

January 13, 2021

To:

LAFCo Commissioners

From:

Martha Poyatos, Executive Officer

Rob Bartoli, Management Analyst

Subject:

Adoption of Sphere of Influence for the San Mateo Resource Conservation District

Summary:

At the October 21, 2020 LAFCo meeting, the Commission reviewed and adopted the Final Municipal Service Review for the San Mateo y Resource Conservation District (RCD). As part of this approval, the Commission set November 18 to review the preliminary the Sphere of Influence (SOI) update for the District and set January 20, 2021 to adopt the SOI. LAFCo staff subsequently met with RCD regarding District boundaries and areas that could be included in the District's sphere and preliminary mapping analysis supporting inclusion of several areas. Staff recommends that the Commission open the public hearing on the sphere update and adopt the SOI determinations and amended SOI boundaries as detailed below.

Background

In 1972, LAFCos were given the power to establish spheres of influence for all local agencies under their jurisdiction. In response, San Mateo LAFCo proactively conducted sphere of influence studies and adopted spheres of influence for cities and special districts. Spheres of influence were studied again in 1985 and reviewed periodically after that. As defined by the Cortese-Knox-Hertzberg Reorganization Act of 2000 (CKH Act), LAFCo's governing law, "sphere of influence" means a plan for the probable physical boundaries and service area of a local agency, as determined by the commission (Government Code Section 56076).

The RCD collaborates with landowners and managers, technical advisors, local jurisdictions, government agencies, and others to protect, conserve and restore natural resources in coastal San Mateo County. Description of district activities and projects is covered later in this report.

COMMISSIONERS: WARREN SLOCUM, CHAIR, COUNTY • MIKE O'NEILL, VICE CHAIR, CITY • HARVEY RARBACK, CITY • DON HORSLEY, COUNTY

• JOSHUA COSGROVE, SPECIAL DISTRICT • RIC LOHMAN, SPECIAL DISTRICT • ANN DRAPER, PUBLIC

ALTERNATES: KATI MARTIN, SPECIAL DISTRICT • VACANT, CITY • JAMES O'NEILL, PUBLIC • DAVE PINE, COUNTY

STAFF: MARTHA POYATOS, EXECUTIVE OFFICER • TIM FOX, LEGAL COUNSEL • ROB BARTOLI, MANAGEMENT

ANALYST - ANGELA MONTES, CLERK

The District operates similar to a non-profit organization, in that it is primarily funded through grants and contracts. Many of its services and projects are driven by the availability of funding.

Existing Sphere of Influence

The original SMRCD boundaries encompassed agricultural lands in northern San Mateo County. Coastal areas (less publicly owned lands and developed areas) were added to district boundaries in two subsequent annexations in 1942 and 1946. In 1954 several subdivisions were detached from the District because at the time, the District's primary mission was soil conservation. Current District boundaries therefore have several "excluded pockets" but generally include western San Mateo County from the San Francisco-San Mateo County boundary to the Santa Cruz-San Mateo County boundary. The LAFCo adopted sphere of influence for the District is conterminous with District boundaries.

LAFCo Proposed Sphere of Influence

The existing SOI designation for SMRCD is coterminous with District boundaries which include areas of unincorporated San Mateo County and portions of San Mateo County watersheds that drain into the Monterey Bay National Marine Sanctuary and the James V. Fitzgerald Area of Special Biological Significance. As stated in Public Resources Code Section 9152, the lands to be included within a RCD are those typically for agricultural purposes, but other lands can be included to control runoff, land improvement, and to address soil erosion. As mentioned previously, there are several excluded pockets within the watersheds of the Marine Sanctuary and other watershed that flow into the Pacifica ocean that benefit from services provided by the District. These areas are located in the cities of Pacifica and Half Moon Bay and portions of the urbanized unincorporated Midcoast, and rural south coast. The inclusion of these pockets within the SOI would allow the District to annex these areas in the future and to obtain a portion of the existing property tax to support District's administrative services.

The following is a list of the areas that are currently excluded that staff is recommending be included within the District's SOI

- Portions of the City of Pacifica (Attachment B)
- Portions of Unincorporated Midcoast (including El Granada, Miramar, Montara, Moss Beach and Princeton) (Attachment C)
- Portions of the City of Half Moon Bay (Attachment C)
- Portions of Unincorporated South Coast (including Dearborn Park, La Honda, Loma Mar, Pescadero, Pescadero Creek County Park, Portola Redwoods State Park, and South Skyline) (Attachment D)

RCD is collaborating on projects that are both within and outside of its boundaries. These projects and actions are funded through grants or contracts and not through the use of the District's property tax. If the property tax base for the District is augmented by a future annexation, the District indicates that these funds would likely be used to support administrative functions for RCD that are not typically funded under grants.

The proposed inclusion of the identified islands would allow for a consistent boundary for the watersheds that flow into the Pacific Ocean. RCD staff has illustrated over a 15 year period from

2005 to 2020 (see Attachment E) that a number of projects carried out by the District have occurred in these excluded islands. The inclusion of these areas would better align the SOI with District services that occur on an on-going bases and that contribute to run-off and watershed issues.

RCD Proposed Sphere of Influence

RCD has requested that the SOI for the District be expanded beyond what LAFCo staff has proposed. The District requests that area along Skyline Boulevard, the San Francisco Public Utilities Commission (SFPUC) watershed lands, and the lands between Skyline Boulevard and Highway 280, including all of the Town Portola Valley and the majority of the Town of Woodside (Attachment F) be included in the District's sphere.

