopted mitigation. These descriptions also reproduce the full text of the mitigation measures identified in the Final EIR for each significant impact.

V. SIGNIFICANT ADVERSE IMPACTS IDENTIFIED IN THE FINAL EIR THAT ARE REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL BY MITIGATION MEASURES ADOPTED AND MADE CONDITIONS OF APPROVAL

The Final EIR identifies the following significant impacts associated with the Proposed Project. It is hereby determined that the impacts addressed by these mitigation measures will be mitigated to a less than significant level or avoided by making these measures conditions of approval for the Project. The findings in this section are based on the Draft EIR and the Final EIR, the discussion and analysis in which is hereby incorporated in full by this reference.

A. Impact Air-1: Construction Period Dust and Emissions. Construction activities would generate exhaust emissions from vehicles and equipment and fugitive dust particles that could affect local air quality.

The EIR finds that construction activities would generate exhaust emissions from vehicles and equipment and fugitive dust particles that could affect local air quality. Construction emissions for all stages of construction were estimated using the most recent version 2016.3.2 of the California Emission Estimator Model (CalEEMod), the land-use model recommended by the BAAQMD for CEQA analyses, as updated with the most recent emissions factors (EMFAC2017). Sources of general construction emissions include off-gassing from pavement and architectural coating, exhaust from off-road and on-road construction vehicles and equipment, and fugitive emissions (dust) associated with site grading (see full report in Appendix C of DEIR for detailed methodology, inputs, and results). As shown in Table 6.3 in the DEIR, predicted construction period emissions would not exceed the applicable BAAQMD significance thresholds.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM10 and PM2.5. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. BAAQMD does not have a quantifiable threshold of significance for fugitive dust impacts, but instead regards fugitive dust impacts as mitigated if appropriate management practices are implemented, as included in Mitigation Measure Air-1.

Implementation of Mitigation Measure MM Air-1, set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by reducing construction period dust and emissions thereby not contributing to a cumulatively considerable net increase in any criteria pollutant under applicable federal or state ambient air quality standards.

MM Air-1: Basic Construction Management Practices. *The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD “Basic Construction Mitigation Measures”.*

- *All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.*
- *All haul trucks transporting soil, sand, or other loose material off-site shall be covered.*
- *All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
- *All vehicle speeds on unpaved roads shall be limited to 15 mile per hour.*
- *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
- *Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.*
- *All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.*
- *Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.*

B. Impact Bio-1: Impacts on Special-Status Plants. While there are no special-status plant species in the Residential Development Area, ten species have the potential to occur on the remainder of the site and could be impacted by construction and use of the fire access road and hiking/equestrian trails and/or vegetation management activities.

The EIR finds that eight special-status plant species were thought to have some potential to occur within the Residential Development Area: bent-flowered fiddleneck, western leatherwood, woodland woollythreads, Santa Cruz clover, California androsace, Oakland star-tulip, bristly leptosiphon, and California bottle-brush grass. None of these eight species, nor any other special-status plants, were observed within the Residential Development Area of the Project site during either the reconnaissance survey or focused rare plant surveys during the flowering periods of the aforementioned species and therefore no impacts to special-status plant would occur on the Residential Development Area.

However, there is the potential for ten special-status plant species to occur in the remainder of the site that would be disturbed by construction of the fire access road, construction of the hiking/equestrian trails, and implementation of the VMP. These species include the above listed eight species plus Michael's rein orchid or Brewer's calandrinia.

If these species are present, grading for the fire access road or hiking/equestrian trails could impact special-status plants through:

- direct removal/destruction of individuals; permanent loss of habitat due to construction of the road and/or trails;
- temporary disturbance of habitat in areas adjacent to the road and/or trails that would be subject to grading;
- degradation of suitable habitat due to alteration of hydrology and soil compaction;
- introduction of non-native species (e.g., seeds introduced to the activity area as a result of contaminated machinery, equipment, or clothing), which can threaten native plant species through competition for resources and the physical or chemical alteration of the habitat; and
- minor fuel and oil spills that may occur during refueling of construction equipment.

In a similar fashion, proposed vegetation management activities, such as mastication, chipping, and/or tilling of vegetation could impact special-status plants through:

- direct removal or destruction of individuals,
- alteration of sun/shade microhabitat near the currently suitable habitat due to tree removal, or
- covering of occupied habitat in a layer of vegetation debris causing the habitat to become unsuitable.
- Temporary impacts could also include dust deposition on the leaves of rare plants, affecting photosynthesis and gas exchange, or trampling that does not kill the plants or prevent seed set.

Impacts from vegetation management activities may be permanent if habitat conditions are disturbed to the extent that conditions for special-status plants are no longer suitable, or they may only be temporary, with plants regrowing or recolonizing after initial vegetation management activities. The VMP Implementation Plan indicates how treatment would occur in high- priority areas without ground- disturbing activities, and with implementation of other measures to minimize impacts on special-status plants. For example, if wood-chipping is necessary as part of these initial treatment activities, wood chips would be distributed so that they are no more than 1 inch deep to allow seed germination and growth of special-status plants.

If more than 10% of the population of any CRPR List 1B species, or more than 20% of the population of any CRPR List 4 species ("population" referring to the occurrence on the Project site) would be impacted by construction of the fire access road and hiking/equestrian trails, and/or implementation of vegetation management activities, this impact would be significant under CEQA due to the regional rarity of these species. These percentages were selected based on the rarity of the species and related percent of the population that could be impacted without affecting the viability of that population.

Implementation of Mitigation Measures MM Bio-1a, Bio-1b, and Bio-1c set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by requiring pre-grading surveys of special status plants, identification of redesign and/or avoidance if special status plants are identified, and development of a Habitat Mitigation and Management Plan (HMMP) as warranted to prevent substantial adverse impacts to any special status plant species.

MM Bio-1a: *Survey (outside the Residential Development Area): Special-Status Plants. Prior to the initiation of grading for the fire access road and/or hiking/equestrian trails, or the*

implementation of initial ground disturbance or vegetation removal activities in areas outside the Residential Development Area that has been surveyed for special- status plants, a qualified biologist shall conduct, in areas outside the Residential Development Area that has been surveyed, a focused survey during the appropriate bloom season for potentially occurring special-status plant species, including:

- California bottle-brush grass (*Elymus californicus*; CRPR 4.3; May through August)
- Western leatherwood (*Dirca occidentalis*; CRPR 1B.2; January through March)
- Bent-flowered fiddleneck (*Amsinckia lunaris*; CRPR 1B2; March through June)
- Woodland woolly threads (*Monolopia gracilens*; CRPR 1B.2; March through July)
- Santa Cruz clover (*Trifolium buckwestiorum*; CRPR 1B.1; April through October)
- California androsace (*Androsace elongata* ssp. *acuta*; CRPR 4.2; March through June)
- Brewer's calandrinia (*Calandrinia breweri*; CRPR 4.2; March through June)
- Oakland star-tulip (*Calochortus umbellatus*; CRPR 4.2; March through May)
- Bristly leptosiphon (*Leptosiphon acicularis*; CRPR 4.2; April through July)
- Michael's rein orchid (*Piperia michaelii*; CRPR 4.2; April through August)

Ground disturbance associated with vegetation management activities that could potentially impact sensitive plant species if they are present, necessitating focused plant surveys, would include all vegetation management activities except initial vegetation management treatments that are implemented prior to construction of the fire access road (Panorama Environmental 2020b). These initial treatments include (1) removing trees and large shrubs through hand removal methods to avoid ground disturbance, and minimizing dragging out material; (2) minimization of soil disturbance through use of low compacting equipment (e.g., masticator or chipper) that would reduce rutting from machine turns and minimize soil compaction; and (3) limiting the spread of chipped or masticated materials to 1- inch in depth or less (Panorama Environmental 2020b). Therefore, focused surveys shall be conducted prior to all ground disturbance associated with vegetation management activities including and following construction of the fire access road, including a surrounding 50-foot buffer area on site and to the extent access to adjacent properties may be permitted. Surveys shall take place no more than 3 years before ground disturbance or vegetation removal for these vegetation management activities and should be conducted in a year with near-average or above-average precipitation. Alternatively, these surveys may be conducted in a year of below-average precipitation and the surveyor should attempt, if possible, to identify a nearby reference population that is flowering and detectable despite the below-average rainfall. The purpose of the survey shall be to assess the presence or absence of the potentially occurring species. If none of the target species are found in the impact area or surrounding 50-foot buffer, then no further mitigation measures shall apply. Otherwise, Mitigation Measure Bio-1b shall be additionally implemented.

MM BIO-1b: Avoidance and Minimization: Special-Status Plants. If any individual special-status plants are found in the impact area or 50-foot buffer, then in consultation with a qualified botanist or plant ecologist, the project shall be designed to avoid direct and indirect impacts to the species to the extent feasible. If avoidance of special-status plants reduces the impacts so that less than 10% for CRPR List 1B species of either individuals or occupied area within the population would be impacted, or less than 20% for CPRP List 4 species, then the impact would be considered less than significant, and no further mitigation is necessary. Otherwise, Mitigation Measure Bio-1c shall be additionally implemented.

MM BIO-1c: Compensatory Mitigation if Avoidance is Infeasible: Special-Status Plants. If,

even with project redesign to minimize impacts, more than 10% of the population for CRPR List 1B species, or more than 20% of the population for CRPR List 4 species would be impacted, compensatory mitigation shall be provided via the management of currently occupied habitat or the establishment of a new population for the species impacted. The mitigation habitat shall be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and shall contain at least as many individuals of the species as are impacted by project activities. A Habitat Mitigation and Management Plan (HMMP) shall be developed by a qualified plant or restoration ecologist and implemented for the mitigation lands. The HMMP shall be approved by the Town of Portola Valley prior to the start of ground-disturbing activities. The HMMP shall include, at a minimum, all of the following information:

- Summary of habitat impacts and the proposed mitigation;
- Description of the location and boundaries of the mitigation site and description of existing site conditions;
- Description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the focal special-status species;
- Description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which shall be determined by a qualified plant or restoration ecologist);
- Proposed management activities to maintain high-quality habitat conditions for the focal species;
- Description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria shall include demonstration that any plant population fluctuations over the monitoring period do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (e.g., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management);
- Annual monitoring should be conducted for a period of 5 years following transplantation of individuals, if plants are transplanted, or following the initiation of monitoring (e.g., for a mitigation site where the species is already present) to ensure that the population is healthy.
- Description of the management plan's adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria.

- C. **Impact Bio-2: Loss of Individual California Red-legged Frogs.** While there is no breeding habitat on the Project site for the California red-legged frog, there is the potential for infrequent individuals to visit the site and these could be impacted directly or indirectly by construction, operation, and vegetation management activities. Despite the low potential for individuals to be impacted, loss of any individual California red-legged frogs resulting from the proposed project activities would constitute a significant impact due to the species' regional rarity.

The EIR identifies five special-status animal species breed on or nearby the Project site: California red-legged frog, western pond turtle, white-tailed kite, pallid bat, and San Francisco

dusky-footed woodrat. Potential impacts to these special-status animal species are discussed individually below and additional detail can be found in the full biological assessment included as Appendix D of the EIR.

While no breeding habitat for the California red-legged frog is present on the Residential Development Area or fire access road, or in the unnamed drainage to the north, there are records of this species in the vicinity and individuals may occasionally disperse onto the site. If they do, such individuals are most likely to occur in the riparian corridors associated with the intermittent stream along the northern edge of the Project site, though this would be expected to occur very infrequently, if at all.

Project activities, including construction and initial vegetation management activities followed by residential use and trail use and ongoing vegetation management activities, would not result in the loss of breeding habitat for the California red-legged frog, or any direct impacts on the intermittent tributary to Los Trancos Creek where this species is most likely to occur if it were to disperse onto the site. Due to the infrequency with which California red-legged frogs might occur in the impact areas (owing the lack of any known breeding populations or high-quality breeding habitat in the immediate vicinity of the site), and the relatively limited extent of project impacts, the Project would not substantially affect California red-legged frog habitat availability in the region. However, in the rare chance that an individual frog moved into Project impact areas and was present during construction or initial vegetation management activities, it could result in injury or mortality of individuals either directly through contact with equipment or fuels/solvents or indirectly through putting them at greater risk of predation (by attracting predators or disturbing refuges with noise and vibrations).

Additionally, once the Residential Development Area and hiking and equestrian trails are constructed, increased human presence could introduce litter, which may attract wild predators, such as raccoons, striped skunks, and common ravens into the riparian and stream habitats where those predators may harass or prey on frogs. Increased numbers of domestic pets such as dogs and free-roaming cats may also result in an increase in predation risk for frogs that may disperse onto the site. Although the Residential Development Area, fire access road, and hiking/equestrian trails would avoid impacts to stream and riparian habitats, there is some potential for increased human presence to introduce pathogens that could be detrimental to amphibians.

Annual vegetation management activities involving goat grazing would have little to no effect on potentially- occurring California red-legged frogs in that this activity would not involve any ground disturbance or operation of large equipment (e.g., masticator) on the site. Likewise, periodic manual removal of trees and branches is not expected to impact potentially-occurring California red-legged frogs. However, if off-road mechanical support is necessary for long-term maintenance, there is potential for California red-legged frogs to be impacted in the same manner as with initial vegetation management activities described above.

Implementation of Mitigation Measures MM Bio-2a, Bio-2b, and Bio-2c set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by requiring pre-construction surveys of special status animals, training, limitation of construction timing, and avoidance measures if special status animals are identified, to prevent substantial adverse impacts to any special status animal species.

MM Bio-2a: *Survey and Avoidance (all Construction Activities and the Initial Vegetation Management Activities): Red-legged Frogs. Before any construction or initial vegetation*

management activities begin, the following measures shall be completed and/or included in construction contracts as ongoing measures:

i. *Pre-activity Survey.* A qualified biologist shall conduct a preconstruction survey for the California red-legged frog no more than 24 hours prior to initial ground disturbing activities or use of mechanical support for vegetation management within 100 feet of any riparian area. If a California red-legged frog is encountered in the work area, all activities with the potential to result in the harassment, injury, or death of the individual shall be immediately halted and shall not resume until the individual leaves the project site of its own accord.

ii. *Worker Environmental Awareness Program.* Before any construction activities begin, Stanford shall hire a qualified biologist to conduct a training session for all construction personnel. At a minimum, the training shall include descriptions of all special-status species potentially occurring on the project site and their habitats, the importance of these species, the general measures that are being implemented to conserve them as they relate to the proposed project, and the boundaries within which project activities may be accomplished.

iii. *Construction Timing.* Because California red-legged frogs are most active at night, nighttime earthmoving, and other construction activities, or use of mechanical support for vegetation management shall be avoided to the extent practicable within 100 feet of any riparian area. Further, to the extent practicable, ground-disturbing activities shall be avoided during the wet season, from mid-October through mid-April, when red-legged frogs are most likely to be moving through upland areas.

MM Bio-2b: *Survey and Avoidance (Initial and Ongoing Vegetation Management Activities): Red-legged Frogs.* Before any construction or vegetation management activities (initial or ongoing) begin, the following measures shall be included in construction/vegetation management contracts:

i. *Vegetation Stockpiles.* Because California red-legged frogs could move into areas under debris piles, where they could then be injured or killed when the debris piles are disposed of, debris intended for burning, mastication, or other disturbance, should not be piled on the ground within 100 feet of any riparian area unless the piles would be treated on the same day that they are created. If vegetation piles cannot be treated or removed daily, they should be dispersed on the site, to the extent feasible.

ii. *Trash Containment during Construction and vegetation management Activities.* Because human trash associated with construction activities and vegetation management activities has the potential to attract predators, all trash shall be contained in sealed containers and disposed of on a daily basis.

iii. *Mechanical Support for Vegetation Management.* If off-road mechanical support is necessary for ongoing vegetation management activities, Mitigation Measure Bio-2a shall be implemented for the off-road mechanical support activities.

MM Bio-2c: *Avoidance, Operational Prohibition of Nighttime Access to Trails: Red- Legged Frogs.* Signage shall be installed at trailheads indicating that nighttime access to trails and all access off trails is prohibited.

D. Impact Bio-3: Loss of Individual Western Pond Turtles. While there is no suitable habitat on the Project site for the western pond turtle, there is a low

potential for individual western pond turtles to visit the site and these could be impacted directly or indirectly by construction or vegetation management activities. Despite the low potential for individuals to be impacted, loss of any individual western pond turtle resulting from the proposed Project activities would constitute a significant impact due to the species' regional rarity.

The EIR identifies that while the Project site does not contain suitable habitat for the western pond turtle, a California species of special concern, they are known to occur at Felt Lake, approximately 0.25 mile east of the site, and elsewhere in the Project vicinity in San Francisquito Creek and Lagunita approximately 2.25 miles to the north. Western pond turtles are expected to occur in Los Trancos Creek, just east of the site, as well. Despite the lack of suitable aquatic and upland habitat, dispersing individuals could potentially cross Alpine Road from Los Trancos Creek and make their way on to the site on rare occasions. Therefore, there is a low probability of this species using the Residential Development Area or the eastern end of the fire access road area, especially near the riparian corridors, for dispersal. Therefore, Project activities would not result in the loss of any aquatic habitat for the western pond turtle or in a substantial loss of upland dispersal habitat.

However, individuals could make their way on to the site on rare occasions and if individuals are present during construction or off-road mechanical vegetation management activities, potentially- occurring western pond turtles would be at risk for injury or mortality. As described above for the California red-legged frog, annual vegetation maintenance activities involving goat grazing and periodic manual tree removal/maintenance would have little to no effect on potentially-occurring western pond turtles because this activity would not involve any ground disturbance or operation of large equipment on the site. However, if off-road mechanical support is necessary for long-term maintenance there is potential for western pond turtles to be impacted in the same manner as with initial vegetation management activities described above.

Implementation of Mitigation Measure MM Bio-3 set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by requiring pre-construction surveys of special status animals, and relocation efforts if special status animals are identified, to prevent substantial adverse impacts to any special status animal species.

MM Bio-3: *Survey and Avoidance (all Construction Activities and Vegetation Management Activities Involving Off-Road Mechanical Equipment): Western Pond Turtles. Before any construction or vegetation management activities involving off-road mechanical equipment begin, a qualified biologist shall conduct a preconstruction survey for western pond turtles no more than 24 hours prior to initial ground disturbing activities within 100 feet of any stream. If a western pond turtle is encountered in the work area, all activities with the potential to result in the harassment, injury, or death of the individual shall be immediately halted, and the individual shall be captured and relocated to a safe location outside of the work area by a qualified biologist, after which work may proceed.*

E. Impact Bio-5: Disturbance of Dusky-footed Woodrats. Hundreds of woodrat nests are expected to be present in the coast live oak woodland, blue oak woodland, mixed riparian forest, and chamise chaparral areas throughout the Project site, including at least 13 in the Residential Development Area. While dusky-footed woodrats and their habitat are relatively common in the region, woodrats are very important ecologically in that they provide an important prey

source for raptors and predatory mammals, and their nests provide habitat for a wide variety of small mammals, reptiles, and amphibians. Loss of multiple woodrat nests would be considered a significant impact due to the ecological impact that the loss of nests would represent both to the woodrat and to the other species that benefit from its presence.

The EIR identifies that at least 13 nests of the San Francisco dusky-footed woodrat, a California species of special concern, are located in the coast live oak woodland, mixed riparian forest, and rural-residential habitats along the perimeter of the Residential Development Area. Additional woodrat nests were also observed outside the Residential Development Area and hundreds are expected to be present in the coast live oak woodland, blue oak woodland, mixed riparian forest, and chamise chaparral in areas throughout the Project site.

Proposed construction and initial vegetation management activities may result in injury or mortality of dusky-footed woodrats and removal of woodrat nests due to construction, staging, Project vehicle traffic, and equipment use. Heavy ground disturbance, noise, and vibrations caused by construction activities could potentially cause woodrats to abandon their nests, possibly leading to abandonment of young as well. Additionally, thinning of trees and vegetation around nests in the surrounding vegetation and canopy layer would increase their internal temperatures through increased sun exposure, which could also lead to nest abandonment. Removal of vegetation around nests would also result in the loss of foraging habitat, which would reduce the carrying capacity of the population on site.

Annual vegetation maintenance activities involving goat grazing would not directly impact nests, but this activity could denude cover and food plants around nests if the goats are allowed to graze for excessive periods, reducing the habitat quality, and possibly leading to nest abandonment. Furthermore, if off-road mechanical support is necessary, periodic tree removal and maintenance could result in injury or mortality of dusky-footed woodrats and removal of woodrat nests if nests are located near or within a tree that is to be removed.

San Francisco dusky-footed woodrats are relatively common in suitable habitat regionally and have high reproductive capabilities. As a result, even given the loss of nests from the Residential Development Area and potential to disturb many more with vegetation management activities, the Project impacts on dusky-footed woodrats would not have a substantial effect on regional populations. However, woodrats are very important ecologically in that they provide an important prey source for raptors (particularly owls) and for predatory mammals, and their nests provide habitat for a wide variety of small mammals, reptiles, and amphibians. As a result, the loss of multiple woodrat nests would be considered a significant impact due to the ecological impact that the loss of nests would represent both to the woodrat and to the other species that benefit from its presence.

Implementation of Mitigation Measures MM Bio-5a and Bio-5b set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by requiring pre-construction surveys of special status animals, establishment of buffers if identified, avoidance and/or relocation measures if special status animals are identified, to prevent substantial adverse impacts to any special status animal species.

MM BIO-5a: Survey and Avoidance (all Construction Activities and Vegetation Management Activities Involving Off-Road Mechanical Equipment): Dusky-footed Woodrats. Before any construction or vegetation management activities involving off-road mechanical support begin, the following measures shall be completed and/or included in construction contracts:

i. *Pre-activity Survey.* No more than 30 days prior to any initial ground disturbance or vegetation removal activities, a pre-activity survey for woodrat nests shall be conducted by a qualified biologist within areas where ground disturbance or vegetation removal shall be conducted and within 10 feet of the disturbance and vegetation removal areas.

ii. *Disturbance-Free Buffers.* If feasible, a minimum 10-ft buffer shall be maintained between project construction activities and each nest to avoid disturbance. In some situations, a smaller buffer may be allowed if in the opinion of a qualified biologist, removing the nest would be a greater impact than that anticipated due to project activities. Environmentally sensitive area (ESA) fencing shall be installed to mark the buffer area around potentially impacted woodrat nests to keep workers, construction equipment, and construction materials out of the area where the nests are located.

iii. *Woodrat Relocation Plan.* Due to the large number of nests that could be impacted and infeasibility of avoiding impact to all nests at the site, a woodrat relocation plan shall be prepared by a qualified biologist prior to initial ground disturbance or vegetation removal activities. At a minimum, the plan shall include woodrat nest relocation methods, relocation site habitat requirements, appropriate relocation sequence with respect to vegetation management activities, spacing of nests, timing of relocations, and recommended protective buffers around nests proposed to remain in place. The plan shall also include a map of all woodrat nests, and proposed relocation areas. Relocation of nest materials shall follow the following guidance:

If it is determined that disturbance of woodrat nests cannot be avoided, the woodrats shall be evicted from their nests prior to the removal of the nests and onset of ground-disturbing activities to avoid injury or mortality of the woodrats. Relocation activities shall follow methods outlined in the Woodrat Relocation Plan. A qualified biologist shall monitor and direct all activities associated with the removal of dusky-footed woodrat nests (structures). Only as necessary and to the minimum extent possible, project site vegetation shall be removed to provide access to the woodrat nest(s). Following the removal of vegetation required to access woodrat nests, a fiber-optic camera shall be used to observe inside the nest to determine its occupancy prior to beginning the dismantling process. If young are not observed, the nest shall be fully dismantled and materials shall be relocated, as described below. If dependent young are present, the protocol for active nests below shall be followed to dismantle the structure over a two-week period.

Except where dependent young are present, woodrat structures or nests shall slowly and progressively be dismantled during a single site visit. Appropriate personal protective equipment (e.g. respirator, gloves, and Tyvek suit) shall be used while dismantling and relocating woodrat nest material to protect against disease carried by rodents (e.g., hantavirus). Where feasible, nesting material or food caches shall be moved to a new location at least 30 feet outside the disturbance area, preferably next to a large tree or similar structure in a riparian or oak woodland habitat, in an area where it can be used by woodrats to construct new nests. If no suitable structure is present, a log pile structure may be constructed to support the nest materials.

If young are uncovered within the nest prior to or during the dismantling process, dismantling of the nest shall be suspended for a period of two weeks to allow young to develop eyesight and become mobile. Nest materials shall be placed back on top of the nest to re-cover the

exposed young. After the two-week period, the above removal procedures shall be resumed. Within 24 hours of vegetation removal and completion of nest dismantling, an additional survey shall be conducted to confirm no new woodrat nests were constructed.

MM BIO-5b: *Avoidance, Implement Overgrazing Management Strategy for Annual Vegetation Management: Dusky-footed Woodrat. To ensure that annual grazing activities do not result in excessive disturbance of, or habitat loss around, San Francisco dusky-footed woodrat nests, grazing shall be performed so that goats will not graze in any one area too long. If no off-road mechanical support of annual vegetation management is required, Mitigation Measure Bio-5a would not also be required for this activity.*

F. Impact Bio-6. Disturbance of Pallid Bats. Construction in or demolition of buildings, vegetation management activities involving off-road mechanical support, or removal or modification of trees could result in destruction or disturbance of maternity roosts, hibernacula, day roosts, and/or night roosts of bat species, including pallid bat.

The EIR identifies the pallid bat, a California species of special concern, may forage throughout the more open areas of the Project site. In addition, several trees with small to moderate-sized cavities were observed throughout the Project site during the reconnaissance survey. These trees provide suitable roosting and breeding habitat for the pallid bat, and removal of such trees could result in the loss of pallid bat roost sites if they are occupied. Although ostensibly suitable roost sites for pallid bats, such mature trees with large cavities are widespread regionally and pallid bat numbers are low and the species' roosts are sparsely dispersed. As a result, the loss of potential habitat or potential (but unoccupied) roost trees for this species would not represent a significant impact. However, the loss of an occupied maternity roost would represent a significant impact because that roost site, coupled with the characteristics of the surrounding area (e.g., foraging habitat, thermal characteristics, lack of human disturbance) that attracted pallid bats to that roost, would be regionally important to this species' populations.

When trees containing roosting colonies or individual pallid bats are removed or modified during construction, or initial and long-term vegetation management activities, individual bats could be physically injured or killed; could be subjected to physiological stress from being disturbed during torpor; or could face increased predation because of exposure during daylight. Even if roost trees are not directly impacted, Project-related disturbance near a maternity roost of pallid bats could cause females to abandon their young. Such impacts would be significant because the species' populations are limited locally and regionally and because loss of individuals may have a substantial adverse effect on local and regional populations of the species.

Implementation of Mitigation Measure MM Bio-6 set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by timing and method limitations on tree removals that could impact nesting for special status animals, pre-construction surveys, and avoidance and/or relocation measures if special status animals are identified, to prevent substantial adverse impacts to any special status animal species.

MM Bio-6: *Survey and Avoidance (all Construction Activities and Vegetation Management Activities Involving Off-Road Mechanical Equipment): Pallid Bats. Before any structure removal, construction, or vegetation management activities involving off-road mechanical support, or removal or modification of trees begin, the following measures shall be completed and/or included in construction contracts to be overseen by a qualified bat biologist:*

- i. *Potential Roost Habitat Removal September through February, Outside Pallid Bat Maternity Season. Prior to any tree removal outside the March 1 – August 31 pallid bat maternity season, a qualified biologist shall conduct a pallid bat roost habitat assessment to determine which trees proposed for removal are suitable for use by roosting pallid bats. Unsuitable trees may be removed without any additional bat-related measures. Trees determined to be suitable roost trees may be removed outside the maternity season, during a two-day tree removal process, to encourage day- roosting bats to leave potential roost trees ahead of tree removal. This process involves removing small branches and small limbs containing no day-roost habitat (e.g., crevices) on habitat trees on Day 1, using chainsaws only. The following day (Day 2), the remainder of the tree is to be removed.*

The disturbance caused by chainsaw noise and vibration, combined with the physical modification of the tree, is expected to cause day- roosting bat species to abandon the roost tree after nightly emergence for foraging. Trimmed habitat trees must be removed the next day to prevent re- occupation of trimmed trees.

If suitable roost trees are not proposed for removal but would undergo a specific treatment (e.g., thinning, crown raising), disturbance shall be scheduled to take place outside the maternity roost season. If treatment activities cannot occur outside the maternity season, a pre-activity evening survey shall be conducted by a qualified biologist to determine if the tree is occupied by a maternity colony. If no bats are detected, work may proceed without any additional surveys. If a maternity colony is present, work shall be postponed until the end of the maternity season (August 31).

- ii. *Pre-activity Survey for Work within Pallid Bat Maternity Season (March through August). Prior to any initial ground disturbance, or off-road mechanical vegetation removal activities, or removal or modification of trees to occur during Pallid Bat Maternity Season, a pallid bat roost habitat assessment shall be conducted for all trees and structures on and within 150 feet of the location of the activity, during the appropriate time of year when bats would be detectable (March 1 – August 31). A qualified bat biologist shall conduct the survey to look for evidence of bat use within suitable habitat. If evidence of use 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 a nocturnal acoustic survey may be necessary to determine if a bat colony is present and to identify the specific location of the bat colony.*

iii. Avoidance. If an active pallid bat maternity colony or non-breeding roost is located, construction work or vegetation activities shall be redesigned to avoid disturbance of the roost, if feasible.

iv. Eviction and Alternative Roost Habitat. If an active pallid bat maternity colony or non-breeding bat roost is located and construction work cannot be redesigned to avoid removal or disturbance of the occupied roost, the individuals shall be safely evicted by a qualified bat biologist between August 1 and October 15 or between February 15 and March 15, with the timing determined by a qualified bat biologist.

If eviction is necessary, alternative roost habitat shall be provided at least 30 days prior to eviction of bats from the roost. A qualified bat biologist shall determine the appropriate location for the alternative roost structure, based on the location of the original roost and habitat conditions in the vicinity, and oversee installation of a new roost structure. The structure shall be placed as close to the affected roost site as feasible, taking into account

potential for disturbance during construction on the site (e.g., the roost might be placed elsewhere on the larger project site). The roost structure either shall be built to specifications determined by a qualified bat biologist or shall be purchased from an appropriate vendor (though a qualified bat biologist should approve the type of structure purchased). Stanford University shall monitor the roost for up to three years (or until occupancy is determined, whichever occurs first) to determine use by bats. If, by Year 3, pallid bats are not using the structure, a qualified bat biologist, in consultation with CDFW, shall identify alternative roost designs or locations for placement of the roost, place the new roost at the agreed-upon location, and monitor the new roost for an additional three years (or until occupancy has been verified).

G. Impact Bio-8: Direct or Indirect Impacts to Riparian Habitat. Construction of the fire access road would occur within 50 feet of an ephemeral stream, which could result in erosion and sedimentation impacting the riparian habitat. Additionally, while vegetation management activities are proposed to generally avoid riparian habitat, impacts could occur without specific measures for avoidance and/or compensation if warranted.

The EIR identifies riparian habitats, which are unique areas that surround river and stream banks and contribute disproportionately high habitat values and functions for their limited surface area. Specially-adapted plants that may tolerate repeated flooding or that rely on a high water table often occur in these areas, but even when it supports primarily upland species, this vegetation is important for stabilizing the banks, reducing soil erosion, and maintaining water quality within the stream channel, and the amount and type of vegetation present can have effects on water temperature and therefore aquatic habitat within the stream. Riparian corridor vegetation also provides specialized habitat for wildlife, including shade, breeding areas, and food sources. Riparian habitats are uncommon within the larger landscape. Riparian areas are considered sensitive habitats by the CDFW and are regulated as such under Section 1600 of the California Fish and Game Code, as well as by the RWQCB.

A limited amount of mixed riparian forest occurs in the northwest corner of the Residential Development Area, associated with the unnamed intermittent tributary of Los Trancos Creek. However, the Project does not propose development within riparian habitat.

Setbacks from creeks (also referred to as riparian buffers) are important to protect sensitive aquatic and riparian habitats, and the animals that inhabit them, from adverse effects of lighting, noise, human activity, sediments and contaminants in runoff, and other stressors associated with development. The dimensions of such setbacks vary depending on local regulations, the size of the creek, the quality of riparian habitat, slope, and other factors. The Town of Portola Valley does not have established setback regulations for development adjacent to the unnamed intermittent tributary at the edge of the Residential Development Area. As shown in Figure 7.1, the Residential Development Area is not located within riparian habitat.

Although the small intermittent stream near the Residential Development Area has some value for plants and wildlife, its ecological functions and values are low compared to a larger and/or perennial stream for which regulated setbacks are in place. Therefore, because the Project would avoid development within the riparian habitat, and the proximity of development to the riparian habitat is limited to a very small portion of the site, and this particular habitat value is relatively low, the setback from the Residential Development Area is considered adequate from a biological standpoint.

The locations of the fire access road and the hiking/equestrian trails do not involve crossing or otherwise impacting the riparian habitat along the intermittent stream on the northern edge of the site and would therefore avoid any direct impacts on riparian habitats. Where the fire access road is proposed to exit off of Alpine Road, however, it would be within 50 feet of the ephemeral stream. Grading for the fire access road would create disturbed soil conditions, potentially resulting in erosion and sedimentation of this ephemeral stream.

Implementation of the VMP would involve initial vegetation treatments throughout much of the 69-acre open space portion of the Project site. Treatment methods would include mechanical methods employing track-mounted excavators to carry out mastication and chipping of woody vegetation, as well as manual treatment methods using hand tools to cut, uproot, crush, compact, or chop vegetation. While the exact locations of these treatments have not been identified, it is assumed they could occur throughout the Project site, and would therefore occur in the vicinity of the riparian habitat that occurs along the intermittent stream occurring along the northern edge of the parcel along the unnamed tributary to Los Trancos Creek. While this corridor is narrow, this habitat is still considered sensitive, and any direct impact to this habitat from vegetation treatment activities would be considered significant. In addition, in the absence of avoidance and minimization measures, indirect impacts such as runoff from the areas of ground disturbance into the riparian habitat could have the potential to degrade this habitat and would be considered a significant impact.

The VMP states that vegetation treatment methods, or “prescriptions”, should avoid sensitive resources, including riparian habitat, to the extent feasible. It is anticipated that the fuel reduction prescriptions proposed in the VMP can largely avoid vegetation removal within the riparian corridor associated with the intermittent stream. In such a manner, vegetation management activities would avoid most, and possibly all, direct impacts on riparian communities from vegetation removal.

Implementation of Mitigation Measures MM Bio-8a and Bio-8b, set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by avoiding all riparian habitats, requiring vegetation replacement as warranted, and development of a Riparian Mitigation and Monitoring Plan.

MM Bio-8a: *Avoidance (all construction and all Vegetation Management Activities): BMPs for Work within/near Sensitive Habitats. The following measures shall be implemented to reduce impacts on mixed riparian forest and streams during construction on the Residential Development Area, during the grading of the fire access road and hiking/equestrian trails, and during all vegetation management activities:*

- i. If the CDFW and/or RWQCB determine potentially impacted areas are under their jurisdiction, the applicant shall acquire permits from CDFW and RWQCB and comply with all permit conditions.*
- ii. Personnel shall prevent the accidental release of chemicals, fuels, lubricants, and non-storm drainage water into channels.*
- iii. Spill prevention kits shall always be in close proximity when using hazardous materials.*
- iv. No equipment servicing shall be done in the stream channel or immediate floodplain, unless equipment stationed in these locations cannot be readily relocated (i.e., pumps, generators).*

- v. Existing native vegetation shall be retained by removing only as much vegetation as necessary to accommodate the fire access road and trail clearing width.
- vi. If riparian vegetation is to be removed with chainsaws, consider using saws currently available that operate with vegetable-based bar oil.
- vii. If goat grazing is to be used as a long-term vegetation management tool in the future, temporary fencing shall be erected when goats are introduced to keep them out of riparian habitats.
- viii. Control exposed soil by stabilizing slopes (e.g., with erosion control blankets) and protecting channels (e.g., using silt fences or straw wattles).
- ix. Control sediment runoff using sandbag barriers or straw wattles.
- x. Stabilize site ingress/egress locations.
- xi. Temporary disturbance or removal of aquatic and riparian vegetation shall not exceed the minimum necessary to complete the work.
- xii. Vehicles operated within and adjacent to streams shall be checked and maintained daily to prevent leaks of materials that, if introduced to the water, could be deleterious to aquatic life.
- xiii. Potential contaminating materials must be stored in covered storage areas or secondary containment that is impervious to leaks and spills
- xiv. All disturbed soils shall be revegetated with native plants suitable for the altered soil conditions upon completion of construction. Local watershed native plants shall be used if available. All disturbed areas that have been compacted shall be de-compacted prior to planting or seeding. Cut-and-fill slopes shall be planted with local native or non-invasive plants suitable for the altered soil conditions.

MM Bio-8b: *Compensatory Mitigation if Avoidance is Infeasible (All Vegetation Management Activities): Riparian Habitat.* The riparian habitat within the Project site consists of a mature overstory composed of California bay, California buckeye, and coast live oak. Riparian vegetation may be removed during vegetation treatment activities. All trees removed within mixed riparian forest habitat shall be replaced with the same species that was removed during project implementation, which shall be planted within the same reach where impacts occur or along streams on other Stanford University lands. Trees shall be replaced at a ratio of at least 1:1.

Additionally, if trees are to be removed within mixed riparian forest habitat, a qualified biologist shall develop a Riparian Mitigation and Monitoring Plan, which shall contain the following components (or as otherwise modified by regulatory agency permitting conditions):

- i. Summary of habitat impacts and proposed mitigation ratios
- ii. Goal of the restoration to achieve no net loss of habitat functions and values
- iii. Location of mitigation site(s) and description of existing site conditions

iv. Mitigation design:

- a) Soil amendments and other site preparation elements as appropriate*
- b) Planting plan*
- c) Irrigation and maintenance plan*
- d) Remedial measures/adaptive management, etc.*

v. Monitoring and Success Criteria: the mitigation site shall be monitored by an ecologist during a 5- year monitoring period. The interim site performance success criterion is annual replacement of any dead trees and shrubs during Years 1-3. The final success criterion at Year 5 shall be defined as 60% average cover of native trees and shrubs combined.

vi. Reporting requirements

H. Impact Bio-9: Introduction and/or Spread of Invasive Plants. Project construction and vegetation management activities could contribute to the introduction or spread of non-native invasive vegetation, some of which could degrade the quality of sensitive habitats.

The EIR identifies that nonnative, invasive plant species were observed in limited numbers within the Project site, including the following species that are considered by California Invasive Plant Council (Cal-IPPC) to have a “moderate” invasive rating and therefore can cause substantial ecological impacts on physical processes, plant and animal communities, and vegetation structure (California Invasive Plant Council 2020): wild oats (*Avena barbata* and *Avena fatua*), black mustard (*Brassica nigra*), ripgut brome (*Bromus diandrus*), Italian thistle (*Carduus pycnocephalus*), bull thistle (*Cirsium vulgare*), and poison- hemlock (*Conium maculatum*). In addition, one species with a “high” Cal- IPPC rating, red brome (*Bromus madritensis* ssp. *rubens*) was also observed within the Project site. Additional invasive species with high ratings, such as yellow starthistle (*Centaurea solstitialis*), French broom (*Genista monspessulana*), and Scotch broom (*Cytisus scoparius*), are known to occur in the immediate vicinity of the Project site.

Invasive species can spread quickly and can be difficult to eradicate, as they produce seeds that germinate readily following disturbance. Further, disturbed areas are highly susceptible to colonization by nonnative, invasive species that occur locally, or whose propagules are transported by personnel, vehicles, and other equipment. The spread of nonnative invasive species could degrade the ecological values of nearby riparian habitat and adversely affect native plants and wildlife that occur there.

The residential development would result in a large area being subject to soil disturbance, in a location adjacent to open space and near riparian habitat. Activities such as vegetation removal, grading, and equipment staging are all factors that would contribute to disturbance. Areas of disturbance could serve as the source for promoting the spread of nonnative species, which could degrade the ecological values of the nearby riparian habitat, and adversely affect native plants and wildlife that occur there.

The construction of the fire access road and the hiking/equestrian trails would result in the creation of a new area of disturbance in an area that was not previously disturbed. Similar to the manner described above, disturbance would be created by the clearing of vegetation and grading for either the fire access road or the new trails. In addition, both these Project elements would introduce new vectors or avenues along which invasive species could be spread. The spread of invasive

species along these corridors could lead to the introduction and spread of invasive species into sensitive riparian habitats within the Project site, and adversely affect native plants and wildlife that occur there.

Vegetation management activities would result in the disturbance of large amounts of vegetation throughout the Project site by mastication, mowing, trimming, and removal of vegetation. There is the potential for either the motorized equipment or the equipment used for manual treatments to have propagules of weed species (e.g., seeds, or dirt containing rhizomes) from other sites, and if not properly cleaned prior to coming onto the Project site, to introduce novel species.

Implementation of Mitigation Measure MM Bio-9, set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by reducing and/or preventing the introduction and/or spread of invasive plants, thus not degrading the quality of sensitive habitats.

MM-BIO-9: *Implement Invasive Weed BMPs. The invasion and/or spread of noxious weeds shall be avoided by the use of the following invasive weed BMPs:*

- i. During construction activities in the Residential Development Area, all seeds and straw materials used on-site shall be weed-free rice straw (or similar material acceptable to the Town), and all gravel and fill material shall be certified weed-free to the satisfaction of the Town.*
- ii. Prior to equipment coming onto the site for construction or vegetation management activities, all equipment (e.g., masticators, haul vehicles, excavators, and other heavy equipment) shall be washed (including wheels, undercarriages, and bumpers). Vehicles shall be cleaned at existing construction yards or legally operating car washes.*
- iii. Following construction of the residential development and the fire access road and hiking/equestrian trails, a standard erosion control seed mix (acceptable to the Town) from a local source shall be planted within the temporary impact zones on any disturbed ground that shall not be under hardscape, landscaped, or maintained. This will minimize the potential for the germination of the majority of seeds from non-native, invasive plant species.*
- iv. If areas are left bare by vegetation treatments as carried out by the VMP, a standard erosion control seed mix (acceptable to the Town) from a local source and consisting of native species shall be planted on any disturbed ground.*

I.Impact Bio-13: Disturbance of Nesting Birds. The removal of trees and other vegetation, demolition of existing structures, and construction activities during the breeding season (January 15 to September 15) could result in mortality of nesting avian species if they are present. This risk could include but is not limited to species of special concern, which could also be disturbed when they are wintering at the site, outside of breeding season.

The EIR identifies disturbance related to construction of the Residential Development Area, fire access road, and hiking/equestrian trails, and vegetation management activities during the avian breeding season (February 1 through August 31) could result in the incidental loss of eggs or nestlings, either directly through the destruction or disturbance of active nests or indirectly by causing the abandonment of nests located on or near the construction or vegetation management

areas.

While the habitats in and adjacent to the Residential Development Area represent a very small proportion of the habitats that support these species regionally and they are relatively degraded, the habitats in the larger portion of the site are more natural and represent a larger proportion of habitats that are used by local breeding species. Still, all species of birds currently using the Residential Development Area are expected to nest and forage or continue these activities on the larger portion of the Project site after the Project is completed because this habitat would still be available, even if modified by vegetation management activities. Furthermore, some species may continue to nest on the developed residential portion of the site, depending on how much habitat is left intact or what landscaping vegetation is provided. Nevertheless, in the absence of mitigation measures, the number of active nests of birds that could be impacted would constitute a significant impact under CEQA. Furthermore, all native bird species are protected from direct take by federal and state statutes (see Regulatory Setting section of DEIR).

Implementation of Mitigation Measures MM Bio-13a and Bio-13b, set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by limiting timing of construction-related activities, pre-activity surveys, establishment of buffer zones, and protection treatments during vegetation management activities to avoid disturbance of nesting birds.