District staff has stated that the desire to include these lands in the SOI would allow for greater visibility of the District in these areas and potential could include additional programs and projects to be conducted in these areas if funding is available. In the memo to LAFCo (Attachment G), RCD staff presents several additional reasons to expand the SOI of the District:

- More accurately represent what the District is, where it provides services, whom it benefits, and where benefits accrue;
- Help the District prioritize and include additional areas for services, funding, and other resources;
- Better enable the District to address threats and provide services at an appropriate scale (e.g. climate change, wildfire, species extinction, water pollution);
- Provide a deeper bench from which to recruit board members;
- Enable the District to access additional funding sources to serve constituents and the lands in the areas proposed for inclusion; and
- Enable the District to pursue an expanded stable funding base, reducing dependence on uncertain grants and increasing the financial security of the District to continue its services.

The District indicates that RCD has played a secondary role in projects on SFPUC lands and as primary contractor for the County on run-off issues related to horse stables in Woodside.

It should be noted that if publicly owned lands such as SFPUC or Midpeninsula Open Space District were annexed to the District, there would not be an increase in property tax as the publicly owned land is exempt from property tax. Also, it is likely that any annexation of lands along Sklyline Boulevard and Highway 280 would be considered inhabited and would be subject to registered voter protest and possibly an election.

Future Implementation of the Sphere

Once amended, the sphere could be implemented by the LAFCo by processing an annexation application submitted by resolution the RCD Board of Directors. This would include referral of the application out to affected agencies and would trigger a property tax negotiation in which the County would consult with the District regarding the share of one percent property tax to

be transferred by the County to the District. Annexations of inhabited areas require protest hearings and which could result in the annexation being finalized or a registered voter election on the annexation. Please see Annexation Flow Chart (Attachment H).

Enabling Legislation - Functions and Services

SMRCD operates according to Public Resources Code Sections 9000 et seq. and is authorized to: conduct surveys and research relating to conservation of resources, prevention and control measures and improvements needed; development and distribution of water¹; make improvements of land capabilities or conduct operations on public or private lands in furtherance of erosion control, water conservation and distribution, agricultural and wildlife enhancement, erosion stabilization, including but not limited to terraces, ditches, levees, and dams or other structures and the planting of trees, shrubs, grasses or other vegetation; and provide public education and technical assistance. As a public resource agency, the District does not have regulatory power, but is designated by the County Grading Ordinance adopted by the Board of Supervisors to review certain applications for grading permit exemptions related to development in unincorporated areas.

Sphere of Influence Determination

LAFCo is required to make five written determinations when establishing, amending, or updating an SOI for any local agency that address the following (§56425(e)):

- 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.

The following are the proposed determinations and recommendations for the SMRCD SOI:

The present and planned land uses in the area, including agricultural and open-space lands.

Determination

At this time the RCD's territory, which includes most of the unincorporated areas of San Mateo County along with portions of six cities, is not projected to experience significant development or population growth. The District includes over 157,000 acres of mostly rural, agricultural, and open space lands in the western half of the County and includes significant portions of all

¹ While SMRCD does assist landowners with the development of water sources, the District is not a public water provider nor does it distribute water. As such, this is function is considered an inactive power

watersheds in San Mateo County draining into the Monterey Bay National Marine Sanctuary. The areas recommended for inclusion in the sphere include portions of the cities of Pacifica and Half Moon Bay and the urbanized areas of the unincorporated midcoast.

In the majority of the unincorporated areas, the San Mateo County Planning Department has designated the lands as Agriculture, Open Space, or Timber Production. These three general plan designations limit the amount of development that can occur within these areas. Almost all of the territory is within the coastal zone, which further restricts potential development. The SOI update will have no change on present or planned land uses.

The present and probable need for public facilities and services in the area

Determination

The majority of demand for District services occurs in the rural, coastal zone consisting of the County's agricultural district, including significant crop and grazing lands as well as watersheds. While population growth in these areas is limited, changes in land use in the region in general, including recreational uses, will continue to impact the need for watershed and soil conservation. It is not anticipated that there will be a decline in the demand for the District's services.

The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.

Determination

The RCD provides natural resource conservation services throughout San Mateo County. LAFCo staff has no concerns regarding the District's capacity to provide services, or the adequacy of District services. Several partner agencies submitted letters during the comment period for the adopted MSR attesting to the value of the services and programs that the District provides. SMRCD currently maintains a multitude of partnerships (with private individuals, businesses, farmers, ranchers, non-profit organizations, special districts, and government agencies) in order to share services, facilities, resources and expertise as appropriate.

These partnerships include contracts for service with the San Mateo County Parks Department and Office of Sustainability. In some cases, the County has provided matching funds for grants secured by RCD, while in other instances, the County has contracted with RCD to conduct projects on County land and provide outreach in the community.

The majority of the District's services are funded through grants or contracts. These grants and contracts are generally not very stable and reliable, which leaves the District with budgets and staffing levels that may fluctuate significantly from year to year. The District received approximately 0.0475 of the 1% property tax or approximately \$67,000 in the 2017-2018 fiscal year along with a \$200,000 San Mateo County contribution.

The SMRCD has been recognized as a statewide leader in providing resource conservation services. Additionally, the District has no near-term infrastructure or equipment needs that may impact its ability to provide services.

The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.

Determination

While there are no identified Disadvantaged Unincorporated Communities within the boundaries of the SMRCD, several activities that SMRCD undertakes do have direct impacts on a number of communities in the County, some of which have lower socioeconomic status. The District has specific projects and programs focused on underserved, low income and non-English speaking communities. RCD actions related to stormwater, water quality, and watershed management are programs that protect and enhance water resources for residents of the community, as well as native wildlife. The programs related to habitat enhancement and fire and forestry have positive impacts on the natural environment in communities that include lower socioeconomic residents.

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.

Determination

The RCD does not provide municipal water, sewer or structural fire protection services; therefore, this SOI determination does not apply, and Disadvantaged Unincorporated Communities are not an issue within the District's existing or proposed SOI.

California Environmental Quality Act

The SOI is categorically exempt from the environmental review requirements of the California Environmental Quality Act (CEQA) under Section 15303, Class 6, which allows for the of 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 SOI 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 SOI 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.

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

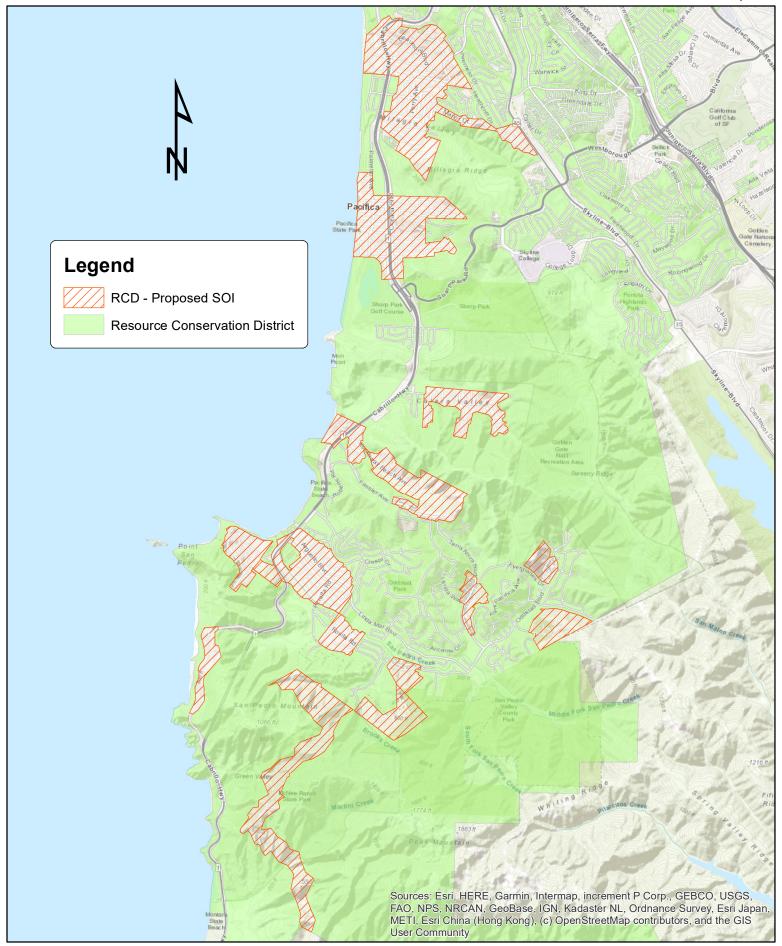
Recommendation

- 1) Open the public hearing and accept public comment; and
- 2) Adopt the recommended Sphere of Influence Determinations for the San Mateo Resource Conservation District; and
- 3) Adopt the Updated Sphere of Influence for the San Mateo Resource Conservation District as proposed by LAFCO staff; or

4) Adopt the Updated Sphere of Influence for San Mateo Resource Conservation District with additional territory as proposed by the District

Attachments:

- A. Existing boundary and sphere of influence map for SMRCD
- B. SOI map by LAFCo for RCD North Coast
- C. SOI map by LAFCo for RCD Midcoast Coast
- D. SOI map by LAFCo for RCD South Coast
- E. Map of RCD actions outside of District boundaries
- F. Proposed areas to include in SOI maps by SMRCD
- G. RCD Memo in Adoption of SOI dated 1/13/2021
- H. Annexation process chart for inhabited areas