MM Bio-13a: *Nesting Bird Avoidance, Substrate Pre-removal, Pre-activity Surveys, and Buffers. The applicant shall conduct or include in work contracts the following measures related to nesting birds for construction and vegetation management activities:*

- i. To the extent feasible, construction and vegetation management activities should be scheduled to avoid all potential bird nesting seasons (January 15 to September 15). If these activities are scheduled to take place outside the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code shall be avoided.*
- ii. If construction of the residential development, fire access road, or trails would not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by these project features may be removed prior to the start of the nesting season (e.g., prior to January 15). This would preclude the initiation of nests in this vegetation, and prevent the potential delay of the project construction due to the presence of active nests in these substrates.*
- iii. If it is not possible to schedule construction or vegetation management activities between September 16 and January 14, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests shall be disturbed during project implementation. We recommend that these surveys be conducted no more than seven (7) days prior to the initiation of all project activities. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., shrubs, ruderal grasslands, trees, horse paddocks) in and immediately adjacent to the impact areas for nests.*
- iv. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction or disturbance-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other*

species to ensure that no nests of species protected by the MBTA and California Fish and Game Code shall be disturbed during Project implementation. On a case by case basis, the ornithologist may determine that another buffer distance is appropriate based on the species, the height and concealment of the nest, vegetation or topography intervening between the nest and project activities, and the degree of human activity to which the nesting birds are already exposed.

MM Bio-13b. *Maintain Nesting Substrate during Vegetation Management. To the extent feasible, maintain a variety of tree, shrub, and herbaceous nesting substrates during vegetation management activities. This would involve maintaining (1) plant species diversity, and structural and age class diversity to accommodate a variety of tree-nesting species, (2) islands or scattered locations of live and dead or dying trees that support nest cavity habitat, and (3) islands or scattered locations supporting moderately dense pockets of shrubs, and other low-lying vegetation for shrub and ground-nesting species.*

J. Impact Cultural-1: Potential Disturbance of Resource P-43-000557 (Precontact Habitation Site). While there is no evidence that Resource P-43-000557 is located within the Project site, the known location is close by (43 meters east of the Residential Development Area). Due to the underlying soils and depositional conditions within the Residential Development Area, it is considered possible that subsurface deposits from this resource could extend into the Residential Development Area and adjacent Alpine Road and if so, could be disturbed by Project construction activities.

The EIR identifies P-43-000557 as a prehistoric occupational site with a high density of habitation debris and is located only 43 meters east of the Residential Development Area. Cultural materials include fire cracked rock, mortars, pestles, chert and obsidian flaked stone and core fragments, a hearth, shell fragments, burned faunal bone, and a human burial. Later survey efforts placed the burial within the contiguous Los Trancos Site (SCL-634). The P-43-000557 surficial site is thought to have subsurface components.

Geological trenching within the Residential Development Area was performed by the Project sponsor to explore the potential for fault traces at the site (see Chapter 9: Geology and Soils), which provided an opportunity for archaeological monitoring. No buried cultural deposits were identified during the geological trenching. However, underlying soils and depositional conditions within the Residential Development Area coupled with the presence of precontact buried cultural deposits east of the creek indicate a moderate sensitivity for buried cultural resources within the Residential Development Area. Therefore, this proposed development has the potential to impact previously unidentified archeological resources during ground disturbance associated with Residential Development Area construction, including utility installation along Alpine Road.

Implementation of Mitigation Measure MM Cultural-1, set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by protecting the historical or cultural value of any discovered resources through data recovery or preservation.

MM-Cultural 1: *Residential Development Area Archaeological Monitoring. Prior to the issuance of a grading permit in the Residential Development Area and adjacent Alpine Road, the project sponsors shall obtain the services of a qualified archaeological consultant (meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (NPS 1983)) to observe all project-related ground disturbing activities.*

In accordance with CEQA Guidelines §15064.5 (f), should any previously unknown prehistoric resources (including but not limited to charcoal, obsidian or chert flakes, grinding bowls, shell fragments, bone, or pockets of dark, friable soils) and/or historic- period resources (including but not limited to glass, metal, ceramics, wood, privies, trash deposits or similar debris) be discovered in the Residential Development Area during grading, trenching, or other on-site excavation(s), earthwork within 25 feet of these materials shall be stopped until a qualified professional archaeologist has an opportunity to evaluate the potential significance of the find and suggest appropriate mitigation(s), as determined necessary to protect the resource.

If feasible, the location of earthwork shall be modified to protect the resource from damaging effects through avoidance.

If avoidance is not feasible, a qualified archaeologist shall conduct data recovery in the area of potential adverse effect in accordance with an approved Archaeological Data Recovery Plan (ADRP).

Once the site has been properly tested, subject to data recovery, or preserved to the satisfaction of the professional archaeologist in compliance with CEQA Guidelines §15064.5, the site can be further developed.

Archaeological monitoring may be reduced or halted at the discretion of the monitor, and in consultation with the Town, as warranted by conditions such as encountering bedrock, ground disturbance is occurring in fill, or negative findings during the first 60 percent of rough grading. If monitoring is reduced to spot-checking, spot checking shall occur when ground-disturbance moves to a new location within the site and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock).

K. Impact Cultural-2: Potential Disturbance of P-41-000297 (Stone Circle) and the Wedge Quarry/Bedrock Mortars Site within the Vegetation Management Area. The “stone circle site” (P-41-000297) and the Precontact component of the Wedge Quarry/Bedrock Mortars site would not be directly impacted by construction associated with the Residential Development Area, trails, or fire access road, but may be affected by activities related to the Stanford Wedge Property VMP. The VMP describes four treatment activities to be undertaken at the Project site: steep slope mechanical treatment with manual support, mechanical treatment, manual treatment, and prescribed herbivory. As described, several of these treatment activities use heavy machinery to assist in vegetation management, which may negatively impact surface or near-surface archaeological resources.

The EIR identifies Resource P-41-000297 (CA-SMA-293) as a prehistoric lithic hearth site, comprised of 12 large stones and some larger boulders; in addition to the hearth, there were two pieces of flaked stone found on the surface. Multiple attempts to find this resource in the listed location have been unsuccessful. The presence of dense vegetation, including sections of thick grasses, shrubbery and tree cover led to a ground visibility of less than 10 percent in the previously mapped site location. Therefore, the feature may be present, but buried by soil or obscured by dense vegetation. Or the incorrect location could have been mapped. On May 22, 2020, Basin Research Associates identified a similar rock ring in a different location but did not provide updated GPS coordinates. Personal communication with Dr. Laura Jones of Stanford Heritage Services indicates they were not positive that they had located the stone circle site. PaleoWest did not find a rock ring in either location during the 2022 survey of the area.

As currently designed, resource P-41-000297 (the stone circle site) would not be directly impacted by the Residential Development Area or proposed fire access road or trail construction but may be affected by activities related to vegetation management. Although a formal significance evaluation of this resources was not undertaken as part of the current cultural resource assessment because it could not be found, existing archival data indicate that the stone circle, and the associated artifacts, need to be evaluated for listing in the CRHR. For the purposes of this undertaking, it is assumed that the resource is eligible for listing in CRHR and the area surrounding the original mapped location of the stone circle will be considered as a Historic Period resource.

The Wedge Quarry/Bedrock Mortars site is a mixed-component site with the remnants of a historic (ca. 1925–1930) sandstone quarry and one bedrock milling feature with eight mortars. PaleoWest visited this site in 2022 around the perimeter of a ravine, which consists of steel anchor cables wrapped around trees, the large wooden post (approximately 12 in × 12 in × 15 feet), quarried rock faces, quarried blocks of sandstone, oak trees, poison oak, tall grass, weeds, and moss. Bedrock mortars were located within the quarry at the top of the ravine. The bedrock mortars were on top of a large (approximately 11 feet long × 7 feet wide) sandstone boulder and had eight distinct mortars. The bedrock mortars were on the east side of a mountain slope in a cluster of boulders and overlooked a ravine bound by large sandstone boulders and thick vegetation around the perimeter. At the bottom of the bedrock mortar boulder was a large (approximately 5 feet wide × 20 feet long) cleared sandstone ledge.

The Wedge Quarry/Bedrock Mortars site was likely quarried between 1925 and 1930 and may have been used in the reconstruction of the Stanford University gates on Palm Drive following their collapse in the 1906 earthquake. The site includes a sandstone outcrop with quarry marks, abandoned quarried blocks, abandoned quarrying implements, and eight Native American bedrock mortars on a nearby upslope boulder. There are scattered features relating to the quarry activities conducted at the site such as hardware and infrastructure (steel cables, a very large wood post, and scattered fragments of metal machinery parts). The Wedge Quarry/Bedrock Mortars site does not appear to be associated with Precontact or Historic Period events that have made a significant contribution to the broad patterns of our history. Therefore, PaleoWest recommends the Wedge Quarry/Bedrock Mortars site not eligible for the CRHR under Criterion 1.

The resource cannot be associated with a particular individual or be considered significant to the lives or a best resource with which to represent the life of a particular individual in the Precontact or historic periods. Therefore, PaleoWest recommends the Wedge Quarry/Bedrock Mortars site not eligible for the CRHR under Criterion 2.

The Wedge Quarry/Bedrock Mortars site is composed of features that are the result of general quarrying activities in the 1920s and 1930s and therefore it does not meet the NRHP under Criterion 3 for embodying the distinctive characteristics of a type, period, and method of construction, or as the work of an important creative individual, or as having high artistic value. Similarly, the Native American bedrock mortars are a common Precontact feature and not indicative of a distinctive type, period, method of construction, or work of high artistic value or important individual. Therefore, PaleoWest recommends the Wedge Quarry/Bedrock Mortars site not eligible for listing in the CRHR under Criterion 3.

The presence of eight Native American bedrock mortars on an uncommon high, steep rock formation at the Wedge Quarry/Bedrock Mortars site offers the potential to test hypotheses offered by the local Muwekma Ohlone Tribe that suggest bedrock mortars in these locations may have been used for purposes other than food preparation, such as preparation of medicine, paint, and

ceremonial functions. Conversely, the data that may be obtained from further archaeological study of the Wedge Quarry would not contribute to the information already available in the archival record. Therefore, PaleoWest recommends the Wedge Quarry/Bedrock Mortars site eligible for listing in the CRHR under Criterion 4 with the Precontact bedrock mortar the only contributing component to the historical significance of the site. The historical quarry is a non-contributing component to the significance of the site and requires no further management.

The Wedge Quarry/Bedrock Mortars site would not be directly impacted by the Residential Development Area or proposed fire access road or trail construction, but may be affected by activities related to vegetation management.

Implementation of Mitigation Measure MM Cultural-2, set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by professional archaeological monitoring prior to and/or during VMP activities.

MM Cultural 2: *Vegetation Management Plan Archaeological Monitoring. Prior to the implementation of the VMP, the Project sponsor shall hire a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (NPS 1983)) to review all proposed activities and determine if those activities are in or near (within 50 feet) P-41-000297 and the precontact component of the Wedge Quarry/Bedrock Mortars site. If work is proposed at or within 50 feet of either of these sites, a qualified archaeologist will be required to accompany the VMP crew and prevent any work from occurring within 25 feet of the site.*

L. Impact Cultural-3: Disturbance of Previously Unidentified Cultural Resources or Human Remains. While not anticipated, it is possible that previously unidentified historic resources, archaeological resources, or human remains could be uncovered and disturbed during ground disturbing activities throughout all portions of the Project site.

The EIR identifies that while no additional unidentified significant cultural or tribal cultural resources were found at the Project site, the following mitigation measures are proposed to address the unexpected presence of unidentified subsurface resources or remains.

Implementation of Mitigation Measures MM Cultural-3a and Cultural 3-b, set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by protecting the historical or cultural value of any discovered resources through a qualified consultant and recovery.

MM Cultural 3a: *Halt Construction Activity, Evaluate Find and Implement Mitigation. In the event that any previously unidentified cultural resource (historic / archaeological / paleontological / Native American) are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific measures can be implemented to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code.*

MM Cultural 3b: *Halt Construction Activity, Evaluate Remains and Take Appropriate Action in Coordination with Native American Heritage Commission. In the event that any human remains are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by the County Coroner, and appropriate*

action taken in coordination with the Native American Heritage Commission, in accordance with section 7050.5 of the California Health and Safety Code or, if the remains are Native American, section 5097.98 of the California Public Resources Code.

M. Impact GEO-2 Seismic Ground Shaking. There is a high probability that the proposed development would be subjected to strong to violent ground shaking from an earthquake during its design life.

The EIR identifies that the San Francisco Bay Area is a seismically active region. Like all projects in the region, the Project will likely be subjected to strong to violent seismically-induced ground shaking within the design life of the development. As discussed in the setting, based on soil classifications at the site, the Project site could be subject to a peak ground acceleration (PGA) of up to 1.090 g (acceleration due to gravity) during a seismic event.

Seismic construction standards are detailed in building codes and specifics of needed site preparation, foundation design, and building construction are specified through structural engineering design formalized in a Design-level Geotechnical Investigation Report. While these are existing requirements through the construction permitting process, these requirements are detailed in the measures below for tracking purposes.

Implementation of Mitigation Measures MM Geo-2a and Geo 2-b, set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by incorporating recommendations from the Geotechnical Investigation into the project design.

MM Geo-2a: *Preparation and Compliance with a Design-Level Geotechnical Investigation. Report prepared by a Registered Civil or Geotechnical Engineer and with Structural Design Plans as Prepared by a Registered Structural Engineer. The Preliminary Geotechnical Investigation and Geologic Hazards Assessment for the site identified seismic design criteria for the Project development. The structural engineering design should incorporate seismic design standards required by the California Building Code/California Residential Code. In general, the design-level report shall either corroborate or provide alternative recommendations to the preliminary report based upon actual soil and rock conditions in the areas where structures are proposed. The fire access road shall also be investigated. As is standard required practice prior to issuance of building permits, a design level geotechnical investigation shall be completed that includes the following elements:*

A) Additional subsurface investigation in areas to be occupied by structures which shall confirm or expand on the geotechnical recommendations presented in the preliminary report related to seismic ground shaking.

B) Specific measures to addressing the potential for seismically-induced landslides, such as retaining structures, buttress fills or other techniques to reduce the potential for seismically induced landslides.

C) Additional test pits within the Residential Development Area and fire access road area to identify areas of expansive claystone bedrock. As applicable, measures to address expansive claystone bedrock shall include control of drainage measures, depth of excavations, location of improvements relative to the claystone, the use of deep foundations, and the use of stiffened structural slabs and void forms beneath the slabs.

D) Measures for control of expansive clay soils, which could include the following:

a. Placing and compacting potentially expansive subgrade soils at high moisture

contents (at least 3 percent above optimum moisture content in accordance with ASTM D1557) and compaction within selected ranges of 87 to 92 percent in the upper 5 feet and 95 percent below a depth of 5 feet.

- b. Using thickened concrete slabs with increased steel reinforcement.
- c. Replacing clayey soils underlying foundations and concrete slabs with select structural fill that is non-expansive or has a low expansion index.
- d. Treating site soils with lime to reduce the expansion potential and increase the strength.
- e. Utilize pier-and-grade-beam foundation systems where appropriate.
- f. Grade around structures to assure positive drainage away from structures.

MM Geo-2b: *Compliance with California Building Code (CBC) and California Residential Code (CRC). Project development shall meet requirements of the current applicable California Building Code and California Residential Code Edition as determined by the Town of Portola Valley, published by the International Conference of Building Officials, and as modified by the amendments, additions and deletions as adopted by the Town of Portola Valley, California.*

N. Impact GEO-4 Seismically-induced Landslides. Portions of the site may be subject to seismically-induced landsliding. A portion of the site is identified on the Seismic Hazard Zone Map of the Palo Alto Quadrangle as being potentially susceptible to seismic shaking induced ground failure. Preliminary investigation by Cornerstone indicates that a design-level geotechnical investigation is needed to address the potential for slope failure associated with seismic shaking events in several areas.

The EIR identifies the California Geological Survey Seismic Hazards Zone Map indicates three localized areas with the potential for seismically induced landslides within one half mile to the west and north of the Residential Development Area, including on a portion of the undeveloped slope on the Project site and the proposed fire access road area. A Preliminary Geotechnical Investigation and Geologic Hazards Assessment was prepared by Cornerstone to generate more detailed site- specific data and conclusions. Based on this assessment, measures to reduce the risk from seismically-induced landslides are incorporated into the following mitigation.

Implementation of Mitigation Measure MM Geo-2a, set forth below, which is hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by incorporating recommendations from the Geotechnical Investigation into the project design.

MM-GEO 2a: *noted above.*

O. Impact GEO-5 Soil Erosion. The Project would involve mass grading in a location that could facilitate stormwater-related soil erosion, soil movement and the loss of topsoil. This could potentially impact vicinity drainages such as Los Trancos Creek, the unnamed creek, and ultimately San Francisco Bay.

The EIR identifies that erosion and loss of topsoil occur primarily when soil is unprotected by either plans or development (structures and pavement). Soil in runoff is considered a water pollutant. Construction period and operational erosion control and stormwater pollution prevention are required under existing regulations. While these regulations are already in place, they are detailed in the measures below for tracking purposes.

Implementation of Mitigation Measures MM Geo-5a and Geo-5b, set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by implementing the best management practices identified in the Erosion Control and Storm Water Pollution Prevention plans Erosion Control and Storm Water Pollution Prevention plans.

MM Geo-5a: Erosion Control Plan. *The Project applicant shall complete an Erosion Control Plan to be submitted to the Town in conjunction with the Grading Permit Application. The Erosion Control Plan shall include winterization, dust, erosion and pollution control measures conforming to the California Stormwater Quality Association (CASQA) Stormwater Best Management Plan Handbook for New Development and Redevelopment. The Erosion Control Plan shall describe the "best management practices" (BMPs) to be used during and after construction to control pollution resulting from both stormwater and construction water runoff. The Erosion Control Plan shall include locations of vehicle and equipment staging, portable restrooms, mobilization areas, and planned access routes. The erosion control plan will also address the fire access road area. Recommended soil stabilization techniques include placement of straw wattles, silt fences, berms, and gravel construction entrance areas or other control to prevent tracking sediment onto city streets and into storm drains.*

MM Geo-5b: Storm Water Pollution Prevention Plan (SWPPP). *In accordance with the Clean Water Act and the requirements of the State Water Resources Control Board (SWRCB), the Applicant shall file a SWPPP prior to the start of construction. The SWPPP shall be prepared by a Qualified Plan Developer (QSD) and shall include specific best management practices to reduce soil erosion and protect ground water quality. This is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activities.*

During construction, the SWPPP measures shall be reviewed by a Qualified Individual (QSP) certified to monitor that the stormwater protection measures are adequately implemented. Reporting will be performed in accordance with General Permit requirements.

P. Impact Hydro-1: Potential for Contaminated Runoff. Unmitigated, Project activities associated with construction of the Project could result in violation of waste discharge requirements under the San Mateo County Municipal Regional Stormwater NPDES Permit from contaminated runoff entering Los Trancos Creek or other unnamed creeks or drainages for both the construction phase and on-going operation of the Project. Increased erosion caused by construction activities and increased runoff could result in the sedimentation of receiving waters.

The EIR identifies that the planned construction, tree removal, earthwork, and grading activities for the Project could result in an increase in erosion from the Project area into the Los Trancos Creek drainage, and San Francisco Bay. Hillside excavation to create residential lots and the new roadway could result in an increase in erosion and sedimentation. Sedimentation can lead to a degradation of water quality because sediment can carry nitrogen, phosphorus, petroleum, and other organic contaminants, pesticides and herbicides, and trace metals. Sediment can also accumulate at the entrance of downstream storm drain system inlets and reduce drainage capacity.

Construction activities associated with the improvements would require the presence of construction vehicles, heavy equipment and materials, and construction crews. In addition to stormwater runoff and potential resulting water quality and sedimentation impacts, there is the

potential for hazardous materials, including petroleum products associated with diesel vehicle and equipment use, and contaminants from paving materials, concrete mixing, pouring and washout, and sanitary facilities, to enter Los Trancos Creek and downstream creeks fed by Los Trancos Creek. Following vegetation clearing, tree removal, and grading, excavation would occur for roadbed improvements, and foundations. All of these activities have the potential to contribute pollutants to Los Trancos Creek (particularly turbidity and high-pH washwater) that could affect water quality and may violate water quality standards if left uncontrolled.

However, the Project would be required to implement an Erosion and Sediment Control Plan (ESCP) and SWPPP under the Municipal Regional Stormwater Permit and the San Mateo Countywide Stormwater Pollution Prevention Program. The ESCP must include BMPs that are designed to prevent runoff from construction areas to reduce potential impacts to surface water quality during Project construction. The SWPPP will also include design elements and BMPs for construction areas such as fueling and equipment washing areas, and trash and hazardous material storage areas.

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) is a partnership of the City/County Association of Governments (C/CAG), each incorporated city and town in the county, and the County of San Mateo, which share a common NPDES permit. The Municipal Regional Stormwater NPDES Permit was issued by the SFBWQCB2 in compliance with the Basin Plan³ and the NPDES Program. Participating agencies (including San Mateo County and the Town of Portola Valley) must comply with the provisions of the Countywide permit by ensuring that new development and redevelopment mitigate, to the maximum extent practicable, water quality impacts from storm water runoff during both construction and operation periods of projects.

Implementation of Mitigation Measures MM Hydro-1a, Hydro-1b, Hydro-1c, and Hydro-1d, set forth below, which are hereby adopted and incorporated into the project, would reduce the impact to a less-than-significant level by implementing the best management practices and other requirements and design requirements identified in the Erosion and Sediment Control Plan, Stormwater Pollution Prevention Program, and the Final Drainage Plan, and the Stormwater Treatment System Operation and Maintenance Plan into the project design.

MM Hydro 1-a: Erosion and Sediment Control Plan. *Prior to issuance of grading permits or approval of improvement plans, the Applicant shall submit a detailed Erosion and Sediment Control Plan (ESCP) to the County of San Mateo Planning and Building Department and the Director of Public Works of Portola Valley for review and approval. The purpose of the ESCP shall be to mitigate erosion and sedimentation impacts during the construction period for the proposed residential development, trails, and the new fire access road. The detailed ESCP shall meet the requirements of both San Mateo County and the Town of Portola Valley. It shall be accompanied by a written narrative and shall include, at a minimum, the following:*

- a. Proposed schedule of grading activities, monitoring, and infrastructure milestones in chronological format. An anticipated construction schedule and/or construction duration (in weeks or months) shall be provided.*
- b. Separate plan sheets for measures to be implemented at the grading stage and the construction stage.*
- c. Delineation of work areas including protection of surface waters, storm drain inlets, sensitive areas, and buffer zones.*
- d. A separate Tree Protection Plan.*

- e. All proposed retaining walls, including areas that will be used for stockpiling and storing construction materials.
- f. Indicate location and method of stabilizing disturbed bare earth areas. Use seeding and/or mulching and the following, as necessary: (i) For slopes less than 3:1, provide silt fencing or fiber rolls along contour lines; (ii) For slopes greater than 3:1, anchored erosion blankets (rice, straw, or coconut) and fiber rolls or silt fencing at the crest are required. Jute netting is preferred when used with seeding.
- g. Use diversion berms to divert water from unstable or denuded areas (e.g., top and base of a disturbed slope, grade breaks where slopes transition to a steeper slope).
- h. Direct water from construction areas to designated temporary filtration/detention areas. Show any temporary detention areas for stormwater and stabilization of those areas.
- i. Show location of office trailer(s), storage sheds, temporary power pole, scaffold footprint, and other temporary installations on the ESCP. Show how they will be accessed and show protection of the access routes.
- j. Show location of utility trenches, indicate utility types, and identify timing of installation.
- k. Use stabilized designated access points for entrance onto the property using 4- to 6-inch fractured aggregate over geo-textile fabric over the first 20 feet of the property. If using an existing paved driveway, identify on ESCP Plan. Where vehicles or equipment will travel from an existing paved driveway to unpaved areas within the property, a stabilized transition point is required that meets the above standards.
- l. Provide designated area(s) for parking of construction vehicles, using aggregate over geo-textile fabrics required that meets the above standards.
- m. Show all access roads/ramps and access points used by excavation equipment, trucks, or forklifts/crane access. The type of materials used for stabilization and their locations shall be indicated on the ESCP. Materials for this purpose are required to be stored on-site.
- n. Show location, installation, and maintenance of a concrete/stucco mixer, washout, and pits. No concrete, mortar, or stucco washout is allowed to be placed directly on the soil/ground. Specify the method used to contain the washout.
- o. Show location of portable toilets away from surface water locations and storm drain inlets.
- p. Show storage location and containment of construction materials during work, as well as afterhours/ weekends. Show the location of lumber, gravel, and materials storage areas on the ESCP. Show how they will be accessed and show protection of the access routes.
- q. Show areas and proposed protection of temporary stockpiles using anchored- down plastic sheeting in dry weather (Dry weather is defined as a time interval during which less than 0.1 inch of rain is observed across a minimum of 72 hours.) The use of plastic sheeting during the wet season, October 1 through April 30, is not allowed, unless the stockpile is also protected with fiber rolls containing the base of the stockpile. Alternatively, in wet weather, or for longer storage, use seeding and mulching, soil blankets or mats.
- r. Indicate the location of refuse piles and debris box locations on the ESCP. Show how they will be accessed and show protection of the access routes.
- s. Identify an Erosion Control Point of Contact, including name, title/qualification, email, and phone number. The Erosion Control Point of Contact will be the County's main point of contact if Erosion and Sediment Control or Tree Protection corrections are required.

The ESCP shall also contain the following standard elements:

- t. Perform clearing and earth-moving activities only during dry weather. Measures to ensure adequate erosion and sediment control shall be installed prior to earth-moving activities and construction.
- u. Measures to ensure adequate erosion and sediment control are required year- round. Stabilize all denuded areas and maintain erosion control measures continuously between

October 1 and April 30.

- v. Use sediment controls or filtration to remove sediment when dewatering site and obtain Regional Water Quality Control Board (RWQCB) permit(s) as necessary.
- w. Avoid cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- x. Limit and time applications of pesticides and fertilizers to prevent polluted runoff.
- y. Limit construction access routes to stabilized, designated access points.
- z. Avoid tracking dirt or other materials off-site; clean off-site paved areas and sidewalks using dry sweeping methods.
- aa. Train and provide instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and Construction BMPs.
- ab. List the locations where placement of erosion materials is required on weekends and during rain events.
- ac. The areas delineated on the plans for parking, grubbing, storage, etc., shall not be enlarged or "run over."
- ad. Construction sites are required to have erosion control materials on-site during the "off-season."
- ae. Dust control is required year-round.
- af. Erosion control materials shall be stored on-site.
- ag. Use of plastic sheeting between October 1 and April 30 is not acceptable, unless for use on stockpiles where the stockpile is also protected with fiber rolls containing the base of the stockpile.
- af. Tree protection shall be in place before any demolition, grading, excavating or grubbing is started.

MM Hydro 1-b: Stormwater Pollution Prevention Program. Prior to issuance of grading permits or approval of improvement plans, the Applicant shall also submit evidence to the Town Engineer of Portola Valley showing that coverage under the Statewide General Construction Activities Stormwater Permit (General Permit) has been obtained. The Applicant shall comply with the NPDES General Construction Activities Storm Water Permit Requirements established by the CWA. The Applicant can obtain coverage under the General Permit by filing a Notice of Intent (NOI) with the State Water Resource Control Board's (SWRCB) Division of Water Quality. The filing shall describe erosion control and storm water treatment measures to be implemented during and following construction and provide a schedule for monitoring performance.

These BMPs shall serve to control point and non-point source pollutants in stormwater and constitute the Project's SWPPP for construction activities. Long-term BMPs shall serve to control post-construction erosion and sedimentation. While the SWPPP will include several of the same components of the ESCP, the SWPPP shall also include BMPs for preventing the discharge of other nonpoint source pollutants besides sediment (such as paint, concrete, etc.) to downstream waters.

MM Hydro 1-c: Final Drainage Plan. Prior to the issuance of the Building permit or Planning permit

(for Provision C3 Regulated Projects), the Applicant shall submit to the Planning and Building Department for review and approval a Drainage Plan including the following:

1. A drainage analysis of the proposed Project (including the Residential Development area, trails, and fire access road) prepared, by a registered civil engineer. The drainage analysis shall consist of a written narrative and a plan. The plan shall include the following:
 - a. A written analysis that includes the delineation of all drainage basins to which stormwater from the Project site would flow, description of proposed drainage system, discussion of rationale used to design the system, a discussion of methods and/or calculations, description of how excess drainage will be detained, and a description of how discharge will be controlled.
 - b. Complete plans of storm drainage contours and elevations, storm drain facilities and lines, utility crossings, and construction materials.
 - c. The flow of the stormwater onto, over, and off of the property shall be detailed on the plan and shall include adjacent lands as appropriate to clearly depict the pattern of flow.
 - d. A hydraulic analysis demonstrating that the post-development discharge will be controlled and peak flow and velocity will not exceed pre- development values, and that all storm drainage facilities have sufficient capacity to carry anticipated peak flows. This analysis shall consider all facilities including the fire access road grading and its drainage system. The condition of the southern culvert underneath Alpine Road shall be assessed and replacement or repairs shall be completed as necessary. The analysis shall detail all measures necessary to certify adequate drainage. Post development flows and velocities shall not exceed those that existed in the pre-developed state.
 - e. Recommended measures shall be designed and included in the improvement plans and submitted to the Planning and Building Department for review and approval.
2. In addition, once reviewed and approved by the Town, the Applicant shall record documents which address future maintenance responsibilities of any private drainage and/or roadway facilities which may be constructed. The Applicant or Homeowners Association must be responsible for proper maintenance of drainage structures, the bioretention swale, and equipment on the Project area. The Applicant must submit an Operation and Maintenance Agreement for review and approval. At a minimum, the Operation and Maintenance Agreement must include the following:
 - The contact information for the property owner(s) or responsible party;
 - Identification of the number, type and location of all stormwater treatment measures on site;
 - A list of specific, routine maintenance tasks and the intervals that they will be conducted; and
 - An inspection checklist specific to the measures, which indicates the items that will be reviewed during regular maintenance inspections.

For bioretention areas, the following inspections must be required:

- Inspect monthly for obstructions and trash.
- Inspect monthly for ponded water. If ponded water does not drain in 5 days, take the appropriate action.

If mosquito larvae are observed, contact the San Mateo County Mosquito Abatement District.

- *Inspect monthly for channels, exposure of soils, or other evidence of erosion. Clear any obstructions and remove any accumulation of sediment.*
- *Inspect biannually for health of plants and remove dead and diseased vegetation.*
- *Treat and maintain vegetation and irrigation system. Minimize use of pesticides and quick-release synthetic fertilizers.*
- *Inspect and replace mulch as needed before wet season.*

MM Hydro 1-d: *Stormwater Treatment System Operation and Maintenance Plan. A stormwater treatment system operation and maintenance plan shall be prepared by the applicant's engineer consistent with the San Mateo County Water Pollution Prevention Program requirements that describes the type and frequency of ongoing maintenance required for proper operation of all post-construction permanent stormwater treatment measures on the Project site. As development accessed via a private road, this operation and maintenance plan shall include maintenance and cleaning of paved areas to minimize litter and debris washing into storm drains. This plan shall be submitted to and must be approved by the City of Portola Valley Public Works Department prior to first certificate of occupancy.*

Q. Impact Trans-2: Additional Vehicle Crossings Across Alpine Road Trail.
The Project would increase in vehicle access points and vehicle crossings across the Alpine Road trail, which would increase the potential for conflict between vehicles and trail users and is considered a potential safety hazard.

The EIR identifies that in the Project vicinity, an unpaved pedestrian/equestrian trail runs on the west side of Alpine Road along the Project frontage, and a paved pedestrian trail exists on the east side of Alpine Road. Pedestrian/equestrian trails also exist along one side of Portola Road and the north side of Westridge Drive. It is expected that the Project would generate some pedestrian/equestrian trips, which could utilize these trails. However, the increase in trail usage is not expected to degrade the quality of these trails because of the small number of pedestrian/equestrian trips that would be generated by the Project.

The Project proposes to construct a new loop trail within its property boundaries to the south of the housing development site. The trail would be accessible to the general public and would connect to the existing pedestrian/equestrian trail that runs on the west side of Alpine Road at two locations. The Project would also improve the existing dirt trail along the frontage of the entire property. Both the new loop trail and the existing trail along Alpine Road would have a minimum six-foot width with all-weather compacted base-rock surface. The new loop trail and improvement to the existing trail would increase the capacity and quality of the Town's trail system.

The Project would have two driveways crossing the pedestrian/equestrian trail that runs along its frontage. As discussed below, under Site Design Hazards and Emergency Access, the Project would provide adequate sight distance at the driveways with low-level landscaping to ensure a clear line of sight between exiting drivers and pedestrians/horses on the trail. The Project would install split rail fencing along the Project frontage. Split rail fencing enables pedestrians/equestrians on the trail and outbound vehicles to see each other when approaching

the driveway.

Based on observations at the site, the trail along the Project's Alpine Road frontage is lightly used and the Project traffic on the Project intersections would also be low; therefore, the chance of the pedestrians/horses and the Project traffic arriving at the crossing simultaneously is expected to be small. Regardless, any increase in vehicle access points along the trail would increase the potential for conflict between pedestrians/equestrians and is considered a potential safety impact.

Implementation of Mitigation Measure MM Trans-2, set forth below, which is hereby adopted and made a condition of approval, would reduce the impact to a less-than-significant level by requiring signage to avoid potential safety hazards.

MM Trans-2: Trail Crossing Warning. *The Project shall install a sign at the driveways "STOP HERE LOOK FOR TRAIL USERS STOP AGAIN AT ROAD" for outbound traffic approaching the trail to alert the exiting drivers of the presence of trail users.*

R. Impact Wildfire-2: Lessened On-Site Wildfire Risk but Increased Activity and Related Ignition Risk. Overall, if the Project and proposed vegetation management activities were implemented, it would substantially lower Wildfire Risk at the Project site. However, the additional human activity creates a greater likelihood of ignition at the site if not mitigated.

The EIR identifies the Wildfire Risk as described in the Methodology section within Chapter 18, "Wildfire", of Exhibit B and more fully detailed in the full Stanford Wedge Wildfire Behavior Assessment, included as Appendix J to this EIR (Exhibit B). Overall Wildfire Risk is represented on a scale of 1 to 10; 1 being equal to a low risk of wildfire and 10 being the highest risk of wildfire. Wildfire Risk under existing conditions and conditions with the Project are shown in Table 18.2 and Figure 18.4 in the DEIR.

As compared to existing conditions, with the Project, there would be an overall lessening of Wildfire Risk at the site. Specifically, there would be a reduction of areas with higher Wildfire Risk ratings of 7 or more. Under existing conditions, over a third of the property experiences Wildfire Risk ratings above 7. After treatment, less than 10% of the property experiences Wildfire Risk rating above 7. In addition, the areas with lower Wildfire Risk ratings of 3 or lower has increased to 35% of the Project site from 18% under existing conditions. The resultant with-Project Wildfire Risk levels are representative of a generally well-managed wilderness area with some areas left untreated mainly due to regulatory restrictions for environmental sensitivity, such as along riparian corridors.

From a wildfire potential standpoint, the overall Wildfire Risk would be substantially reduced under Project implementation. However, untreated areas within the Project site (many due to regulatory restrictions) could remain a risk to structures within and outside the property. With Project implementation, from a fire growth standpoint, if a fire were to start within the Project area, fire spread would be much slower and the spot fire generation potential has been reduced due to treatments linked to the Project. However, Project vegetation management activities are constricted to the Project site, and untreated fuels outside of the Project site and therefore not under the control of the Project applicant would remain a threat to surrounding structures.

Additional human activity creates a greater likelihood of ignition if not mitigated, which in this case includes human activity due to the residential development as well as new trails and increased

use of trails. The analysis of wildland fires is by definition specific to wildland areas. Structures are not incorporated into wildfire spread model. While there are fuel models that characterize grass, or chaparral, or different types of oak forests, there is no “Structure” fuel model. Some have tried to fit different types of structures into wildland fuel models, but the attempt is too speculative for application.

While not incorporated specifically into wildland fire spread modeling, research and regulations have focused primarily on reducing the potential for structures to be impacted by or contribute to the spread of wildland fires by providing “defensible space” separation from wildland areas and “hardening” homes by reducing the ignitability of roofs, siding, decks, windows and other assemblies.

The Project sponsor has indicated the following Wildfire Reduction Measures would be incorporated into the Project:

1. The project has been designed as a clustered development. The design, maintenance, and use of defensible space for fire protection is more effective when neighborhoods are developed more densely and are built to stringent fire-resistant building codes. Such neighborhoods are more compact and easier to defend with a smaller firefighting force, and help achieve goals for climate resiliency. Denser neighborhoods often have lower amounts of flammable vegetation and more pavement, making them generally less flammable than larger homes on large lots.
2. The proposed project will be located at the base of the hills and close to Alpine Road. The proposed project is not located in uphill flow of heat and flames. (Developments located on or at the top of steep slopes can be at particular risk from wildfire because fire and heat generally flow faster uphill.)
3. The project site design proposes a loop road with two points of ingress and egress to/from Alpine Road.
4. At the request of the Woodside Fire Protection District, the project has incorporated an access point between lots 8 and 9 to allow public safety personnel to access the open space immediately behind the project.
5. Electrical utilities lines serving all residences will be installed below ground.
6. Stanford has committed to constructing “all electric” homes, and the project will not provide natural gas to the homes. Therefore, the homes will not have gas water heaters or gas valves that can potentially create a fire hazard during an earthquake.
7. The project will construct “fire-hardened” homes that meet or exceed the Town of Portola Valley’s Wildfire Preparedness Building Code.
8. Stanford contracted with wildfire professionals to prepare a Vegetation Management Plan (VMP) for both the developed and undeveloped portions of the property. Areas with high fire hazard are mitigated through modifications to the live vegetation and removal of dead fuels onsite to reduce the risks. Several treatments or prescriptions (the modification of vegetation to reduce a fire’s potential) are available in vegetation management practice. The type of treatments to be utilized within the project parcel depend on the vegetation type, cover, and location. The VMP identified two types of vegetation cover on the project site that can exhibit extreme fire behavior, which are chaparral and oak woodland. Given the existing condition of the vegetation on-site, three treatment areas were developed in the VMP, including defensible space areas around structures and recommended maintenance activities within the oak woodland chaparral areas of the property.
9. The project has been designed to establish a defensible area around the perimeter of all homes as well as the common open space areas within the development area. This defensible area will consist of irrigated, low-fuel landscaping.

10. The project landscape plan has been designed with fire prevention in mind. In lieu of traditional solid wall fencing, the project is proposing the use of wood/wire "deer" fencing to secure the resident's rear and side yards. Fences at all residential buildings in the Portola Terrace project will be constructed so that fence material within 10' of buildings is noncombustible. Flame- resistant materials will be used as a substitute to wood mulch in common area landscaping and around all homes.
11. A wildfire buffer area, consisting of mowed and maintained natural vegetation, will surround and buffer the development area from the surrounding natural undeveloped area. This buffer area will be owned and maintained by the project homeowner's association.
12. In order to facilitate the maintenance of the undeveloped portions of the property, Stanford has proposed the construction of a fire access road. The road will provide vehicular access from Alpine Road up and into the center of the Wedge property to allow mechanized equipment to clear and remove vegetation from areas not presently accessible by crews required to hike into the property. This fire access road was prescribed by the Vegetation Maintenance Plan to improve the effectiveness of the measures called out in the VMP.
13. As part of the construction of the Project, Stanford will underground the existing PG&E overhead power line that runs along the Alpine Road frontage of the Stanford property. The undergrounding of this overhead line will eliminate a potential ignition source across the length of the property along Alpine Road.
14. As part of the project, Stanford will be extending a water line approximately 1,700 feet south along Alpine Road from the Alpine Road/Westridge Drive intersection to the project site. The project will connect to both an existing 12-inch water main and an existing 6-inch water main located near the intersection of Westridge Drive and Alpine Road. Since these two water mains are fed from two separate sources of water, Stanford will create a dual connection, providing a redundant source of water to the project site and surrounding area. The project itself will install several new fire hydrants on Stanford owned property and in the Alpine Road right-of-way, which will deliver additional fire safety for the Project and the immediate neighbors as well as providing a source of water for fire equipment in the event there is a fire event in the undeveloped portion of the site. (At present, there are no existing fire hydrants on the Project site or along Alpine Road.)
15. At the request of the Woodside Fire Protection District, Stanford is investigating the possibility of constructing a fire staging area along the Project frontage in the Alpine Road right-of-way. In case of fire incident in the vicinity, this fire staging area will allow for a variety of WFPD and/Cal Fire apparatus to stage in a safe manner. If feasible, water hydrants will be provided adjacent to this staging area.

The analysis in Appendix J concludes that with required implementation of the treatments and defensible space required by the Woodside Fire Protection District and/or proposed in Project plans and the Vegetation Management Plan, both fire hazard and risk would be substantially lowered across the Project site. In addition, the new structures at the site are proposed to recently-updated ignition- resistant standards. Combined with stringent vegetation treatments, this area can serve as a fuel break, buffering adjacent areas from fire spread.

Implementation of Mitigation Measures MM Wildfire-2a and Wildfire-2b, set forth below, which are hereby adopted and made a condition of approval, would reduce the impact to a less-than-significant level by increasing the effectiveness of the Vegetation Management Plan to reduce the fire hazard at the Project site through additional treatment measures.

MM Wildfire-2a: *Further Increase Effectiveness of the Vegetation Management Plan. The Project sponsor shall implement the following measures to further increase the effectiveness of the VMP, as feasible:*

- i. Consideration of less While associated with reduction of fuels in the tree canopy, thinning of the oak woodland canopy cover can promote growth of understory shrubs and small trees - ladder fuels that contribute to tree torching, and ember production if not addressed by other VMP measures. The VMP shall include discussion and incorporation of the optimal canopy cover thinning given site characteristics and other proposed VMP measures.
- ii. Consult with the California Department of Fish and Wildlife to identify any allowable methods to remove over-abundant fuels in riparian forests and creekbeds and incorporate identified measures into the VMP, as feasible.
- iii. No mechanical equipment use on days of Red Flag Warning.
- iv. As feasible based on availability of equipment, utilize equipment with electric motors for VMP work when ignition potential is higher due to low moisture in vegetative fuels, generally from May 1 to November 1. Currently available electrical equipment includes chain saws, leaf blowers, weed whippers, and push mowers. Larger equipment may only be available in gas-powered versions, but should transition to electric-powered versions as those become electric.

MMWildfire-2b: Ignition Reduction. The Project sponsor shall implement the following measures to further reduce the potential for ignitions within the Residential Development Area and submit an annual report to the Town of Portola Valley and Woodside Fire Protection District verifying ongoing implementation/enforcement:

- i. Annual third-party inspection and certification of defensible space in HOA- community property (areas within the development area but outside of private lots).
- ii. As feasible, obtain fuel management easements on adjacent properties where defensible space is not 100-feet from structures to treat fuels appropriately.
- iii. Installation of non-combustible fences on sides as well as rear yards. Solid, non-combustible fences could form a radiant heat barrier rather than a source of heat.
- iv. Installation and maintenance of ember-resistant zones 5-feet from side walls, per AB 3074.
- v. Prohibition of smoking in common areas.
- vi. Provide robust and regular education of residents regarding ignition prevention.
- vii. Outdoor fireplaces and pizza ovens in private yards and in common areas are to be allowed only with the following provisions:
 - a. The outdoor fireplace or pizza oven is surrounded by at least 10 feet of non-combustible materials, and
 - b. A water source and a fire extinguisher are both readily available within 5 feet of the outdoor fireplace or pizza oven.
- viii. Prohibition of a future increase in the existing total surface area of windows on any existing external wall facing another structure within 30-feet of each other, unless new window volume has a fire-resistance rating of not less than 45 minutes when tested according to National Fire Protection Association standards.
- ix. Installation of two panes of glass on all external windows, at least one of which shall be

tempered glass.

- x. *Installation of a radiant heat barrier (such as a coating of a radiant-heat reflecting material) on all external walls facing and within 30-feet of another parallel external wall. A radiant heat barrier is anything that deflects radiant heat (i.e. is highly reflective in the visible and near-infrared part of the electromagnetic spectrum) and includes but is not limited to a layer of radiant heat reflecting material or radiant heat reflecting paint/coatings or masonry (concrete, cinder block, brick).*
- xi. *As feasible based on availability of equipment, utilize equipment with electric motors for landscaping work when ignition potential is higher due to low moisture in vegetative fuels, generally from May 1 to November 1 or during Red Flag Warnings indicating higher fire risk. Currently available electrical equipment includes chain saws, leaf blowers, weed whippers, and push mowers. Larger equipment may only be available in gas-powered versions, but should transition to electric-powered versions as those become electric.*

VI. ALTERNATIVES

The Draft EIR analyzed three alternatives to the Project: the No Project Alternative, the Larger Setback (from Nearby Lots) Alternative, and the No Clustering Alternative, and compared them to the Project. The alternatives are briefly summarized below and described in Chapter 20 of the Draft EIR. As explained in Section X, below, the findings in this Section are based on the Draft EIR and the Final EIR, the discussion and analysis in which is hereby incorporated in full by this reference, and on the record as a whole.

A. No Project, Alternative A

CEQA requires consideration of a no project alternative. Consistent with State CEQA Guidelines section 15126.6(e), the No Project Alternative assumes the existing Alpine Rock Ranch horse boarding facility use (or a similar use) would remain in operation on the site. The Town currently has limited regulatory authority to require comprehensive vegetation management activities or construction of the fire road under the No Project Alternative, so this alternative also assumes no change in the site conditions related to wildfire.

Under the No Project Alternative, the Project site would remain as it is today with no substantial construction activities or changes to operations at the site. Therefore, the potential for all of the less than significant impacts and need for mitigation would be avoided. While continuance of existing conditions would not be considered an impact under CEQA, the No Project Alternative also would not develop the site for the residential uses identified for the site in the Town's Housing Element, would not develop additional public trails, and would not reduce wildfire risk at the site through a comprehensive vegetation management plan and fire access road as proposed under the Project.

The "No Project" Alternative would have the following ability to meet Project objectives:

1. The "No Project" Alternative would not meet the objective to maximize single-family

housing opportunities in an area the Town has studied and identified for housing. This alternative would not result in the construction of any residential units at the site.

2. The “No Project” Alternative would not meet the objective to reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community. This alternative would not result in any additional access or management of wildfire risk.
3. The “No Project” Alternative would not meet the objective to make progress toward the Town’s fair share low-income housing needs under the Housing Element of the Town’s General Plan, enable a density bonus, and comply with the Town’s inclusionary housing ordinance. This alternative would not result in the construction of any residential units at the site.
4. The “No Project” Alternative would not meet the objective to cluster development closest to existing infrastructure on relatively flat land, in a manner that avoids development on unstable soil, preserves substantial open space, minimizes grading, and fosters a sense of community. While the existing use is clustered on the flat area near infrastructure, it does not represent new development.

The No Project Alternative would not meet any of the Project Objectives.

While the “No Project” Alternative would not result in any substantial changes to the site or use and, therefore, is environmentally superior because it has the lowest possible impacts in every parameter, pursuant to CEQA Guidelines section 15126.6(e)(2) “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Please see the remainder of this Section VI, below, which identifies the environmentally superior alternative. In addition, the “No Project” Alternative does not meet any of the Project objectives.

For the foregoing reasons, the No Project Alternative is hereby rejected.

B. Larger Setback (from Nearby Lots), Alternative B

The Larger Setback Alternative assumes that the same development as the proposed Project would occur, but shifted farther to the south to allow for increased setback from nearby lots to the north as requested by some of the nearby neighbors. Construction activities under this alternative would be increased to account for the shifting of development to a less flat area of the lot, which would require more grading. A potential layout for this alternative is included as Figure 20.1 in Exhibit B, showing the relationship to the topographical map of the site. It is assumed that under this Alternative, the fire access road, trails, and Vegetation Management Plan (VMP) would remain the same as under the Project.

Under the Larger Setback Alternative, impacts would remain substantially the same as they are under the Project. There would be a marginal increase in construction-related impacts due to the increased grading activities that would be required by shifting the development to a less flat portion of the site, including marginally increased air quality and greenhouse gas emissions, the potential for soil erosion and stormwater pollution,

additional tree removal, use of construction hazardous materials (like fuel and lubricants), and the need to design appropriately for the soil conditions and slope and stormwater.

This alternative was assessed in response to feedback received from neighborhood residents. The proposed Project is marginally preferable to this alternative from an environmental perspective because the Larger Setback Alternative would have the same or marginally increased environmental impacts in all respects.

The “Larger Setback” Alternative would have the following ability to meet Project objectives:

1. The “Larger Setback” Alternative would meet to the same degree the objective to maximize single-family housing opportunities in an area the Town has studied and approved for housing. This alternative would result in the same total 39 residential units, including 27 single-family homes.
2. The “Larger Setback” Alternative would meet to the same degree the objective to reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community. This alternative would result in the same reduced wildfire risk and slowed wildfire spread due to vegetation management, increased access, defensible space and fire hardened homes.
3. The “Larger Setback” Alternative would meet to the same degree the objective to make progress toward the Town’s fair share low-income housing needs under the Housing Element of the Town’s General Plan, enable a density bonus, and comply with the Town’s inclusionary housing ordinance. This alternative would result in the same total 12 affordable residential units.
4. The “Larger Setback” Alternative would meet to a marginally lesser degree the objective to cluster development closest to existing infrastructure on relatively flat land, in a manner that avoids development on unstable soil, preserves substantial open space and avoids significant grading, and fosters a sense of community. This alternative would have clustered development near existing infrastructure but would be located on less flat land.

The Larger Setback Alternative would meet all of the Project Objectives to the same or only marginally lesser degree than would the proposed Project. It is anticipated that the increased grading necessary for this alternative would not result in a financially infeasible project; however, a financial feasibility assessment could be submitted to verify financial feasibility if this alternative was pursued. The “Larger Setback” Alternative and the Project would have similar impacts. However, the “Larger Setback” alternative would result in marginally greater impacts related to grading, including construction emissions and tree removals.

For the foregoing reasons, the Larger Setback Alternative is hereby rejected.

C. No Clustering, Alternative C

The No Clustering Alternative assumes the site would be developed with standard single family homes, each on their own lots rather than a clustered development, including some

multi-family homes and duet units. This would eliminate the need for a Planned Unit Development approval and more closely follow the adjacent lotting pattern. Without a Planned Unit Development, each lot would be at least 3.5 acres in size, which would total 21 lots that could be developed on the site. Pursuant to the Town's Inclusionary requirements in PVMC Section 17.20.215, three of the units would be deed restricted for affordable households. Further, given the larger lot sizes and State laws promoting accessory dwelling unit (ADU) and junior accessory unit (JADU) construction, 21 detached ADUs are also assumed for this alternative, bringing the total number of units to 42.5. Construction activities would be increased to account for a greater development footprint into a less flat portion of the site and the need for longer driveways to reach the larger, separate lots.

Due to the large size of the lots, this analysis assumes that much of the site would remain in a generally natural state despite being divided into private lots. No trails or fire access road would be developed and no comprehensive vegetation management plan would be implemented.

Under the No Clustering Alternative, impacts would remain similar to those under the Project. There would be a marginal increase in construction-related impacts due to the increased grading activities for scattered development sites and longer driveways, including marginally increased air quality and greenhouse gas emissions, the potential for soil erosion and stormwater pollution, additional tree removal, use of construction hazardous materials (like fuel and lubricants), and the need to design appropriately for the soil conditions and slope and stormwater. Additionally, while the proposed Project would avoid disturbance to a known cultural resource on the non-development portion of the site, because this alternative would divide the whole site into private lots, there would be a significant potential to impact the resource and the need to formally protect it as well as marginally increased potential to discover other unknown resources due to development of a larger area of the site.

Because a larger lot development would support the addition of ADUs and JADUs, up to 42 units are assumed under this alternative, which would be three more units than under the proposed Project and would result in marginal increases in use of utilities, energy, and an increase in transportation impacts (vehicle miles traveled per capita).

The division of the site into private lots would likely preclude the implementation of a comprehensive vegetation management plan to address wildfire risk. Individual lot owners would be motivated to address wildfire risks on their own lots, but the beneficial effects may not be as successful without a coordinated and comprehensive plan. Therefore, wildfire impacts under this alternative would likely be marginally increased compared to the proposed Project.

This alternative was included to explore the difference in environmental impacts if the Project were held to all development standards for single family detached homes under the existing zoning. While the need for a Conditional Use Permit for a Planned Unit Development would not be required under this alternative, such an approval process is specifically allowed and clustering was specifically encouraged at this site in the General Plan to minimize the development of the wooded hillside. There is no associated environmental impact related to the need for a Planned Unit Development.

As discussed by topic below, the proposed Project is superior to this alternative from an environmental perspective because the No Clustering Alternative would have the same or marginally increased environmental impacts in all respects and potentially substantially increased impacts with respect to cultural resources.

The “No Clustering” Alternative would have the following ability to meet the Project objectives:

1. The “No Clustering” Alternative would meet to a lesser degree the objective to maximize single- family housing opportunities in an area the Town has studied and approved for housing. This alternative would result in 21 single-family homes compared to 27 single-family homes under the proposed Project.
2. The “No Clustering” Alternative would meet to a lesser degree the objective to reduce wildfire risk at the site, increase access for fighting wildfires, and contribute to a more fire resilient community. With no comprehensive vegetation management plan across a site divided into private lots, the beneficial effects of vegetation management would likely not be as successful and wildfire risk and speed of spread would be as reduced as under the proposed Project.
3. The “No Clustering” Alternative would meet to a lesser degree the objective to make progress toward the Town’s fair share low-income housing needs under the Housing Element of the Town’s General Plan, enable a density bonus, and comply with the Town’s inclusionary housing ordinance. This alternative would be required by the inclusionary housing ordinance to provide at least 3 of the single-family homes at an affordable level, compared to 12 affordable units under the proposed Project. Meeting Town requirements would not trigger a density bonus. While new State laws and the large lot size would allow for an additional ADU on each lot, there would not necessarily be restrictions on affordability for these additional ADUs.
4. The “No Clustering” Alternative would not meet the objective to cluster development closest to existing infrastructure on relatively flat land, in a manner that preserves substantial open space and steep slopes, and fosters a sense of community. The proposed Project clusters development such that 90% of the site – about 68 acres - would be preserved as open space. This alternative would not include clustering at all but would instead divide the entire site into large private lots without preserving any substantial land as open space outside of private lots.

Because the “No Clustering” Alternative would require additional construction activities to prepare spread out development sites and longer driveways, it would result in marginally greater construction impacts including the potential to significantly impact a known cultural resource at the site and is therefore not environmentally superior to the Project.

For the foregoing reasons, the No Clustering Alternative is hereby rejected.

D. Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, Section 15126.6(e)(2) of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection

disclosed. The environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the Town.

Table 20.1, in Exhibit B, provides a summary comparison of the environmental impacts of the alternatives compared to the proposed Project. The table lists the level of significance of the impacts of the proposed Project to each of the environmental topics areas analyzed in the EIR and shows whether the impacts anticipated under each proposed alternative would be similar to ("s"), greater ("+"), marginally greater ("s+"), lesser ("+"), or marginally lesser ("s-") than the proposed Project.

No significant and unavoidable impacts were identified under the proposed Project. All Project impacts are either less than significant or can be reduced to those levels through implementation of the mitigation contained in this Draft EIR. Because of the low impact of the proposed Project, differences between the proposed Project and the Alternatives relate to marginal increases or reductions in already less than significant impacts except in the case of the "No Project" Alternative, which avoids all impacts of the proposed Project, and the potential for construction-period impacts to cultural resources, which could be significantly increased under the No Clustering Alternative.

The "No Project" Alternative would not result in any substantial changes to the site or use and therefore, has the lowest possible impacts in every parameter. The "No Project" Alternative would be the environmentally superior alternative. However, the "No Project" Alternative would not meet any of the Project objectives.

The CEQA Guidelines also require that "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (CEQA Guidelines Section 15126.6(e)(2)).

The "No Clustering" Alternative would require additional construction activities to prepare spread out development sites and longer driveways, it would result in marginally greater construction impacts including the potential to significantly impact a known cultural resource at the site and is therefore environmentally inferior to the Project.

The Larger Setback Alternative and the Project would have similar impacts. However, the Larger Setback Alternative would result in marginally greater impacts related to grading, including construction emissions and tree removals compared to the Project.

For the foregoing reasons, the Project is the environmentally superior alternative.

VII. INCORPORATION BY REFERENCE

These findings incorporate the text of the Final Environmental Impact Report for the Portola Terrace Project by reference and in their entirety. Without limitation, this incorporation is intended to elaborate on the scope and nature of mitigation measures, the basis for determining the significance of impacts, the comparative analysis of alternatives, the determination of the environmentally superior alternative, and the reasons for approving the Project.

VIII. RECIRCULATION NOT REQUIRED

No significant new information was added to the Draft EIR or the Final EIR Volume as a result of the public comment process. The Final EIR Volume responds to comments, and clarifies, amplifies, and makes insignificant modifications to the Draft EIR. It does not identify any new significant effects on the environment or a substantial increase in the severity of an environmental impact requiring major revisions to the Draft EIR.

IX. RECORD OF PROCEEDINGS

Various documents and other materials related to the Project constitute the record of proceedings upon which the Town bases its findings and decisions contained herein. Those documents and materials are located in the offices of the custodian for the documents and materials, which is the Town of Portola Valley, 765 Portola Road, Portola Valley, CA, 94028.

X. SUMMARY

- A.** Based on the foregoing Findings and the information contained in the record, the Town has made one or more of the following Findings with respect to each of the significant effects of the Proposed Project:
 - 1.** Changes or alterations have been required in, or made a condition of approval of, the Project that avoid or substantially lessen the significant environmental effects identified in the Final EIR.
 - 2.** Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other public agency.
 - 3.** Specific economic, legal, social, technological, or other considerations, make infeasible the mitigation measures or alternatives identified in the Final EIR that would otherwise avoid or substantially lessen the identified significant environmental effects of the Project.
- B.** Based on the foregoing Findings and the information contained in the record, the Town determines that:
 - 1.** All significant effects on the environment due to the approval of the Proposed Project have been eliminated or substantially lessened where feasible.
 - 2.** Any remaining significant effects on the environment found to be unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations, above.

Exhibit D: Mitigation Monitoring and Reporting Program (MMRP)

STANFORD WEDGE HOUSING PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Air Quality					
Mitigation Measure Air-1: Basic Construction Management Practices. The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD “Basic Construction Mitigation Measures”: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title	Prior to issuance of grading or construction permits -and- During construction	Project Sponsor/ Applicant	Verify requirements are included in construction contracts and are met during construction	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • A publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.					
Biological Resources					
Mitigation Measure Bio-1a: Survey (outside the Residential Development Area): Special-Status Plant Surveys. Prior to the initiation of grading for the fire access road and/or hiking/equestrian trail, or the implementation of initial ground disturbance or vegetation removal activities in areas outside the Residential Development Area that has been surveyed for special- status plants, a qualified biologist shall conduct, in areas outside the Residential Development Area that has been surveyed, a focused survey during the appropriate bloom season for potentially occurring special-status plant species, including:	Prior to grading of fire road and/or trails, initial vegetation management activities, or initial ground disturbance outside the Residential Development Area	Project Sponsor/Applicant	Verify survey was performed Verify buffer zones are included in construction contracts and Vegetation Maintenance Plan (VMP), if required by survey	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
- California bottle-brush grass (<i>Elymus californicus</i>; CRPR 4.3; May through August) - Western leatherwood (<i>Dirca occidentalis</i>; CRPR 1B.2; January through March) - Bent-flowered fiddleneck (<i>Amsinckia lunaris</i>; CRPR 1B2; March through June) - Woodland woolly threads (<i>Monolopia gracilens</i>; CRPR 1B.2; March through July) - Santa Cruz clover (<i>Trifolium buckwestiorum</i>; CRPR 1B.1; April through October) - California androsace (<i>Androsace elongata ssp. acuta</i>; CRPR 4.2; March through June) - Brewer's calandrinia (<i>Calandrinia breweri</i>; CRPR 4.2; March through June) - Oakland star-tulip (<i>Calochortus umbellatus</i>; CRPR 4.2; March through May) - Bristly leptosiphon (<i>Leptosiphon acicularis</i>; CRPR 4.2; April through July) - Michael's rein orchid (<i>Piperia michaelii</i>; CRPR 4.2; April through August) Ground disturbance associated with vegetation management activities that could potentially impact sensitive plant species if they are present, necessitating focused plant surveys, would include all vegetation management activities except initial vegetation management treatments that are implemented prior to construction of the fire access road (Panorama Environmental 2020b). These initial treatments include (1) removing trees and large shrubs through hand removal methods to avoid ground disturbance, and minimizing dragging out					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
material; (2) minimization of soil disturbance through use of low compacting equipment (e.g., masticator or chipper) that would reduce rutting from machine turns and minimize soil compaction; and (3) limiting the spread of chipped or masticated materials to 1-inch in depth or less (Panorama Environmental 2020b). Therefore, focused surveys shall be conducted prior to all ground disturbance associated with vegetation management activities including and following construction of the fire access road, including a surrounding 50-foot buffer area on site and to the extent access to adjacent properties may be permitted. Surveys shall take place no more than 3 years before ground disturbance or vegetation removal for these vegetation management activities and should be conducted in a year with near-average or above-average precipitation. Alternatively, these surveys may be conducted in a year of below-average precipitation and the surveyor should attempt, if possible, to identify a nearby reference population that is flowering and detectable despite the below-average rainfall. The purpose of the survey shall be to assess the presence or absence of the potentially occurring species. If none of the target species are found in the impact area or surrounding 50-foot buffer, then no further mitigation measures shall apply. Otherwise, Mitigation Measure Bio-1b shall be additionally implemented.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-1b: Avoidance and Minimization: Special-Status Plants. If any individual special-status plants are found in the impact area or 50-foot buffer, then in consultation with a qualified botanist or plant ecologist, the project shall be designed to avoid direct and indirect impacts to the species to the extent feasible. If avoidance of special-status plants reduces the impacts so that less than 10% for CRPR List 1B species of either individuals or occupied area within the population would be impacted, or less than 20% for CRPR List 4 species, then the impact would be considered less than significant, and no further mitigation is necessary. Otherwise, Mitigation Measure Bio-1c shall be additionally implemented.	Only if required by Bio-1a above: Prior to issuance of grading or construction permits	Project Sponsor/ Applicant	Verify survey was performed Verify redesign or buffer zones are included in construction contracts, if required	Portola Valley Planning and Building Department	
Mitigation Measure Bio-1c: Compensatory Mitigation if Avoidance is Infeasible: Special-Status Plants. If, even with project redesign to minimize impacts, more than 10% of the population for CRPR List 1B species or more than 20% of the population for CRPR List 4 species would be impacted, compensatory mitigation shall be provided via the management of currently occupied habitat or the establishment of a new population for the species impacted at a different site. The mitigation habitat shall be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and shall contain at least as many individuals of the species as are impacted by project activities. A Habitat Mitigation and Management Plan (HMMP) shall be	Only if required by Bio-1b above: Prior to issuance of grading or construction permits	Project Sponsor/ Applicant	Verify HMMP completion, if required	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
developed by a qualified plant or restoration ecologist and implemented for the mitigation lands. The HMMP shall be approved by the Town of Portola Valley prior to the start of ground-disturbing activities. The HMMP shall include, at a minimum, all of the following information: • Summary of habitat impacts and the proposed mitigation; • Description of the location and boundaries of the mitigation site and description of existing site conditions; • Description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the focal special-status species; • Description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which shall be determined by a qualified plant or restoration ecologist); • Proposed management activities to maintain high-quality habitat conditions for the focal species; • Description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria shall include demonstration that any plant population fluctuations over the monitoring period do not indicate a downward trajectory in terms of					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (e.g., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management); and - Annual monitoring should be conducted for a period of 5 years following transplantation of individuals, if plants are transplanted, or following the initiation of monitoring (e.g., for a mitigation site where the species is already present) to ensure that the population is healthy. - Description of the management plan's adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria.					
Mitigation Measure Bio-2a: Survey and Avoidance (all Construction Activities and the Initial Vegetation Management Activities): Red-legged Frogs. Before any construction or initial vegetation management activities begin, the following measures shall be completed and/or included in construction contracts as ongoing measures: i. <i>Pre-activity Survey.</i> A qualified biologist shall conduct a preconstruction survey for the California red-legged frog no more than 24 hours prior to initial ground disturbing activities or use of mechanical support for vegetation management within 100 feet of any riparian area. If a California red-legged frog is encountered in the work area, all activities with the potential to result in the	Prior to issuance of construction or grading permits -and- Prior to initial vegetation management activities	Project Sponsor/Applicant	Verify survey was performed Verify requirements included in construction contracts and Vegetation Maintenance Plan (VMP)	Portola Valley Planning Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
harassment, injury, or death of the individual shall be immediately halted and shall not resume until the individual leaves the project site of its own accord. ii. <i>Worker Environmental Awareness Program.</i> Before any construction activities begin, Stanford shall hire a qualified biologist to conduct a training session for all construction personnel. At a minimum, the training shall include descriptions of all special-status species potentially occurring on the project site and their habitats, the importance of these species, the general measures that are being implemented to conserve them as they relate to the proposed project, and the boundaries within which project activities may be accomplished. iii. <i>Construction Timing.</i> Because California red-legged frogs are most active at night, nighttime earthmoving, other construction activities, or use of mechanical support for vegetation management shall be avoided to the extent practicable within 100 feet of any riparian area. Further, to the extent practicable, ground-disturbing activities shall be avoided during the wet season, from mid-October through mid-April, when red-legged frogs are most likely to be moving through upland areas.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-2b: Survey and Avoidance (Initial and Ongoing Vegetation Management Activities): Red-legged Frogs. Before any construction or vegetation management activities (initial or ongoing) begin, the following measures shall be included in construction/vegetation management contracts: i. <i>Vegetation Stockpiles.</i> Because California red-legged frogs could move into areas under debris piles, where they could then be injured or killed when the debris piles are disposed of, debris intended for burning, mastication, or other disturbance, should not be piled on the ground within 100 feet of any riparian area unless the piles would be treated on the same day that they are created. If vegetation piles cannot be treated or removed daily, they should be dispersed on the site, to the extent feasible. ii. <i>Trash Containment during Construction and vegetation management Activities.</i> Because human trash associated with construction activities and vegetation management activities has the potential to attract predators, all trash shall be contained in sealed containers and disposed of on a daily basis. iii. <i>Mechanical Support for Vegetation Management.</i> If off-road mechanical support is necessary for ongoing vegetation management activities, Mitigation Measure Bio-2a shall be implemented for the off-road mechanical support activities.	Prior to issuance of grading or construction permits -and- Prior to initial or ongoing vegetation management activities	Project Sponsor/ Applicant	Verify survey was performed Verify requirements included in construction contracts and Vegetation Maintenance Plan (VMP)	Portola Valley Planning Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-2c: Avoidance, Operational Prohibition of Nighttime Access to Trails: Red-Legged Frogs. Signage shall be installed at trailheads indicating that nighttime access to trails and all access off trails is prohibited.	Prior to operation of trails	Project Sponsor/ Applicant	Verify improvements have been implemented	Portola Valley Public Works Department	
Mitigation Measure Bio-3: Survey and Avoidance (all Construction Activities and Vegetation Management Activities Involving Off-Road Mechanical Equipment): Western Pond Turtles. Before any construction or vegetation management activities involving off-road mechanical equipment begin, a qualified biologist shall conduct a preconstruction survey for western pond turtles no more than 24 hours prior to initial ground disturbing activities within 100 feet of any stream. If a western pond turtle is encountered in the work area, all activities with the potential to result in the harassment, injury, or death of the individual shall be immediately halted, and the individual shall be captured and relocated to a safe location outside of the work area by a qualified biologist, after which work may proceed.	Within 24 hours prior to ground disturbing activities and use of off-road mechanical equipment within 100 feet of streams -and- During ground disturbing activities or the use of off-road mechanical equipment	Project Sponsor/ Applicant	Verify survey was performed Verify relocation has occurred, if required	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-5a: Survey and Avoidance (all Construction Activities and Vegetation Management Activities Involving Off-Road Mechanical Equipment): Dusky-footed Woodrats. Before any construction or vegetation management activities involving off-road mechanical support begin, the following measures shall be completed and/or included in construction contracts: i. <i>Pre-activity Survey.</i> No more than 30 days prior to any initial ground disturbance or vegetation removal activities, a pre-activity survey for woodrat nests shall be conducted by a qualified biologist within areas where ground disturbance or vegetation removal shall be conducted and within 10 feet of the disturbance and vegetation removal areas. ii. <i>Disturbance-Free Buffers.</i> If feasible, a minimum 10-ft buffer shall be maintained between project construction activities and each nest to avoid disturbance. In some situations, a smaller buffer may be allowed if in the opinion of a qualified biologist, removing the nest would be a greater impact than that anticipated due to project activities. Environmentally sensitive area (ESA) fencing shall be installed to mark the buffer area around potentially impacted woodrat nests to keep workers, construction equipment, and construction materials out of the area where the nests are located. iii. <i>Woodrat Relocation Plan.</i> Due to the large number of nests that could be impacted and infeasibility of avoiding impact to all nests at the site, a woodrat	Less than 30 days prior to construction activities or vegetation management activities involving off-road mechanical equipment	Project Sponsor/ Applicant	Verify survey was performed Verify buffer zones are included in construction contracts and Vegetation Maintenance Plan (VMP), if required Verify relocation has occurred, if required	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
relocation plan shall be prepared by a qualified biologist prior to initial ground disturbance or vegetation removal activities. At a minimum, the plan shall include woodrat nest relocation methods, relocation site habitat requirements, appropriate relocation sequence with respect to vegetation management activities, spacing of nests, timing of relocations, and recommended protective buffers around nests proposed to remain in place. The plan shall also include a map of all woodrat nests, and proposed relocation areas. Relocation of nest materials shall follow the following guidance: If it is determined that disturbance of woodrat nests cannot be avoided, the woodrats shall be evicted from their nests prior to the removal of the nests and onset of ground-disturbing activities to avoid injury or mortality of the woodrats. Relocation activities shall follow methods outlined in the Woodrat Relocation Plan. A qualified biologist shall monitor and direct all activities associated with the removal of dusky-footed woodrat nests (structures). Only as necessary and to the minimum extent possible, project site vegetation shall be removed to provide access to the woodrat nest(s). Following the removal of vegetation required to access woodrat nests, a fiber-optic camera shall be used to observe inside the nest to determine its occupancy prior to beginning the dismantling process. If young are not observed, the nest shall be fully dismantled and materials shall be relocated, as described below. If dependent young are present, the protocol for					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
active nests below shall be followed to dismantle the structure over a two-week period. Except where dependent young are present, woodrat structures or nests shall slowly and progressively be dismantled during a single site visit. Appropriate personal protective equipment (e.g. respirator, gloves, and Tyvek suit) shall be used while dismantling and relocating woodrat nest material to protect against disease carried by rodents (e.g., hantavirus). Where feasible, nesting material or food caches shall be moved to a new location at least 30 feet outside the disturbance area, preferably next to a large tree or similar structure in a riparian or oak woodland habitat, in an area where it can be used by woodrats to construct new nests. If no suitable structure is present, a log pile structure may be constructed to support the nest materials. If young are uncovered within the nest prior to or during the dismantling process, dismantling of the nest shall be suspended for a period of two weeks to allow young to develop eyesight and become mobile. Nest materials shall be placed back on top of the nest to re-cover the exposed young. After the two-week period, the above removal procedures shall be resumed. Within 24 hours of vegetation removal and completion of nest dismantling, an additional survey shall be conducted to confirm no new woodrat nests were constructed.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-5b: Avoidance, Implement Overgrazing Management Strategy for Annual Vegetation Management: Dusky- footed Woodrat. To ensure that annual grazing activities do not result in excessive disturbance of, or habitat loss around, San Francisco dusky- footed woodrat nests, grazing shall be performed so that goats will not graze in any one area too long. If no off-road mechanical support of annual vegetation management is required, Mitigation Measure Bio-5a would not also be required for this activity.	Prior to vegetation management activities involving goat grazing	Project Sponsor/ Applicant	Verify grazing requirements are included in Vegetation Maintenance Plan (VMP)	Portola Valley Planning and Building Department	
Mitigation Measure Bio-6: Survey and Avoidance (all Construction Activities and Vegetation Management Activities Involving Off-Road Mechanical Equipment): Pallid Bats. Before any structure removal, construction, or vegetation management activities involving off-road mechanical support, or removal or modification of trees begin, the following measures shall be completed and/or included in construction contracts: i. <i>Potential Roost Habitat Removal September through February, Outside Pallid Bat Maternity Season.</i> Prior to any tree removal outside the March 1 – August 31 pallid bat maternity season, a qualified biologist shall conduct a pallid bat roost habitat assessment to determine which trees proposed for removal are suitable for use by roosting pallid bats. Unsuitable trees may be removed without any additional bat-related measures. Trees determined to be suitable roost trees may be removed outside the maternity season, during a two-day tree removal process, to	Prior to construction activities -and- Prior to vegetation management activities -and- Prior to tree removal or modification	Project Sponsor/ Applicant	Verify survey was performed Verify buffer zones are included in construction contracts and Vegetation Maintenance Plan (VMP), if required Verify eviction procedures are followed, if required	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
encourage day-roosting bats to leave potential roost trees ahead of tree removal. This process involves removing small branches and small limbs containing no day-roost habitat (e.g., crevices) on habitat trees on Day 1, using chainsaws only. The following day (Day 2), the remainder of the tree is to be removed. The disturbance caused by chainsaw noise and vibration, combined with the physical modification of the tree, is expected to cause day-roosting bat species to abandon the roost tree after nightly emergence for foraging. Trimmed habitat trees must be removed the next day to prevent re-occupation of trimmed trees. If suitable roost trees are not proposed for removal but would undergo a specific treatment (e.g., thinning, crown raising), disturbance shall be scheduled to take place outside the maternity roost season. If treatment activities cannot occur outside the maternity season, a pre-activity evening survey shall be conducted by a qualified biologist to determine if the tree is occupied by a maternity colony. If no bats are detected, work may proceed without any additional surveys. If a maternity colony is present, work shall be postponed until the end of the maternity season (August 31). ii. <i>Pre-activity Survey for Work within Pallid Bat Maternity Season (March through August).</i> Prior to any initial ground disturbance or off-road mechanical vegetation removal activities, or removal or modification of trees to occur during Pallid Bat Maternity Season, a pallid bat roost habitat assessment shall be conducted for all trees					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
and structures on and within 150 feet of the location of the activity, during the appropriate time of year when bats would be detectable (March 1 – August 31). A qualified bat biologist shall conduct the survey to look for evidence of bat use within suitable habitat. If evidence of use 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 a nocturnal acoustic survey may be necessary to determine if a bat colony is present and to identify the specific location of the bat colony. iii. <i>Avoidance.</i> If an active pallid bat maternity colony or non-breeding roost is located, construction work or vegetation activities shall be redesigned to avoid disturbance of the roost, if feasible. iv. <i>Eviction and Alternative Roost Habitat.</i> If an active pallid bat maternity colony or non-breeding bat roost is located and construction work cannot be redesigned to avoid removal or disturbance of the occupied roost, the individuals shall be safely evicted by a qualified bat biologist between August 1 and October 15 or between February 15 and March 15, with the timing determined by a qualified bat biologist. If eviction is necessary, alternative roost habitat shall be provided at least 30 days prior to eviction of bats from the roost. A qualified bat biologist shall determine the appropriate location for the alternative roost structure, based on the location of the original roost and habitat conditions in the vicinity, and oversee installation of a new roost structure. The					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
structure shall be placed as close to the affected roost site as feasible, taking into account potential for disturbance during construction on the site (e.g., the roost might be placed elsewhere on the larger project site). The roost structure either shall be built to specifications determined by a qualified bat biologist or, with approval of a qualified bat biologist as to structure type, shall be purchased from an appropriate vendor. Stanford University shall monitor the roost for up to three years (or until occupancy is determined, whichever occurs first) to determine use by bats. If, by Year 3, pallid bats are not using the structure, a qualified bat biologist, in consultation with CDFW, shall identify alternative roost designs or locations for placement of the roost, place the new roost at the agreed-upon location, and monitor the new roost for an additional three years (or until occupancy has been verified).					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-8a: Avoidance (all construction and all Vegetation Management Activities): BMPs for Work within/near Sensitive Habitats. The following measures shall be implemented to reduce impacts on mixed riparian forest and streams during construction on the Residential Development Area, during the grading of the fire access road and hiking/equestrian trails, and during all vegetation management activities: i. If the CDFW and/or RWQCB determine potentially impacted areas are under their jurisdiction, the applicant shall acquire permits from CDFW and RWQCB and comply with all permit conditions. ii. Personnel shall prevent the accidental release of chemicals, fuels, lubricants, and non-storm drainage water into channels. iii. Spill prevention kits shall always be in close proximity when using hazardous materials. iv. No equipment servicing shall be done in the stream channel or immediate floodplain, unless equipment stationed in these locations cannot be readily relocated (i.e., pumps, generators). v. Existing native vegetation shall be retained by removing only as much vegetation as necessary to accommodate the fire access road and trail clearing width. vi. If riparian vegetation is to be removed with chainsaws, consider using saws currently available that operate with vegetable-based bar oil.	Prior to issuance of building or grading permits -and- Prior to vegetation management activities	Project Sponsor/ Applicant	Verify determination of CDFW and RWQCB. Verify requirements are included in construction contracts and met during construction Verify requirements are included in Vegetation Maintenance Plan (VMP)	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
vii. If goat grazing is to be used as a long-term vegetation management tool in the future, temporary fencing shall be erected when goats are introduced to keep them out of riparian habitats. viii. Control exposed soil by stabilizing slopes (e.g., with erosion control blankets) and protecting channels (e.g., using silt fences or straw wattles). ix. Control sediment runoff using sandbag barriers or straw wattles. x. Stabilize site ingress/egress locations. xi. Temporary disturbance or removal of aquatic and riparian vegetation shall not exceed the minimum necessary to complete the work. xii. Vehicles operated within and adjacent to streams shall be checked and maintained daily to prevent leaks of materials that, if introduced to the water, could be deleterious to aquatic life. xiii. Potential contaminating materials must be stored in covered storage areas or secondary containment that is impervious to leaks and spills. xiv. All disturbed soils shall be revegetated with native plants suitable for the altered soil conditions upon completion of construction. Local watershed native plants shall be used if available. All disturbed areas that have been compacted shall be de-compacted prior to planting or seeding. Cut-and-fill slopes shall be planted with local native or non-invasive plants suitable for the altered soil conditions.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Bio-8b: Compensatory Mitigation if Avoidance is Infeasible (All Vegetation Management Activities): Riparian Habitat. The riparian habitat within the project site consists of a mature overstory composed of California bay, California buckeye, and coast live oak. Riparian vegetation may be removed during vegetation treatment activities. All trees removed within mixed riparian forest habitat shall be replaced with the same species that was removed during project implementation, which shall be planted within the same reach where impacts occur or along streams on other Stanford University lands. Trees shall be replaced at a ratio of at least 1:1. Additionally, if trees are to be removed within mixed riparian forest habitat, a qualified biologist shall develop a Riparian Mitigation and Monitoring Plan, which shall contain the following components (or as otherwise modified by regulatory agency permitting conditions): i. Summary of habitat impacts and proposed mitigation ratios ii. Goal of the restoration to achieve no net loss of habitat functions and values iii. Location of mitigation site(s) and description of existing site conditions iv. Mitigation design: a) Soil amendments and other site preparation elements as appropriate b) Planting plan c) Irrigation and maintenance plan	Prior to vegetation management activities	Project Sponsor/Applicant	Verify requirements are included in Vegetation Maintenance Plan (VMP) Verify compensatory mitigation completed, if required Verify completion of Riparian Mitigation and Monitoring Plan, if required	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
d) Remedial measures/adaptive management, etc. v. Monitoring and Success Criteria: the mitigation site shall be monitored by an ecologist during a 5- year monitoring period. The interim site performance success criterion is annual replacement of any dead trees and shrubs during Years 1-3. The final success criterion at Year 5 shall be defined as 60% average cover of native trees and shrubs combined. vi. Reporting requirements					
Mitigation Measure Bio-9: Implement Invasive Weed BMPs. The invasion and/or spread of noxious weeds shall be avoided by the use of the following invasive weed BMPs: i. During construction activities in the Residential Development Area, all seeds and straw materials used on-site shall be weed-free rice straw (or similar material acceptable to the Town), and all gravel and fill material shall be certified weed-free to the satisfaction of the Town. ii. Prior to equipment coming onto the site for construction or vegetation management activities, all equipment (e.g., masticators, haul vehicles, excavators, and other heavy equipment) shall be washed (including wheels, undercarriages, and bumpers). Vehicles shall be cleaned at existing construction yards or legally operating car washes. iii. Following construction of the residential development and the fire access road and hiking/equestrian trails, a standard erosion control	Prior to issuance of building or grading permits -and- Prior to vegetation management activities	Project Sponsor/ Applicant	Verify requirements are included in construction contracts and VMP	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
seed mix (acceptable to the Town) from a local source shall be planted within the temporary impact zones on any disturbed ground that shall not be under hardscape, landscaped, or maintained. This will minimize the potential for the germination of the majority of seeds from non-native, invasive plant species. If areas are left bare by vegetation treatments as carried out by the Vegetation Maintenance Plan (VMP), a standard erosion control seed mix (acceptable to the Town) from a local source and consisting of native species shall be planted on any disturbed ground.					
Mitigation Measure Bio-13a: Nesting Bird Avoidance, Substrate Pre-removal, Pre-activity Surveys, and Buffers. The applicant shall conduct or include in work contracts the following measures related to nesting birds for construction and vegetation management activities: i. To the extent feasible, construction and vegetation management activities should be scheduled to avoid all potential bird nesting seasons (January 15 to September 15). If these activities are scheduled to take place outside the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code shall be avoided. ii. If construction of the residential development, fire access road, or trails would not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and	Within 7 days of construction or vegetation management activities	Project Sponsor/ Applicant	Verify survey was performed Verify buffer zones are included in construction contracts and Vegetation Maintenance Plan (VMP), if required	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
other vegetation) that are scheduled to be removed by these project features may be removed prior to the start of the nesting season (e.g., prior to January 15). This would preclude the initiation of nests in this vegetation and prevent the potential delay of the project construction due to the presence of active nests in these substrates. iii. If it is not possible to schedule construction or vegetation management activities between September 16 and January 14, then pre-activity surveys for nesting birds should be conducted by a qualified ornithologist to ensure that no nests shall be disturbed during project implementation. These surveys shall be conducted no more than seven (7) days prior to the initiation of all project activities. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., shrubs, ruderal grasslands, trees, horse paddocks) in and immediately adjacent to the impact areas for nests. iv. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction- or disturbance-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code shall be disturbed during Project implementation. On a case by case basis, the ornithologist may determine that another buffer distance is appropriate based on the species, the height and concealment of the nest, vegetation or topography					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
intervening between the nest and project activities, and the degree of human activity to which the nesting birds are already exposed.					
Mitigation Measure Bio-13b: Maintain Nesting Substrate during Vegetation Management. To the extent feasible, maintain a variety of tree, shrub, and herbaceous nesting substrates during vegetation management activities. This would involve maintaining (1) plant species diversity, and structural and age class diversity to accommodate a variety of tree-nesting species, (2) islands or scattered locations of live and dead or dying trees that support nest cavity habitat, and (3) islands or scattered locations supporting moderately dense pockets of shrubs, and other low-lying vegetation for shrub and ground-nesting species.	Prior to vegetation management activities	Project Sponsor/Applicant	Verify requirements are included in Vegetation Maintenance Plan (VMP)	Portola Valley Planning and Building Department	
Cultural Resources					
Mitigation Measure Cultural-1: Residential Development Area Archaeological Monitoring. Prior to the issuance of a grading permit in the development Residential Development Area and adjacent Alpine Road , the project sponsors shall obtain the services of a qualified archaeological consultant (meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (NPS 1983)) to observe all project-related ground disturbing activities. In accordance with CEQA Guideline §15064.5 (f), should any previously unknown prehistoric resources	Prior to issuance of grading permits for the Residential Development Area and adjacent roadway -and- During construction of that area	Project Sponsor/Applicant	Verify requirements are included in construction contracts and are met during construction	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
(including but not limited to charcoal, obsidian or chert flakes, grinding bowls, shell fragments, bone, or pockets of dark, friable soils) and/or historic-period resources (including but not limited to glass, metal, ceramics, wood, privies, trash deposits or similar debris) be discovered in the Residential Development Area during grading, trenching, or other on-site excavation(s), earthwork within 25 feet of these materials shall be stopped until a qualified professional archaeologist has an opportunity to evaluate the potential significance of the find and suggest appropriate mitigation(s), as determined necessary to protect the resource. If feasible, the location of earthwork shall be modified to protect the resource from damaging effects through avoidance. If avoidance is not feasible, a qualified archaeologist shall conduct data recovery in the area of potential adverse effect in accordance with an approved Archaeological Data Recovery Plan (ADRP) Once the site has been properly tested, subject to data recovery, or preserved to the satisfaction of the professional archaeologist in compliance with CEQA Guideline §15064.5, the site can be further developed. Archaeological monitoring may be reduced or halted at the discretion of the monitor, and in consultation with the Town, as warranted by conditions such as encountering bedrock, ground disturbance is occurring in fill, or negative findings during the first 60 percent of rough grading. If monitoring is reduced to spot-checking, spot checking shall occur when					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
ground-disturbance moves to a new location within the site and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock).					
Mitigation Measure Cultural-2: Vegetation Management Plan Archaeological Monitoring. Prior to the implementation of the Vegetation Maintenance Plan (VMP), the Project sponsor shall hire a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (NPS 1983)) to review all proposed activities and determine if those activities are in or near (within 50 feet of) P-41-000297 and the precontact component of the Wedge Quarry/Bedrock Mortars site. If work is proposed at or within 50 feet of either of these sites, a qualified archaeologist will be required to accompany the VMP crew and prevent any work from occurring within 25 feet of the site.	Prior to vegetation management activities	Project Sponsor/ Applicant	Verify requirements are included in vegetation management contracts	Portola Valley Planning and Building Department	
Mitigation Measure Cultural-3a: Halt Construction Activity, Evaluate Find and Implement Mitigation. In the event that any previously unidentified cultural resources (historic / archaeological / paleontological / Native American) are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific measures can be implemented to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code.	Prior to issuance of building or grading permits -and- During construction if triggered	Project Sponsor/ Applicant	Verify requirements are included in construction contracts Track outcome if triggered	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Mitigation Measure Cultural-3b: Halt Construction Activity, Evaluate Remains and Take Appropriate Action in Coordination with Native American Heritage Commission. In the event that any human remains are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by the County Coroner, and appropriate action taken in coordination with the Native American Heritage Commission, in accordance with section 7050.5 of the California Health and Safety Code or, if the remains are Native American, section 5097.98 of the California Public Resources Code.	Prior to issuance of building or grading permits -and- During construction if triggered	Project Sponsor/ Applicant	Verify requirements are included in construction contracts Track outcome if triggered	Portola Valley Planning and Building Department	
Geology and Soils					
Mitigation Measure Geo-2a: Preparation and Compliance with a Design-Level Geotechnical Investigation Report prepared by a Registered Civil or Geotechnical Engineer and with Structural Design Plans as Prepared by a Registered Structural Engineer. The Preliminary Geotechnical Investigation and Geologic Hazards Assessment for the site identified seismic design criteria for the Project development. The structural engineering design shall incorporate seismic design standards required by the California Building Code/California Residential Code. In general, the design-level report shall either corroborate or provide alternative recommendations to the preliminary report based upon actual soil and rock conditions in the areas where structures are proposed. The fire access road shall also be investigated. As is standard required practice prior to	Prior to issuance of building or grading permits	Project Sponsor/ Applicant	Verify completion of report and adherence of structural design plans to the report Verify inclusion of requirements in design plan	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
issuance of building permits, a design level geotechnical investigation shall be completed that includes the following elements: A) Additional subsurface investigation in areas to be occupied by structures which shall confirm or expand on the geotechnical recommendations presented in the preliminary report related to seismic ground shaking. B) Specific measures to addressing the potential for seismically-induced landslides, such as retaining structures, buttress fills or other techniques to reduce the potential for seismically induced landslides. C) Additional test pits within the Residential Development Area and fire access road area to identify areas of expansive claystone bedrock. As applicable, measures to address expansive claystone bedrock shall include control of drainage measures, depth of excavations, location of improvements relative to the claystone, the use of deep foundations, and the use of stiffened structural slabs and void forms beneath the slabs. D) Measures for control of expansive clay soils, which could include the following: 1. Placing and compacting potentially expansive subgrade soils at high moisture contents (at least 3 percent above optimum moisture content in accordance with ASTM D1557) and compaction within selected ranges of 87 to 92 percent in the upper 5 feet and 95 percent below a depth of 5 feet.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
2. Using thickened concrete slabs with increased steel reinforcement. 3. Replacing clayey soils underlying foundations and concrete slabs with select structural fill that is non-expansive or has a low expansion index. 4. Treating site soils with lime to reduce the expansion potential and increase the strength. 5. Utilize pier-and-grade-beam foundation systems where appropriate; 6. Grade around structures to assure positive drainage away from structures.					
Mitigation Measure Geo-2b: Compliance with California Building Code (CBC) and California Residential Code (CRC). Project development shall meet requirements of the current applicable California Building Code and California Residential Code Edition as determined by the Town of Portola Valley, published by the International Conference of Building Officials, and as modified by the amendments, additions and deletions as adopted by the Town of Portola Valley, California.	Prior to issuance of building or grading permits	Project Sponsor/ Applicant	Verify inclusion of requirements in design plan	Portola Valley Planning and Building Department	
Mitigation Measure Geo-5a: Erosion Control Plan. The Project applicant shall complete an Erosion Control Plan to be submitted to the Town in conjunction with the Grading Permit Application. The Erosion Control Plan shall include winterization, dust, erosion and pollution control measures conforming to the California Stormwater Quality Association (CASQA) Stormwater Best Management Plan Handbook for New Development and Redevelopment.	Prior to issuance of grading permits	Project Sponsor/ Applicant	Verify submission of ECP and inclusion of BMPs in construction contracts	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
The Erosion Control Plan shall describe the "best management practices" (BMPs) to be used during and after construction to control pollution resulting from both stormwater and construction water runoff. The Erosion Control Plan shall include locations of vehicle and equipment staging, portable restrooms, mobilization areas, and planned access routes. The erosion control plan will also address the fire access road area. Recommended soil stabilization techniques include placement of straw wattles, silt fences, berms, and gravel construction entrance areas or other control to prevent tracking sediment onto city streets and into storm drains.					
Mitigation Measure Geo-5b: Storm Water Pollution Prevention Plan (SWPPP). In accordance with the Clean Water Act and the requirements of the State Water Resources Control Board (SWRCB), the Applicant shall file a SWPPP prior to the start of construction. The SWPPP shall be prepared by a Qualified Plan Developer (QSD) and shall include specific best management practices to reduce soil erosion and protect ground water quality. This is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activities. During construction, the SWPPP measures shall be reviewed by a Qualified Individual (QSP) certified to monitor that the stormwater protection measures are adequately implemented. Reporting will be	Prior to issuance of grading permits -and- During construction	Project Sponsor/ Applicant	Verify filing of SWPPP Verify review and monitoring activities during construction	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
performed in accordance with General Permit requirements.					
Hydrology and Water Quality					
Mitigation Measure Hydro-1a: Erosion and Sediment Control Plan. Prior to issuance of grading permits or approval of improvement plans, the Applicant shall submit a detailed Erosion and Sediment Control Plan (ESCP) to the County of San Mateo Planning and Building Department and the Director of Public Works of Portola Valley for review and approval. The purpose of the ESCP shall be to mitigate erosion and sedimentation impacts during the construction period for the proposed residential development, trails, and the new fire access road. The detailed ESCP shall meet the requirements of both San Mateo County and the Town of Portola Valley. It shall be accompanied by a written narrative and shall include, at a minimum, the following: a. Proposed schedule of grading activities, monitoring, and infrastructure milestones in chronological format. An anticipated construction schedule and/or construction duration (in weeks or months) shall be provided. b. Separate plan sheets for measures to be implemented at the grading stage and the construction stage. c. Delineation of work areas including protection of surface waters, storm drain inlets, sensitive areas, and buffer zones.	Prior to issuance of building or grading permits -and- During construction	Project Sponsor/ Applicant	Verify ESCP completion Verify requirements are included in construction contracts and are met during construction	Portola Valley Public Works Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
d. A separate Tree Protection Plan. e. All proposed retaining walls, including areas that will be used for stockpiling and storing construction materials. f. Indicate location and method of stabilizing disturbed bare earth areas. Use seeding and/or mulching and the following, as necessary: (i) For slopes less than 3:1, provide silt fencing or fiber rolls along contour lines; (ii) For slopes greater than 3:1, anchored erosion blankets (rice, straw, or coconut) and fiber rolls or silt fencing at the crest are required. Jute netting is preferred when used with seeding. g. Use diversion berms to divert water from unstable or denuded areas (e.g., top and base of a disturbed slope, grade breaks where slopes transition to a steeper slope). h. Direct water from construction areas to designated temporary filtration/detention areas. Show any temporary detention areas for stormwater and stabilization of those areas. i. Show location of office trailer(s), storage sheds, temporary power pole, scaffold footprint, and other temporary installations on the ESCP. Show how they will be accessed and show protection of the access routes. j. Show location of utility trenches, indicate utility types, and identify timing of installation. k. Use stabilized designated access points for entrance onto the property using 4- to 6-inch					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
fractured aggregate over geo-textile fabric over the first 20 feet of the property. If using an existing paved driveway, identify on ESCP. Where vehicles or equipment will travel from an existing paved driveway to unpaved areas within the property, a stabilized transition point is required that meets the above standards. l. Provide designated area(s) for parking of construction vehicles, using aggregate over geo-textile fabrics required that meets the above standards. m. Show all access roads/ramps and access points used by excavation equipment, trucks, or forklifts/crane access. The type of materials used for stabilization and their locations shall be indicated on the ESCP. Materials for this purpose are required to be stored on-site. n. Show location, installation, and maintenance of a concrete/stucco mixer, washout, and pits. No concrete, mortar, or stucco washout is allowed to be placed directly on the soil/ground. Specify the method used to contain the washout. o. Show location of portable toilets away from surface water locations and storm drain inlets. p. Show storage location and containment of construction materials during work, as well as afterhours/ weekends. Show the location of lumber, gravel, and materials storage areas on the ESCP. Show how they will be accessed and show protection of the access routes.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
q. Show areas and proposed protection of temporary stockpiles using anchored-down plastic sheeting in dry weather. (Dry weather is defined as a time interval during which less than 0.1 inch of rain is observed across a minimum of 72 hours.) The use of plastic sheeting during the wet season, October 1 through April 30, is not allowed, unless the stockpile is also protected with fiber rolls containing the base of the stockpile. Alternatively, in wet weather, or for longer storage, use seeding and mulching, soil blankets or mats. r. Indicate the location of refuse piles and debris box locations on the ESCP. Show how they will be accessed and show protection of the access routes. s. Identify an Erosion Control Point of Contact, including name, title/qualification, email, and phone number. The Erosion Control Point of Contact will be the County's main point of contact if Erosion and Sediment Control or Tree Protection corrections are required. The ESCP shall also contain the following standard elements: t. Perform clearing and earth-moving activities only during dry weather. Measures to ensure adequate erosion and sediment control shall be installed prior to earth-moving activities and construction. u. Measures to ensure adequate erosion and sediment control are required year-round. Stabilize all denuded areas and maintain erosion					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
control measures continuously between October 1 and April 30. v. Use sediment controls or filtration to remove sediment when dewatering site and obtain Regional Water Quality Control Board (RWQCB) permit(s) as necessary. w. Avoid cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated. x. Limit and time applications of pesticides and fertilizers to prevent polluted runoff. y. Limit construction access routes to stabilized, designated access points. z. Avoid tracking dirt or other materials off-site; clean off-site paved areas and sidewalks using dry sweeping methods. aa. Train and provide instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and Construction BMPs. ab. List the locations where placement of erosion materials is required on weekends and during rain events. ac. The areas delineated on the plans for parking, grubbing, storage, etc., shall not be enlarged or "run over." ad. Construction sites are required to have erosion control materials on-site during the "off-season." ae. Dust control is required year-round.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
af. Erosion control materials shall be stored on-site. ag. Use of plastic sheeting between October 1 and April 30 is not acceptable, unless for use on stockpiles where the stockpile is also protected with fiber rolls containing the base of the stockpile. ah. Tree protection shall be in place before any demolition, grading, excavating or grubbing is started.					
Mitigation Measure Hydro-1b: Stormwater Pollution Prevention Program. Prior to issuance of grading permits or approval of improvement plans, the Applicant shall also submit evidence to the Town Engineer of Portola Valley showing that coverage under the Statewide General Construction Activities Stormwater Permit (General Permit) has been obtained. The Applicant shall comply with the NPDES General Construction Activities Storm Water Permit Requirements established by the CWA. The Applicant can obtain coverage under the General Permit by filing a Notice of Intent (NOI) with the State Water Resource Control Board's (SWRCB) Division of Water Quality. The filing shall describe erosion control and storm water treatment measures to be implemented during and following construction and provide a schedule for monitoring performance. These BMPs shall serve to control point and non-point source pollutants in stormwater and constitute the Project's SWPPP for construction activities. Long-term BMPs shall serve to control post-construction erosion and sedimentation. While the SWPPP will include	Prior to issuance of grading permits or approval of improvement plans	Project Sponsor/ Applicant	Verification of Construction General Permit from the State Water Resources Control Board Verify inclusion of BMPs in construction contracts	Portola Valley Planning and Building Department (Town Engineer)	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
several of the same components as the ESCP, the SWPPP shall also include BMPs for preventing the discharge of other nonpoint source pollutants besides sediment (such as paint, concrete, etc.) to downstream waters.					
Mitigation Measure Hydro-1c: Final Drainage Plan. Prior to the issuance of the Building permit or Planning permit (for Provision C3 Regulated Projects), the Applicant shall submit to the Planning and Building Department for review and approval a Drainage Plan including the following: 1. A drainage analysis of the proposed Project (including the Residential Development Area, trails, and fire access road) prepared, by a registered civil engineer. The drainage analysis shall consist of a written narrative and a plan. The plan shall include the following: a. A written analysis that includes the delineation of all drainage basins to which stormwater from the Project site would flow, description of proposed drainage system, discussion of rationale used to design the system, a discussion of methods and/or calculations, description of how excess drainage will be detained, and a description of how discharge will be controlled. b. Complete plans of storm drainage contours and elevations, storm drain facilities and lines, utility crossings, and construction materials. c. The flow of the stormwater onto, over, and off of the property shall be detailed on the plan	Prior to issuance of building or planning permit	Project Sponsor/ Applicant	Verification of submission and approval of Drainage Plan Verification of submission and approval of Operation and Maintenance Agreement	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
and shall include adjacent lands as appropriate to clearly depict the pattern of flow. d. A hydraulic analysis demonstrating that the post-development discharge will be controlled and peak flow and velocity will not exceed pre-development values, and that all storm drainage facilities have sufficient capacity to carry anticipated peak flows. This analysis shall consider all facilities including the fire access road grading and its drainage system. The condition of the southern culvert underneath Alpine Road shall be assessed and replacement or repairs shall be completed as necessary. The analysis shall detail all measures necessary to certify adequate drainage. Post development flows and velocities shall not exceed those that existed in the pre-developed state. e. Recommended measures shall be designed and included in the improvement plans and submitted to the Planning and Building Department for review and approval. 2. In addition, once reviewed and approved by the Town, the Applicant shall record documents which address future maintenance responsibilities of any private drainage and/or roadway facilities which may be constructed. The Applicant or Homeowners Association must be responsible for proper maintenance of drainage structures, the bioretention swale, and equipment on the Project area. The Applicant must submit an Operation and Maintenance Agreement for review and approval.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
At a minimum, the Operation and Maintenance Agreement must include the following: • The contact information for the property owner(s) or responsible party; • Identification of the number, type and location of all stormwater treatment measures on site; • A list of specific, routine maintenance tasks and the intervals that they will be conducted; and • An inspection checklist specific to the measures, which indicates the items that will be reviewed during regular maintenance inspections. For bioretention areas, the following inspections must be required: • Inspect monthly for obstructions and trash. • Inspect monthly for ponded water. If ponded water does not drain in 5 days, take the appropriate action. If mosquito larvae are observed, contact the San Mateo County Mosquito Abatement District. • Inspect monthly for channels, exposure of soils, or other evidence of erosion. Clear any obstructions and remove any accumulation of sediment. • Inspect biannually for health of plants and remove dead and diseased vegetation. • Treat and maintain vegetation and irrigation system. Minimize use of pesticides and quick-release synthetic fertilizers.					