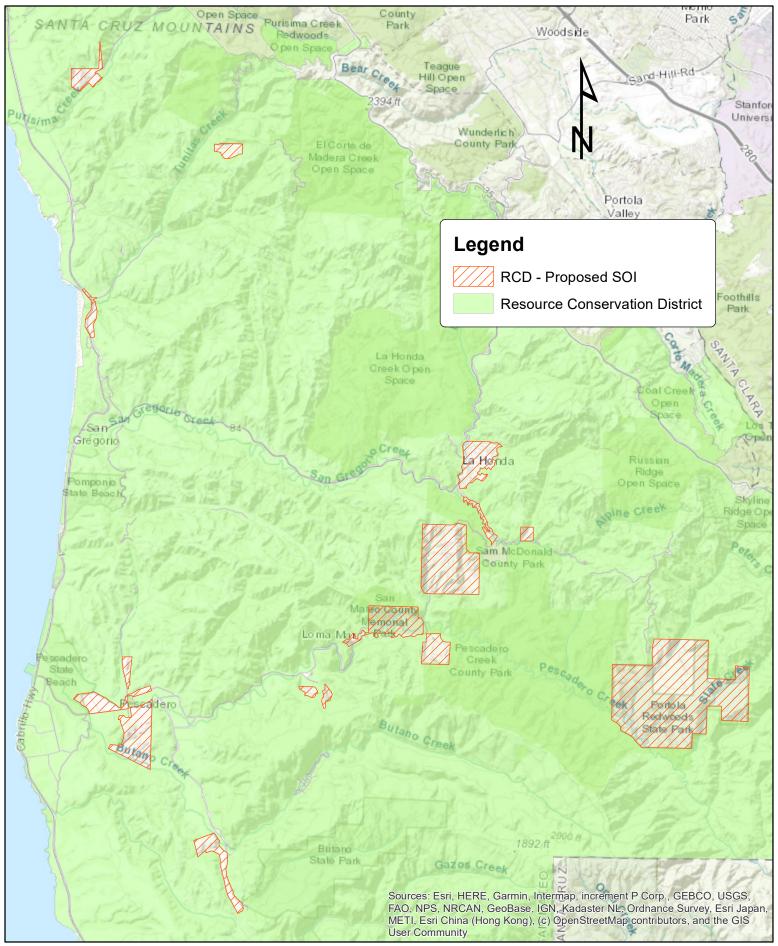
RCD - Proposed Sphere of Influence





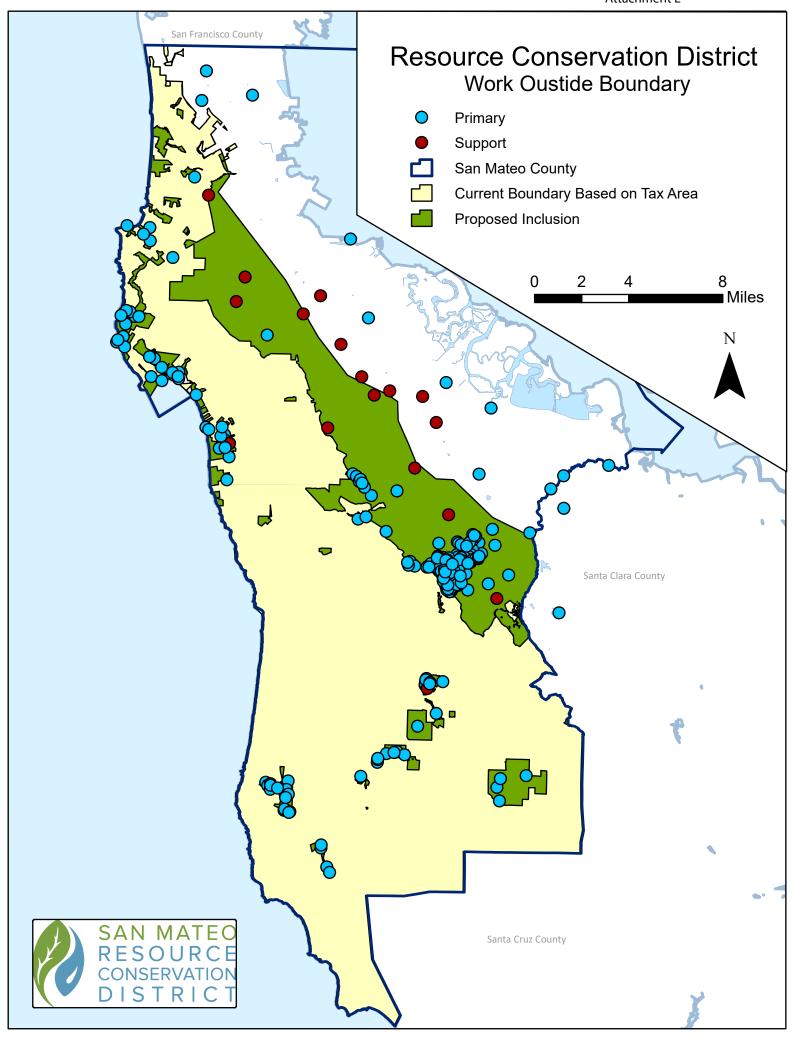
RCD - Proposed Sphere of Influence

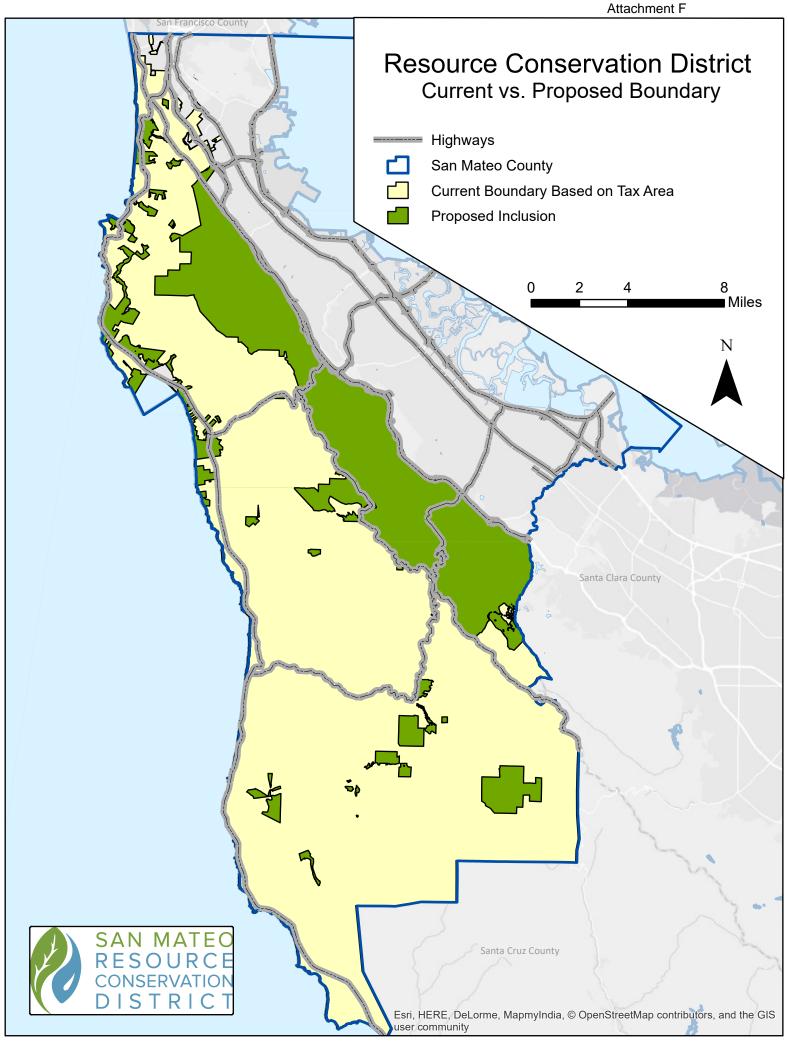




RCD - Proposed Sphere of Influence







MEMORANDUM

To: Martha Poyatos

Executive Officer, LAFCo

From: Kellyx Nelson

Executive Director, San Mateo Resource Conservation District

Date: January 13, 2021

Re: Information for Adoption of Sphere of Influence

Overview

This memorandum provides information for LAFCo as it considers adopting a revised Sphere of Influence for the San Mateo Resource Conservation District on January 20, 2021. It includes the following sections:

- What is a Resource Conservation District?
- What does the RCD do in San Mateo County?
- What is the RCD's unique role in environmental conservation?
- What priorities are addressed by the RCD?
- How are these services funded?
 - Figure 1: Property Tax Leverage
 - Figure 2: Funding for Services
 - Figure 3: Direct Services vs. Administration & Operations
- Why does the RCD proposed expanding its Sphere of Influence?
- What areas does the RCD propose for inclusion?
 - Map 1: Current vs. Proposed Boundary
 - Map 2: Work Outside Boundary
 - Map 3: Forest Health and Fire Program
 - Map 4: Wildland Urban Interface- Fire Threatened Communities
 - Map 5: Critical Linkages: Bay Area and Beyond
 - Map 6: Parcelization
 - Map 7: Stream Conservation Targets
 - Map 8: Stream Valleys and Headwater Source Areas
 - Map 9: Terrestrial Species at Risk

What is a Resource Conservation District?

The RCD in San Mateo County is one of nearly 100 conservation districts in California, and about 3,000 across the United States- almost one in every county nationwide. These districts serve as local hubs for conservation, connecting people with the technical, financial, and educational assistance they need to conserve and manage natural resources. RCDs work directly with landowners and other interests to ensure the resilience and health of water resources, soils, wildlife habitat, and beyond. Conservation districts coordinate assistance from all available sources—public and private, local, state, and federal—to develop locally-driven solutions to natural resource concerns.

What does the RCD do in San Mateo County?

In San Mateo County, the RCD is a boots-on-the-ground agency using very diverse tools. The District's work takes many forms:

- <u>Technical assistance</u> from experts on staff, partners, or consultants as needed. Examples: hydrologists, engineers, biologists, foresters, soil scientists.
- <u>Project implementation</u> on public and private lands. Examples: chipping and hauling services to
 help private landowners reduce risk of wildfire; modifying a County road to restore migration for
 endangered salmon; dredging a creek through State, County, and private properties to
 implement a wildlife-friendly flood control project; helping farmers upgrade water
 infrastructure to maximize conservation.
- <u>Trusted broker</u> coordinating across jurisdictions and land ownerships, leveraging local, state, federal, and private funding. Example: securing State and federal grants to repair a failing access road on County Parks property, coordinating project design and permitting, managing construction contracts, and overseeing construction—all in partnership with Parks staff.
- Outreach and education in various formats on a wide range of issues of concern to the community. Examples: on-farm tailgate workshops in Spanish for farmworkers about irrigation water conservation; workshops for equipment operators to learn best practices to protect forests, including operators from County and State Parks as well as local private construction businesses; outreach to pet owners regarding water quality pollution from pet waste; workshops for equestrians about how to compost manure; and assisting the County with outreach regarding sea level rise.
- <u>Financial assistance</u> via grants, cost-share programs, and other resources for RCD staff, partner organizations, and contractors to directly benefit the community.

What is the RCD's unique role in environmental conservation?

The RCD is uniquely positioned as an extremely nimble form of local government that has the benefits of government accountability and focus on service, while also retaining some of the flexibility and function of nonprofit organizations.

- The RCD is the only entity¹ in the county, public or private, that exists for the purpose of *helping people* help the land. RCDs work as a neutral party with constituents on a voluntary basis aiming for win-win solutions—a key reason they are trusted resources in the communities they serve.
- RCDs were designed to evolve with the changing needs of people and the land to support thriving communities, landscapes, and economies. In recent years this has enabled San Mateo RCD to bring resources and solutions for flooding, drought, fire, and climate change.
- The District partners closely with other environmental agencies and organizations, while not duplicating any of their work. The District often serves as a liaison across environmental

¹ The USDA's Natural Resources Conservation Service co-exists in a Local Partnership Office with the RCD to deliver this shared mission, hosted by the RCD as codified in a longstanding Memorandum of Understanding.

agencies and organizations that have a regulatory function, develop and implement policy, acquire and protect land as open space preserves, do environmental advocacy, or were formed for a specific environmental interest. The District is also able to integrate other community or landowner goals and values, such as agricultural production, public safety, economic security, business plans, equity and social justice, and more.

- As a governmental entity that is a subdivision of the State of California (Division 9 of the California Public Resources Code), the RCD is (1) subject to laws ensuring accountability and transparency; (2) reliable and enduring because it exists in statute; and (3) able enter into interagency agreements at all levels of government.
- Able to provide diverse services across jurisdictions and public and private lands, the RCD
 accomplishes on-the-ground environmental protection at landscape and regional scales.

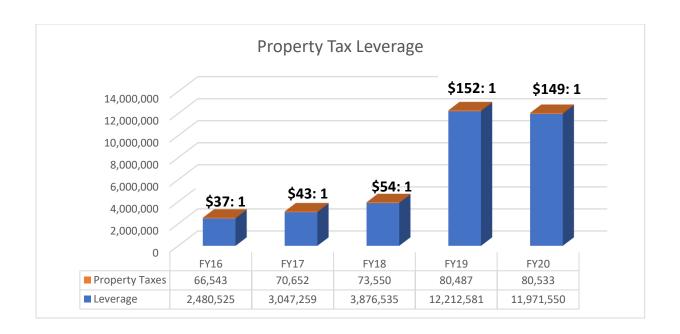
What priorities are addressed by the RCD?