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Inspect and replace mulch as needed before wet season.					
Mitigation Measure Hydro-1d: Stormwater Treatment System Operation and Maintenance Plan. A stormwater treatment system operation and maintenance plan shall be prepared by the applicant's engineer consistent with the San Mateo County Water Pollution Prevention Program requirements that describes the type and frequency of ongoing maintenance required for proper operation of all post-construction permanent stormwater treatment measures on the Project site. As a development that is accessed via a private road, this operation and maintenance plan shall include maintenance and cleaning of paved areas to minimize litter and debris washing into storm drains. This plan shall be submitted to and must be approved by the City of Portola Valley Public Works Department prior to first certificate of occupancy.	Prior to issuance of certificate of occupancy permits for residences	Project Sponsor/ Applicant	Verify submission and approval of plan	Portola Valley Public Works Department	
Transportation					
Mitigation Measure Trans-2: Trail Crossing Warning. The Project shall install a sign at the driveways "STOP HERE LOOK FOR TRAIL USERS STOP AGAIN AT ROAD" for outbound traffic approaching the trail to alert the exiting drivers of the presence of trail users.	Prior to issuance of certificate of occupancy permits for residences	Project Sponsor/ Applicant	Verify improvements have been implemented	Portola Valley Public Works Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Wildfire					
Mitigation Measure Wildfire-2a: Further Increase Effectiveness of the Vegetation Management Plan. The Project sponsor shall implement the following measures to further increase the effectiveness of the Vegetation Maintenance Plan (VMP), as feasible: i. While associated with reduction of fuels in the tree canopy, thinning of the oak woodland canopy cover can promote growth of understory shrubs and small trees - ladder fuels that contribute to tree torching, and ember production if not addressed by other VMP measures. The VMP shall include discussion and incorporation of the optimal canopy cover thinning given site characteristics and other proposed VMP measures. ii. Consult with the California Department of Fish and Wildlife to identify any allowable methods to remove over-abundant fuels in riparian forests and creekbeds and incorporate identified measures into the VMP, as feasible. iii. No mechanical equipment use on days of Red Flag Warning. iv. As feasible based on availability of equipment, utilize equipment with electric motors for VMP work when ignition potential is higher due to low moisture in vegetative fuels, generally from May 1 to November 1. Currently available electrical equipment includes chain saws, leaf blowers, weed whippers, and push mowers. Larger equipment may only be available in gas-powered versions, but	Prior to vegetation management activities	Project Sponsor/ Applicant	Verify CDFW was consulted Verify requirements are included in VMP	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
should transition to electric-powered versions as those become electric.					
Mitigation Measure Wildfire-2b: Ignition Reduction. The Project sponsor shall implement the following measures to further reduce the potential for ignitions within the Residential Development Area and submit an annual report to the Town of Portola Valley and Woodside Fire Protection District verifying ongoing implementation/enforcement: i. Annual third-party inspection and certification of defensible space in community property (areas within the development area but outside of private lots). ii. As feasible, obtain fuel management easements on adjacent properties where defensible space is not 100-feet from structures to treat fuels appropriately. iii. Installation of non-combustible fences on sides as well as rear yards. Solid, non-combustible fences could form a radiant heat barrier rather than a source of heat. iv. Installation and maintenance of ember-resistant zones 5-feet from side walls, per AB 3074. v. Prohibition of smoking in common areas. vi. Provide robust and regular education of residents regarding ignition prevention. vii. Outdoor fireplaces and pizza ovens in private yards and in common areas are to be allowed only with the following provisions:	Prior to issuance of building or grading permits -and- Prior to issuance of certificate of occupancy permits for residences -and- Annually	Project Sponsor/ Applicant	Verify requirements are included in construction contracts and are met during construction Verify proposed enforcement documentation (likely to be through deeds and/or HOA) Verify annual inspection/certification	Portola Valley Planning and Building Department	

Mitigation Measure	Timing / Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
a. The outdoor fireplace or pizza oven is surrounded by at least 10 feet of non-combustible materials, and b. A water source and a fire extinguisher are both readily available within 5 feet of the outdoor fireplace or pizza oven. viii. Prohibition of a future increase in the existing total surface area of windows on any existing external wall facing another structure within 30-feet of each other, unless new window volume has a fire-resistance rating of not less than 45 minutes when tested according to National Fire Protection Association standards. ix. Installation of two panes of glass on all external windows, at least one of which shall be tempered glass. x. Installation of a radiant heat barrier (such as a coating of a radiant-heat reflecting material) on all external walls facing and within 30-feet of another parallel external wall. A radiant heat barrier is anything that deflects radiant heat (i.e. is highly reflective in the visible and near-infrared part of the electromagnetic spectrum) and includes but is not limited to a layer of radiant heat reflecting material or radiant heat reflecting paint/coatings or masonry (concrete, cinder block, brick). xi. As feasible based on availability of equipment, utilize equipment with electric motors for landscaping work when ignition potential is higher due to low moisture in vegetative fuels, generally from May 1 to November 1 or during Red Flag Warnings indicating higher fire risk. Currently					

SAN MATEO



LOCAL AGENCY FORMATION COMMISSION

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September 9, 2026

To: LAFCo Commissioners

From: Rob Bartoli, Executive Officer
Sarah Flamm, Management Analyst

Subject: Consideration of Circulation Draft Municipal Service Reviews and Sphere of Influence Updates for the Town of Atherton, the Atherton Channel Drainage District, and the City of Menlo Park

Summary & Background

In 1985, San Mateo LAFCo first prepared comprehensive Sphere of Influence (SOI) studies and adopted SOIs for the County's cities and special districts. Subsequently, LAFCo reviewed and updated spheres on a three-year cycle. SOI updates focus on changes in service demand within the boundaries of cities and special districts. In 2003, in order to comply with the newly enacted CKH Act, LAFCo began the process of preparing SOI updates in conjunction with or following a Municipal Service Review (MSR). This report reviews the following agencies in San Mateo County:

Town of Atherton: The Town of Atherton was incorporated on September 12, 1923 as a general law municipality. As of January 2026, the estimated population is 7,086. The Town covers approximately 5 square miles of residential community in San Mateo County. As of September 2026, the Town employs 43 Full Time Equivalent staff. The FY 2026-27 adopted General Fund budget is \$23,370,663. The Town SOI is coterminous with its existing corporate boundaries.

Atherton Channel Drainage District: The Drainage District was formed in 1958 as a subsidiary district of the Town of Atherton, for the purpose of constructing and maintaining stormwater collection facilities. As a subsidiary district, the Atherton City Council functions as the District's governing body. The District receives approximately 0.2% share of the 1% property tax assessed on each of the parcels within the 6 square mile boundaries, which span Atherton, Menlo Park, Woodside and parts of unincorporated San Mateo County. This assessment was "locked in" by Proposition 13. The District budget is adopted as part of the Town's general budget. Town staff

COMMISSIONERS: VIRGINIA CHANG KIRALY, CHAIR, SPECIAL DISTRICT • ANN DRAPER, VICE CHAIR, PUBLIC • KATHRYN SLATER-CARTER, SPECIAL DISTRICT • DAVID J CANEPA, COUNTY • DEBBIE RUDDOCK, CITY • STEPHEN RAINALDI, CITY • JACKIE SPEIER, COUNTY

ALTERNATES: NOELIA CORZO, COUNTY • VACANT, SPECIAL DISTRICT • GREG WRIGHT, CITY • COLLEEN YOU, PUBLIC

STAFF: ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK

provide operations and routine maintenance services. According to City Manager George Rodericks, the FY 2026-27 District revenues total \$125,000, and expenditures total \$60,000. The available ending fund balance is \$589,511.

City of Menlo Park: The City of Menlo Park was incorporated on November 23, 1927 as a general law municipality. As of January 2026, the estimated population is 33,785. The City land area is approximately 10 square miles, plus an additional 7 square miles of water area. As of September 2026, the Town budget includes 297 Full Time Equivalent staff. The FY 2026-27 adopted General Fund budget is \$90,537,503. The City's SOI is expansive, including the unincorporated San Mateo County communities of Menlo Oaks, West Menlo Park, Weekend Acres, and SLAC.

Current Key Issues

The Town of Atherton and the Atherton Channel Drainage District: LAFCo staff has not identified any issues with the Town's budgeting practices, and the Town continues to adopt a balanced budget and has adequate reserves. However, the Town, like other municipalities in the County, is affected by the Vehicle License Fee (VLF) in-lieu shortfall. From FY 2023-24 through FY 2025-26, the Town is missing a total of \$1,914,709 in unpaid VLF funds, which represents approximately 7% of the FY 2026-27 budget.

The Atherton Channel Drainage District, a dependent district of the Town of Atherton, provides stormwater collection services. Currently, the Drainage District's budget is insufficient to fund the full cost of ongoing maintenance and infrastructure replacement, largely due to the limited property tax dollars the Drainage District receives. Also, while funds for the Drainage District are kept separately from Town funds, the Town could enhance financial and capital project transparency by preparing and adopting a budget and capital improvement plan for the Atherton Channel Drainage District separately from the Town's budget and Town capital improvement program.

San Mateo LAFCo last conducted an MSR for the Town of Atherton and Atherton Channel Drainage District in 2008.¹

The City of Menlo Park: The City is also affected by the VLF in-lieu shortfall. In FY 2026-27, the VLF revenue is anticipated to be \$1.9M. This represents a shortfall of \$4.3M, or 5% of total General Fund expenditures. The City does not include VLF backfill revenue in budget forecasts for FY 2027-28 onward. The City is facing a structural deficit. Nonetheless, the City Council adopted a balanced budget in FY 2026-27, addressing an anticipated \$7.9M shortfall through a combination of cuts to departmental operating expenditures and increased revenue generation through updates to the Master Fee Schedule and cost allocation plan.

San Mateo LAFCo recommends undertaking a special study to capture the current service providers and reevaluate the SOI designations of Stanford lands in unincorporated San Mateo County. This study will enable LAFCo, Menlo Park, Portola Valley, Woodside, and Stanford

¹ San Mateo LAFCo, Town of Atherton MSR July 30, 2008
LAFCo Meeting Packet Page 137

University to have a comprehensive discussion regarding SOI designations, accurately capture the current service providers, and determine the probable physical future boundaries of these cities.

Three parcels have been reviewed by LAFCo staff and the Menlo Park City Manager as candidates for additions to the SOI of Menlo Park: APN 055-130-010 (Haven Ave, north-east Menlo Park), APN 074-160-050 (Sharron Heights Golf Club), and APN 073-250-070 (Sharron Heights Golf Club/Stanford University).

San Mateo LAFCo last conducted an MSR for the City of Menlo Park in 2009.²

MSR Determinations and Recommendations for the Town of Atherton and Atherton Channel Drainage District

As required by State law, there are seven areas of MSR determination, including local policies as set forth in Section 56430. LAFCo has the following determinations and recommendations:

- I. Growth and Population Determination:** As of 2026, the Town of Atherton is home to 7,086 residents and nearly 2,700 housing units. The Town's adopted 2023-2031 Housing Element proposed to increase its housing stock by approximately 15%, largely through the construction of ADU's on existing developed property. All housing sites identified in the Town's Housing Element are within the existing boundaries of the Town.

Recommendation: None

- II. Disadvantaged Unincorporated Communities Determination:** The Town's SOI and municipal boundaries are contiguous, and the Town does not provide water, sewer, or structural fire services. There are no disadvantaged unincorporated communities within the Town's SOI.

Recommendation: None

- III. Capacity and Adequacy of Public Facilities and Services Determination:** The Town of Atherton has the capacity to meet service needs of existing and future development within its boundaries. Atherton's five-year capital improvement plan is adequately funded and designed to ensure public services are adequate and infrastructure needs are proactively addressed.

Recommendation:

1. LAFCo encourages the Town to continue to review potential revenue sources for drainage systems and enhance existing revenue sources for the Atherton Channel Drainage District for capital projects and ongoing operations and maintenance.

- IV. Financial Ability Determination:** The Town prepares an annual operating and capital improvement budget for the upcoming fiscal year that gets adopted by the City Council at a

² San Mateo LAFCo Municipal Service Review for Menlo Park, 2009
LAFCo Meeting Packet Page 138

noticed public hearing before June 30th. The City also produces an Annual Comprehensive Financial Report that is reviewed by the City Council. The most recently published report is for FY 2024-25. The Town has healthy reserves, with a FY 2026-27 fund balance projected to represent 50% of total expenditures. The Town has the requisite financial policies in place to ensure its continued financial accountability and stability.

Recommendations:

2. LAFCo encourages the Town to separate the Atherton Channel Drainage District budget from its current structure within the Town's General Fund and Capital Improvement Plan. This will enhance transparency and provide a forum for discussions regarding funding allocation and projects within the District.

3. The annual Independent Financial Audit for the Town should review the Drainage District finances separately from the Town's General Fund and other special revenue funds, as the Drainage District is a dependent district of the Town.

4. Currently, the Town budgets \$1.3M in VLF expected revenues for FY 2026-27. Given the uncertainties in VLF revenue payments from the state, and the historic shortfalls/partial payment for prior years, the Town may consider reducing or removing anticipated VLF revenue from future budgets.

V. Shared Service and Facilities Determination: The Town of Atherton offers its residents mostly in-house services, such as its own Police Department. The Town contracts out public works projects and does collaborate with other cities on fire and library services.

Recommendation: None

VI. Accountability, Structure, and Efficiencies Determination: The Town of Atherton ensures that public meetings are accessible and publicized. Archived meeting minutes and videos are available online. LAFCo is not aware of any failure to comply with disclosure laws or the Brown Act.

Recommendation:

5. The City Council does not hold separate governing body meetings for the Atherton Channel Drainage District. Decisions relating to the District, including the annual budget adoption, occur during the Town's regular City Council Meetings. As the District includes portions of Atherton, Menlo Park, Woodside, and unincorporated San Mateo County, having the City Council sit as the governing body of the District would likely facilitate inter-jurisdiction collaboration on projects and collaboration on funding and budget. Notice of governing body meetings would also enhance transparency for the public, particularly for those who reside within the District, but outside of the Town Atherton. LAFCo recommends the Town of Atherton holds governing body meetings for the Atherton Channel Drainage District when discussing actions related to the District, including the adoption of the District's budget and capital improvement plan.

VII. Other Issues Determination: The Town is engaged in activities to address hazard mitigation, wildfire prevention, greenhouse gas emissions and sea level rise.

Recommendation: None

Sphere of Influence Determinations for the Town of Atherton and Atherton Channel Drainage District

- I. The present and planned land uses in the area, including agricultural and open space lands:** The majority of the Town's land use is residential. Other land use includes park and open space, and public facilities and schools. There is no agricultural land within the Town's SOI.
- II. The present and probable need for public facilities and services in the area:** Over the next 5-10 years, no significant population change or new development is expected within the current Town boundaries.
- III. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide:** The Town provides adequate public services and facilities to its residents.
- IV. The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency:** There are no disadvantaged unincorporated communities within the boundaries or the SOI of the Town.
- V. For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to Section 56425(g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence:** N/A

MSR Determinations and Recommendations for the City of Menlo Park

As required by State law, there are seven areas of MSR determination, including local policies as set forth in Section 56430. LAFCo has the following determinations and recommendations:

- I. Growth and Population Determination:** As of 2026, the City of Menlo Park is home to 33,785 residents and approximately 14,000 housing units. The City's adopted 2023-2031 Housing Element proposed to increase its housing stock by 2,946 units or approximately 20%, largely through infill and increasing residential density. The development sites identified in the City's adopted Housing Element are within the existing boundaries of the City.
Recommendation: None.
- II. Disadvantaged Unincorporated Communities Determination:** While the City does provide water service to a portion of the City, there are no disadvantaged unincorporated communities within the City's SOI or corporate boundaries. However, the Menlo Park

neighborhoods of Belle Haven and the Bayfront are considered “low income” and are separated from the rest of the City by US-101.

Recommendation: None

III. Capacity and Adequacy of Public Facilities and Services Determination: The City of Menlo Park has the capacity to meet service needs of existing and future development within its boundaries. The City has Master Plans to guide capital expenditures and priorities across various service areas. The capital improvement plan is currently adequately funded, although the General Fund transfer for capital projects was reduced by \$1M in FY 2026-27 in order to balance the budget.

Recommendation: None.

IV. Financial Ability Determination: The City prepares an annual operating and capital improvement budget for the upcoming fiscal year that gets adopted by the City Council at a noticed public hearing before June 30th. The City also produces an Annual Comprehensive Financial Report that is reviewed by the City Council. The most recently published report is for FY 2024-25. The City’s target General Fund reserve level is 35% of total expenditures. The projected FY 2026-27 reserve level is just shy of the target, representing 32%. Without any intervention or changes, the reserve level is projected to decline further, reaching 9% in FY 2030-31.

The City has the requisite financial policies in place to ensure its continued financial accountability and stability. In FY 2026-27, the property tax in lieu of vehicle license fee (VLF) revenue is anticipated to be \$1.9M. This represents a shortfall of \$4.3M, or 5% of total General Fund expenditures. Menlo Park does not include any VLF backfill revenue in budget forecasts for FY2027-28 onward.

Recommendation:

1. LAFCo staff encourages the City to continue monitoring its reserve levels and exploring additional revenue sources to help the City obtain alignment with its General Fund fund balance policy.

V. Shared Service and Facilities Determination: The City collaborates and partners with various Bay Area jurisdictions on natural hazard mitigation planning, transportation and traffic management, and sea level rise. The City shares fire protection services via the Menlo Park Fire Protection District, and participates in the County’s multijurisdictional Local Hazard Mitigation Plan. The City is also a member of the San Francisquito Creek Joint Powers Authority (SFCJPA), along with the City of East Palo Alto, City of Palo Alto, the San Mateo County Flooding and Sea Level Resiliency District, and the Santa Clara Valley Water District. The City also partners with regional transit agencies for various projects, including with Caltrain on Grade Separations and the Metropolitan Transit Committee on Dumbarton Forward.

Recommendation:

2. LAFCo staff encourages the City of Menlo Park to continue partnering with regional agencies to address traffic and transportation projects, as well as natural hazards and mitigation planning.

VI. Accountability, Structure, and Efficiencies Determination: The City ensures that public meetings are accessible and publicized. Archived meeting minutes and videos are available online. LAFCo is not aware of any failure to comply with disclosure laws or the Brown Act.

Recommendation: None.

VII. Other Issues Determination: The City is engaged in activities to address hazard mitigation, wildfire prevention, greenhouse gas emissions and sea level rise. Additionally, through this report, LAFCo staff was made aware that the City of Menlo Park has water infrastructure on Stanford-owned land in unincorporated San Mateo County. This area is currently with the designated SOI of the Town of Woodside. It should be determined whether these SOI designations of the Stanford lands and SLAC accurately reflect the current service providers, potential service needs, as well as the probable physical future boundaries of Menlo Park, Woodside, and Portola Valley.

Recommendation:

3. LAFCo staff recommends that the Commission add to the FY 2027-28 LAFCo workplan and budget a Special Study of Stanford Lands to determine the extent of current service providers, and the appropriate SOI designations of these areas. The Special Study should include an inventory of City-owned infrastructure on Stanford lands, and recommendations for any SOI amendments to be presented for consideration to the Commission and to the respective Managers of the City of Menlo Park, Town of Woodside, and Town of Portola Valley and Stanford University staff.

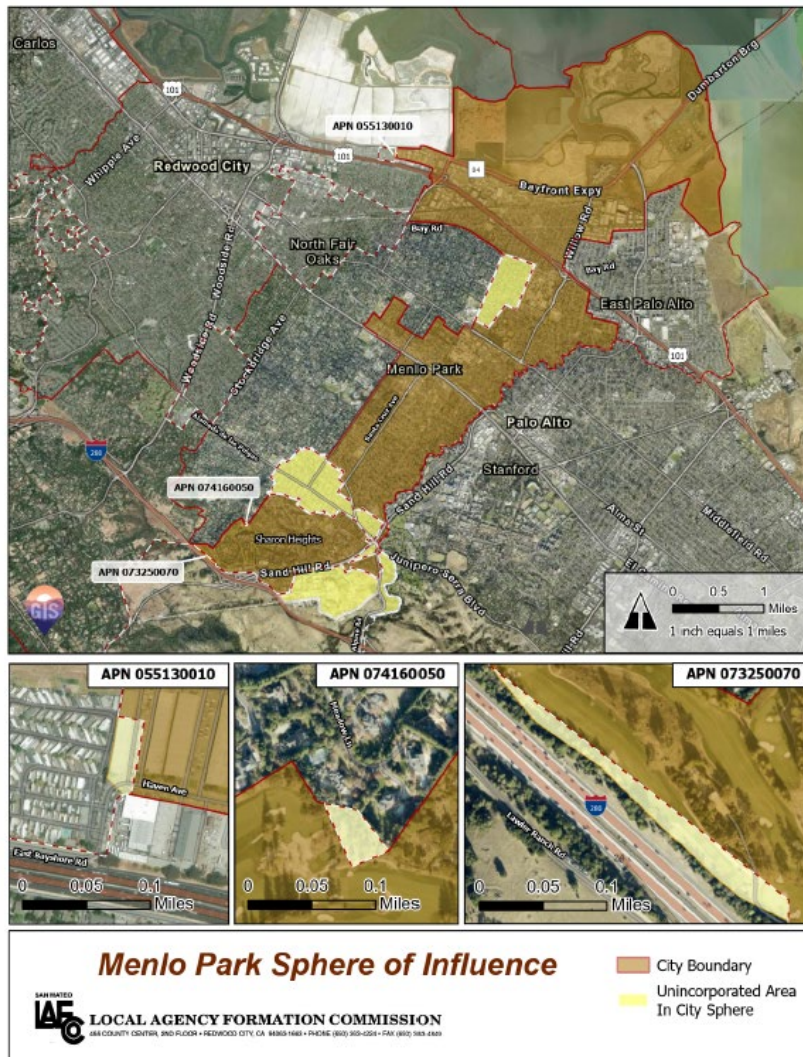
Proposed Sphere of Influence Determinations for the City of Menlo Park

As required by State law, LAFCo is required to make five written determinations when establishing, amending, or updating an SOI for any local agency as set forth in Government Code Section 56425(e) that addresses the following:

- I. **The present and planned land uses in the area, including agricultural and open-space lands:**
The majority of the City's land use is residential. Other land uses include commercial, life sciences and industrial (Bayfront district), institutional, public facilities, parks and open space (tidal marshes and protected wetlands). There is no agricultural land within the City's SOI.

- II. The present and probable need for public facilities and services in the area:** The City of Menlo Park's facilities and services meet the needs of its residents and businesses, and the City anticipates that it will be able to provide adequate facilities and services for the anticipated growth within its service area. In reviewing the City's SOI and surrounding parcels, three parcels have been identified to be included in the City's SOI (see Figure 1):
- 3501 Haven Ave. (APN 055-130-010), an unincorporated parcel contiguous to the City. It is currently being used as part of a larger warehouse unit. The City provides water to this parcel. The City of Redwood City has no objection to this parcel being added to the Menlo Park SOI.
 - APN 074-160-050 is an unincorporated island owned by the Sharon Heights Golf Club. It is currently in use as part of the golf course. The rest of the Sharon Heights Golf Club is incorporated in the City of Menlo Park. This unincorporated island parcel is contiguous with the border of Menlo Park and Atherton and seemingly has never been assigned to an SOI.
 - APN 073-250-070 is an unincorporated parcel owned by Stanford University, currently in use as part of the Sharon Heights golf course. It is contiguous to the City of Menlo Park, and adjacent to I-280 on the east side. This parcel was assigned to the SOI of Woodside. The Town of Woodside has no objection to having this parcel detached from the Town's SOI and added to the City of Menlo Park's SOI.

Figure 1. Proposed Sphere of Influence Amendment to the City of Menlo Park



- III. **The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide:** The City currently provides adequate public services to its residents, including fire and police protection, water, sanitary sewer and storm water services. The City routinely adopts a Capital Improvement Program to fund critical repairs, replacements and improvements to the City's infrastructure and facilities.
- IV. **The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency:** There are no disadvantaged unincorporated communities within the SOI of the City of Menlo Park.
- V. **For an update of a SOI of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to Section 56425(g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence:** N/A.

from publicly available agency-adopted plans, budgets, reports, and policies. Information received by San Mateo LAFCo in response to requests for data from the Town of Atherton and the City of Menlo Park has been incorporated into this report.

Environmental Review/CEQA: The MSR is categorically exempt from the environmental review requirements of the California Environmental Quality Act (CEQA) under Section 15303, Class 6, which allows for the basic data collection, research, experimental management, and resource evaluation activities that do not result in a serious or major disturbance to an environmental resource. The MSR collects data for the purpose of evaluating municipal services provided by an agency. There are no land use changes or environmental impacts created by this study.

The MSR is also exempt from CEQA under section 15061(b)(3), the commonsense provision, which states that CEQA applies only to projects which have the potential to cause a significant effect on the environment and where it is certain that the activity will have no possible significant effect on the environment, the activity is exempt from CEQA.

The MSR and SOI update will not have a significant effect on the environment as there are no land use changes associated with the documents.

Staff Recommendations for Commission:

1. Open the public hearing and accept public comment.
2. Provide Commissioner comment.
3. Direct the Executive Officer to schedule the public hearing for the Town of Atherton, the Atherton Channel Drainage District and the City of Menlo Park Final Municipal Service Reviews and Sphere of Influence updates at the next Commission meeting on November 18, 2026; and to circulate the drafts to the County, cities, and independent special districts.
4. Direct the Executive Officer to schedule a virtual public workshop for the MSRs or to coordinate with the two cities regarding possible presentations to their respective City Councils.

Attachments

- A. Circulation Draft Municipal Service Review and SOI Update for the Town of Atherton and the Atherton Channel Drainage District
- B. Circulation Draft Municipal Service Review and SOI Update for the City of Menlo Park
- C. SOI Maps for the Town of Atherton and the City of Menlo Park

SAN MATEO



LOCAL AGENCY FORMATION COMMISSION

**Municipal Service Review and Sphere of
Influence Update for the Town of Atherton and
the Atherton Channel Drainage District**

Circulation Draft

Released September 9, 2026

Municipal Service Review and Sphere of Influence Review for the Town of Atherton and the Atherton Channel Drainage District

Town of Atherton

80 Fair Oaks Lane

Atherton, California 94027

Contact: George Rodericks, Town Manager, 650-752-0504

CONDUCTED BY:

San Mateo Local Agency Formation Commission

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Greg Wright, City Member

Staff:

Rob Bartoli, Executive Officer

Sarah Flamm, Management Analyst

Diane Estipona, Commission Clerk

Tim Fox, Legal Counsel

EXECUTIVE SUMMARY

Section I: Report Overview

This report is a Municipal Service Review (MSR) and Sphere of Influence (SOI) study for the Town of Atherton. California Government Code Section 56430 requires that Local Agency Formation Commissions (LAFCo's) complete MSR and SOI reviews on all cities and special districts. These state-mandated reports are studies of an agency's service provision and logical boundaries. The review process is intended to identify municipal service delivery challenges and opportunities, provide the public and affected agencies with a platform to comment on an agency's services and finances, and review opportunities to share governmental resources. Once the MSR determinations are adopted, the SOI—the plan for the boundaries of a city or special district—is reviewed, pursuant to Section 56425.

San Mateo Local Agency Formation Commission

San Mateo LAFCo is a State-mandated, independent entity with county-wide jurisdiction over the boundaries and organization of cities and special districts. LAFCo reviews annexations, detachments, incorporations, formations, and dissolutions. LAFCo also has authority over extensions of service outside city or district boundaries, and activation or divestiture of special district powers. The purpose of LAFCo includes discouraging urban sprawl, preserving open space and prime agricultural lands, planning for the efficient provision of government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances.

LAFCo operates pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH Act) contained in California Government Code Sections 56000 and 57000. The Commission is comprised of two members of the County Board of Supervisors, two city councilmembers from two of the County's 20 cities, two special district board members from two of the 21 independent special districts, one member of the public, and four alternate members (county, city, special district, and public).

In 1985, San Mateo LAFCo first prepared comprehensive SOI studies and adopted SOI's for the County's cities and special districts. Subsequently, LAFCo reviewed and updated SOI's on a three-year cycle. SOI updates focus on changes in service demand within the boundaries of cities and special districts. In 2003, in order to comply with the newly enacted CKH Act, LAFCo began the process of preparing SOI updates/reviews in conjunction with or following an MSR.

Local Government in San Mateo County

Municipal service providers in San Mateo County include the County of San Mateo, 20 cities, 21 independent special districts, six subsidiary districts governed by city councils, and 33 County-governed special districts. Independent special districts provide a limited set of services based on their enabling legislation (i.e., fire, water, sanitation, etc.), while cities generally provide a wider array of basic services including police, recreation programs, planning, street repair, and building inspection. The County, as a subdivision of the State, provides a vast array of services for all residents across its cities, special districts and subsidiary districts, including social services, public health protection, housing programs, property tax assessments, tax collection, elections, and public safety. The County also provides basic municipal services for residents who live in unincorporated areas who are not part of any city or special district. According to Census 2020 data, 63,205 of the County's total 764,442 residents (8%) live in unincorporated areas.

MSR and SOI Determinations

Per Government Code Section 56430, LAFCo is required to include MSR Determinations that address the following areas for any local agency:

1. Growth and population projections for the affected area.
2. The location and characteristics of any disadvantaged unincorporated communities¹ within or contiguous to the SOI.
3. Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies.
4. Financial ability of the agency to provide services.
5. Status of, and opportunities for, shared facilities.
6. Accountability for community service needs, including governmental structure and operational efficiencies.
7. Any other matter related to effective or efficient service delivery, as required by LAFCo policy: a) Water Resiliency and Climate Change and b) Impact of Natural Hazards and Mitigation Planning

¹ "Disadvantaged community" means a community with an annual median household income that is less than 80 percent of the Statewide annual median household income. This area of determination does not apply to the study area.

MSR Determinations must be adopted before the Commission updates or amends a SOI. Per Government Code Section 56425, LAFCo is required to make the following five written determinations when establishing, amending, or updating an SOI for any local agency:

1. The present and planned land uses in the area, including agricultural and open-space lands.
2. The present and probable need for public facilities and services in the area.
3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
4. The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.
5. For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to Section 56425(g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

Report Review Process

A hearing for the Draft Report will be held at LAFCo's September 16, 2026 meeting. The report will subsequently be circulated for comment to the agencies under study, as well as interested individuals and groups. This report has been written based on source documents that include Adopted Budgets, Capital Improvement Plans, Meeting Minutes, Staff Reports, Consultant Reports, and information provided directly to LAFCo by the Town staff.

Disadvantaged Unincorporated Communities

In 2011, SB 244 (Chapter 513, Statutes of 2011) made changes to the CKH Act related to "disadvantaged unincorporated communities," including the addition of MSR determination #2 and SOI determination #5 listed above. Disadvantaged unincorporated communities, or "DUC's," are inhabited, unincorporated territories (containing 12 or more registered voters) where the annual median household income is less than 80 percent of the statewide annual median household income. There are no DUC's within the current boundaries or service areas of the Town of Atherton.

Section II. Summary of Key Issues

Key issues identified in compiling information on the Town of Atherton and the Atherton Channel Drainage District:

- LAFCo staff has not identified any issues with the Town’s budgeting practices, and the Town continues to adopt a balanced budget and has adequate reserves. However, the Town, like other municipalities in the County, is affected by the Vehicle License Fee (VLF) in-lieu shortfall. From FY 2023/24-FY 2025/26, the Town is missing a total of \$1,914,709 in unpaid VLF funds, which represents approximately 7% of the 2026/27 budget.
- The Atherton City Council is the governing body of the Atherton Channel Drainage District, a dependent district of the Town. The Drainage District includes a majority of Atherton, and portions of the City of Menlo Park, the Town of Woodside, unincorporated San Mateo County, and Stanford lands. The Drainage District provides stormwater collection services. Currently, the Drainage District’s budget is insufficient to fund the full cost of ongoing maintenance and infrastructure replacement, largely due to the limited property tax dollars the Drainage District receives. Also, while funds for the Drainage District are kept separately from Town funds, the Town could enhance financial and capital project transparency by preparing and adopting a budget and capital improvement plan for the Atherton Channel Drainage District separately from the Town’s budget and Town capital improvement program.

San Mateo LAFCo last conducted an MSR for the Town of Atherton and Atherton Channel Drainage District in 2008.²

Section III. Affected Agencies

Cities/Towns and County: Town of Atherton and San Mateo County

School Districts: Sequoia Union High School District, Menlo Park City School District, Las Lomas Elementary School District, and Redwood City School District

Independent Special Districts: County Harbor District, Fair Oaks Sewer Maintenance District, Menlo Park Fire Protection District, and West Bay Sanitary District

Dependent Special Districts: Atherton Channel Drainage District

Section IV. Municipal Service Review for the Town of Atherton and the Atherton Channel Drainage District

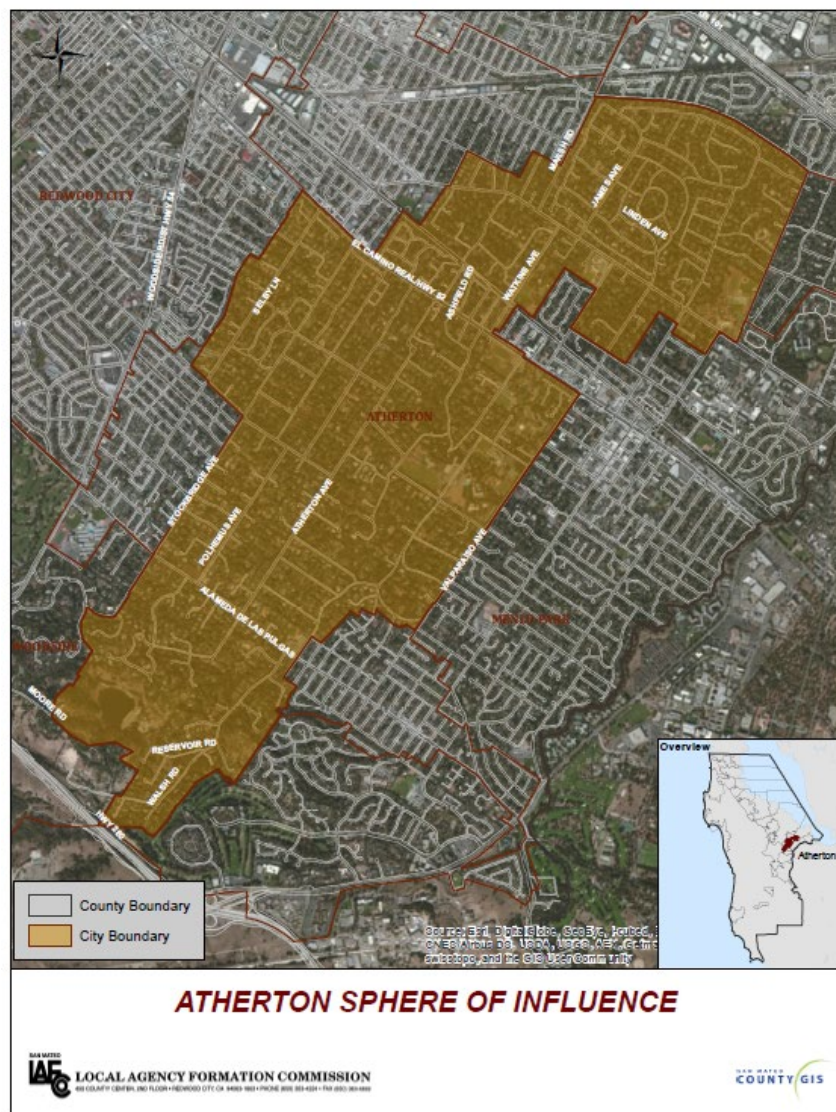
Background: On September 12, 1923, the Town of Atherton was incorporated as a General Law municipality. Atherton is a small, residential community in San Mateo County, nestled between the cities of Redwood City and Menlo Park and portions of unincorporated County. Atherton is governed by five council members, each serving a staggered four-year term,

² San Mateo LAFCo, Town of Atherton MSR July 30, 2008

elected by City residents in at-large elections. The City Council appoints a City Manager, City Attorney, members of City Boards and Commissions, and also selects the Mayor. The population of Atherton is 7,086 and the area is approximately five square miles.³

The current sphere of influence (SOI) for Atherton is coterminous: the SOI matches the City's boundaries, and there are no plans to expand beyond current jurisdictional limits. (See Figure 1). The City Council adopted six goals to guide its annual 2025-26 workplan. The first goal is to “preserve small town character and quality of life”.⁴

Figure 1. Town of Atherton Sphere of Influence



³ As of January 1, 2026 according to the California Department of Finance, <https://www.abridged.org/wp-content/uploads/2026/05/Department-of-Finance.pdf>

⁴ Town of Atherton FY 2025-26 Work Plan [Town of Atherton](#)

1) Growth and Population: The Town of Atherton

The MSR determinations checked below are potentially significant, as indicated by “yes” or “maybe” answers to the key policy questions in the checklist. If most or all determinations are not significant, the Commission may find that an MSR update is not warranted.

Growth and population projections	Yes	Maybe	No
a) Is the City’s territory or surrounding area expected to experience any significant population change or development over the next 5-10 years?			X
b) Will population changes have an impact on City’s service needs and demands?			X
c) Will projected growth require a change in the City’s service boundary?			X

a-c) As of 2026, the population count for Atherton is 7,086. The average age in Atherton is approximately 48 years old, while the average age in San Mateo County is 40.⁵ Over the next 5-10 years, no significant population change or new development is expected within the current Atherton boundaries, based on a review of planning documents from the City, County and the Association of Bay Area Governments. While there are very few undeveloped or vacant parcels, there is modest opportunity for ADU construction and SB-9 subdivision of large lots.⁶ Atherton is characterized by large residential lot size (zoning code limits parcel size primarily to 1-acre, single-family developments), no commercial land use, and has amongst the highest property values in the state, and country. As of FY 2026/27, Atherton is comprised of 2,621 parcels, with an average assessed value of \$7.4M per parcel. The Town of Atherton is comprised of residential, school and civic, and open space land uses.

Atherton provides residents services including building inspection, parks, recreation, planning, police, and public works directly through in-house staff (43 FTE), as well as through contracted providers.

In May 2025, the California State Department of Housing and Community Development (HCD) certified Atherton’s 6th Cycle (2023-2031) adopted Housing Element.⁷ Atherton has a Regional Housing Needs Allocation of 348 units, which it plans to meet with 396 units projected over the 2023-2031 planning period. All Atherton sites identified as available for

⁵ SMC Housing Element 2023-31, 25-211 - 20250325_att_att C Exhibit A to Resolution.pdf

⁶ Housing Law Fact Sheet: Duplexes and Lot Splits (SB 9)

⁷ Housing Element Update | Atherton, CA - Official Website

housing in the Housing Element are on existing developed property already connected to public sewer and water.⁸ The majority of the planned housing units are Accessory Dwelling Units (ADUs). The Housing Element Update also introduces multifamily overlay districts on certain private properties, creating a pathway for denser development. All sites that were identified are within the existing boundaries of the Town.

Growth and Population Determination: As of 2026, the Town of Atherton is home to 7,086 residents and nearly 2,700 housing units. The Town’s adopted 2023-2031 Housing Element proposed to increase its housing stock by approximately 15%, largely through the construction of ADU’s on existing developed property. All housing sites identified in the Town’s Housing Element are within the existing boundaries of the Town.

2) Disadvantaged Unincorporated Communities

The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the sphere of influence.	Yes	Maybe	No
a) Does the Town provide public services related to sewers, municipal and industrial water, or structural fire protection?			X
b) Are there any “inhabited unincorporated communities” within or adjacent to the Town’s sphere of influence that are considered “disadvantaged” (80% or less of the Statewide median household income)?			X

a-b) The Town of Atherton utilizes other purveyors to provide water (CalWater), sewer (West Bay Sanitary District and Fair Oaks Sewer Maintenance District) or structural fire (Menlo Park Fire Protection District) services. The Town of Atherton is contiguous to North Fair Oaks, an unincorporated “island” that has the highest poverty rates in San Mateo County, but does not meet the definition of a Disadvantaged Unincorporated Community (DUC).⁹ Notably, North Fair Oaks is recognized as an environmental justice community.¹⁰ The community of North Fair Oaks is wholly within the SOI of the City of Redwood City.

⁸ [Housing Element Update | Atherton, CA - Official Website](#)

⁹ The median household income for North Fair Oaks is \$106,690 (US Census Bureau ACS 2023) while the California statewide median household income is \$96,334. A DUC is defined as an “inhabited territory” (with 12 or more registered voters) that has an annual median household income less than 80 percent of the statewide median household income (Government Code §56033.5).

¹⁰ [San Mateo County – Environmental Justice Planning Initiative](#)

Disadvantaged Unincorporated Communities Determination: The Town's SOI and municipal boundaries are contiguous, and the Town does not provide water, sewer, or structural fire services. There are no disadvantaged unincorporated communities within the Town's SOI.

3) Capacity and Adequacy of Public Facilities and Services

Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies	Yes	Maybe	No
a) Are there any deficiencies in Town capacity to meet service needs of existing development within its existing territory?			X
b) Are there any issues regarding the Town's capacity to meet the service demand of reasonably foreseeable future growth?			X
c) Are there any concerns regarding public services provided by the Town being considered adequate?			X
d) Are there any significant infrastructure needs or deficiencies to be addressed?		X	
e) Are there changes in State regulations on the horizon that will require significant facility and/or infrastructure upgrades?			X
f) Are there any service needs or deficiencies for disadvantaged unincorporated communities related to sewers, municipal and industrial water, and structural fire protection within or contiguous to the Town's sphere of influence?			X

a-f) There are 43 full-time equivalent (FTE) positions in Atherton's FY2025/26 Budget, with 3 vacancies. There were 44 FTE in the 2024/25 budget. The Town has not experienced any significant challenges with recruiting or retaining staff members.

Atherton meets the service needs of existing development within its boundaries. Available public services include police, fire, parks and recreation, public works, building inspection and town administration.

Parks and Recreation: Holbrook-Palmer Park is Atherton's 22-acre park that has tennis courts, pickleball courts, a playground, ball fields, trails, Jennings Pavilion, among other

facilities. The courts and playing fields are available for rent. The Town has a rental coordinator for Park facilities, and a Tennis Program Manager for the tennis courts.

Sewer Services: Most Atherton residents receive sewer services from the West Bay Sanitary District, with a portion of the Town (north side) served by the County-operated Fair Oaks Sewer Maintenance District.

Water: Water is supplied throughout Atherton by the Bear Gulch District of Cal Water. Most of the water provided (93%) is purchased or imported through the San Francisco Public Utilities Commission, with a remaining 7% supplied by Bear Gulch Reservoir. Cal Water's 2020 Urban Water Management Plan details the extent of available capacity and allocations for each district, with sufficient planned volume through 2045.¹¹

Fire Protection: Fire protection for Atherton is provided by the Menlo Park Fire Protection District, an independent special district that serves Atherton, East Palo Alto, Menlo Park, and portions of unincorporated San Mateo County. The District operates one fire station inside Atherton city limits (Fire Station 3 located at 32 Almendral Ave.). Atherton represents 8% of the District's total population, and most service calls are outside of Atherton. As such, in 2020, Atherton completed a Fire Services Fiscal Review to study the actual cost of fire and emergency services in Atherton, compared to the property tax revenue generated within the Town boundaries.¹² Atherton considered detachment from the Menlo Park Fire Protection District as part of this report, however since 2020, there has been no further formal discussion or actions on the matter. At the time of the study LAFCo questioned how fire service would be provided.

Atherton Channel Drainage District: The Atherton Channel District was formed in 1958 as a subsidiary district of the Town to construct and maintain stormwater collection facilities in areas determined to be in the local stream flood plain. As a subsidiary district, the Atherton City Council functions as the District's governing body. The District budget is adopted as part of the Town's Capital Improvement Plan budget. Town staff provide operations and routine maintenance services to the District. Capital Improvements are provided through public contracting. When needed, the Town will coordinate with the Menlo Park, Stanford, and the County, for various projects.

The District is approximately six square miles, including in its boundaries a majority of Atherton, portions of the City of Menlo Park, the Town of Woodside, unincorporated San Mateo County, and Stanford lands (see Table 1 and Figure 2).

¹¹ Town 6th Cycle Housing Element

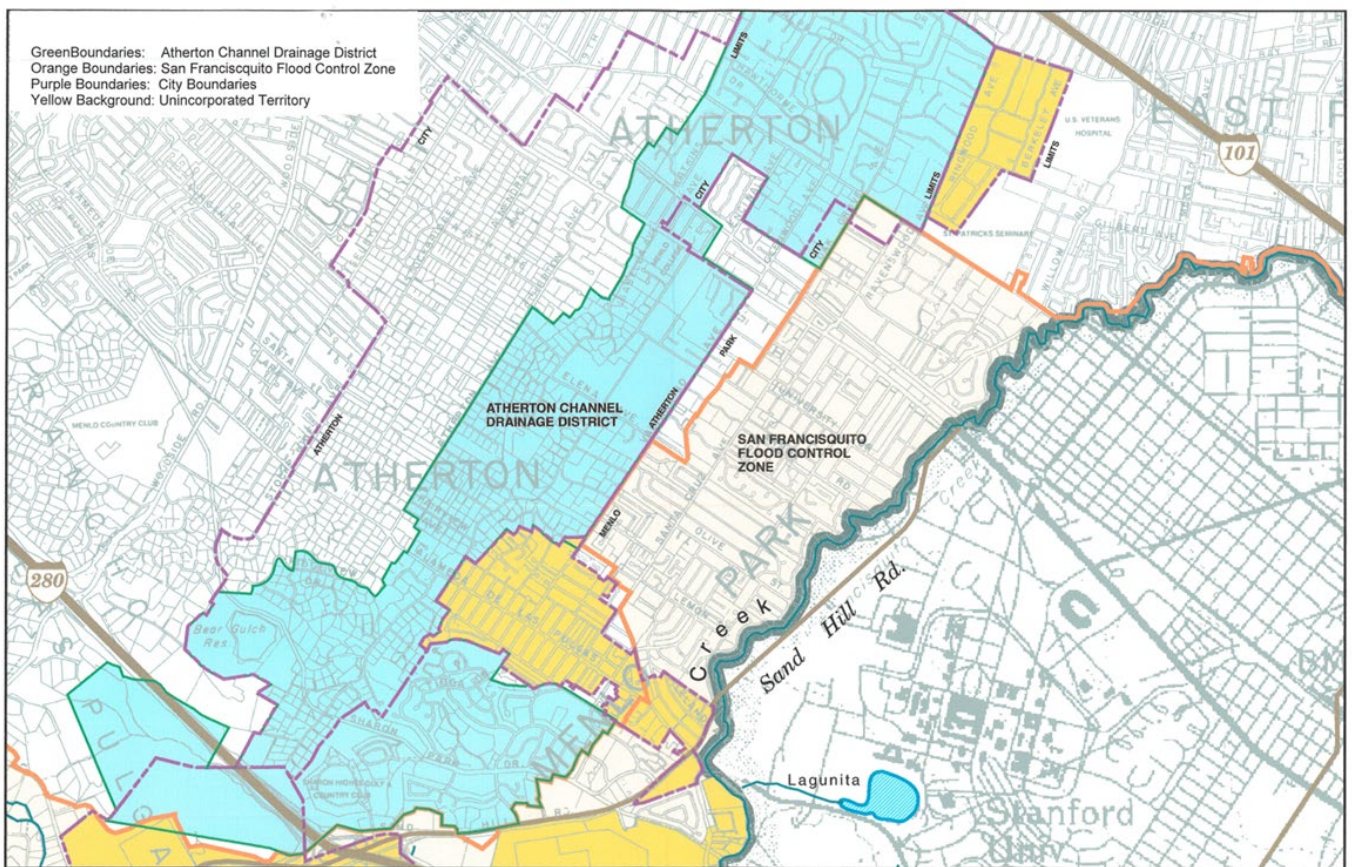
¹² [Fire Services Fiscal Review | Atherton, CA - Official Website](#)

Table 1. Atherton Channel Drainage District Parcel Count by Jurisdiction

Jurisdiction	No. Parcels	Share
Atherton	1,357	54.8%
Menlo Park	1,043	42.1%
Woodside	13	0.5%
Unincorporated	64	2.6%
Total Parcels	2,478	100%

Source: County Assessor 2027

Figure 2. Atherton Channel Drainage District Map



Atherton Channel Drainage District

CDR8/San Francisco Creek Study map (Sfgto study map).cdr 9-19-02 rp

The Atherton Channel Drainage District receives approximately 0.2% share of the 1% property tax assessed on each of the parcels within the District Boundaries (see Table 2). This assessment was “locked in” by Proposition 13. The District’s FY2026/27 estimated annual property tax revenues from parcels within the District are approximately \$100,000. According to Atherton City Manager, the FY2026/27 District revenues total \$125,000, and expenditures total \$60,000. The available ending fund balance is \$589,511. Projects within

the District are the Upper Channel Repair Monitoring Phase I (\$10,000) and Drainage Improvements (\$50,000). Funds for the Atherton Drainage Improvement Project are located both within the District and outside of it; projects are funded by various sources including the Town’s General Fund and grants.

Table 2. 1% Property Tax Distribution – Sample Tax Rate Area for Town of Atherton (TRA 001-001)

Agency	Share(%)
General County Tax	24
Menlo Park City Elementary School District	16
Menlo Park Fire District	16
Sequoia High School District	15
City of Atherton	10
San Mateo Junior College	7
County Education Tax	4
Free Library	3
Midpeninsula Regional Open Space	2
Sequoia Hospital District	1
County Harbor District	0.4
Atherton Channel Drainage District	0.2
County Vector Control	0.2
Bay Area Air Quality Management	0.2
Total	100*

Source: County Assessor

Note: Exact shares vary between tax rate areas. May not total 100 due to rounding.

Capital Improvements: Adequate infrastructure exists throughout the Town to accommodate the existing and planned density of development. In 2019-2022, the Town constructed a new Town Center which included new buildings for the Administration, Community Development Department, Library and Police Department, as well as the renovation of the historic Town Hall.

Atherton has a five-year Capital Improvement Plan (CIP) that is updated annually to reflect community needs, priorities, cost estimates, and funding sources. The CIP is reviewed by the City Planning Commission to ensure consistency with the General Plan and other town-

wide plans (i.e. Bicycle and Pedestrian Master Plan, Neighborhood Traffic Management Action Plan, and the Storm Drainage Master Plan). Project updates are published on the Atherton Public Works website.

The CIP for FY 2025/26 through FY 2029/30 totals approximately \$26M (see Table 3). Funding for capital projects is sourced from the General Fund, Measure A (countywide transportation projects and programs), Measure M (countywide vehicle registration fee), Measure W (countywide sales tax for use on transportation improvements and affordable transit), Gas tax (state allocation based on population and lane miles), the Atherton Channel Fund (fees collected by Town to finance drainage and improvements to the Channel), and the Library Fund (for library maintenance and services). On an annual basis, Atherton transfers General Fund unallocated reserves to the Capital Improvement Program Fund: this transfer totaled \$5.8M in FY2023/24, \$4.4M in FY2024/25, \$5.5M in FY2025/26 and \$4.3M in FY2026/27.

Table 3. Town of Atherton Five-Year Capital Improvement Plan, FY 2025/26-FY2029/30

Capital Project	FY2025/26	FY2026/27	FY2027/28	FY2028/29	FY2029/30	5-Year Total
Drainage Improvements Program	\$2,685,000	\$550,000	\$1,700,000	\$200,000	\$4,200,000	\$9,335,000
Upper Atherton Channel Phase II Monitoring	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$50,000
Traffic Control Devices Program	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000	\$75,000
Traffic Safety Improvement Program	\$1,840,000	\$40,000	\$1,040,000	\$40,000	\$40,000	\$3,000,000
Bike & Pedestrian Facilities Improvement Program	\$425,000	\$275,000	\$2,525,000	\$25,000	\$25,000	\$3,275,000
Road Maintenance Program	\$1,455,000	\$1,455,000	\$1,455,000	\$1,455,000	\$1,455,000	\$7,275,000
Neighborhood Traffic Management Program	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$100,000
Facility Accessibility Improvements	\$100,000	\$25,000	\$25,000	\$25,000	\$25,000	\$200,000
Town Center/Library Improvements	\$375,000	\$700,000	\$100,000	\$100,000	\$100,000	\$1,375,000
Park Master Plan	\$630,000	\$100,000	\$350,000	\$100,000	\$100,000	\$1,280,000
Total	\$7,555,000	\$4,090,000	\$7,240,000	\$1,990,000	\$5,990,000	\$25,965,000

Source: Town of Atherton Operating and Capital Improvement Budget, FY 2026/27

Capacity and Adequacy of Public Facilities and Services Determination: The Town of Atherton has the capacity to meet service needs of existing and future development within its boundaries. Atherton's five-year capital improvement plan is adequately funded and

designed to ensure public services are adequate and infrastructure needs are proactively addressed.

Recommendation:

1. LAFCo encourages the Town to continue to review potential revenue sources for drainage systems and enhance existing revenue sources for the Atherton Channel Drainage District for capital projects and ongoing operations and maintenance.

4) Financial Ability

Financial ability of the agency to provide service	Yes	Maybe	No
a) Does the Town routinely engage in budgeting practices that may indicate poor financial management, such as overspending its revenues, failing to commission independent audits, or adopting its budget late?			X
b) Is the Town lacking adequate reserve to protect against unexpected events or upcoming significant costs?			X
c) Is the Town's rate/fee schedule insufficient to fund an adequate level of service, and/or is the fee inconsistent with the schedules of similar service organizations?			X
d) Is the Town unable to fund necessary infrastructure maintenance, replacement and/or any needed expansion?			X
e) Is the Town lacking financial policies that ensure its continued financial accountability and stability?		X	
f) Is the Town's debt at an unmanageable level?			X

Budget Overview: The Town of Atherton's consistently largest revenue source is from property taxes, representing \$14.7M or 56% of the \$26M in total projected General Fund revenue for FY 2026/27 (see Table 4). The Vehicle License Fee (VLF) in-lieu fund is a State administered revenue source that is built into the Town's operating revenue projections.¹³ From FY 2023/24-FY 2025/26, the Town is missing a total of \$1,914,709 in unpaid VLF funds, which represents approximately 7% of the 2026/27 budget.

¹³ Excess ERAF is another state-administered revenue source that is a refund of surplus school property tax. The Town uses these funds for one-time capital projects, not daily operations. Excess ERAF refund amounts have increased, exceeding expected revenues even, totaling \$3.2M in FY2026/27.

The VLF in-lieu revenue for San Mateo County and its 20 cities, including Atherton, may be in jeopardy due to state level policy changes. These policies affect only three counties statewide: San Mateo, Mono and Alpine counties. As of August 2026, negotiations between San Mateo County, its cities, and the State are ongoing to find a permanent fix to the revenue formula. Town staff are monitoring the issue. The Town staff has budgeted the VLF revenue for FY2026/27 with the understanding of a shortfall occurring while also possibly receiving partial payment for prior shortfalls. According to Town staff, adding the VLF shortfalls outstanding for previous years of \$973,168 and the current FY 2025/26 of \$788,602 leaves a total outstanding of \$1,761,770 for the Town. Staff have budgeted the VLF revenues for FY2026/27 at \$1.3M, the same amount as the estimated actuals from the prior year (FY 2025/26).¹⁴

The Town's second largest revenue source is from building permits and other fees associated with local construction projects, totaling a projected \$2.8M or 11% of total revenue in FY 2026/27. For nearly 40 years, from 1978 to 2017, Atherton residents approved a special tax for \$750 per parcel, generating \$1.8M in revenue to the Town per year (in 2017). It was discontinued in 2017.¹⁵

Table 4. Town of Atherton General Fund Budget, FY 2024/25 - FY2026/27

	2026-27 (Budget)		2025-26 (Est. Actuals)		2024-25 (Actuals)	
<i>Revenues</i>		<i>Share</i>		<i>Share</i>		<i>Share</i>
Prop. Tax (Secured)	\$14,722,250	56%	\$13,955,000	56%	\$12,787,864	53%
Prop. Tax in lieu of VLF	\$1,312,000	5%	\$1,312,000	5%	\$1,448,354	6%
All Other	\$10,127,313	39%		0%		0%
Total Revenues	\$26,161,563	100%	\$25,022,071	100%	\$24,284,401	100%
<i>Expenditures</i>						
Police Dep't	-\$11,492,484	49%	-\$11,285,000	51%	-\$13,075,794	58%
Public Works Dep't	-\$4,162,863	18%	-\$3,900,000	18%	-2,789,444	12%
All Other	-\$7,715,316	33%	-\$7,065,000	32%	-\$6,526,089	29%
Total Expenditures	-\$23,370,663	100%	-\$22,250,000	100%	-\$22,391,327	100%
Net	\$2,790,900		\$2,772,071		\$1,893,074	

**Note: Does not include ERAF revenue, Debt service payments, CalPERS or other Transfers*

Source: Town of Atherton Operating and Capital Improvement Budget, FY 2026/27

The Town's largest expenditure category every year is its Police Department, totaling \$11.5M or 49% of General Fund projected expenditures in FY 2026/27. This amount is significantly larger than the second largest expenditure category which is the Public Works Department at \$4.1M or 18% of total projected expenditures. The Police Department has 31 employees

¹⁴ FY2026/27 Town Budget

¹⁵ In 2017, Ballot Measure F received approximately 50% of the vote, well short of the two-thirds supermajority vote required to pass a local special parcel tax under Proposition 218.

across four divisions: Administrative/Training, Patrol/Traffic, Investigations, and Communications/Records. Based on the January 2026 Atherton population count of 7,086, the Town budgets \$1,574 per resident, per year on police services. For comparison, the neighboring City of Menlo Park budgets spending \$867 per resident per year.¹⁶ While some cities choose to fund and operate their own police services, other cities such as Millbrae, San Carlos, the Town of Woodside, and the Town of Portola Valley contract with the County Sherriff's Office.¹⁷ There are currently no proposed changes to police services within the Town.

a) Does the City routinely engage in budgeting practices that may indicate poor financial management? The Town of Atherton regularly adopts a balanced budget in June, before the July 1 start of each fiscal year. Proposed expenditures and revenues are presented in public hearings for comment prior to adoption. The Town hosts historic records of annual operating budgets from FY 2009/10 to the present on its Archive Center webpage. Also accessible via the Archive Center are agendas, minutes, and recorded videos of City Council meetings and various Commission meetings, dating back to June 2012.

Each fiscal year, Atherton undergoes an independent financial audit. Since 2008, Maze & Associates has performed the annual audit. The online Archive Center contains the City's historical audit reports back to FY 1990/2000. The FY 2024/25 audited draft basic financial statements were presented to the Finance Committee at the March 25, 2026 meeting, and overall delivered a positive report. There is no separate audit for the Atherton Channel Drainage District, although District capital improvement funds are summarized.

The audit mentions the chronic issue of VLF revenue shortfalls \$(1,758,734 due vs. \$1,018,223 received) as a "State issue of insufficient funding in non-basic aid school districts and the failure of the State to backfill these local taxes. The consistent shortfall of multiple years in this revenue source leaves the Town with a potential gap of \$1.7M." The Town expects future state budgets will reconcile this gap.

b) Is the City lacking adequate reserve to protect against unexpected events or upcoming significant costs? Atherton has adopted fiscal policies to ensure adequate annual reserve levels. The Town's General Fund reserve policy is to allocate at least 30% of General Fund operating expenditures equally to the Emergency Reserve (for disasters and catastrophic events), and to the Budget Stabilization Reserve (cushion against significant costs or downturns). Any remaining fund balance beyond this 30% is designated as Unallocated Fund Balance.

¹⁶ In FY 2026/27, projected expenditures total \$29.3M for the Menlo Park Police Department, with a population count of 33,785. Source: City of Menlo Park 2026-27 Adopted Budget, Police Expenses, Updated June 29, 2026

¹⁷ The annual cost of the Town of Woodside's contract with the County Sherriff is approximately \$3.1M.

As shown in Table 5 and Table 6, the projected year-end General Fund balance is consistently sufficient to meet the City’s policy, resulting in sizable Unallocated Fund Balance each year. The Unallocated Fund Balance may, with Council direction, be appropriated towards operational use, capital projects, debt service, or liability down payments.

Table 5. Fund Balance as Share of Total GF Expenditures, FY 2023/24-FY 2026/27

Fiscal Year	Ending Fund Balance	Total GF Expenditures	Share
2026-27 (projected)	\$11,702,402	\$23,370,663	50%
2025-26	\$11,363,374	\$22,250,000	51%
2024-25	\$11,950,140	\$22,391,327	53%
2023-24	\$12,729,534	\$19,767,139	64%

Source: Town of Atherton, June 17, 2026 Meeting Agenda Packet

Table 6 details the Ending Fund Balance reserve allocations For FY2026/27. Atherton will meet the 30% reserve requirements total of \$7,011,199 in FY 2026/27, and projects an unallocated reserve that is 21% of projected expenditures.¹⁸

Table 6. Fund Balance Breakdown FY 2026/27 (projected)

FY 2026/27 Expenditures	\$23,370,663
Projected FY 2026/27 Ending Fund Balance	\$11,702,402
15% Emergency Reserve	\$3,505,000
15% Budget Stabilization Reserve	\$3,505,000
Total Reserve Requirement (30%)	\$7,011,199
Unallocated Reserves	\$4,691,203

Source: Town of Atherton, June 17, 2026 Meeting Agenda Packet

c) Is the Town’s rate/fee schedule insufficient to fund an adequate level of service, and/or is the fee inconsistent with the schedules of similar service organizations? On an annual basis, Atherton updates its Master Fee schedule.¹⁹ According to Town staff, most fees are set at full cost recovery, except for planning applications which are set below full cost recovery. Atherton’s Park fees are tiered, with lower (or free) usage costs for Atherton residents compared to non-residents. The Town rents park facilities, tennis and pickleball courts, and playing fields. Revenues from facility rentals totaled \$68,885 in FY 2024/25 and \$72,725 in FY2025/26.

¹⁸ [Budget 26-27 meeting June 2026.pdf](#)

¹⁹ [Master Fee Schedule | Atherton, CA - Official Website](#)

Atherton's fees are in line with comparable jurisdictions in the county. The fee schedule is unique in scope because unlike most other cities in San Mateo County, Atherton has no business/commercial zones, nor many multifamily zones.

d) Is the City unable to fund necessary infrastructure maintenance, replacement and/or any needed expansion? While the City of Atherton is able to fund Town operations and associated capital improvements, the Atherton Channel Drainage District revenues are insufficient to fund the full cost of ongoing maintenance and infrastructure replacement. The most recent 2015 update to the Atherton Townwide Drainage Study and Master Plan (prepared by engineering firm NV5), identified over \$41M in recommended improvement projects, while the current fund balance for the district is \$589,511.²⁰ As a subsidiary district of the Town, this is a problem that City Council and Town staff deliberate. The dependent special district currently relies on annual reserve allocations from the City General Fund, as well as external grants and inter-agency partnerships (e.g. Caltrans). In 2019, the Town commissioned a study from the consulting firm NBS to explore financing options to increase the Atherton Channel Drainage District's revenue, including: special taxes, special benefit assessments and property-related fees.²¹ No subsequent actions have been taken based on the study's findings.

The five-year CIP for FY 2026/27- FY2030/31, allocates \$6.8M towards the Atherton Drainage Improvements Program, with funds coming from various sources including the General Fund and grants. The CIP has scheduled a Drainage Master Plan Update in FY 2026/27.

e) Is the Town lacking financial policies that ensure its continued financial accountability and stability? The Town of Atherton has the requisite financial policies in place to ensure its continued financial accountability and stability. Atherton maintains a structurally balanced General Fund; Capital Improvement Program Capital Projects Fund; and an array of Special Revenue Funds (e.g. Library Measure A, Measure M, Gas Tax, etc.).

f) Is the Town's debt at an unmanageable level?

New Civic Center: On June 1, 2020 the Town entered into a ten-year lease financing agreement in the amount of \$7,680,000 from Capital One Public Financing for the construction of the Town Center project. Atherton carries Certificates of Participation debt financing with an annual debt service payment of \$861,870 (FY2026/27) to finance a portion of the \$21,847,000 construction of the new Atherton Civic Center Complex in 2019.²²

²⁰ [Atherton Townwide-Drainage-Study-Update-April-2015](#) An update to the Drainage Master Plan (\$350,000) is tentatively scheduled for Fall 2026 (according to the FY 2025/26 Town Work Plan).

²¹ <https://www.athertonca.gov/DocumentCenter/View/10191/ITEM-4-NEW>

²² <https://www.athertonca.gov/DocumentCenter/View/4037/Item-6-3-21-17-Civic-Center-Funding?bidId=>

Bayfront Canal and Atherton Channel Flood Protection: In 2021, Atherton entered into a five-year \$1.35M loan agreement between the City of Redwood City, City of Menlo Park, Town of Atherton, and the County of San Mateo for Atherton’s portion of the planning, design, and environmental permitting for the Bayfront Canal and Atherton Channel Flood Management and Restoration Project.²³ Atherton is servicing this debt through scheduled property tax revenue allocations of \$148,500 on April 15 and December 15 annually. The loan will be paid off by November 30, 2026. As of September 2026, the final payment amount on the loan is \$148,500.

Table 8. Town of Atherton Debt Service Requirements

Year ending June 30	San Mateo County Bayfront Canal Loan		Town Center Project Capital Lease		Total
	Principal	Interest	Principal	Interest	
2025	\$313,815	\$683	\$760,015	\$101,856	\$1,176,369
2026	\$314,016	\$482	\$776,828	\$85,044	\$1,176,370
2027	\$179,221	\$277	\$794,012	\$67,859	\$1,041,369
2028	\$8,679	\$71	\$811,577	\$50,294	\$870,621
2029	-	-	\$829,531	\$32,341	\$861,872
2030	-	-	\$845,270	\$13,990	\$859,260
Total	\$815,731	\$1,513	\$4,817,233	\$351,384	\$5,985,861

Source: Maze & Associates Financial Audit for Town of Atherton, FY2024/25.

CalPERS: All full-time employees are enrolled in the California Public Employees Retirement System (CalPERS). As of FY 2026-27, the Town of Atherton reports a net pension liability of \$20,692,973: \$7.3M for the Miscellaneous Employee Plan and \$13.4M for the Safety Employees Plan (unaudited). The total funded ratio for the pension plans is 78.8%.

In FY 2025-26, the Town made a \$3M additional discretionary payment (ADP) to CalPERS Public Safety in order to reduce the Safety Employees plan unfunded liability. Funding sources for the ADP were \$2.2M in unassigned General Fund reserves, and \$800,000 from the Employee Benefit Fund. In FY2026/27, the CalPERS Unfunded Accrued Liability Payment amount is \$1,737,092.

Other Post Employment Benefits (OPEB): Atherton has fully funded its OPEB obligations. These benefits include medical coverage for vested employees and their dependent who retire directly from the city at age 50 or older. As of June 30, 2025 (the latest independent financial audit), Atherton has the following employees covered by benefit terms: 41 active employees and 40 retirees receiving benefits payments. The Town has a trust account

²³ San Mateo County Resolution Number 075608 adopted on December 5, 2017

designated to fund OPEB costs. In FY2026/27, Atherton reports a net OPEB asset/surplus of \$1,070,389 compared to liability.

Financial Ability Determination: The Town prepares an annual operating and capital improvement budget for the upcoming fiscal year that gets adopted by the City Council at a noticed public hearing before June 30th. The City also produces an Annual Comprehensive Financial Report that is reviewed by the City Council. The most recently published report is for FY 2024-25. The Town has healthy reserves, with a FY 2026/27 fund balance projected to represent 50% of total expenditures. The Town has the requisite financial policies in place to ensure its continued financial accountability and stability.

Recommendations:

2. LAFCo encourages the Town to separate the Atherton Channel Drainage District budget from its current structure within the Town’s General Fund and Capital Improvement Plan. This will enhance transparency and provide a forum for discussions regarding funding allocation and projects within the District.

3. The annual Independent Financial Audit for the Town should review the Drainage District finances separately from the Town’s General Fund and other special revenue funds, as the Drainage District is a dependent district of the Town.

4. Currently, the Town budgets \$1.3M in VLF expected revenues for FY 2026/27. Given the uncertainties in VLF revenue payments from the state, and the historic shortfalls/partial payment for prior years, the Town may consider reducing or removing anticipated VLF revenue from future budgets.

5) Shared Service and Facilities

Status of, and opportunities for, shared facilities	Yes	Maybe	No
a) Is the City currently sharing services or facilities with other organizations? If so, describe the status of such efforts.	X		
b) Are there any opportunities for the City to share services or facilities with neighboring or overlapping organizations that are not currently being utilized?			X
c) Are there governance options to allow appropriate facilities and/or resources to be shared, or making excess capacity available to others, and avoid			X

construction of extra or unnecessary infrastructure or eliminate duplicative resources?			
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a-c) Atherton is a signatory to the California Master Mutual Aid Agreement, along with all other fire agencies in San Mateo County. The Menlo Park Fire District also has specific mutual aid agreements with the cities of Palo Alto and Redwood City.²⁴ Atherton, along with the County and ten other municipalities in the County, participates in the Library Joint Powers Agreement. Property tax revenues in excess of the JPA's costs of maintaining the library are remitted to the Town's Library Special Revenue Fund.

Atherton utilizes contracted workers for certain functions such as in the Department of Public Works, core personnel are supplemented by various contract service personnel and service vendors such as contracted street sweeping services.

Shared Service and Facilities Determination: The Town of Atherton offers its residents mostly in-house services, such as its own Police Department. The Town contracts out public works projects and does collaborate with other cities on fire and library services.

²⁴ Town of Atherton General Plan 2026

6) Accountability, Structure, and Efficiencies

Accountability for community service needs, including governmental structure and operational efficiencies	Yes	Maybe	No
a) Are there any issues with meetings being accessible and well publicized? Any failures to comply with disclosure laws and the Brown Act?			X
b) Are there any issues with staff turnover or operational efficiencies?			X
c) Is there a lack of regular audits, adopted budgets and public access to these documents?			X
d) Are there any recommended changes to the City's governance structure that will increase accountability and efficiency?			X
e) Are there any governance restructure options to enhance services and/or eliminate deficiencies or redundancies?			X
f) Are there any opportunities to eliminate overlapping boundaries that confuse the public, cause service inefficiencies, unnecessarily increase the cost of infrastructure, exacerbate rate issues and/or undermine good planning practices?			X

a-f) Atherton is governed by a five-member City Council, elected at-large by voters within the City. Regular meetings of the City Council are held on the third Wednesday of each month at 6PM. Meetings are open to the public and are held at Town Hall Council Chambers, 80 Fair Oaks Lane, Atherton. Meetings have a remote access option via Zoom and public comment via Zoom is available. The Town posts copies of meeting agendas on their website and the full meeting packets with staff reports and video recordings are available as well. LAFCo is not aware of any failures to comply with the Brown Act.

Atherton's City Manager, George Rodericks, has been in the same position for 14 years. Mr. Rodericks does not report issues with staff turnover or operational efficiencies.

Atherton's online Archive Center hosts a vast array of public documents in a user-friendly interface. The archives include independent financial audits of Town finances for all years up to FY 2024/25.

Atherton has been exploring whether to become a Charter City in order to obtain “greater local control over municipal affairs such as governance, elections, contracting land use, and public finance”.²⁵ San Mateo LAFCo would not have involvement in Atherton changing from a General Law municipality to a Charter City/Town, since there are currently no proposed changes in the city’s boundaries or scope of services. Adopting a city charter would not impact the requirement that the Town apply to LAFCo for boundary changes (i.e. annexations, detachments, etc.) in the future.

Accountability, Structure, and Efficiencies Determination

The Town of Atherton ensures that public meetings are accessible and publicized. Archived meeting minutes and videos are available online. LAFCo is not aware of any failure to comply with disclosure laws or the Brown Act.

Recommendation:

5. The City Council does not hold separate governing body meetings for the Atherton Channel Drainage District. Decisions relating to the District, including the annual budget adoption, occur during the Town’s regular City Council Meetings. As the District includes portions of Atherton, Menlo Park, Woodside, and unincorporated San Mateo County, having the City Council sit as the governing body of the District would likely facilitate inter-jurisdiction collaboration on projects and collaboration on funding and budget. Notice of governing body meetings would also enhance transparency for the public, particularly for those who reside within the District, but outside of the Town Atherton. LAFCo recommends the Town of Atherton holds governing body meetings for the Atherton Channel Drainage District when discussing actions related to the District, including the adoption of the District’s budget and capital improvement plan.

7) Other Issues:

Any other matter related to effective or efficient service delivery, as required by commission policy.	Yes	Maybe	No
a) Are there any other service delivery issues that can be resolved by the MSR/SOI process?			X
b) Water Resiliency and Climate Change			
i) Does the organization support a governance model that enhances and provides a more robust water supply capacity?	X		

²⁵ [Charter City | Atherton, CA - Official Website](https://www.aatherton.org/charter-city)

ii) Does the organization support multi-agency collaboration and a governance model that provide risk reduction solutions that address sea level rise and other measures to adapt to climate change?	X		
c) Natural Hazards and Mitigation Planning			
i) Has the agency planned for how natural hazards may impact service delivery?	X		
ii) Does the organization support multi-agency collaboration and a governance model that provides risk reduction for all natural hazards?	X		

a-c) Atherton’s Community Safety Element was adopted in March 2026. The Safety Element outlines the Town’s goal, policies, and progress related to natural and human-made disasters, and includes actions for mitigating associated risks.

As described in the Safety Element, the Atherton Police Department and the Menlo Park Fire Protection District have jointly prepared an Emergency Operations Plan that includes detailed information covering Emergency Operations Center procedures, documentation and reference and support information.²⁶ Atherton utilizes the SMC Alert and Atherton Newsflash Alert System platforms to communicate with residents via text message notification regarding emergency notifications.