The RCD currently provides comprehensive, integrated services addressing community needs and priorities regarding wildlife, water, climate, agriculture, and wildfire.

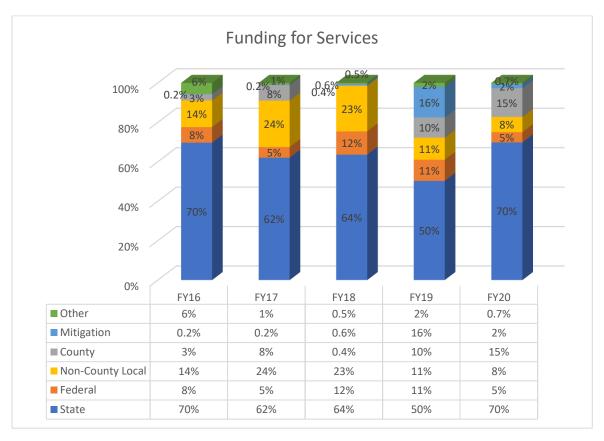
- Wildlife: restoring ecosystems and habitat with a focus on species at risk of becoming extinct
- <u>Water</u>: improving water conservation, water resource management, and water quality to help ensure clean and reliable water for people, wildlife, and agriculture
- <u>Climate</u>: removing greenhouse gases from the atmosphere, reducing emissions, and building critically needed resilience to extreme weather conditions for wildlife and the community
- <u>Agriculture</u>: helping ensure viable local agriculture while also helping agriculture be environmentally beneficial
- <u>Wildfire</u>: reducing the risk of catastrophic fire, improving forest health, and healing the land after fire does occur

How are these services funded?

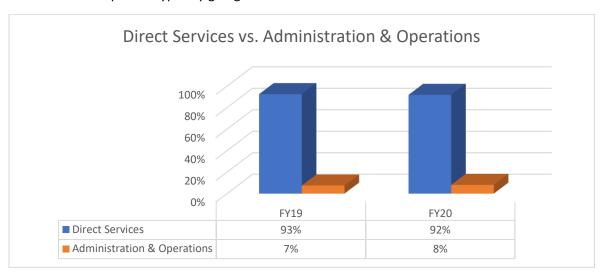
The San Mateo RCD leverages a small property tax base to bring diverse public and private funds via grants, interagency agreements, contracts for services, donations, etc. Per the table below, each dollar of property taxes paid by constituents over the last five fiscal years leveraged between \$37 and \$152. This amount does not include the extensive contributions of the USDA Natural Resources Conservation Service, which provides in-kind services and grant programs in the county at the RCD's invitation.



The following figure shows the sources of funding over the same time period. It highlights the substantial resources that the RCD brings into the county from outside sources, primarily State and federal.



As highlighted in the figure below, the vast majority of these funds go to direct services, with less than 10% of annual expenses typically going to District administration.



Why does the RCD propose expanding its Sphere of Influence?

An updated Sphere of Influence would:

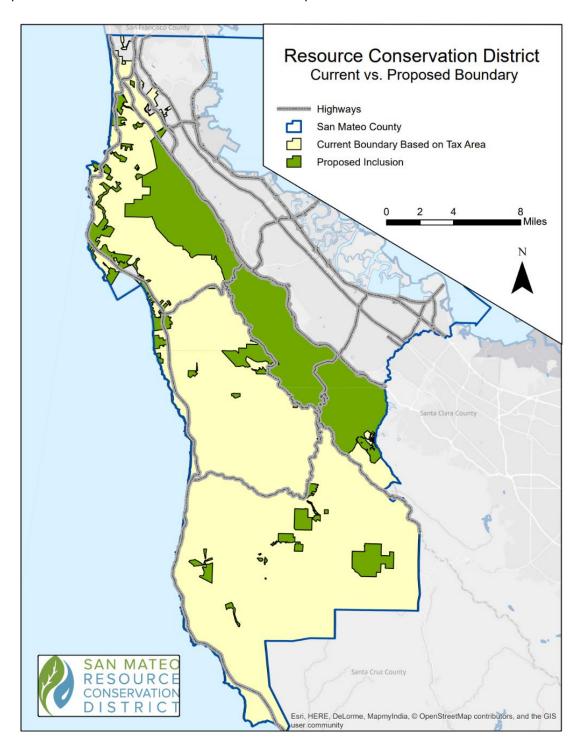
- more accurately represent what the District is, where it provides services, whom it benefits, and where benefits accrue;
- help the District prioritize and include additional areas for services, funding, and other resources;
- better enable the District to address threats and provide services at an appropriate scale (e.g. climate change, wildfire, species extinction, water pollution);
- provide a deeper bench from which to recruit board members;
- enable the District to access additional funding sources to serve constituents and the lands in the areas proposed for inclusion; and
- enable the District to pursue an expanded stable funding base, reducing dependence on uncertain grants and increasing the financial security of the District to continue its services.

What areas does the RCD propose for inclusion?