Get Ready Atherton is a 501(c)(3) non-profit that for the past three decades has worked in partnership with the Atherton Police Department and local emergency responders to train and organize residents to prepare for emergencies and natural disasters.²⁷

Atherton has adopted a Climate Action Plan (updated in October 2023) which serves as a guiding document to identify methods that the Town can implement to reduce greenhouse gas emissions. The Plan sets targets to reduce greenhouse gas emission to 49% below 2005 levels by 2030 and reach carbon neutrality by 2045.

Atherton also conducted a Climate Adaptation Vulnerability Assessment in 2025 that summarizes climate-related hazards and their effects on populations and assets in the community. The Town participates in the San Mateo Local Hazard Mitigation Plan.

Other Issues Determination: The Town is engaged in activities to address hazard mitigation, wildfire prevention, greenhouse gas emissions and sea level rise.

²⁶ Housing Element 2026

²⁷ [Get Ready Atherton](#)

Section V. Town of Atherton and Atherton Channel Drainage District Sphere of Influence Determinations

Government Code Section 56425 requires San Mateo LAFCo make determinations concerning land use, present and probable need for public facilities and services in the area, capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide, and existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency. These include the following determinations:

1. **The present and planned land uses in the area, including agricultural and open space lands:** Residential, park and open space, and public facilities and schools.
2. **The present and probable need for public facilities and services in the area:** Over the next 5-10 years, no significant population change or new development is expected within the current Atherton boundaries.
3. **The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide:** The Town of Atherton provides adequate public services and facilities to its residents.
4. **The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency:** There are no disadvantaged unincorporated communities within the boundaries or the SOI of the Town of Atherton.
5. **For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence:** N/A.

On the basis of the Municipal Service Review:

☒ Staff has reviewed the agency's Sphere of Influence and recommends that a SOI Update is NOT NECESSARY in accordance with Government Code Section 56425(g). Therefore, NO CHANGE to the agency's SOI is recommended and SOI determinations HAVE NOT been made.

☐ Staff has reviewed the agency's Sphere of Influence and recommends that a SOI Update IS NECESSARY in accordance with Government Code Section 56425(g). Therefore, A

CHANGE to the agency’s SOI is recommended and SOI determinations HAVE been made and are included in this MSR/SOI study.

Appendix A. Town of Atherton Fact Sheet

City Manager: George Rodericks (appointed by Board)

Physical Address: 80 Fair Oaks Lane, Atherton, CA, 94027

Email Address: grodericks@athertonca.gov

Phone Number: 650-752-0504

Date of Incorporation: September 12, 1923

City Council Members: Members are elected at-large to serve a staggered four-year term. There are no term limits. Must reside in City of Atherton.

City Council Members	Term Expiration Date
Stacy Holland, Mayor	2026
Rick DeGolia, Vice Mayor	2026
Elizabeth Lewis	2028
Bill Widmer	2026
Eric Lane	2028

Compensation: City council members are all volunteers (not paid).

Public Meetings: Regular meetings of the City Council are held on the third Wednesday of each month at 6PM at 80 Fair Oaks Lane. Participation by the public is also available remotely via Zoom, including the option to provide live public comment on agendized items. Meeting agendas, minutes and materials are published on the City website, with City Council and Commission video archives also available hosted by YouTube since 2012: [TownOfAtherton - YouTube](#) .

Services Provided: Building inspection, parks, recreation, planning, police, and public works

Agency staff: 43 FTE

Area Served: 5 square miles

Population: 7,086 (January 2026)

Sphere of Influence: Contiguous with corporate boundaries.

FY 2026-27 General Fund Expenditures: \$23,370,663 (Projected)



Municipal Service Review and Sphere of Influence Update for the City of Menlo Park

Circulation Draft

Released September 9, 2026

Municipal Service Review and Sphere of Influence Review for the City of Menlo Park

City of Menlo Park

701 Laurel Street

Menlo Park, California 94025

Contact: Justin Murphy, City Manager, 650-330-6600

CONDUCTED BY:

San Mateo Local Agency Formation Commission

455 County Center, 2nd Floor

Redwood City, CA 94063

(650) 363-4224

Commissioners:

Virginia Chang Kiraly, Chair, Special District Member

Ann Draper, Vice Chair, Public Member

Jackie Speier, County Member

David Canepa, County Member

Katheryn Slater-Carter, Special District Member

Debbie Ruddock, City Member

Stephen Rainaldi, City Member

Commission Alternates:

Noelia Corzo, County Member

Colleen You, Public Member

Vacant, Special District Member

Greg Wright, City Member

Staff:

Rob Bartoli, Executive Officer

Sarah Flamm, Management Analyst

Diane Estipona, Commission Clerk

Tim Fox, Legal Counsel

EXECUTIVE SUMMARY

Section I: Report Overview

This report is a Municipal Service Review (MSR) and Sphere of Influence (SOI) study for the City of Menlo Park. California Government Code Section 56430 requires that Local Agency Formation Commissions (LAFCo's) complete MSR and SOI reviews on all cities and special districts. These state-mandated reports are studies of an agency's service provision and logical boundaries. The review process is intended to identify municipal service delivery challenges and opportunities, provide the public and affected agencies with a platform to comment on an agency's services and finances, and review opportunities to share governmental resources. Once the MSR determinations are adopted, the SOI—the plan for the boundaries of a city or special district—is reviewed, pursuant to Section 56425.

San Mateo Local Agency Formation Commission

San Mateo LAFCo is a State-mandated, independent entity with county-wide jurisdiction over the boundaries and organization of cities and special districts. LAFCo reviews annexations, detachments, incorporations, formations, and dissolutions. LAFCo also has authority over extensions of service outside city or district boundaries, and activation or divestiture of special district powers. The purpose of LAFCo includes discouraging urban sprawl, preserving open space and prime agricultural lands, planning for the efficient provision of government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances.

LAFCo operates pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH Act) contained in California Government Code Sections 56000 and 57000. The Commission is comprised of two members of the County Board of Supervisors, two city councilmembers from two of the County's 20 cities, two special district board members from two of the 21 independent special districts, one member of the public, and four alternate members (county, city, special district, and public).

In 1985, San Mateo LAFCo first prepared comprehensive SOI studies and adopted SOI's for the County's cities and special districts. Subsequently, LAFCo reviewed and updated SOI's on a three-year cycle. SOI updates focus on changes in service demand within the boundaries of cities and special districts. In 2003, in order to comply with the newly enacted CKH Act, LAFCo began the process of preparing SOI updates/reviews in conjunction with or following an MSR.

Local Government in San Mateo County

Municipal service providers in San Mateo County include the County of San Mateo, 20 cities, 21 independent special districts, six subsidiary districts governed by city councils, and 33 County-governed special districts. Independent special districts provide a limited set of services based on their enabling legislation (i.e., fire, water, sanitation, etc.), while cities generally provide a wider array of basic services including police, recreation programs, planning, street repair, and building inspection. The County, as a subdivision of the State, provides a vast array of services for all residents across its cities, special districts and subsidiary districts, including social services, public health protection, housing programs, property tax assessments, tax collection, elections, and public safety. The County also provides basic municipal services for residents who live in unincorporated areas who are not part of any city or special district. According to Census 2020 data, 63,205 of the County's total 764,442 residents (8%) live in unincorporated areas.

MSR and SOI Determinations

Per Government Code Section 56430, LAFCo is required to include MSR Determinations that address the following areas for any local agency:

1. Growth and population projections for the affected area.
2. The location and characteristics of any disadvantaged unincorporated communities¹ within or contiguous to the SOI.
3. Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies.
4. Financial ability of the agency to provide services.
5. Status of, and opportunities for, shared facilities.
6. Accountability for community service needs, including governmental structure and operational efficiencies.
7. Any other matter related to effective or efficient service delivery, as required by LAFCo policy: a) Water Resiliency and Climate Change and b) Impact of Natural Hazards and Mitigation Planning

MSR Determinations must be adopted before the Commission updates or amends a SOI. Per Government Code Section 56425, LAFCo is required to make the following five written determinations when establishing, amending, or updating an SOI for any local agency:

¹ "Disadvantaged community" means a community with an annual median household income that is less than 80 percent of the Statewide annual median household income. This area of determination does not apply to the study area.

1. The present and planned land uses in the area, including agricultural and open-space lands.
2. The present and probable need for public facilities and services in the area.
3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
4. The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.
5. For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to Section 56425(g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

Report Review Process

A hearing for the Draft Report will be held at LAFCo’s September 16, 2026 meeting. The report will subsequently be circulated for comment to the agencies under study, as well as interested individuals and groups. This report has been written based on source documents that include Adopted Budgets, Capital Improvement Plans, Meeting Minutes, Staff Reports, Consultant Reports, and information provided directly to LAFCo by the City staff.

Disadvantaged Unincorporated Communities

In 2011, SB 244 (Chapter 513, Statutes of 2011) made changes to the CKH Act related to “disadvantaged unincorporated communities,” including the addition of MSR determination #2 and SOI determination #5 listed above. Disadvantaged unincorporated communities, or “DUC’s,” are inhabited, unincorporated territories (containing 12 or more registered voters) where the annual median household income is less than 80 percent of the statewide annual median household income. There are no DUC’s within the current boundaries or service areas of the City of Menlo Park.

Section II. Summary of Key Issues

San Mateo LAFCo last conducted an MSR for the City of Menlo Park in 2009.² The following are three key issues identified in compiling information on the City of Menlo Park for the 2026 MSR and SOI update:

- The City, like other municipalities in the County, is affected by the Vehicle License Fee (VLF) in-lieu shortfall. In FY 2026/27, the VLF revenue is anticipated to be \$1.9M.

² [San Mateo LAFCo Municipal Service Review for Menlo Park, 2009](#)

This represents a shortfall of \$4.3M, or 5% of total General Fund expenditures (\$90.1M). The City does not include VLF backfill revenue in budget forecasts for FY 2027/28 onward.

- The City is facing a structural deficit. Nonetheless, the City Council adopted a balanced budget in FY 2026/27, addressing an anticipated \$7.9M shortfall through a combination of cuts to departmental operating expenditures and increased revenue generation through updates to the Master Fee Schedule and cost allocation plan.
- San Mateo LAFCo recommends undertaking a special study to capture the current service providers and reevaluate the SOI designations of Stanford lands in unincorporated San Mateo County. This study will enable LAFCo, Menlo Park, Portola Valley, Woodside, and Stanford University to have a comprehensive discussion regarding SOI designations, accurately capture the current service providers, and determine the probable physical future boundaries of these cities.
- Three parcels have been reviewed by LAFCo staff and the Menlo Park City Manager as candidates for additions to the SOI of Menlo Park: APN 055-130-010, APN 074-160-050, and APN 073-250-070.

Section III. Affected Agencies

Cities/Towns and County: City of Menlo Park and San Mateo County

School Districts: Sequoia Union High School District, Menlo Park City School District, Las Lomas Elementary School District, Ravenswood City School District, Redwood City School District

Independent Special Districts: County Harbor District, Fair Oaks Sewer Maintenance District, Menlo Park Fire Protection District, West Bay Sanitary District, Midpeninsula Regional Open Space District

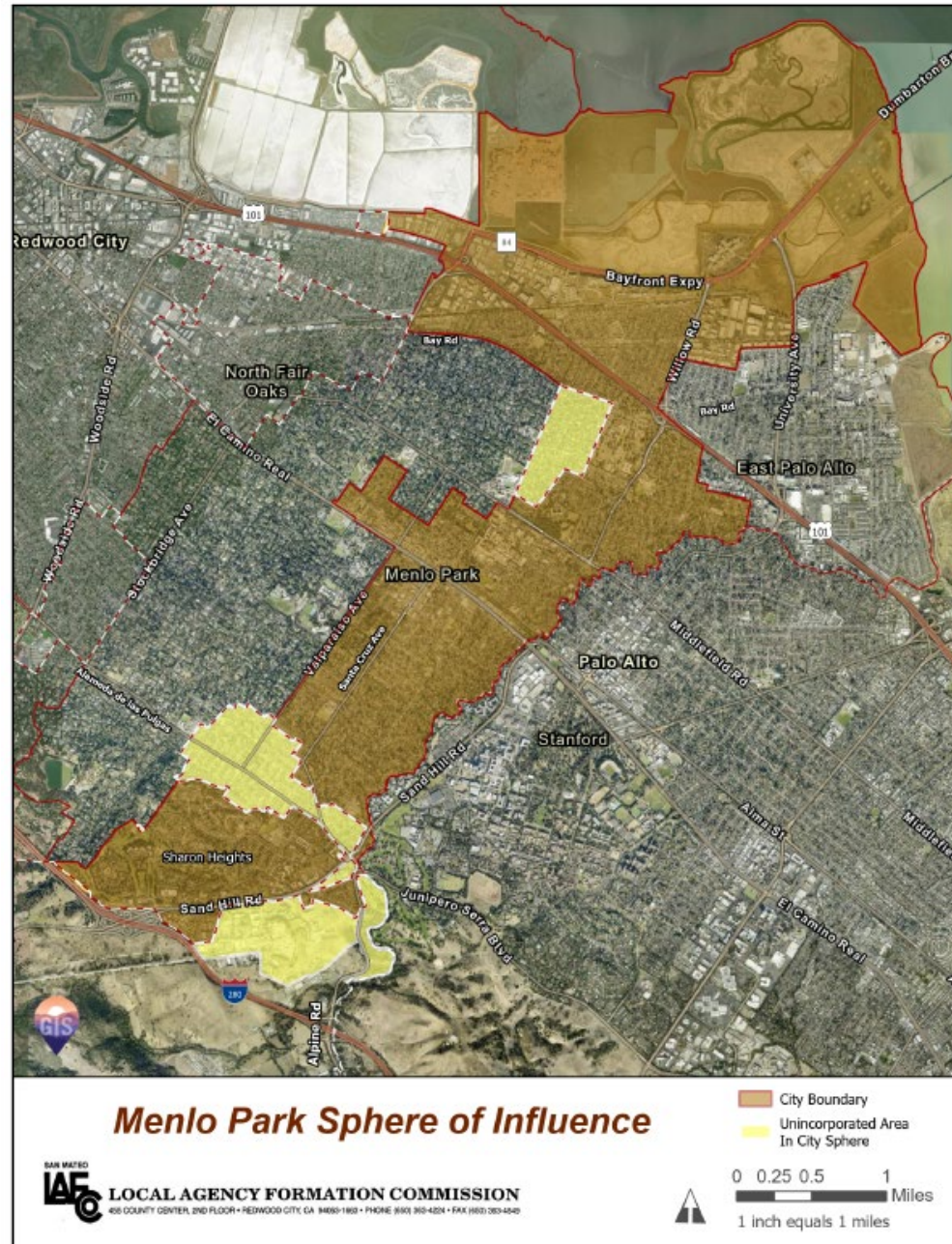
Dependent Special Districts: University Heights Drainage Maintenance District, Campo Bello-University Park Drainage District, Atherton Channel Drainage District, East Palo Alto Sanitary District

Section IV. Municipal Service Review for the City of Menlo Park

Background: On November 23, 1927, the City of Menlo Park was incorporated as a general law municipality. Menlo Park is governed by five council members elected by City residents in district elections. Council members each serve a staggered four-year term. The City Council appoints a City Manager, City Attorney, members of the ten City Commissions, and selects the Mayor and Mayor Pro Tem to serve one-year terms.

As of January 2026, the population of Menlo Park is 33,785 and the City land area is approximately 10 square miles, plus an additional 7 square miles water area.³ Menlo Park’s sphere of influence is expansive, including the unincorporated San Mateo County communities of Menlo Oaks, West Menlo Park, Weekend Acres, and SLAC. (See Figure 1).

Figure 1. City of Menlo Park Sphere of Influence



³ As of January 1, 2026 according to the California Department of Finance, <https://www.abridged.org/wp-content/uploads/2026/05/Department-of-Finance.pdf>.

1) Growth and Population: City of Menlo Park

The MSR determinations checked below are potentially significant, as indicated by “yes” or “maybe” answers to the key policy questions in the checklist. If most or all determinations are not significant, the Commission may find that an MSR update is not warranted.

Growth and population projections	Yes	Maybe	No
a) Is the City’s territory or surrounding area expected to experience any significant population change or development over the next 5-10 years?			X
b) Will population changes have an impact on the subject agency’s service needs and demands?			X
c) Will projected growth require a change in the City’s service boundary?			X

a-c) As of January 2026, the population estimate for the City of Menlo Park is 33,785. This is a 4% decline from the 2020 population estimate of 35,254. Over the next 5-10 years, minimal population change is expected within the current Menlo Park boundaries, based on a review of planning documents from the City, County, and the Association of Bay Area Governments. The City is largely built-out, and any new development will occur primarily through infill.

Most of the City’s land use is residential (55%), while the remaining 45% is split among other uses, notably the Bayfront Innovation Area (15%), Parks and Recreation (10%), and Commercial uses (7%).⁴

In March 2024, the California State Department of Housing and Community Development (HCD) certified Menlo Park’s 6th Cycle 2023-31 adopted Housing Element.⁵ The 6th Cycle Regional Housing Need Allocation (RHNA) for the City projects a need to plan for 2,946 units, of which 1,662 units (56%) must be “affordable” at the moderate-income level or below. To help meet the RHNA quota, the City has adopted various measures such as changing land use controls policies and zoning to allow higher residential densities, partnering with affordable housing developers to build residential projects on city-owned land, and encouraging the creation of more ADUs.

Growth and Population Determination: As of 2026, City of Menlo Park is home to 33,785 residents and approximately 14,000 housing units. The City’s adopted 2023-2031 Housing Element proposed to increase its housing stock by 2,946 units or approximately 20%, largely

⁴ [General Plan City of Menlo Park](#) Land Use Element (City of Menlo Park, 2016)

⁵ [2023-2031-city-of-menlo-park-housing-element-clean_010324.pdf](#)

through infill and increasing residential density. The development sites identified in the City’s adopted Housing Element are within the existing boundaries of the City.

2) Disadvantaged Unincorporated Communities (DUC’s)

The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the City sphere of influence.	Yes	Maybe	No
a) Does the City provide public services related to sewers, municipal and industrial water, or structural fire protection?	X		
b) Are there any “inhabited unincorporated communities” within or adjacent to the City’s sphere of influence that are considered “disadvantaged” (80% or less of the Statewide median household income)?			X

a-c) The City of Menlo Park does provide municipal water to a majority of the City and does not provide sewer (West Bay Sanitary District does) or fire (Menlo Park Fire Protection District does). There are no Disadvantaged Unincorporated Communities (DUC’s) within or adjacent to Menlo Park’s sphere of influence (SOI) or corporate boundaries. It is worth noting that the City has identified the eastern neighborhoods of Belle Haven and the Bayfront as “underserved”.⁶ Belle Haven and the Bayfront are separated from the rest of Menlo Park by US-101 and are in 2020 Census tracts designated as low-income (80% or less of area median income).

Disadvantaged Unincorporated Communities Determination: While the City does provide water service to a portion of the City, there are no disadvantaged unincorporated communities within the City’s SOI or corporate boundaries. However, the Menlo Park neighborhoods of Belle Haven and the Bayfront are considered “low income”, and are separated from the rest of the City by US-101.

⁶ Menlo Park [Environmental Justice Element](#), 2024

3) Capacity and Adequacy of Public Facilities and Services

Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies.	Yes	Maybe	No
a) Are there any deficiencies in City capacity to meet service needs of existing development within its existing territory?			X
b) Are there any issues regarding the City’s capacity to meet the service demand of reasonably foreseeable future growth?			X
c) Are there any concerns regarding public services provided by the City being considered adequate?			X
d) Are there any significant infrastructure needs or deficiencies to be addressed?			X
e) Are there changes in State regulations on the horizon that will require significant facility and/or infrastructure upgrades?			X
f) Are there any service needs or deficiencies for DUC’s related to sewers, municipal and industrial water, and structural fire protection within or contiguous to the City’s sphere of influence?			X

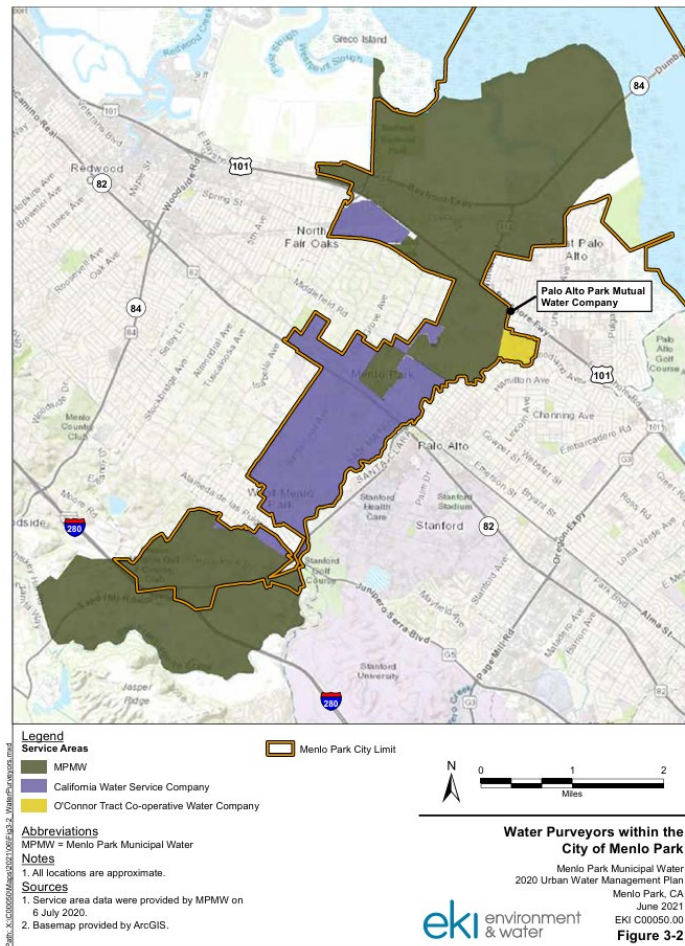
Overview of Menlo Park Services:

Water: Most residents and businesses in Menlo Park receive water from either Menlo Park Municipal Water or California Water Service (see Figure 2).⁷ Menlo Park Municipal Water is purchased from the San Francisco Public Utilities Commission and distributed by Menlo Park Department of Public Works via 59 miles of water lines in the City-owned distribution system. The cost of water service operations and capital improvements are funded primarily by customers through water usage charges, service charges, and connection fees, maintained in the Water Enterprise Fund. In FY2026/27, the City allocated \$3.5M to water

⁷ There are less than ten homes receiving water from wells managed by the Palo Alto Park Mutual Water Company. The O’Connor Tract Co-operative Water Company provides water to 343 connections (apartment complexes and single-family homes) in the Willows neighborhood of Menlo Park as well as in East Palo Alto.

capital projects. In March 2026, the City procured a water rate study to analyze revenue requirements, cost of service, and drought surcharges.⁸ On June 9, 2026, the City Council adopted revised three-year water rates, effective July 1, 2026 - June 30, 2029. The new rate structure introduces a single uniform rate for all water usage, rather than billing for usage based on three tiers of consumption.⁹

Figure 2. Water Service Providers in Menlo Park



Source: City of Menlo Park Housing Element Update, Water Supply Assessment 2022

Street Lighting: The Menlo Park Highway Lighting District is an independent special district that was formed on October 3, 1910 to provide and maintain street lighting. The district is governed by the San Mateo County Board of Supervisors and operation and repairs are managed by the County Department of Public Works. The district primarily serves unincorporated areas surrounding the City, including North Fair Oaks (in Redwood City SOI), and Menlo Oaks and West Menlo Park (in Menlo Park SOI).

⁸ [Water Rate Study](#)

⁹ [Fiscal Years 2027-2029 Menlo Park Municipal Water Rates](#)

Highway Lighting District Map Forthcoming

Sanitary Sewer Services: Menlo Park residents, businesses, schools, and other facilities receive sewer services from West Bay Sanitary District, an independent special district.

Fire Protection: Fire protection for the City of Menlo Park is provided by the Menlo Park Fire Protection District, an independent special district that also serves the cities of Atherton and East Palo Alto, as well as portions of San Mateo County unincorporated areas. Funding for the Fire Protection District is primarily from property taxes. Passage of Proposition 13 in 1978 resulted in the District receiving a share (16%) of the 1 percent property tax within Fire District boundaries (see Table 1).

Police: Menlo Park has a municipal police department dedicated to protection, patrols, dispatch and specialized safety units. For FY2026/27, the City Police Department budget is \$29.3M. The Police Department has 73 full-time employees. Menlo Park budgets approximately \$867 per resident per year for police protection. The Police Department is the City's second largest department following the Department of Public Works (\$41.1M).

Streets and Sidewalks: The Menlo Park Department of Public Works maintains 96 miles of streets, 2,300 streetlights, and 25 traffic signals. As of 2024, the City's pavement condition index, as reported by the Associated of Bay Area Governments is "Good" with a score of 76 out of a maximum score of 100.¹⁰ The City has allocated \$4.3M in capital project funding for street and sidewalk projects (see table 6).

Stormwater: The Department of Public Works maintains more than 46 miles of storm drainage facilities that collect, convey and discharge stormwater runoff to the San Francisquito Creek, Atherton Channel and the Bay. In FY 2026/27, the City allocated \$1.5M in stormwater capital projects. The City Stormwater Master Plan was most recently updated in 2023.¹¹ The City and its SOI encompass three Drainage Maintenance Districts (i.e. special districts that collect a share of the 1% property tax from parcels within the district): The Atherton Channel Drainage District (1,043 parcels in Menlo Park), the University Heights Drainage Maintenance District (XX parcels), and the Campo-Bello University Park Drainage Maintenance District (XX parcels).

Drainage Maintenance Districts Map Forthcoming

Parks and Recreation: The City owns and operates 14 parks, 1 community center, 1 recreation center, 3 childcare centers and 1 senior center. The City has allocated \$1.3M in capital project funding for Parks and Recreation. The FY 2026/27 Parks and Recreation

¹⁰ [Pavement Condition of Bay Area Jurisdictions, 2024](#)

¹¹ [City of Menlo Park Stormwater Master Plan](#)

budget incorporated budget cuts to programs, services and facility hours in order to help balance the FY 2026/27 budget.

Table 1. 1% Property Tax Distribution – Sample Tax Rate Area for Menlo Park (008-001)

Agency	Share(%)
General County Tax	24
Menlo Park Elementary School District	17
Sequoia High School District	16
Menlo Park Fire District	16
City of Menlo Park	12
San Mateo Jr College	7
County Education Tax	4
Midpeninsula Regional Open Space	2
Sequoia Hospital District	1
County Harbor District	0.3
San Francisquito Creek Flood Zone 2	0.2
Bay Area Air Quality Management	0.2
County Mosquito & Vector Control District	0.2
Total	100

Source: County Assessor

Note: Exact shares vary between tax rate areas. May not total 100 due to rounding.

Capital Improvement Plan: The City Council adopts a five-year Capital Improvement Plan as part of the budget adoption process annually in June.¹² The City maintains an ongoing capital asset depreciation schedule and prioritizes maintaining and improving existing infrastructure.¹³ For FY 2026/27, the General CIP Fund proposed budget includes \$13M in new funding requested (see Table 2). Projects rely on funding from various sources, including, in FY 2026/27, a \$3.9M transfer from the General Fund. The General Fund transfer amount was reduced this year by nearly \$1M in order to balance the budget. According to the City, the General Fund Transfer has averaged \$4.86M annually since 2018. Other funding sources for capital projects include special revenue funds (e.g. gas tax, SB1, Transportation

¹² Capital expenditures less than \$75k are not included in the plan

¹³ City of Menlo Park FY2026/27 Budget Principles

impact fees, construction impact fee, Measure T, Measure A and Measure W), grants, and the Water Enterprise Fund.

Table 2. Capital Projects by Category for FY 2026/27

Project Category	Budget
Streets & Sidewalks	\$4,310,000
Water	\$3,500,000
Stormwater	\$1,520,000
Parks & Recreation	\$1,320,000
Traffic & Transportation	\$1,285,000
City Buildings & Systems	\$1,070,000
Total	\$13,005,000

Source: City of Menlo Park Budget 2026/27

The City’s FY 2026/27 adopted budget principles include, “limit budget appropriations for capital projects to those with secured funding. Appropriations shall not exceed available funding and will be adjusted if funding is reduced.” All FY 2026/27 projects are funded in part by the General Fund, except for “Streets & Sidewalks” projects and “Water” projects which have dedicated special revenue sources.

The City Master Plans that guide the development of long-term infrastructure planning include: Bedwell Bayfront Park Master Plan; Climate Action Plan; Facilities Condition Assessments; Green Stormwater Infrastructure Plan; Information Technology Master Plan; Parks and Recreation Facilities Master Plan; Stormwater Master Plan; Vision Zero Action Plan/Transportation Master Plan; Water System Master Plan; and the Zero Waste (trash, recycling and compost) Plan.

Capacity and Adequacy of Public Facilities and Services Determination: The City of Menlo Park has the capacity to meet service needs of existing and future development within its boundaries. The City has Master Plans to guide capital expenditures and priorities across various service areas. The capital improvement plan is currently adequately funded, although the General Fund transfer for capital projects was reduced by \$1M in FY 2026/27 in order to balance the budget.

4) Financial Ability

Financial ability of the City to provide service	Yes	Maybe	No
a) Does the City routinely engage in budgeting practices that may indicate poor financial management, such as overspending its revenues, failing to commission independent audits, or adopting its budget late?			X
b) Is the City lacking adequate reserve to protect against unexpected events or upcoming significant costs?			X
c) Is the City's rate/fee schedule insufficient to fund an adequate level of service, and/or is the fee inconsistent with the schedules of similar service organizations?			X
d) Is the City unable to fund necessary infrastructure maintenance, replacement and/or any needed expansion?			X
e) Is the City lacking financial policies that ensure its continued financial accountability and stability?			x
f) Is the City's debt at an unmanageable level?			X

General Fund Overview: While the City has an underlying structural deficit, it managed to adopt a balanced budget for FY 2026/27 without the use of reserves. The City projects \$90M in General Fund expenditures, and a nominal surplus of \$9,296 (see Table 3). The City's primary source of General Fund revenue is from property taxes (43%) followed by the Transient Occupancy Tax (TOT, 20%). The TOT or hotel tax is the tax added to hotel guest bills for stays of fewer than 30 days. The City placed a measure on the November 2024 ballot to raise the TOT from 12% to 15.5% over a two-year period, which was approved by 84% of voters. The increased rate of 15.5% became effective January 1, 2026 and is reflected in the proposed budget (\$18.4M).

In FY 2026/27, the property tax in lieu of vehicle license fee (VLF) revenue is anticipated to be \$1.9M. This represents a shortfall of \$4.3M, or 5% of total General Fund expenditures. Menlo Park does not include VLF backfill revenue in budget forecasts for FY2027/28 onward.

To balance the FY2026/27 budget and to not utilize reserve funds, the City had to address the anticipated \$7.9M shortfall through a combination of cuts to departmental operating

expenditures and increased revenue generation by updating the Master Fee Schedule and cost allocation plan. Department cost cutting measures included scaling back programs, reducing operating hours, reducing special event frequency, and increasing fees.

Table 3. General Fund Revenues and Expenditures, FY 2023/24-FY2026/27

	FY 2023-24 (Actual)		2024-25 (Actual)		2025-26 (Amended)		2026-27 (Budget)	
<i>Revenues</i>	Share		Share		Share		Share	
Property Tax (Total)	\$35,449,403	46%	\$39,397,868	48%	\$36,696,871	45%	\$38,892,052	43%
Transient Occupancy Tax	\$11,827,368	15%	\$14,763,089	18%	\$16,169,749	20%	\$18,404,642	20%
Charges for Services	\$8,344,742	11%	\$7,646,556	9%	\$5,790,650	7%	\$8,450,119	9%
Sales Tax	\$5,826,799	8%	\$6,850,318	8%	\$6,474,000	8%	\$7,207,900	8%
All Other	\$15,029,255	20%	\$13,844,990	17%	\$15,206,250	19%	\$16,897,415	19%
Total GF Revenues	\$76,477,567	100	\$82,502,821	100	\$82,002,728	100	\$90,125,783	100
<i>Expenditures</i>	Share		Share		Share		Share	
Salaries & Benefits	\$38,233,758	52%	\$48,413,649	58%	\$49,770,239	59%	\$56,925,959	63%
Internal Service								
Charges	\$7,724,662	10	\$9,620,545	11	\$9,948,444	12	\$11,787,976	13
Services	\$8,387,357	11	\$9,331,574	11	\$12,158,077	14	\$11,649,347	13
All Other	\$15,761,696	21	\$12,835,704	15	\$8,124,325	10	\$9,745,040	11
Total GF Expenditures	\$73,762,731		\$84,146,680		\$84,602,342		\$90,116,487	
Net	\$2,714,836		-\$1,643,859		-\$2,599,614		\$9,296	

Source: [Fiscal year 2025/26 and 2026/27 Adopted Budget | Transmittal Letter](#)

a) Does the City routinely engage in budgeting practices that may indicate poor financial management, such as overspending its revenues, failing to commission independent audits, or adopting its budget late? The City of Menlo Park regularly prepares an annual budget that is adopted on time each fiscal year, presented in hearings open to the public, and accessible on the City's website. The City contracts with an independent accounting firm (Pun Group, LLC) to conduct Annual Comprehensive Financial Reports (ACFR). These reports are available on the City's Administrative Services Department website.¹⁴ In January 2026, the City Council received the most recent, FY 2024/25 ACFR report. This report received the Certificate of Achievement for Excellence in Financial Reporting from the Government Finance Officers Association. To receive this award, a government must publish an easily readable and efficiently organized ACFR that evidence a spirit of transparency and full disclosure.

¹⁴ [Annual Comprehensive Financial Report City of Menlo Park](#)

The FY 2026/27 Budget Priorities include:

- “Address the City’s structural imbalance between revenues and expenditures through immediate and ongoing actions to stabilize the General Fund reserve and restore long-term fiscal sustainability.”
- “Continue to evaluate the most cost-effective method to provide services at a specified level that provides the City with flexibility in all economic conditions, including the use of contracted services, shared services, and regular and limited-term employees.”

b) Is the City lacking adequate reserve to protect against unexpected events or upcoming significant costs? In October 2014, the City adopted a General Fund fund balance policy that specifies target reserve levels for five components of general fund reserves: non-spendable; restricted; committed; assigned; and unassigned (see Table 4).¹⁵ The Committed fund balance is comprised of allocations for the Emergency Contingency and Economic Stabilization. The General Fund Emergency Contingency is established at \$6M, with the option for the City Council to increase/decrease the amount, with the goal of providing for an amount equal to 15-20% of the City’s annual general fund operating budget. “This range should be sufficient to allow for a quick and decisive municipal response to events such as natural disasters, catastrophic accidents, or other declared emergency incidents.” The Economic Stabilization Contingency is established at \$8M, with the goal of providing an amount equal to 20-25% of the City’s annual general fund operating budget. “This range serves as a sufficient cushion, safeguarding the City’s fiscal health against fluctuations in revenues and costs due to economic volatility.”

Table 4. City of Menlo Park Ending Fund Balance Components

	FY2025/26 (Amended Budget)	Share	FY2026/27 (Budget)	Share
Economic Stabilization	\$13,878,049	45%	\$13,878,049	45%
Emergency Contingency	\$10,408,536	33%	\$10,408,537	36%
Unassigned	\$3,220,125	10%	\$664,851	2%
Nonspendable	\$2,919,082	9%	\$2,919,082	10%
Strategic Pension	\$653,240	2%	\$653,240	2%
Ending Fund Balance	\$31,079,033	100%	\$28,523,759	100%

Source: FY 2026/27 Budget and CIP

The City’s target General Fund reserve level as a share of expenditures is 35%. Currently, the FY 2026/27 budget projects a reserve level just shy of that target, at 32% (see Table 5). The

¹⁵ [City Council Policy No. CC-14-003 Effective 10/7/2024](#)

five-year General Fund reserve level forecast anticipates an annual decline in ending fund balance, projected to reach \$9.2M in FY2030/31, or 9% of a projected \$104M in General Fund expenditures (well below the target).

Table 5. General Fund Reserves as Share of Expenditures

Fiscal Year	Ending Fund Balance	Total GF Expenditures	Share
2030-31 (forecast)	\$9,214,565	\$104,392,694	9%
2029-30 (forecast)	\$13,153,020	\$101,416,990	13%
2028-29 (forecast)	\$18,979,340	\$98,513,001	19%
2027-28 (forecast)	\$24,047,344	\$94,745,031	25%
2026-27 (budget)	\$28,523,759	\$90,537,503	32%
2025-26 (amended budget)	\$31,079,033	\$84,602,342	37%
2024-25 (actual)	\$34,571,733	\$74,231,260	47%
2023-24 (actual)	\$37,298,641	\$76,137,991	49%

Source: FY 2026/27 Budget and CIP [Staff report](#) ¹⁶

c) Is the City’s rate/fee schedule insufficient to fund an adequate level of service, and/or is the fee inconsistent with the schedules of similar service organizations?

In April 2026, the City completed a comprehensive cost of services study resulting in an updated Master Fee Schedule. Comparison to private or public sector alternatives are incorporated into the fee setting process. According to the City’s User Fee Cost Recovery Policy,¹⁷ fees are intended to recover the cost of services provided to residents. The policy recognizes that not all services should recover costs at the same level. Services that provide a broad public benefit are generally more subsidized, while services that primarily benefit specific individuals or businesses are expected to recover a greater share of their costs. The Master fee schedule includes annexation fees, license and permit fees, rental fees, and more. The 2026 Master Fee schedule increased development-related fees in order to help balance the budget, and it also incorporated a payment card processing fee to shift processing costs to the cardholder.¹⁸

d) Is the organization unable to fund necessary infrastructure maintenance, replacement and/or any needed expansion? The City relies on a combination of general

¹⁶ Maintaining adequate reserves is an important factor in preserving the City’s AAA bond rating, the highest credit rating available. This rating provides access to more favorable borrowing terms and financing options for capital investments and other long-term needs.

¹⁷ [Resolution No. 6768, August 2022](#)

¹⁸ [Master Fee Schedule](#) July 1, 2026

fund transfers, local taxes, enterprise revenue, and grants to fund necessary infrastructure maintenance and replacement. Several projects on the City’s five-year capital improvement plan are not fully funded. The City plans to consider future revenue generating measures to present to voters on the November 2028 ballot, such as an additional sales tax, business license tax, or utility users tax.

e) Is the organization lacking financial policies that ensure its continued financial accountability and stability? The City has adopted financial policies to ensure its continued financial stability, including fund balance policies.

f) Is the organization’s debt at an unmanageable level?

CalPERS: The City of Menlo Park participates in the California Public Employees Retirement System (CalPERS), which provides members with a defined-benefit pension based on years of service. CalPERS is funded by a combination of investment earnings on the CalPERS portfolio, contributions by employees, and contributions by the City.

As of June 2025 (the most recent audit), a total of 886 employees were covered by the benefit terms of the CalPERS Miscellaneous Plan, and 219 employees were covered by the Safety Plan (see Table 6). For the year ending on June 30, 2025, the employer contributions for the miscellaneous plan and the safety plan were \$6.7M and \$5.8M, respectively. The City’s actual contributions to both the CalPERS Safety and Miscellaneous Plans fully met or exceeded the actuarially determined contribution (ADC) every year from FY 2021-25.

Table 6. City of Menlo Park Employees Covered by CalPERS

	Miscellaneous Plans	Safety Plans
Active Employees	223	41
Transferred & terminated employees	376	47
Retired employees & beneficiaries	287	131
Total	886	219

Source: ACFR 2024/25

In 2014, the City established a Strategic Pension Funding reserve, utilizing an initial \$1M of the General Fund unassigned reserve. Since then, 25% of the General Fund’s final operating surplus (if there is one) is added annually to the Strategic Pension Fund Reserve upon completion of the annual financial report.

Other Post Employment Benefits (OPEB): The City provides healthcare insurance benefits to eligible retired employees and their dependents. The City participates in the CalPERS

healthcare program (PEMHCA) and allows retirees to continue participation in the medical insurance program after retirement. As of June 30, 2023, 381 employees were covered by the Plan (see Table 7).

Table 7. City of Menlo Park Employees Covered by the OPEB Plan

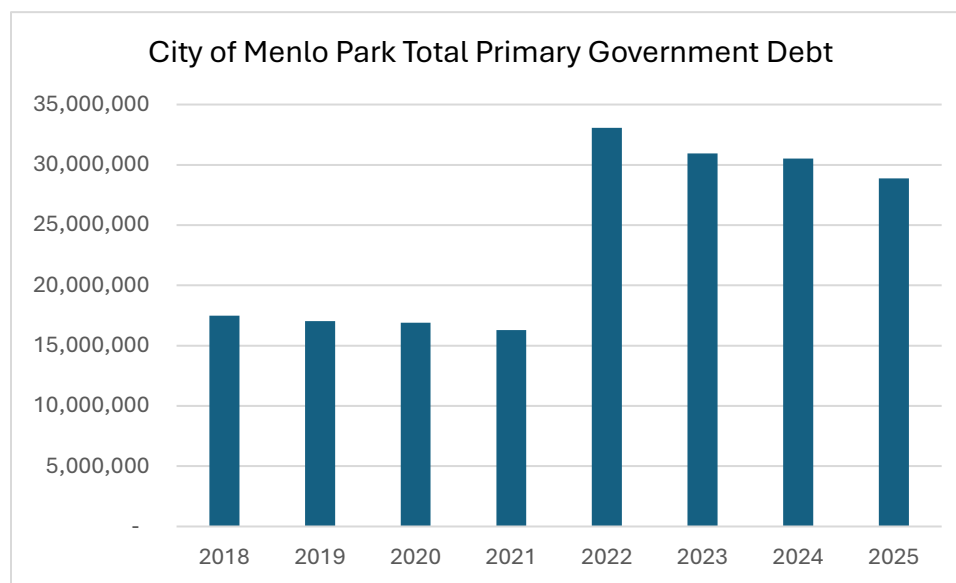
	Miscellaneous Plans
Active Employees	261
Retired employees and beneficiaries	120
Total	381

Source: ACFR 2024/25

In FY 2025, the actuarially determined contribution rose significantly to \$810,386, up from \$415,000 in FY 2024 (see Table 8). Because actual contributions fell short of the recommended actuarial targets each year, the City recorded a contribution deficiency of \$419,053 in FY 2025, compared to \$66,079 in FY 2024.¹⁹

Other Debt: The City's debt nearly doubled in 2022, driven by the issuances of voter-approved new General Obligation bonds and refinancing of the City's 2012 General Obligation Bonds (see Figure 3). Despite the overall debt increase, the total debt remains below 1% of total personal income.

Figure 3. Menlo Park Debt, FY 2018-25



Source: ACFR 2024/25

¹⁹ [ACFR 2024/25](#)

Financial Ability Determination: The City prepares an annual operating and capital improvement budget for the upcoming fiscal year that gets adopted by the City Council at a noticed public hearing before June 30th. The City also produces an Annual Comprehensive Financial Report that is reviewed by the City Council. The most recently published report is for FY 2024-25. The City’s target General Fund reserve level is 35% of total expenditures. The projected FY 2026/27 reserve level is just shy of the target, representing 32%. Without any intervention or changes, the reserve level is projected to decline further, reaching 9% in FY 2030/31. The City has the requisite financial policies in place to ensure its continued financial accountability and stability. In FY 2026/27, the property tax in lieu of vehicle license fee (VLF) revenue is anticipated to be \$1.9M. This represents a shortfall of \$4.3M, or 5% of total General Fund expenditures. Menlo Park does not include any VLF backfill revenue in budget forecasts for FY2027/28 onward.

Recommendation

1. LAFCo staff encourages the City to continue monitoring its reserve levels and exploring additional revenue sources to help the City obtain alignment with its General Fund fund balance policy.

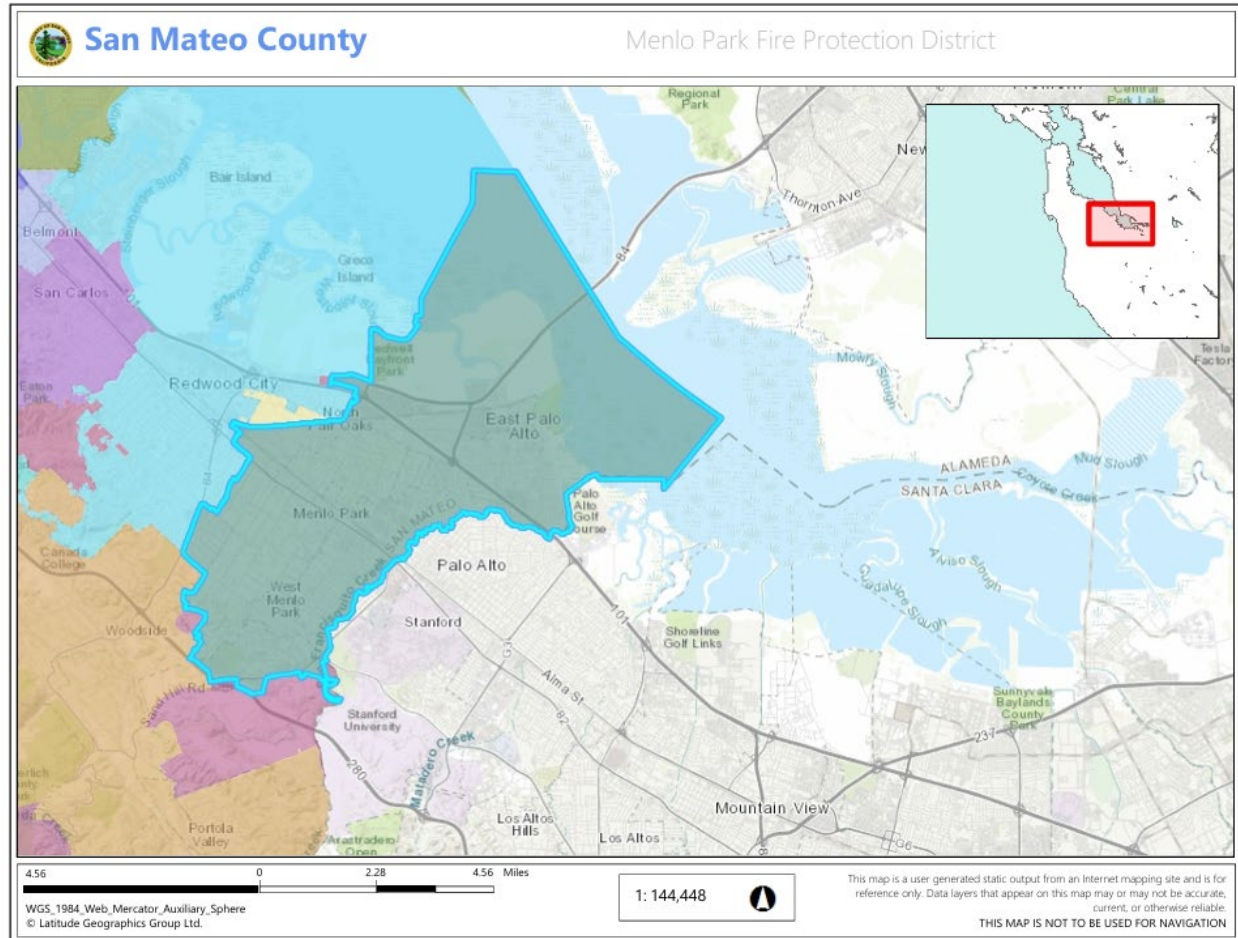
5) Shared Service and Facilities

Status of, and opportunities for, shared facilities	Yes	Maybe	No
a) Is the City currently sharing services or facilities with other organizations? If so, describe the status of such efforts.	X		
b) Are there any opportunities for the City to share services or facilities with neighboring or overlapping organizations that are not currently being utilized?			X
c) Are there governance options to allow appropriate facilities and/or resources to be shared, or making excess capacity available to others, and avoid construction of extra or unnecessary infrastructure or eliminate duplicative resources?			X

a-c) Menlo Park shares fire protection services via the Menlo Park Fire Protection District (an independent special district) with the City of East Palo Alto, Town of Atherton, and unincorporated San Mateo County areas (see Figure 4). The Menlo Park Fire Protection District also provides contracted coverage to SLAC and automatic mutual aid responses to

Palo Alto and Redwood City. Menlo Park participates in the County’s multijurisdictional Local Hazard Mitigation Plan. The City is also a member of the San Francisquito Creek Joint Powers Authority (SFCJPA), along with the City of East Palo Alto, City of Palo Alto, the San Mateo County Flooding and Sea Level Resiliency District, and the Santa Clara Valley Water District. The SFCJPA “addresses flood risks from the San Francisquito Creek and the Bay Shoreline through collaboratively planned, multi-benefit projects”.²⁰

Figure 4. Menlo Park Fire Protection District Boundaries



Source: San Mateo County Planning and Building Map Viewer

Shared Service and Facilities Determination:

The City collaborates and partners with various Bay Area jurisdictions on natural hazard mitigation planning, transportation and traffic management, and sea level rise. The City shares fire protection services via the Menlo Park Fire Protection District, and participates in the County’s multijurisdictional Local Hazard Mitigation Plan. The City is also a member of the San Francisquito Creek Joint Powers Authority (SFCJPA), along with the City of East Palo

²⁰ [About the JPA - San Francisquito Creek Joint Powers Authority](#)

Alto, City of Palo Alto, the San Mateo County Flooding and Sea Level Resiliency District, and the Santa Clara Valley Water District. The City also partners with regional transit agencies for various projects, including with Caltrain on Grade Separations and the Metropolitan Transit Committee on Dumbarton Forward.

Recommendation

2. LAFCo staff encourages the City of Menlo Park to continue partnering with regional agencies to address traffic and transportation projects, as well as natural hazards and mitigation planning.

6) Accountability, Structure, and Efficiencies

Accountability for community service needs, including governmental structure and operational efficiencies	Yes	Maybe	No
a) Are there any issues with meetings being accessible and well publicized? Any failures to comply with disclosure laws and the Brown Act?			X
b) Are there any issues with staff turnover or operational efficiencies?			X
c) Is there a lack of regular audits, adopted budgets and public access to these documents?			X
d) Are there any recommended changes to the City's governance structure that will increase accountability and efficiency?			X
e) Are there any governance restructure options to enhance services and/or eliminate deficiencies or redundancies?			X
f) Are there any opportunities to eliminate overlapping boundaries that confuse the public, cause service inefficiencies, unnecessarily increase the cost of infrastructure, exacerbate rate issues and/or undermine good planning practices?			X

a) Are there any issues with meetings being accessible and well publicized? Any failures to comply with disclosure laws and the Brown Act? The City of Menlo Park is governed by

a five-member City Council elected by voters within each City district. Until 2018, councilmembers were elected at-large. In 2018, a change to the California Voting Rights Act required the City to switch to District elections.

The City Council meets on the second and fourth Tuesdays of the month at 6PM. Meetings are open to the public and are held at City Council Chambers, 751 Laurel St., Menlo Park, CA 94025. Meetings are also livestreamed via Zoom and the public may provide comment remotely or in-person. Meeting agendas are posted on the City website at least 72 hours before a regular meeting. The City has a YouTube channel (@cityofmenlopark) that hosts a video archive of City Council and Commission meetings. Past City Council Meetings are also available for viewing/listening in Spanish. The City website publishes an archive of meeting agendas, minutes as well as staff reports. The City’s “Open Government” webpage contains shortcuts to information of interest to the public such as master plans, fee schedules, adopted budgets (which needs to be updated as the most recent is from FY2023/24), and the public records.²¹ LAFCo is not aware of any failures to comply with the Brown Act.

b) Are there any issues with staff turnover or operational efficiencies? The City experiences some challenges recruiting new employees due to the high cost of living, lack of affordable housing in the area, and competition for talent. For the period of May 1, 2025 through April 30, 2026, the median tenure of City employees was 5 years, and there was a 92% staff retention rate. The City’s ongoing strategy for employee recruitment and retention includes engagement through surveys and focus groups; hiring incentives for lateral police officers and policy academy graduates; conducting a citywide classification and compensation study and attending career fairs. The City has prioritized “incorporate[ing] programs and initiatives that strengthen Menlo Park’s standing as an employer of choice to retain highly qualified personnel.”²²

Staffing levels have remained consistent over the past five years. In FY2025/26, the vacancy rate was approximately 15%, and in FY2026/27 the vacancy rate is projected to decrease to 11%. The Community Development Department and General Administration Departments have the highest vacancy rates at 22% and 21%, respectively, as of May 2026.

Table 6. City Full Time Equivalent (FTE) Count by Department, FY 2020-2025

Department	2020	2021	2022	2023	2024	2025	2026
Public Works	70	65	73	73	72	72	73
Public Safety	77	62	63	70	70	70	73
Community Services	52	38	46	48	46	48	47
Administrative Services	34	30	35	40	42	42	30

²¹ The [Open government City of Menlo Park](#) webpage was designed using a [checklist](#) provided by Ballotpedia (formerly Sunshine Review), a nonprofit organization dedicated to government transparency.

²² City of Menlo Park FY2026/27 Budget Principles

Community Development	31	28	32	36	35	35	34
Library	19	18	18	18	21	21	21
City Council	5	5	5	5	5	5	5
Total FTE*	287	245	272	290	290	293	297

Note: *FTE count rounded to the nearest whole number

c) Is there a lack of regular audits, adopted budgets and public access to these documents? City budget and audit documents are published online and available for public viewing, including through an interactive budget portal. The FY2026/27 Adopted Budget Book is not available as of August 2026, however prior year adopted budget books are available. The City's most recent Annual Comprehensive Financial Reports (ACFR) was for FY 2024/25.

d-f) Any recommended changes in governance structure? LAFCo staff has not identified any recommendations regarding restructuring of the City or its service boundaries that would increase accountability and efficiencies, enhance services or eliminate deficiencies.

Accountability, Structure, and Efficiencies Determination

The City of Menlo Park ensures that public meetings are accessible and publicized. Archived meeting minutes and videos are available online. LAFCo is not aware of any failure to comply with disclosure laws or the Brown Act.

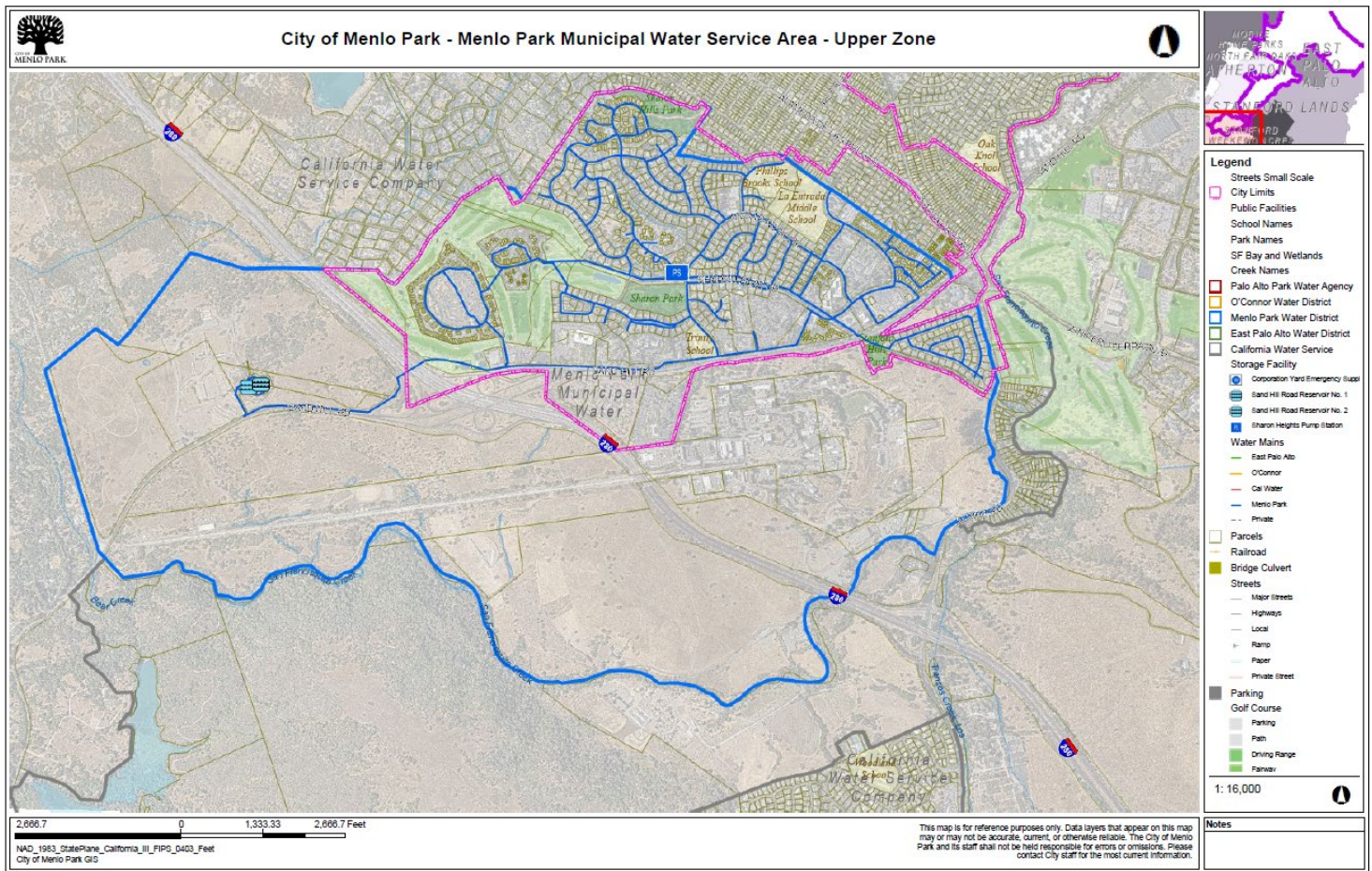
7) Other Issues:

Any other matter related to effective or efficient service delivery, as required by commission policy.	Yes	Maybe	No
a) Are there any other service delivery issues that can be resolved by the MSR/SOI process?			X
b) Water Resiliency and Climate Change			
i) Does the organization support a governance model that enhances and provides a more robust water supply capacity?	X		
ii) Does the organization support multi-agency collaboration and a governance model that provide risk reduction solutions that address sea level rise and other measures to adapt to climate change?	X		

c) Natural Hazards and Mitigation Planning			
i) Has the agency planned for how natural hazards may impact service delivery?	X		
ii) Does the organization support multi-agency collaboration and a governance model that provides risk reduction for all natural hazards?	X		

a) Are there any other service delivery issues that can be resolved by the MSR/SOI process? During this MSR process, Menlo Park staff made LAFCo staff aware of Menlo Park City-owned infrastructure that is located outside of corporate boundaries, notably a water reservoir and associated infrastructure, on Stanford owned lands (see Figure 5). The area is unincorporated San Mateo and currently the designated SOI for this area is the Town of Woodside.

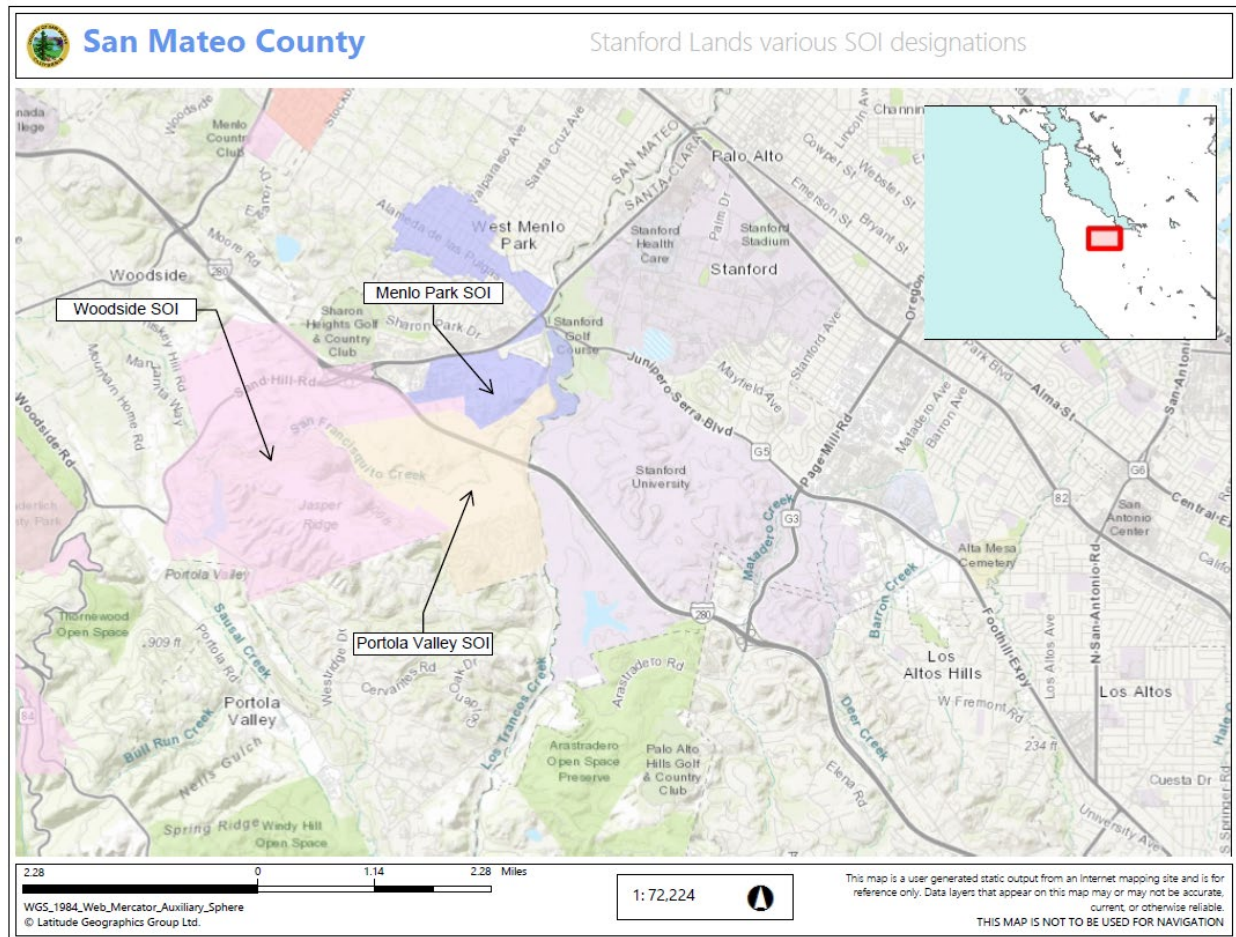
Figure 5. Menlo Park Water Infrastructure on Stanford-owned Land



Source: City of Menlo Park

The City of Menlo Park, the Town of Portola Valley, and the Town of Woodside all have SOI designations on this unincorporated Stanford land area (see Figure 6). At the time that this designation was made in the 1980s, there was discussion about the potential of development on the Stanford lands, including additional development of the Stanford Linear Accelerator Center (SLAC). Since then, the majority of the Stanford lands has been designated as lands of biological preservation and Stanford has a contract to operate and manage SLAC through 2027.

Figure 6. SOI's on Stanford-owned land in Unincorporated San Mateo County



Source: San Mateo County Planning and Building Map Viewer

Due to this information about the City's water system infrastructure and the changes in development potential within this area, San Mateo LAFCo recommends undertaking a special study to capture the current service providers and reevaluate the SOI designations of Stanford lands in unincorporated San Mateo County. This study will allow LAFCo, Menlo Park, Portola Valley, Woodside, and Stanford University to have a comprehensive discussion regarding SOI designations and accurately reflect the current service providers, as well as the probable physical future boundaries of these cities.

b-c) Water Resiliency, Climate Change, Natural Hazards and Mitigation Planning:

The Menlo Park City Council has consistently identified “Climate Action— mitigation, adaption and resilience” as the first of five top priorities, each year in 2024, 2025, and 2026.²³ The City’s first Climate Action Plan was adopted in 2009, and most recently amended in 2024.²⁴ The Plan includes strategies to reduce the City’s greenhouse gas emissions in order to reach carbon neutrality by 2030. Measures adopted included converting existing City buildings to all-electric, transitioning to an electric municipal vehicle fleet, adopting building regulations to accommodate electric vehicle charging stations, banning gas-powered landscaping equipment, and subscribing all residents and business to the community choice aggregate clean energy provider WestLight energy (prior to July 2026 it was called Peninsula Clean Energy).²⁵ Annual Climate Action Plan progress reports are available on the City Manager’s Office website.

Menlo Park is a partner of One Shoreline, an independent government agency that secures and leverages public and private resources to plan for and build solutions to the climate change impacts of sea level rise, flooding and coastal erosion. Menlo Park is also in the San Mateo County Flood Control District.

Menlo Park is a member of the San Francisquito Creek Joint Powers Authority (SFCJPA), along with the City of Palo Alto, the City of East Palo Alto, OneShoreline, and the Santa Clara Valley Water District.²⁶ The SFCJPA was formed in 1999 to lead projects that mitigate the risk along the San Francisquito Creek and the Bay, such as the SAFER Bay project.²⁷

“MenloPrepared” is the City’s disaster preparedness program which is organized by the City Manager’s Office in partnership with the Menlo Park Fire Protection District, the County Office of Emergency Services, and local Community Emergency Response Teams (CERT). The program provides resources and suggestions to: 1) Make A Plan; 2) Build a Kit; 3) Emergency Alerts 4) Evacuation Preparedness Tips; 5) Evacuation Zones; 6) Pet Preparedness; 7) Neighborhood Preparedness; 8) Business Preparedness, and 9) Access and Functional Needs.

Other Issues Determination: The City is engaged in activities to address hazard mitigation, wildfire prevention, greenhouse gas emissions and sea level rise. Additionally, through this report, LAFCo staff was made aware that the City of Menlo Park has water infrastructure on Stanford-owned land in unincorporated San Mateo County. This area is currently with the designated SOI of the Town of Woodside. It should be determined whether these SOI

²³ [City Council Priority Setting Workshop City of Menlo Park](#). Priorities are Climate action - mitigation, adaptation and resilience; Downtown vibrancy; Housing; Public Safety; and Safe routes.

²⁴ [2030 Climate Action Plan](#)

²⁵ [Our Story - WestLight Energy](#)

²⁶ [About the JPA - San Francisquito Creek Joint Powers Authority](#)

²⁷ [SAFER Bay Project - San Francisquito Creek Joint Powers Authority](#)

designations of the Stanford lands and SLAC accurately reflect the current service providers, potential service needs, as well as the probable physical future boundaries of Menlo Park, Woodside, and Portola Valley.

Recommendation:

3. LAFCo staff recommends that the Commission add to the FY2027/28 LAFCo workplan and budget a Special Study of Stanford Lands to determine the extent of current service providers, and the appropriate SOI designations of these areas. The Special Study should include an inventory of City-owned infrastructure on Stanford lands, and recommendations for any SOI amendments to be presented for consideration to the Commission and to the respective Managers of the City of Menlo Park, Town of Woodside, and Town of Portola Valley and Stanford University staff.

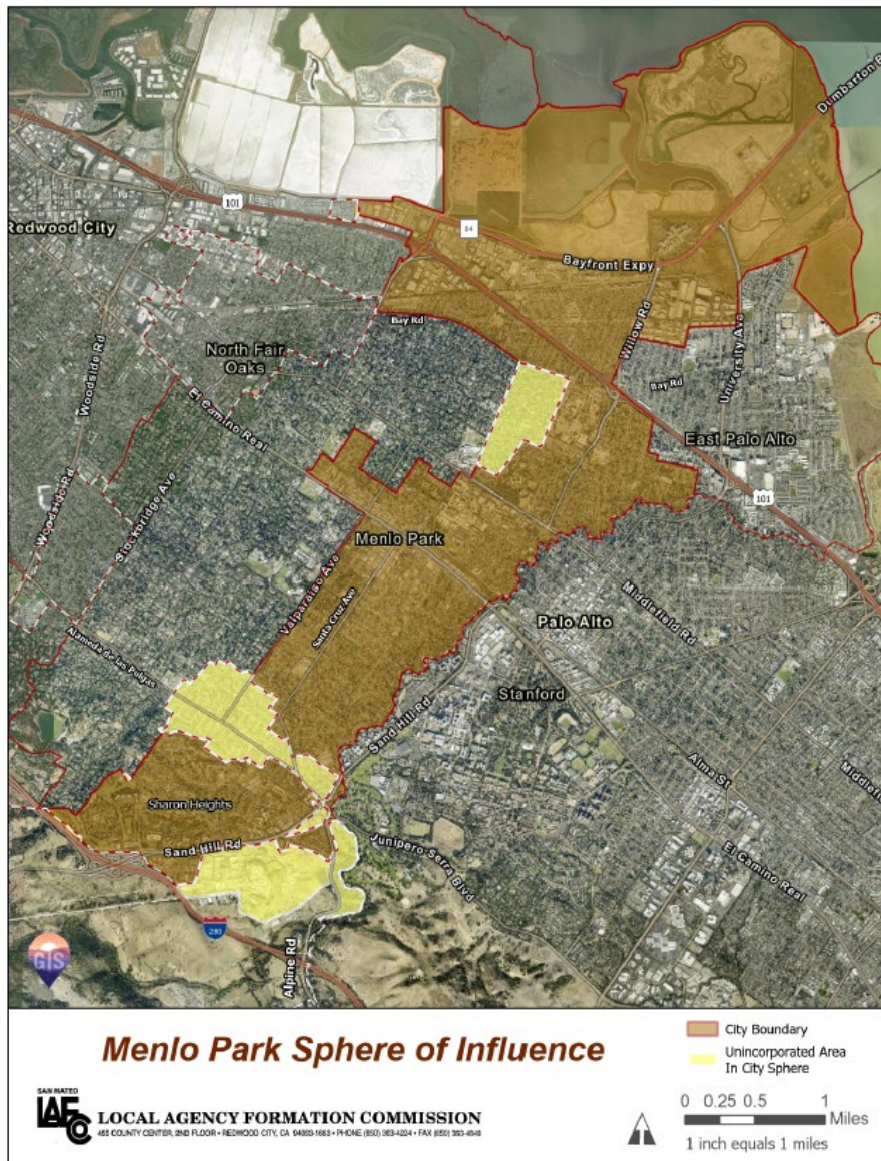
Section 6. City of Menlo Park Sphere of Influence Determinations

Government Code Section 56425 requires San Mateo LAFCo make determinations concerning land use, present and probable need for public facilities and services in the area, capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide, and existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency. These include the following determinations:

1. **The present and planned land uses in the area, including agricultural and open space lands:** The majority of the City's land use is residential. Other land uses include commercial, life sciences and industrial (Bayfront district), institutional, public facilities, parks and open space (tidal marshes and protected wetlands). There is no agricultural land within the City's SOI.
2. **The present and probable need for public facilities and services in the area:** The City of Menlo Park's facilities and services meet the needs of its residents and businesses, and the City anticipates that it will be able to provide adequate facilities and services for the anticipated growth within its service area.
3. **The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide:** The City currently provides adequate public services to its residents, including fire and police protection, water, sanitary sewer and storm water services. The City routinely adopts a Capital Improvement Program to fund critical repairs, replacements and improvements to the City's infrastructure and facilities.

4. **The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency:** There are no disadvantaged unincorporated communities within the SOI of the City of Menlo Park.
5. **For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence:** N/A.

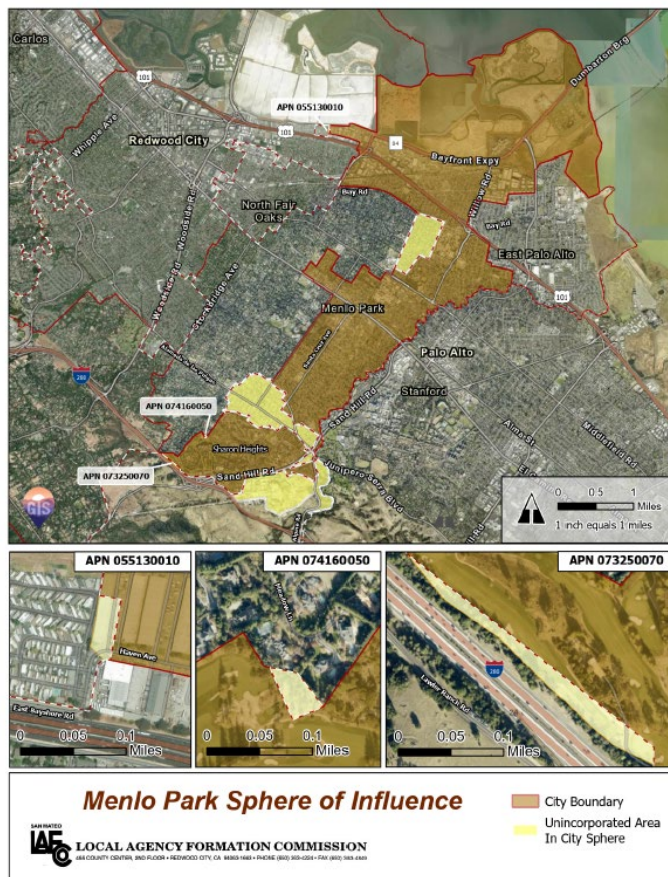
Figure 6. City Menlo Park Sphere of Influence Map



The following three parcels have been reviewed by LAFCo staff and the Menlo Park City Manager as candidates for additions to the SOI of Menlo Park (see Figure 7):

- 1) 3501 Haven Ave (APN 055-130-010) is an unincorporated parcel contiguous to the City of Menlo Park. It is currently being used as part of a larger warehouse unit, zoned Light Manufacturing & Industrial (331L). The City of Menlo Park currently provides water to this parcel. The City of Redwood City has no objection to this parcel being added to the Menlo Park SOI.
- 2) APN 074-160-050 is an unincorporated island owned by the Sharon Heights Golf Club. It is currently in use as part of the golf course. The rest of the Sharon Heights Golf Club is incorporated in the City of Menlo Park. This unincorporated island parcel is contiguous with the border of Menlo Park and Atherton and seemingly has never been assigned to an SOI.
- 3) APN 073-250-070 is an unincorporated parcel owned by Stanford University, currently in use as part of the Sharon Heights golf course. It is contiguous to the City of Menlo Park, and adjacent to I-280 on the east side. This parcel was assigned to the SOI of Woodside. The Town of Woodside has no objection to having this parcel detached from the Town's SOI and added to the City of Menlo Park's SOI.

Figure 7. Proposed Sphere of Influence Amendment to the City of Menlo Park



On the basis of the Municipal Service Review:

☐ Staff has reviewed the agency’s Sphere of Influence and recommends that a SOI Update is NOT NECESSARY in accordance with Government Code Section 56425(g). Therefore, NO CHANGE to the agency’s SOI is recommended and SOI determinations HAVE NOT been made.

☒ Staff has reviewed the agency’s Sphere of Influence and recommends that a SOI Update IS NECESSARY in accordance with Government Code Section 56425(g). Therefore, A CHANGE to the agency’s SOI is recommended and SOI determinations HAVE been made and are included in this MSR/SOI study.

Appendix A. City of Menlo Park Fact Sheet

City Manager: Justin Murphy (appointed by City Council)

Physical Address: 701 Laurel St., Menlo Park, CA 94025

Email Address: jicmurphy@menlopark.gov

Phone Number: (650) 330-6600

Date of Incorporation: November 23, 1927

City Council Members: Members are elected in district elections to serve a staggered four-year term. There are no term limits. Mayor and Vice Mayor serve one-year term selected by City Council.

Council Members	District	Term Expiration Date
Betsy Nash, Mayor	District 4	2026
Jennifer Wise, Vice Mayor	District 5	2028
Drew Combs	District 2	2026
Jeff Schmidt	District 3	2028
Cecilia Taylor	District 1	2026

Compensation: City council members are paid \$950 per month, and are eligible for benefits including CalPERS retirement, health, dental, life insurance and vision coverage for themselves and their dependents.

Public Meetings: Regular City Council meetings are held on the second and fourth Tuesdays of the month at 6PM at City Council Chambers 751 Laurel St., Menlo Park, CA 94025. Meetings are livestreamed via Zoom and the public may provide comment remotely or in-person. Official agendas are posted on the City Website at least 72 hours before a regular meeting. An archive of staff reports and meeting minutes is also available.

Services Provided: Building, engineering, housing rehabilitation, parks, library, planning, police, maintenance, recreation, senior services, water, daycare, redevelopment, traffic/transportation.

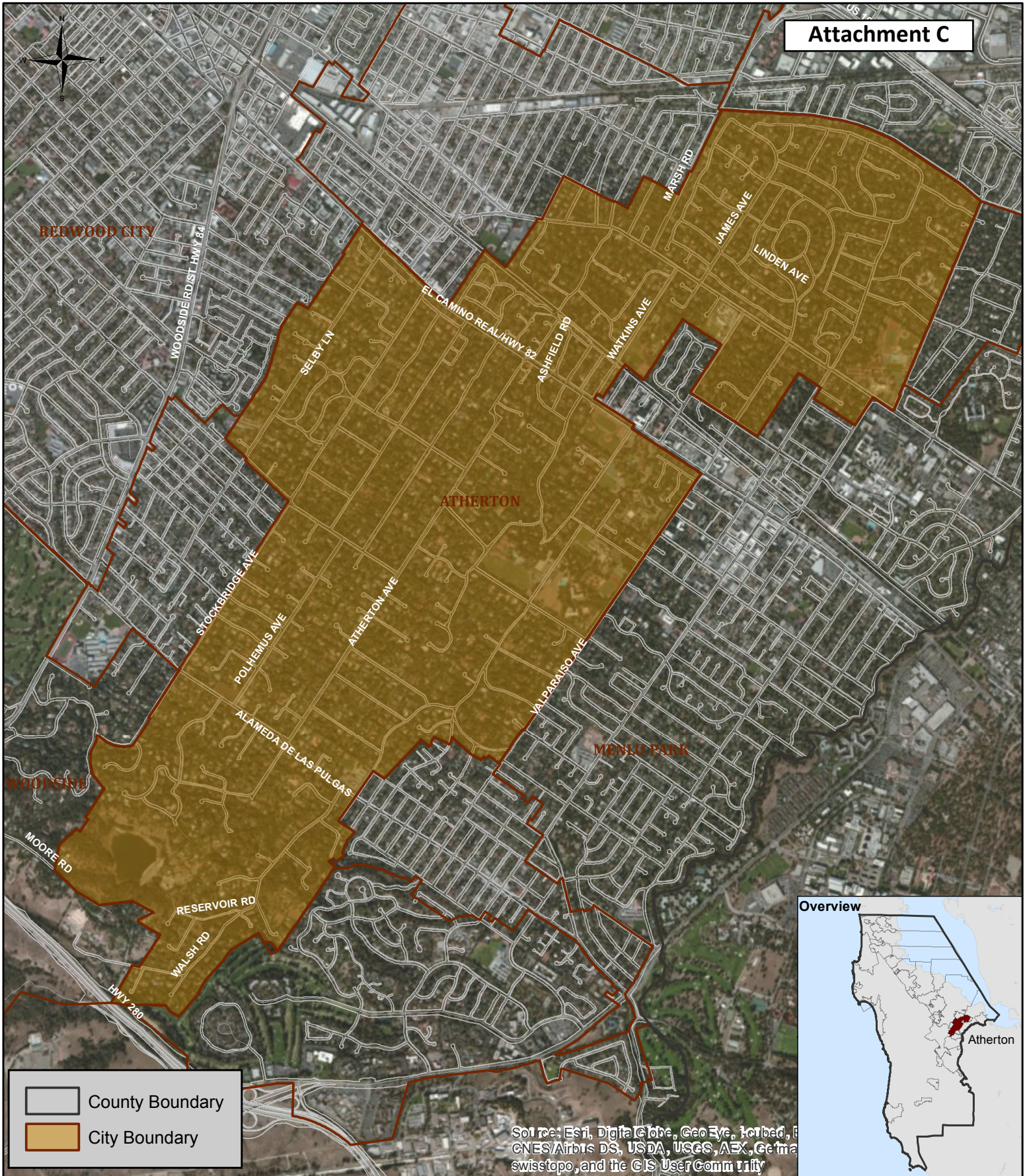
Agency staff: 297 FTE, (32 vacant FTE) (May 2026)

Area Served: Land Area- 10 square miles, Water Area-7 square miles; Total 17 square miles

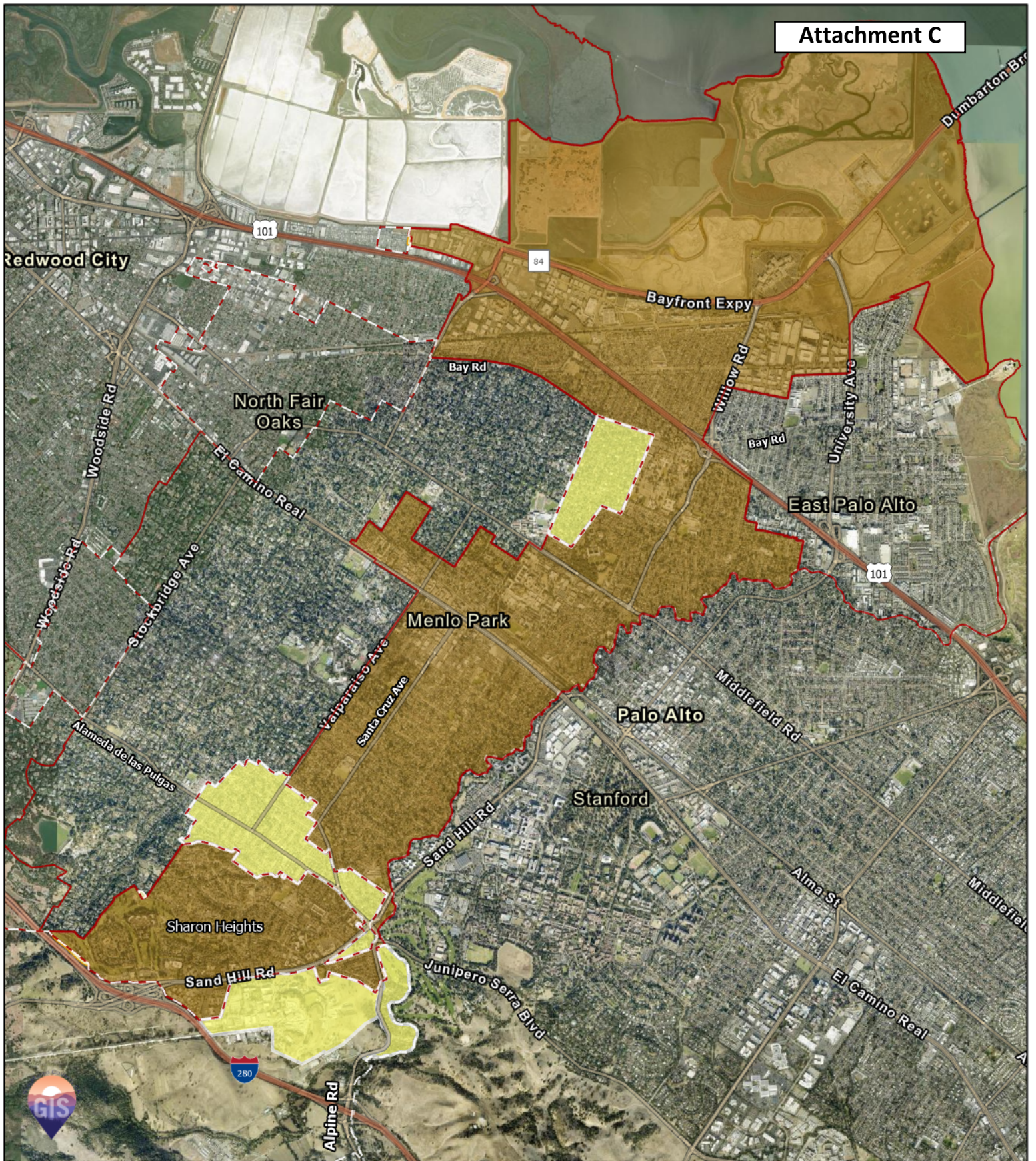
Population: 33,785 (January 2026)

Sphere of Influence: Boundaries of 1984 plus the unincorporated communities of West Menlo Park, Stanford Linear Accelerator Center (SLAC) east of Interstate 280, Weekend Acres, and Menlo Oaks.

FY 2026-27 General Fund Expenditures: \$90,116,487 (Budget)



ATHERTON SPHERE OF INFLUENCE



Menlo Park Sphere of Influence



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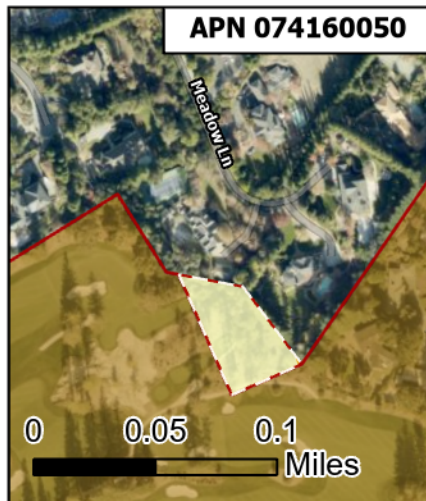
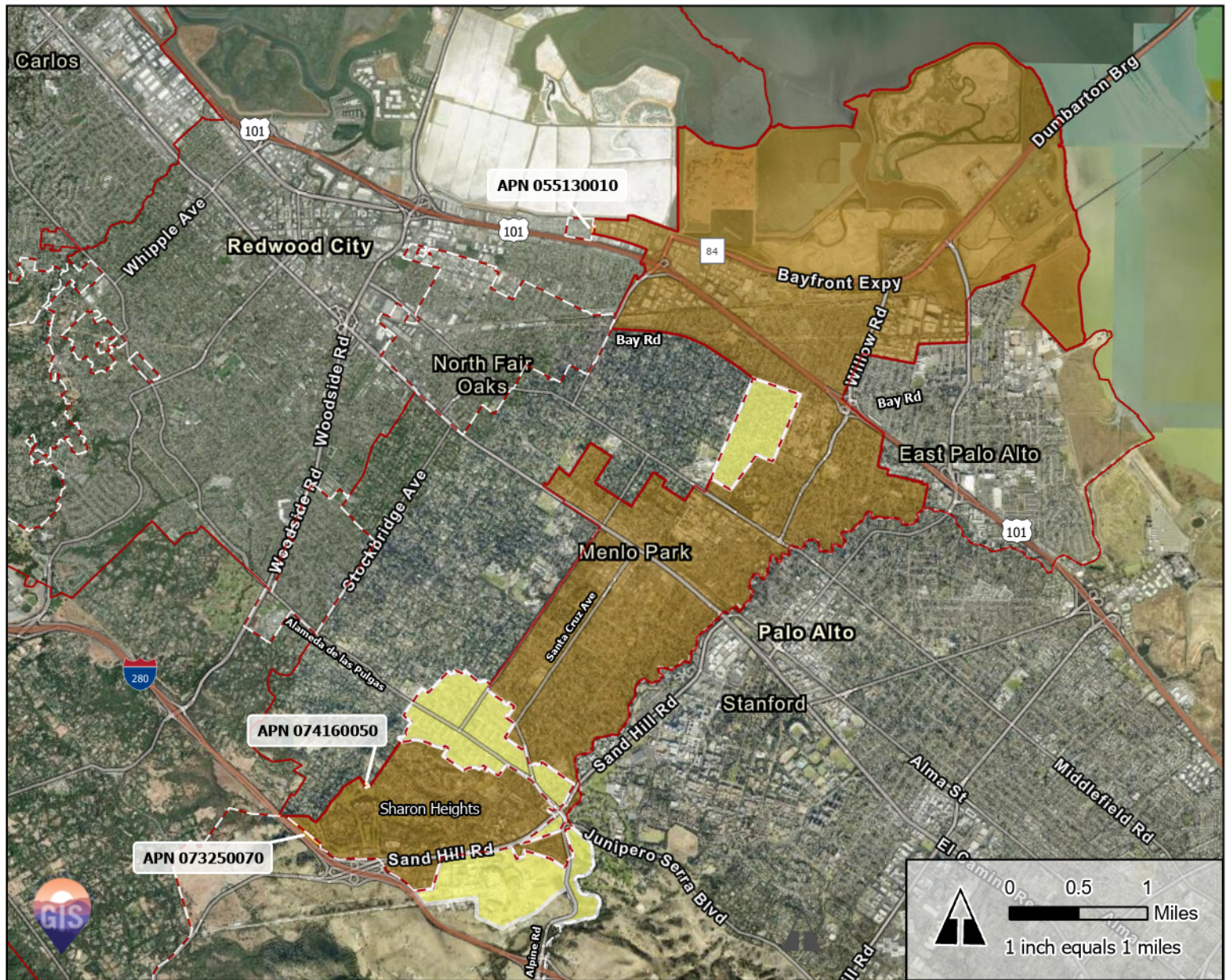
LAFCo Meeting Packet Page 207

- City Boundary
- Unincorporated Area In City Sphere

0 0.25 0.5 1 Miles



1 inch equals 1 miles



Menlo Park Sphere of Influence

- City Boundary
- Unincorporated Area In City Sphere



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SAN MATEO



LOCAL AGENCY FORMATION COMMISSION

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Staff Report

September 9, 2026

To: LAFCo Commissioners

From: Rob Bartoli, Executive Officer
Sarah Flamm, Management Analyst

Subject: Adoption of Provisional Sphere of Influence for the Edgewood Sewer Maintenance District

Summary

There are three types of municipal agencies that provide sewer service in the County of San Mateo: cities, independent districts, and dependent districts. LAFCo is the agency to review and make determinations about proposed boundary or governance changes for these providers, including San Mateo County governed “dependent” districts.