The District proposes closing the "doughnut holes," areas within the District geographically that are not included within its boundaries, and generally extending the eastern boundary to Highway 280. This proposal is denoted on the following map, "Current vs. Proposed Boundary." The District made this determination based on the following criteria:

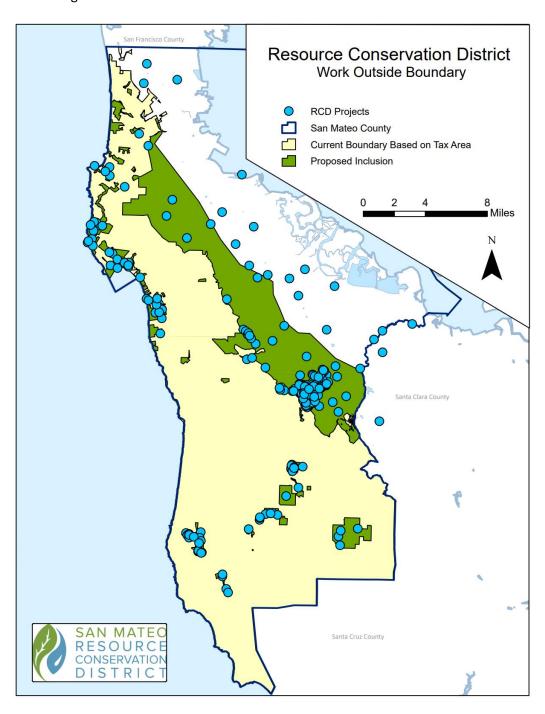
1. <u>Need and opportunity.</u> The proposed area has significant needs for District programs and services (e.g., risk of wildfire, risk of species extinction) and there are high priority opportunities to meet the need (e.g., potential for fuel load reduction, high value habitat for endangered species).

- 2. <u>Accuracy.</u> The District has been providing services to the area proposed for inclusion. Revised boundaries would more accurately represent the District's influence and make it easier to bring consistent services to those areas.
- 3. <u>Appropriate scale</u>. Inclusion of the proposed area would enable the District to work at the appropriate scale to meet a high priority need, e.g., including headwaters of watersheds to help protect downstream water resources as well as upstream habitat.

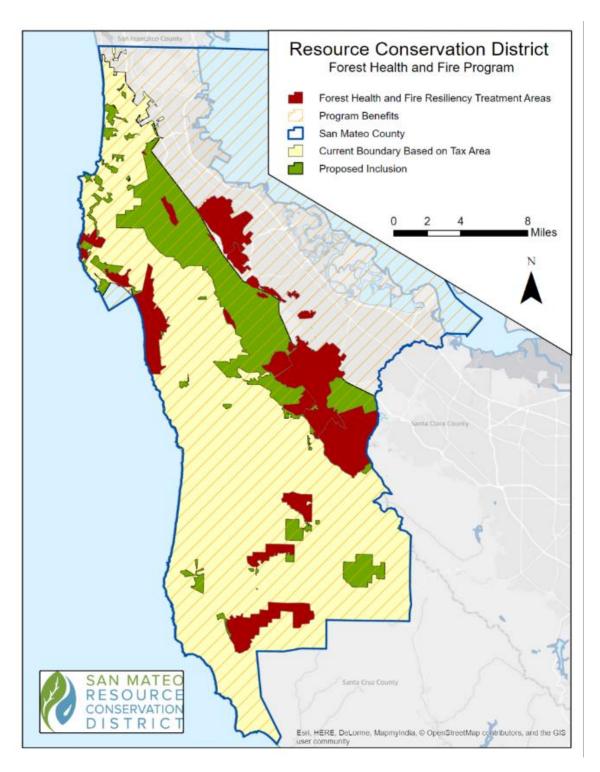


The map below, "Work Outside Boundary," denotes locations where the District has been providing services outside its current boundaries. Each dot represents a distinct project or effort. The dots represent work done at different time scales (one-time, recurring, or ongoing), different geographic scales (one property or watershed-wide), different types of work (technical assistance or project implementation, etc.), and involving various partners in different ways.

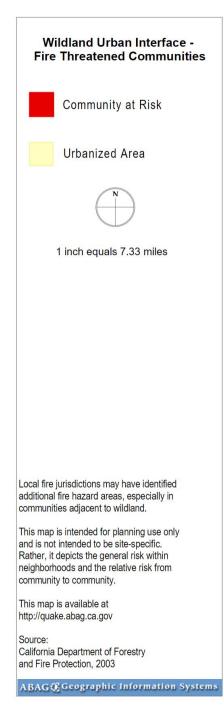
Revised boundaries would more accurately represent the District's services and make it easier to prioritize and bring resources to the included areas.

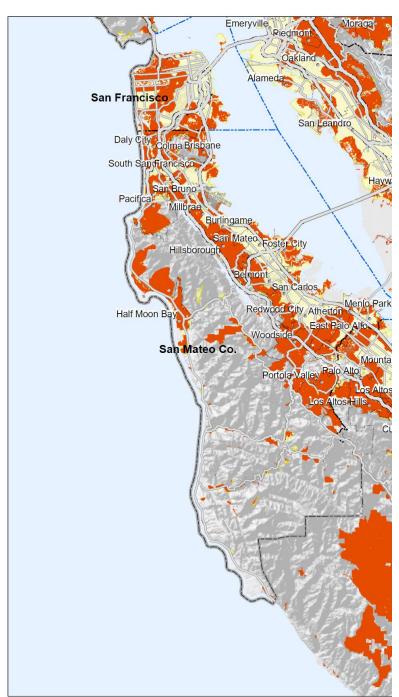


The map below, "Forest Health and Fire Program," shows where there are recent activities or projects underway to improve forest health and fire resiliency. Much of this work, as well as future anticipated priorities that are not reflected on this map, is on lands the District proposes for inclusion. Benefits of preventing or minimizing the risks from a catastrophic wildfire are countywide and beyond.