The County has two governance structures for dependent sewer districts: County Sanitation Districts (i.e. Crystal Springs, Devonshire, and Scenic Heights) and Sewer Maintenance Districts (i.e. Burlingame Hills, Edgewood, Emerald Lake Heights, Fair Oaks, Harbor Industrial, Kensington Square, and Oak Knoll). Historically, LAFCo has only processed changes and established Spheres of Influence for the County Sanitation Districts and not the Sewer Maintenance Districts, even though both types of agencies provide similar services, and both are considered districts under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. For Sewer Maintenance District changes, these historically have been processed by the San Mateo County Department of Public Works (DPW), with the San Mateo County Board of Supervisors as the reviewing body.

Over the last year, LAFCo and DPW staff met to discuss possible changes to the approval process related to Sewer Maintenance Districts. DPW and LAFCo have agreed to have LAFCo process boundary and governance changes related to Sewer Maintenance Districts as this allows for a more streamlined process for applicants, enhanced review authority for the County, consistency with LAFCo law, and efficiency gains for County staff time.

COMMISSIONERS:

VIRGINIA CHANG KIRALY, CHAIR, SPECIAL DISTRICT • ANN DRAPER, VICE CHAIR, PUBLIC • DAVID CANEPA, COUNTY • STEPHEN RAINALDI, CITY • DEBBIE RUDDOCK, CITY • KATHRYN SLATER-CARTER, SPECIAL DISTRICT • JACKIE SPEIER, COUNTY

ALTERNATES:

NOELIA CORZO, COUNTY • GREG WRIGHT, CITY • COLLEEN YOU, PUBLIC • VACANT, SPECIAL DISTRICT •

STAFF:

ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK

Each of the Sewer Maintenance Districts requires the establishment of a Sphere of Influence (SOI) from LAFCo, as these Districts currently lack any SOI designation.

The item before the Commission today is the adoption of a Provisional SOI for the Edgewood Sewer Maintenance District (ESMD). The proposed SOI for Edgewood SMD is coterminous to its current boundaries, or “status quo”. The district has no plans to expand beyond its existing borders.

Establishment of a Provisional Sphere of Influence for Edgewood Sewer Maintenance District

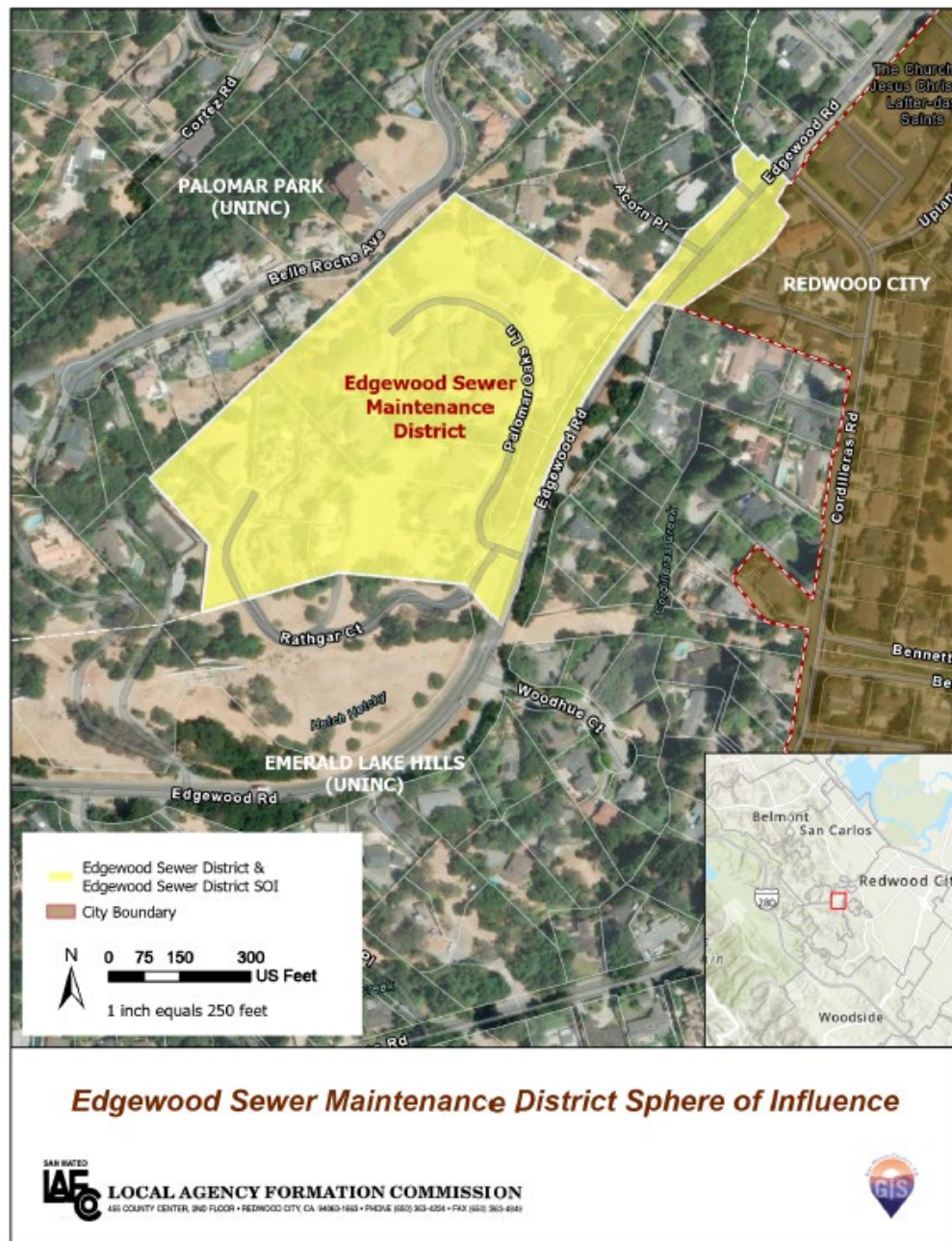
Today, we consider the establishment of a provisional SOI for Edgewood Sewer Maintenance District (ESMD), the newest of the ten County-governed sewer districts. In January 2004, the County Board of Supervisors established the Edgewood SMD for the purpose of providing sewer services to the properties in the new subdivisions, “Edgewood Estates” and the “Rathgar Court Subdivisions”. Edgewood SMD is administered by the County of San Mateo Public Works Department and governed by the San Mateo County Board of Supervisors. The property owners in the district financed the construction of the district. As an enterprise district, the primary revenue source is sewer fees that are assessed on the property tax bill of parcels within the District.

The District’s sewer connection facilities/structures are connected to Redwood City (City). The City provides wastewater transmission and treatment facilities to the District. The District discharges effluent flows to the City’s manhole located in Edgewood Road at the intersection of Cordilleras Road. The location of the manhole was agreed to by both the City and the District.

The current boundaries of the 12.75 acre Edgewood SMD include 18 parcels in unincorporated San Mateo County’s Palomar Park neighborhood (see Figure 1). Edgewood SMD currently provides sewer services to 15 of the 18 parcels, as the other 3 parcels are currently vacant. If these parcels were to connect to ESMD, they are already within the District and no LAFCo action would be required. ESMD does not provide service outside of the District’s boundaries.

The Provisional SOI for Edgewood SMD is proposed to be coterminous with the existing boundaries. The Provisional SOI would next be reviewed in the FY2028-29 MSR/SOI review cycle.

Figure 1. Edgewood Sewer Maintenance District Sphere of Influence Map



In adopting an SOI amendment, Section 56425(e) of the Cortese-Knox-Hertzberg Act requires that the Commission consider the following factors and prepare a written statement of determination with respect to each of the following:

1) The present and planned land uses in the area, including agricultural and open-space lands: Land use within the Edgewood SMD is low density residential. The existing boundaries do not include any open space or agricultural lands.

2) The present and probable need for public facilities and services in the area: There will be continued need to provide sewer service within the boundaries of Edgewood Sewer Maintenance District. Within the proposed SOI there are a total of 18 parcels and 15 are receiving sewer services from the District. These areas are within unincorporated San Mateo County. The plan, as stated in the district's founding resolution, is for these properties to eventually annex to the City of San Carlos.

3) The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide: The County Department of Public Works staff has confirmed that Edgewood SMD is able to continue providing sanitary sewer services to the parcels within its boundary and the proposed SOI. The District's present capacity for public facilities and services is adequate.

4) The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency: None.

5) Present and probable need for water, wastewater, and structural fire protection facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence: There are no disadvantaged unincorporated communities (DUCs) within the proposed Edgewood SMD sphere of influence.

Background

Previous Annexation Process

San Mateo County currently operates ten sewer districts (i.e. Dependent Districts). Three of these districts were formed as County Sanitation Districts¹ and seven were formed as Sewer Maintenance Districts².

The County Sanitation Districts include: the Crystal Springs County Sanitation District (est. 1947), Scenic Heights County Sanitation District (est. 1949), and the Devonshire County Sanitation District (est. 1956). These districts provide sewer services to properties in the unincorporated bayside area and have agreements with neighboring cities for transmission and treatment of wastewater generated within the District boundaries.

¹ Enabling act: Section 4700 et seq. of the CA Health and Safety Code

² Enabling act: Section 4860 et seq. of the CA Health and Safety Code or Section 5820 et seq. of the CA Streets and Highways Code

Historically, San Mateo LAFCo has reviewed County Sanitation District actions the same as cities and other districts under LAFCo jurisdiction; establishing Spheres of Influence (SOIs) and processing boundary changes.

The seven other sewer districts operated by San Mateo County were formed as Sewer Maintenance Districts: the Burlingame Hills Sewer Maintenance District (est. 1935); Fair Oaks Sewer Maintenance District (est. 1938); Emerald Lake Heights Sewer Maintenance District (est. 1947); Harbor Industrial Sewer Maintenance District (est. 1951); Kensington Square Sewer Maintenance District (est. 1956); Oak Knoll Sewer Maintenance District (est. 1957); and Edgewood Sewer Maintenance District (est. 2004). These districts provide sewer services to properties in the unincorporated bayside area (and in the case of FOSMD, four incorporated cities) and have agreements with neighboring cities for the transmission and treatment of wastewater generated within the District boundaries.

Historically, Sewer Maintenance District boundary changes were processed by the County Department of Public Works (DPW) and then acted upon by the County Board of Supervisors as the governing body. In the case of Sewer Maintenance District annexations, the County required two noticed public hearings and DPW was required to prepare the application materials, including a map and geographic description of the annexation area.

Revised Annexation Process

LAFCo staff, LAFCo Counsel, and County DPW staff reviewed the current process for County Sanitation Districts and Sewer Maintenance Districts and concluded that LAFCo assuming the responsibility of processing boundary changes for Sewer Maintenance Districts would be beneficial to the County and to applicants. DPW still reviews and comments on actions affecting sewer maintenance districts via the LAFCo referral process, following a similar process for reviewing engineering documents. The DPW review is important, as DPW must determine if it has sufficient treatment capacity to allocate to any additional development (i.e. annexations), and whether any action is aligned with pertinent district principle act guidelines. DPW still sends any required agreements to the BOS for approval.

Sewer service has been a part of many recent LAFCo discussions and reports over the last few years as cities are determining how to achieve their state-mandated Regional Housing Needs Allocation (RHNA) numbers. As identified in the Municipal Service Reviews for these agencies, sewer service will likely be needed to meet service demand for many of the potential housing developments. Typically, private onsite septic systems are unable to accommodate increased density as they have restrictive capacity limits, require valuable lot space, and also experience failure.

Given the need to coordinate between multiple agencies regarding expanding public sewer services in San Mateo County, LAFCo staff and legal counsel reviewed CKH and determined it was

appropriate and within LAFCo authority³ to systematically review all proposed boundary changes to both County Sewer Districts and Sewer Maintenance Districts.

Under the new process, LAFCo is the conducting authority for boundary changes (e.g. annexations, detachments, etc.) to the following sewer agencies:

The Burlingame Hills Sewer Maintenance District (est. 1935); Fair Oaks Sewer Maintenance District (est. 1938); Emerald Lake Heights Sewer Maintenance District (est. 1947); Harbor Industrial Sewer Maintenance District (est. 1951); Kensington Square Sewer Maintenance District (est. 1956); Oak Knoll Sewer Maintenance District (est. 1957); and Edgewood Sewer Maintenance District (est. 2004)

Annexations must be consistent with an agency's SOI —the probable physical boundaries of a service area—in reviewing application for annexation to the district, or any other actions, to ensure sewer services are logically extended. With the revisions to the annexation process, LAFCo will be the conducting authority for annexation applications into County Sewer Maintenance Districts (i.e. dependent districts). It is necessary to assign Spheres of Influence for each District.

California Environmental Quality Act: The establishment of a Sphere of Influence is categorically exempt from the environmental review requirements of the California Environmental Quality Act (CEQA) under Section 15303, Class 6, which allows for basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. The Sphere of Influence collects data for the purpose of evaluating municipal services provided by an agency. There are no land use changes or environmental impacts created by this study. Any future annexation proposals will be reviewed when they come before LAFCo.

The Sphere of Influence is also exempt from CEQA under the section 15061(b)(3), the common-sense provision, which states that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it is certain that the activity will have no possible significant effect on the environment, the activity is exempt from CEQA.

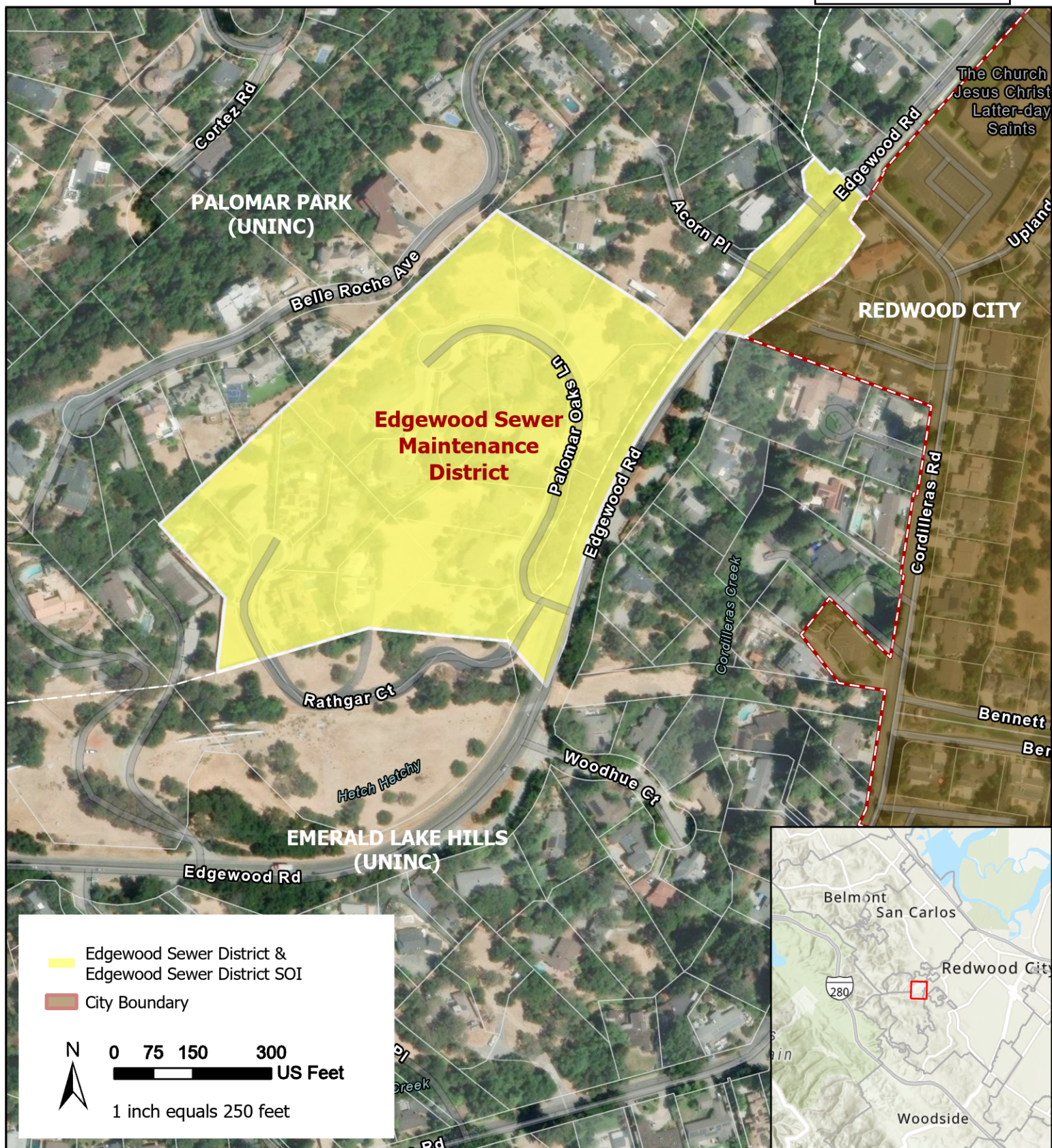
Recommended Commission Action

By resolution, approve the Provisional Sphere of Influence for the Edgewood Sewer Maintenance District.

Attachments

- A. Sphere of Influence Map for Edgewood Sewer Maintenance District
- B. Resolution No. 1359

³ Relevant CKH chapters include: **56036.5.** (a), **56036.6.** (a-b), **56100.** (a-b), and **56119.**
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Edgewood Sewer Maintenance District Sphere of Influence



LOCAL AGENCY FORMATION COMMISSION

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RESOLUTION NO. 1359

**RESOLUTION OF THE LOCAL AGENCY FORMATION COMMISSION
OF THE COUNTY OF SAN MATEO
MAKING DETERMINATIONS PURSUANT TO GOVERNMENT CODE
SECTION 56425 ESTABLISHING A PROVISIONAL SPHERE OF INFLUENCE FOR THE EDGEWOOD
SEWER MAINTENANCE DISTRICT**

RESOLVED, by the Local Agency Formation Commission of the County of San Mateo, State of California, that:

WHEREAS, the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, set forth in Government Code Section 56000 et seq., governs the organization and reorganization of cities and special districts by local agency formation commissions established in each county, as defined and specified in Government Code Section 56000 et seq.,

WHEREAS, Government Code Section 56425 et seq. requires the Local Agency Formation Commission (LAFCo or Commission) to develop and determine the sphere of influence of each local governmental agency within the County; and

WHEREAS, the Executive Officer prepared a written report of the Establishment of a Provisional Sphere of Influence for the Edgewood Sewer Maintenance District that was provided to the Commission and affected agencies; and

WHEREAS, the Executive Officer set a public hearing date for September 16, 2026 for the consideration of the Establishment of a Provisional Sphere of Influence for the Edgewood Sewer Maintenance District and caused notice thereof to be posted, published and mailed at the times and in the manner required by law at least twenty-one (21) days in advance of the date; and

WHEREAS, the Commission heard and fully considered all the evidence presented at a public hearing held on September 16, 2026; and

WHEREAS, a public hearing by this Commission was held on the report and at the hearing this Commission heard and received all oral and written protests, objections and evidence which were made, presented or filed, and all persons present were given an opportunity to hear and be heard with respect to the proposal and the Executive Officer's report; and

WHEREAS, the Commission is required pursuant to Government Code Section 56425 and local Commission policy to make statement of written determinations with regards to the following factors:

1. The present and planned land uses in the area, including agricultural and open-space lands.

Land use within the Edgewood SMD is low density residential. The existing boundaries do not include any open space or agricultural lands.

2. The present and probable need for public facilities and services in the area.

There will be continued need to provide sewer service within the boundaries of Edgewood Sewer Maintenance District. Within the proposed SOI there are 18 total parcels, 15 of which are currently receiving sewer services. These areas are within unincorporated San Mateo County. The plan, as stated in the district's founding resolution, is for these properties to eventually annex to the City of San Carlos. The County Department of Public Works staff has confirmed that Edgewood SMD is able to continue providing sanitary sewer services to the parcels within its boundary and the proposed SOI.

3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.

The County Department of Public Works staff, which operates Edgewood SMD, has confirmed that Edgewood SMD is able to provide sanitary sewer services to the parcels within its boundary and the proposed SOI. The District's present capacity for public facilities and services is adequate.

4. The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.

None.

5. For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to Section 56425(g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

There are no disadvantaged unincorporated communities within the proposed provisional Edgewood SMD SOI.

WHEREAS, the establishment of a Sphere of Influence is categorically exempt from the environmental review requirements of the California Environmental Quality Act (CEQA) under Section 15303, Class 6, which allows for basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. The Sphere of Influence collects data for the purpose of evaluating municipal services provided by an agency.

The Sphere of Influence also is exempt from CEQA under the section 15061(b)(3), the common-sense provision, which states that CEQA applies only to projects which have the potential for causing a significant effect on the environment and where it is certain that the activity will have no possible significant effect on the environment, the activity is exempt from CEQA; and

NOW, THEREFORE, the Local Agency Formation Commission of the County of San Mateo DOES HEREBY RESOLVE, DETERMINE AND ORDER as follows:

Section 1. By Resolution, the Commission accepts the Executive Officer's Report dated September 9, 2026, Provisional Sphere of Influence for the Edgewood Sewer Maintenance District, and all written comments and attachments incorporated herein and contained in attached "Exhibit A."

Regularly passed and adopted this ____ day of ____.

Ayes and in favor of said resolution:

Commissioners:

Noes and against said resolution:

Commissioners Absent and/or Abstentions:

Commissioners:

Chair
Local Agency Formation Commission
County of San Mateo
State of California

ATTEST:

Executive Officer
Local Agency Formation Commission

Date: _____

I certify that this is a true and correct copy of the resolution above set forth.

Date: _____

Clerk to the Commission
Local Agency Formation Commission

SAN MATEO



LOCAL AGENCY FORMATION COMMISSION

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September 9, 2026

To: LAFCo Commissioners
From: Rob Bartoli, Executive Officer
Subject: Appointment of Alternate Public Member

Summary

Section 56334 of the Cortese-Knox-Hertzberg (CKH) Act sets forth that LAFCo terms shall be four years ending on the first Monday in May, with the provision that members shall serve until their replacement is appointed. Currently, the alternate public member position is vacant. Pursuant to LAFCo policy, staff distributed and posted a notice of the vacancy dated April 10, 2026 requesting submittal of applications for the position by May 29. Notices were distributed by mail to cities, special districts, and the County. The announcement was also posted on social media reaching San Mateo County residents.

Chair Chang Kiraly and Commissioners Canepa and Wright served on the Alternate Public Member Recruitment Committee to interview applicants. In response to the notice, LAFCo received two applications. After conducting interviews and careful consideration of the applications, the Committee unanimously recommends Mark Massara to be appointed as the alternate public member based on his broad professional experience as an environmental and land use attorney; serving as member and chair of numerous nonprofits organizations; and his understanding of planning, coastal zone, and LAFCo related issues.

Government Code Section 56325(d) requires an affirmative vote from the majority of the Commission, including an affirmative vote from at least one each of the County, City, and Special District members to appoint a public member.

Recommended Commission Action

By motion, make an appointment to the LAFCo Alternate Public Member position with a term ending in May 2030.

Attachment

A. Application from Mark Massara

COMMISSIONERS: VIRGINIA CHANG KIRALY, CHAIR, SPECIAL DISTRICT • ANN DRAPER, VICE CHAIR, PUBLIC • KATHRYN SLATER-CARTER, SPECIAL DISTRICT • DAVID J CANEPA, COUNTY • DEBBIE RUDDOCK, CITY • STEPHEN RAINALDI, CITY • JACKIE SPEIER, COUNTY •

ALTERNATES: NOELIA CORZO, COUNTY • VACANT, SPECIAL DISTRICT • GREG WRIGHT, CITY • VACANT, PUBLIC

STAFF: ROB BARTOLI, EXECUTIVE OFFICER • SARAH FLAMM, MANAGEMENT ANALYST • TIM FOX, LEGAL COUNSEL • DIANE ESTIPONA, CLERK



SAN MATEO LAFCO
LOCAL AGENCY FORMATION COMMISSION

455 County Center, 2nd Floor
Redwood City, CA 94063
Phone: 650-363-4224 Fax: 650-363-4849
www.sanmateolafco.org

Application for Public Member and Alternate Public Member of the Commission

Information provided on this application is public information and may be made available to other applicants, members of the press, or the general public.

Application for: Public Member ☐ Alternate Public Member ☒ Either Position ☐

Name: Mark Massara **Phone:** _____

Address: _____ **Email:** _____

Present Employer: Law Offices of Mark Massara **Position:** Principal Lawyer

Work Address: _____ **Work Phone:** _____

How long have you resided in San Mateo County? 8 years / 35 years Bay Area

Educational Background:

USF '87 (JD)
UCSD '84 (BA)

Employment and/or Professional Experience:

35 years environmental and land use law representing land owners, nonprofit organizations and Special Districts related to complicated real estate acquisition and sales, compliance, permitting and enforcement issues. All teach and lecture re: Coastal Law, Science & Policy

Civic Activities (Please include any present or past membership on county or city boards, committees, as well as participation in the activities of community groups or organizations.)

Am a donor to numerous nonprofit organizations including POST, Sierra Club, Surfrider Foundation and Me Water Foundation, am President of Oceans4All and past President and Board member of CA CoastWalk.

Would you be available to attend daytime meetings? yes

Why are you seeking this appointment? (Please include in your response any **qualifications/special interests** related to this position that may not have been covered in your previous responses.)

I can help LAFCO with the implementation of CKH Act and would like to assist Cities and Special Districts with an eye toward preservation of natural resources as we strive to create communities that are affordable, offer high quality lifestyles and attract diverse populations, particularly young people.

Have you attended any meetings of the Commission? only virtual

How did you become aware of the recruitment? via the smcgov.org website

Date: May 28, 2026

Your Signature

In addition to completing this application, you may attach a resume if you wish.

This application will remain on file for at least one year from the date of receipt.

Please return via email to Rob Bartoli at rbartoli@smcgov.org, or send to:

Rob Bartoli, Executive Officer
San Mateo LAFCo
455 County Center, 2nd Floor
Redwood City, CA 94063

Please respond no later than **Monday, June 30, 2025 at 5:00pm** for your application to be considered.

Thank you for your interest in LAFCo

Mark A. Massara

Strategic Advocacy, Government Relations, Real Property, Land Use & Environmental Resource Conservation, Sustainability & Social Responsibility



Profile

Private Attorney specializing in maximizing economic value & natural resource protection, sustainability strategies and wise land use, water quality, recreation and conservation development projects for corporate entities, nonprofit organizations, government agencies and individuals.

Experience

Law Offices of Mark A. Massara
San Mateo, CA.

2001-Present

Strategic representation of private interests, government agencies and nonprofit entities regarding coastal conservation and development of real property with focus on maximizing economic benefits resulting from environmental initiatives and protections.

General Counsel & Vice President of Social Responsibility,
O'Neill Wetsuits, LLC, Santa Cruz, CA.

2010-2021

Oversaw and coordinated diverse corporate legal work for world's largest surf wear and neoprene manufacturer, including distribution, contracts, litigation management and conservation strategies promoting sustainability & efficiency projects around the world.

Director, Sierra Club Coastal Programs
San Francisco, CA.

1992-2009

Worked with public officials, media and local communities to develop conservation strategies for land use planning & development decisions. Published *CoastWatcher* newsletter & blog and directed Great Coastal Places community organizing program involving over 50,000 activists (<http://www.sierraclub.org/CA/coasts/>). Successfully coordinated testimony and arguments for over 1000 development proposals before California Coastal Commission.

Guest Lecturer

1989-Present

Developed programs on coastal law, science and policy for collegiate graduate and undergraduate courses, including Stanford Law School, California Western School of Law, UC Santa Barbara, and Cal Poly Humboldt and Cal Poly San Luis State University's.

General Counsel, Surfrider Foundation
San Clemente, CA.

1988-1992

Worked to grow environmental organization from 300 to 50,000 members through initiation of clean beaches campaigns, including prosecution of the largest Clean Water Act enforcement action ever, resulting in \$100 million settlement resolving over 40,000 water pollution violations at a surfing beach in Humboldt County CA (*Surfrider Foundation v. Louisana-Pacific Corp. & Simpson Paper Company*).

Education

University of San Francisco, School of Law, J.D., 1987
University of California San Diego, Political Science, Economics & Philosophy,
B.A. 1984

Skills, Affiliations & Honors

Bold leader in field of corporate sustainable development, where financial achievements are realized through conservation efficiencies, resource protection initiatives and pioneering development strategies. Worked to develop a private recreational campground and implement permanent public resource protections on historic 3700-acre El Capitan Ranch in Santa Barbara County (www.elcapitancanyon.com/), and on numerous other conservation development projects on ranches along California's Central Coast. President of Oceans4All (www.oceans4all.org). Intimately involved in major coastal land use decisions on California coast in last 15 years, including deliberations imposing over \$100 million in mitigation from San Onofre Nuclear Generation Station, development and preservation of the Bolsa Chica & Ballona wetlands, development and conservation of Hearst Ranch and Pebble Beach Company's Del Monte Forest, strategic initiatives for protection and acquisition of wetlands, endangered species habitat and projects involving fiber optic cables, desalination facilities, tidal and wind energy. power plants and municipal wastewater treatment operations, offshore oil & gas and liquid natural gas terminals. Co-creator of California Coastal Records website (www.californiacoastline.org) an aerial survey of the California coast used by planners, activists, developers and decision-makers.

Recognized by Smithsonian Institute's Ocean Planet as an "Ocean Hero"
https://seawifs.gsfc.nasa.gov/OCEAN_PLANET/HTML/ocean_planet_heroes.html
See also, <https://www.stickylawyers.com/surfer-coastal-conservation-lawyer-mark-massara/>

Referrals

Joe Cotchett, Founder of www.cpmlegal.com Burlingame CA
<https://www.cpmlegal.com/professionals-joseph-cotchett-renowned-trial-attorney>

Steve Blank, serial entrepreneur, professor, former Member, California Coastal Commission (<http://steveblank.com/>)

Roger Himovitz, Conservation Developer & Owner, Dos Pueblos Institute, former owner El Capitan Canyon Campground, Santa Barbara CA
www.dospueblosinstitute.org

Amy Forbes, Co-Chair Land Use Practice Group, Gibson, Dunn & Crutcher,
<https://www.gibsondunn.com/lawyer/forbes-amy-r/>

Patrick O'Neill, President & CEO, O'Neill Wetsuits, LLC (www.oneill.com)

 and
http://en.wikipedia.org/wiki/Mark_Massara

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LOCAL AGENCY FORMATION COMMISSION

455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849

September 9, 2026

To: LAFCo Commissioners

From: Rob Bartoli, Executive Officer

Subject: CALAFCO Update - Information Only

Summary

The CALAFCO 2026 annual conference will be held in Sacramento from October 21-23. The adopted FY 2026-27 LAFCo Budget allows for eight LAFCo Commissioners and staff to attend the CALAFCO conference and currently eight commissioners and staff are registered: Commissioners Chang Kiraly, Canepa, Rainaldi, Wright, and Slater-Carter and Executive Officer Bartoli, Management Analyst Flamm and Clerk Estipona.

In addition, the nominations for the CALAFCO Board of Directors is now closed. At the July LAFCo meeting, San Mateo LAFCo nominated Chair Chang Kiraly for election to one of the 2-year term positions from the Coastal Region. It is anticipated that the full candidate roster will be released in mid-September.

Recommendation

Receive the report.

COMMISSIONERS: VIRGINIA CHANG KIRALY, CHAIR, SPECIAL DISTRICT ▪ ANN DRAPER, VICE CHAIR, PUBLIC ▪ KATHRYN SLATER-CARTER, SPECIAL DISTRICT ▪ DAVID J CANEPA, COUNTY ▪ DEBBIE RUDDOCK, CITY ▪ STEPHEN RAINALDI, CITY ▪ JACKIE SPEIER, COUNTY ▪

ALTERNATES: NOELIA CORZO, COUNTY ▪ VACANT, SPECIAL DISTRICT ▪ GREG WRIGHT, CITY ▪ VACANT, PUBLIC

STAFF: ROB BARTOLI, EXECUTIVE OFFICER ▪ SARAH FLAMM, MANAGEMENT ANALYST ▪ TIM FOX, LEGAL COUNSEL ▪ DIANE ESTIPONA, CLERK

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September 9, 2026

To: LAFCo Commissioners

From: Rob Bartoli, Executive Officer

Subject: Fiscal Year 2025-26 Year End and Fiscal Year 2026-27 Quarterly LAFCo Budget Update - Information Only

Summary

The intent of the year end and quarterly financial reports is to provide the Commission with an update on how LAFCo performed financially in the previous fiscal year and quarter as compared to the adopted budget and to discuss any issues as appropriate. The practice was recommended during a previous audit as an additional safeguard to ensure sound financial management. In accordance with LAFCo Fiscal Policies and Procedures, the Commission adopts the final budget and is authorized to make adjustments as appropriate.

End of Year Report for FY 2025-26

Revenue

Overall, LAFCo revenues for FY2025-26 totaled \$939,639, slightly over the budgeted amount of \$923,821. LAFCo received \$32,160 in application fees out of a budgeted amount of \$30,000.

Expenditures

LAFCo expenditures totaled \$790,146 compared to a budgeted amount of \$828,897 (95%). Higher than expected costs include expenditures for telephone charges, insurance, and audit costs, however sufficient funds were available for these costs.

The carryover funds will be allocated to the reserve fund until the next budget process commences. The ending fund balance for FY 26-27 is \$225,667.

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Year to Date Report for FY 2026-27

Revenue

LAFCo has received approximately 75% of the 1/3 apportionment from member agencies. Application revenue to date is \$7,176.

The carryover fund balance from FY 25-26 was \$225,667.

Expenditures

LAFCo is within budget for all expenditures for FY 26-27.

Recommended Commission Action

Receive the budget update.

Attachments

- A. LAFCo FY 25-26 Budget Actuals
- B. LAFCo FY 26-27 Year to Date

LAFCo FY 25-26 Budget Actuals

LAFCo	Budget	Adopted FY 25-26	Final Actuals FY 25-26	Percent Expended
	Revenues			
1983	County Contribution	240,299	240,299	100%
1992	City Contributions	240,299	240,299	100%
1992	Special District Contributions	240,299	240,299	100%
	Sub-Total County/City/District Contributions	720,897	720,897	100%
2421	Application Fees	30,000	32,160	107%
2600	Miscellaneous Revenue	0	0	0%
1521	Interest	8,000	21,658	271%
	Fund Balance Offset	164,924	164,924	100%
	Total Revenues	923,821	939,639	102%
	Expenditures			
4111	Salary & Benefits for Executive Officer and Management Analyst	527,562	538,608	102%
4141	Admin. Leave Cash Out	13,500	13,252	98%
4161	Commissioner Compensation	5,000	5,000	100%
4628	Wellness Dividend	500	0	0%
4512	Workers Compensation Experience	500	38	8%
4000	SALARIES & BENEFITS SUBTOTAL	547,062	556,898	102%
5132	Internet/Communications	1,200	1,006	84%
5191	Outside Printing (other special printing)	1,000	0	0%
5193	General Office Supplies	700	595	85%
5196	Photocopy - in-house copier	600	580	97%
5197	Postage & Mailing Service	1,000	151	15%
5211	Computer Supplies	500	0	0%
5212	Computer Equipment under \$5,000	2,500	0	0%
5215	Software License	0	0	0%
5218	Corovan Records Storage	700	308	44%
5234	Office Furniture/Equipment	7,500	0	0%
5331	Memberships (CALAFCO/CSDA)	16,000	14,793	92%
5341	Legal Advertising	3,000	573	19%
5443	Signage	600	205	34%
5712	Mileage Allowance	1,000	0	0%
5721	Meetings & Conferences	20,000	14,773	74%
5733	Training	300	0	0%
5814	Fiscal Office Specialist	2,025	2,021	100%
5838	.5 FTE LAFCo Clerk	69,998	66,936	96%
5842	Outside Auditing Services	11,000	14,963	136%
5848	Graphics	1,500	0	0%
5856	Consulting	0	0	0%
5858	Other Professional Contract Services (Recording of Meetings)	4,800	3,074	64%
5861	DPW/GIS Mapping/Scanning	9,000	8,574	95%
5866	Fingerprinting new employee	0	0	0%
5872	Controller Admin	10,000	931	9%
5969	Other special dept expense	100	300	300%
5000	SERVICES & SUPPLIES SUBTOTAL	165,023	129,783	79%
6705	Accounting Software	0	0	0%
6706	Accounts Payable Software	0	0	0%
6712	Telephone	900	1,095	122%
6713	TSD (Automation Services)	8,000	7,995	100%
6714	Rent	20,737	20,737	100%
6717	Motor Pool	0	0	0%
6725	Gen'l Liability	10,000	11,567	116%

LAFCo	Budget	Adopted FY 25-26	Final Actuals FY 25-26	Percent Expended
6727	Bond Insurance	85	74	87%
6732	County Attorney's Office	70,000	18,819	27%
6733	Human Resources	100	75	75%
6738	Countywide Security	190	189	99%
6739	All Other Charges (Accounting Software)	650	129	20%
6751	Card key services	250	205	82%
6752	TSD Software Licenses	1,300	1,363	105%
6758	TSD Support Service	4,600	4,299	93%
6821	A 87 Charges/County Cost Allocation	0	36,918	N/A
6000	OTHER CHARGES SUBTOTAL	116,812	103,465	89%
	Subtotal Appropriations	828,897	790,146	95%
8612	Reserve	94,924	0	0%
	Special Reserve	0	0	0%
	Total Appropriations Budget	923,821	790,146	86%
	Fund Balance			
3333	Fund Balance	217,948	225,667	104%

LAFCo FY 26-27 Year to Date

LAFCo	Year to Date FY 2026-27 (As of 9/8/26)	Adopted FY 26-27	Expenditures YTD FY 26-27
	Revenues		
1983	County Contribution	295,023	295,023
1992	City Contributions	295,023	139,589
1992	Special District Contributions	295,023	139,589
	Sub-Total County/City/District Contributions	885,070	574,201
2421	Application Fees	20,000	7,176
2600	Miscellaneous Revenue	2,000	0
1521	Interest	10,000	0
	Fund Balance Offset	120,000	120,000
	Total Revenues	1,037,070	701,377
	Expenditures		
4111	Salary & Benefits for Executive Officer and Management Analyst	580,615	69,097
4141	Admin. Leave Cash Out	13,500	0
4161	Commissioner Compensation	5,000	700
4628	Wellness Dividend	600	0
4512	Workers Compensation Experience	600	0
4000	SALARIES & BENEFITS SUBTOTAL	600,315	69,797
5132	Internet/Communications	1,400	85
5191	Outside Printing (other special printing)	1,000	0
5193	General Office Supplies	800	0
5196	Photocopy - in-house copier	600	0
5197	Postage & Mailing Service	1,000	0
5211	Computer Supplies	500	0
5212	Computer Equipment under \$5,000	2,000	0
5215	Software License	0	0
5218	Corovan Records Storage	700	21
5234	Office Furniture/Equipment	8,000	0
5331	Memberships (CALAFCO/CSDA)	17,000	13,305
5341	Legal Advertising	2,500	0
5443	Signage	600	0
5712	Mileage Allowance	1,000	748
5721	Meetings & Conferences	26,000	6,820
5733	Training	300	0
5814	Fiscal Office Specialist	2,300	0
5838	.5 FTE LAFCo Clerk	77,000	0
5842	Outside Auditing Services	11,000	0
5848	Graphics	1,500	0
5856	Consulting	0	0
5858	Other Professional Contract Services (Recording of Meetings)	5,000	600
5861	DPW/GIS Mapping/Scanning	9,000	0
5866	Fingerprinting new employee	100	0
5872	Controller Admin	11,000	0
5969	Other special dept expense	1,000	0

LAFCo	Year to Date FY 2026-27 (As of 9/8/26)	Adopted FY 26-27	Expenditures YTD FY 26-27
5000	SERVICES & SUPPLIES SUBTOTAL	181,300	21,579
6705	Accounting Software	150	0
6706	Accounts Payable Software	400	0
6712	Telephone	1,000	93
6713	TSD (Automation Services)	8,600	1,378
6714	Rent	21,800	0
6717	Motor Pool	0	0
6725	Gen'l Liability	14,000	7,120
6727	Bond Insurance	85	0
6732	County Attorney's Office	60,000	0
6733	Human Resources	120	0
6738	Countywide Security	250	0
6739	All Other Charges (Accounting Software)	0	0
6751	Card key services	250	0
6752	TSD Software Licenses	1,400	174
6758	TSD Support Service	5,400	465
6821	A 87 Charges/County Cost Allocation	42,000	0
6000	OTHER CHARGES SUBTOTAL	155,455	9,230
	Subtotal Appropriations	937,070	100,606
8612	Reserve	100,000	0
	Special Reserve	0	0
	Total Appropriations Budget	1,037,070	100,606
	Fund Balance		
3333	Fund Balance	225,667	225,667

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September 9, 2026

To: LAFCo Commissioners

From: Rob Bartoli, Executive Officer
Sarah Flamm, Management Analyst

Subject: Legislative Report – Information Only

Summary

Legislative tracker

AB 184 (Assembly Committee on Budget) is the trailer bill for the State’s budget. In this bill, there is intent language committing the State to work with the County of San Mateo, cities within the County, and others on a solution to take effect in the 2027–28 legislative cycle related to in-lieu Vehicle License Fee (VLF). While the State has historically made counties and cities whole by reimbursing in-lieu VLF shortfalls through a special appropriation, only a portion of these funds have been allocated this year and for FY 2025–26, the VLF shortfall is approximately \$226 million to the County and cities.

Recommended Committee Action:

Receive the report.

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