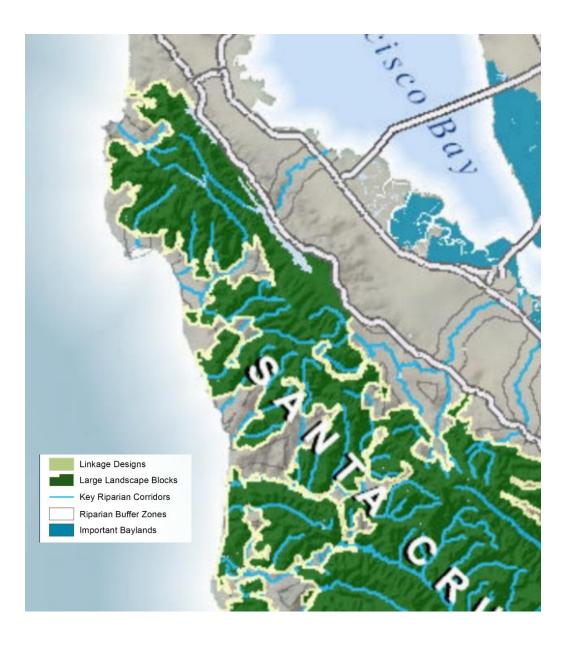


The following map excerpt, from CalFire via Association of Bay Area Governments, highlights communities at risk of fire because of their location at the Wildland Urban Interface. The high-risk communities within and beyond the proposed inclusion area would benefit from fuel load reduction activities in the proposed included area.



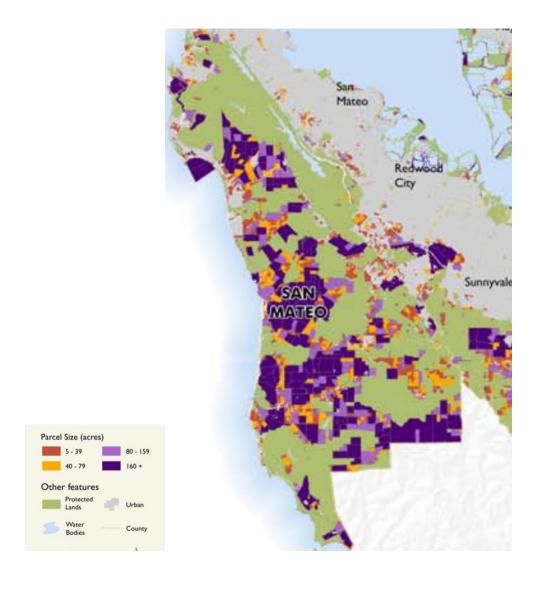


The following map is excerpted from "Critical Linkages: Bay Area and Beyond," a science-based initiative that identified priority wildlife corridors essential to conserving ecosystems and wildlife. Strategically protecting and restoring these lands is considered an essential adaptation strategy for climate change, particularly as climate change forces many species to shift their geographic range, often northwards or to higher elevations. Much of the area proposed by the District for inclusion is within a priority wildlife corridor for the Santa Cruz Mountains region, which includes San Mateo County.



The following is excerpted from a map titled "Parcelization," prepared by the San Francisco Bay Area Upland Habitat Goals Project. It is intended to support local jurisdictions and others in setting conservation priorities and directing resources to address the impacts to biodiversity from development.

The map shows the level of parcelization in the areas the District proposes to include, which is significant for two reasons: (1) RCDs are the entity created by the State of California to work across land ownerships to accomplish conservation priorities, and (2) the District was formed to offset the impacts of land use, which is exacerbated with higher rates of parcelization.



The following is excerpted from the Conservation Lands Network 2.0 "Stream Conservation Targets" map. It illustrates why the District's boundaries should include whole watersheds and highlights the significant amount of high priority streams that are in the area proposed for inclusion.

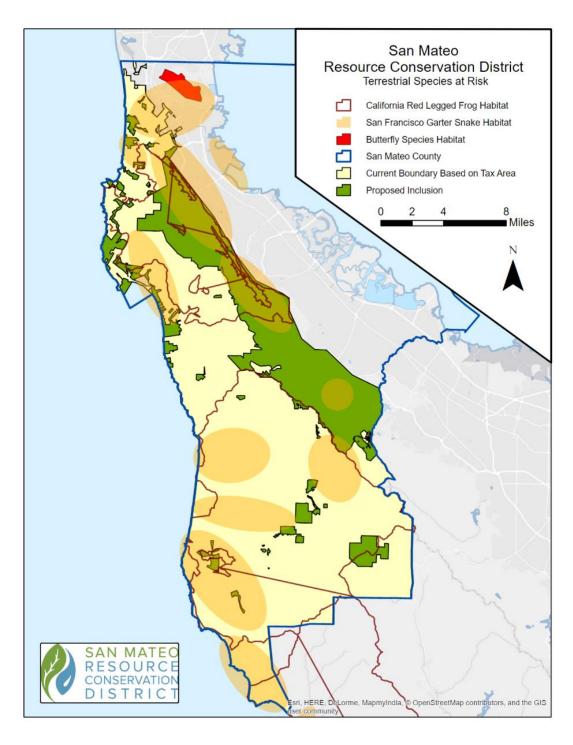


The following is excerpted from the Conservation Lands Network 2.0 "Stream Valleys & Headwater Source Areas" map. Upper watersheds, including headwaters, and stream valleys provide essential habitat for many species. Moreover, they provide complex ecosystem services that help upstream and downstream communities be resilient. When functioning well, they can attenuate both flooding and drought, minimize the risk of catastrophic erosion, protect water resources, and contribute to local economies. The converse is also true. When impaired, these lands contribute to localized flooding, drought, erosion, and compromised waters.

This map demonstrates the almost exact overlay between the proposed District boundaries and these areas in San Mateo County.



The following, and final, map highlights the areas designated as critical habitat for key wildlife species of at risk of extinction overlaying the areas proposed for inclusion in the District. Including these areas would better enable the District to provide services addressing the threat of extinction throughout the range of these species in San Mateo County.



Inhabited District Annexation

