

**Cordilleras Health System
Replacement Project
Final Environmental Impact Report**

February 2020



**San Mateo County Manager's Office
Project Development Unit**

**CORDILLERAS HEALTH SYSTEM REPLACEMENT PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

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Chapter 1 INTRODUCTION

This document is the Final Environmental Impact Report (EIR) for the San Mateo County Cordilleras Health System Replacement Project. The EIR is prepared as an informational document for action by the County of San Mateo on the development of Cordilleras mental health facility near Redwood City, CA.

Per the California Environmental Quality Act (CEQA) Guidelines Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the draft.
- Comments and recommendations received on the Draft EIR either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

In accordance with CEQA Guidelines Section §15132, this document together with the November 2019 Draft EIR constitutes the Final EIR for the Cordilleras Health System Replacement Project.

1.1 ENVIRONMENTAL REVIEW PROCESS

1.1.1 Public Scoping of Draft EIR

The County of San Mateo determined that the implementation of the proposed Cordilleras Health System Replacement Project would have the potential to have a significant impact on the environment and that an EIR would be prepared pursuant to CEQA. Accordingly, the County issued a Notice of Preparation (NOP) of an EIR for the proposed project on July 1, 2015. The County distributed the NOP to state agencies via the State Clearinghouse and directly mailed the NOP to state and local agencies and other potentially interested organizations and individuals, including property owners within 300 feet radius of the project site. The County also posted the NOP for review at the San Mateo County Clerk's Office. The County provided a 30-day public review period for the NOP from July 1 to July 31, 2015. The County received two comment letters in response to the NOP. These comments were summarized in Section 1.3 of the Draft EIR and presented in full in Appendix A of the Draft EIR. Additionally, the County held a public scoping meeting on September 17, 2015 for the purpose of inviting public comments on the project. Public notice of the scoping meeting was distributed to adjacent property residents, homeowner and neighborhood associations, local community agencies, and interest groups. Notice was also published in a newspaper of local circulation. Three comments were raised at the public scoping meeting as summarized in meeting notes presented in Draft EIR Appendix A.

1.1.2 Public Review of Draft EIR

On November 8, 2019, a Notice of Completion of the Draft EIR was filed with the California Governor's Office of Planning and Research, State Clearinghouse, and a Notice of Availability (NOA) for the Draft EIR was posted at the County Clerk's office for San Mateo County. The County directly mailed the NOA to local agencies, other potentially interested agencies, organizations, and individuals. Notices were also published in the local daily newspaper: The

San Mateo Times and the San Mateo Daily Journal on November 14, 2019. The Draft EIR was circulated for a 45-day commenting period between November 8 and December 23, 2019. Hard copies were made available for review at the San Mateo County Manager's Office, Project Development Unit (Redwood City). In addition, the Draft EIR was made available online at the County Manager's Office PDU website (<https://cmo.smcgov.org/public-notifications>).

The San Mateo County Board of Supervisors held a public hearing to receive comment on the Draft EIR at the Hall of Justice, 400 County Center in Redwood City on December 3, 2019.

1.1.3 Agency Review of Response to Comment

Upon completion of the 45-day public review period, written responses to all significant comments raised with respect to the environment were prepared and incorporated into the Final EIR. Written responses to comments received from public agencies have been made available to those agencies at least 10 days before the County of San Mateo considers certification of the Final EIR. The comments and their responses will be considered by the County when deciding whether to certify the Final EIR and approve the Cordilleras Health System Replacement Project.

1.2 CHANGES TO THE DRAFT EIR

CEQA anticipates that the public review process will elicit information that can result in modification of the project design and refined impact analysis to reduce potential environmental effects of the project. As provided in CEQA Guidelines Section 15088.5, when significant new information is added to the EIR after public noticing of the Draft EIR, the EIR must be recirculated to give the public a meaningful opportunity for review. Significant new information is defined as 1) a new significant environmental impact, 2) a substantial increase in the severity of an environmental impact requiring new mitigation, or 3) a feasible project alternative or mitigation measure considerably different from those previously analyzed that would clearly reduce environmental impacts. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

This Final EIR includes the following modifications to the Draft EIR:

- New information that provides additional project description details.
- Text changes to provide clarity to the analysis, make minor text corrections, or fix grammatical or typographic errors.

These revisions do not constitute considerably different changes in the project description, environmental setting, conclusions of the environmental analysis, or in the mitigation requirements incorporated into the project or otherwise provide significant new information that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

1.3 FINAL EIR ORGANIZATION

The Final EIR for the Cordilleras Health System Replacement Project is as organized as follows:

- Chapter 1 Introduction.** This chapter explains the contents of a Final EIR and the environmental review process for the Cordilleras Health System Replacement Project.
- Chapter 2 Additional Information.** This chapter describes and summarizes additional information related to the environmental analysis of the

Cordilleras Health System Replacement Project and the effect this information has on the discussions contained in the Draft EIR.

- Chapter 3 Public Comment on Draft EIR.** This chapter contains copies of the comment letters received on the Draft EIR during the public review period. The comment letters have been individually numbered. A list of those who commented is provided at the front of the chapter.
- Chapter 4 Responses to Draft EIR Comment.** This chapter provides the written comments received on the Draft EIR and provides a written response to each comment raising a significant environmental issue submitted on the Draft EIR.
- Chapter 5 Errata and Revisions.** This chapter includes the changes to the Draft EIR needed to respond to comments and clarify or amplify the information provided in the Draft EIR. The changes correct inaccuracies and clarify the analysis in the EIR.
- Chapter 6 Mitigation Monitoring and Reporting Program.** This chapter contains the County's program for monitoring and reporting on the implementation of mitigation measures incorporated into the Cordilleras Health System Replacement Project EIR.

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Chapter 2 ADDITIONAL INFORMATION

2.1 DEED RESTRICTION

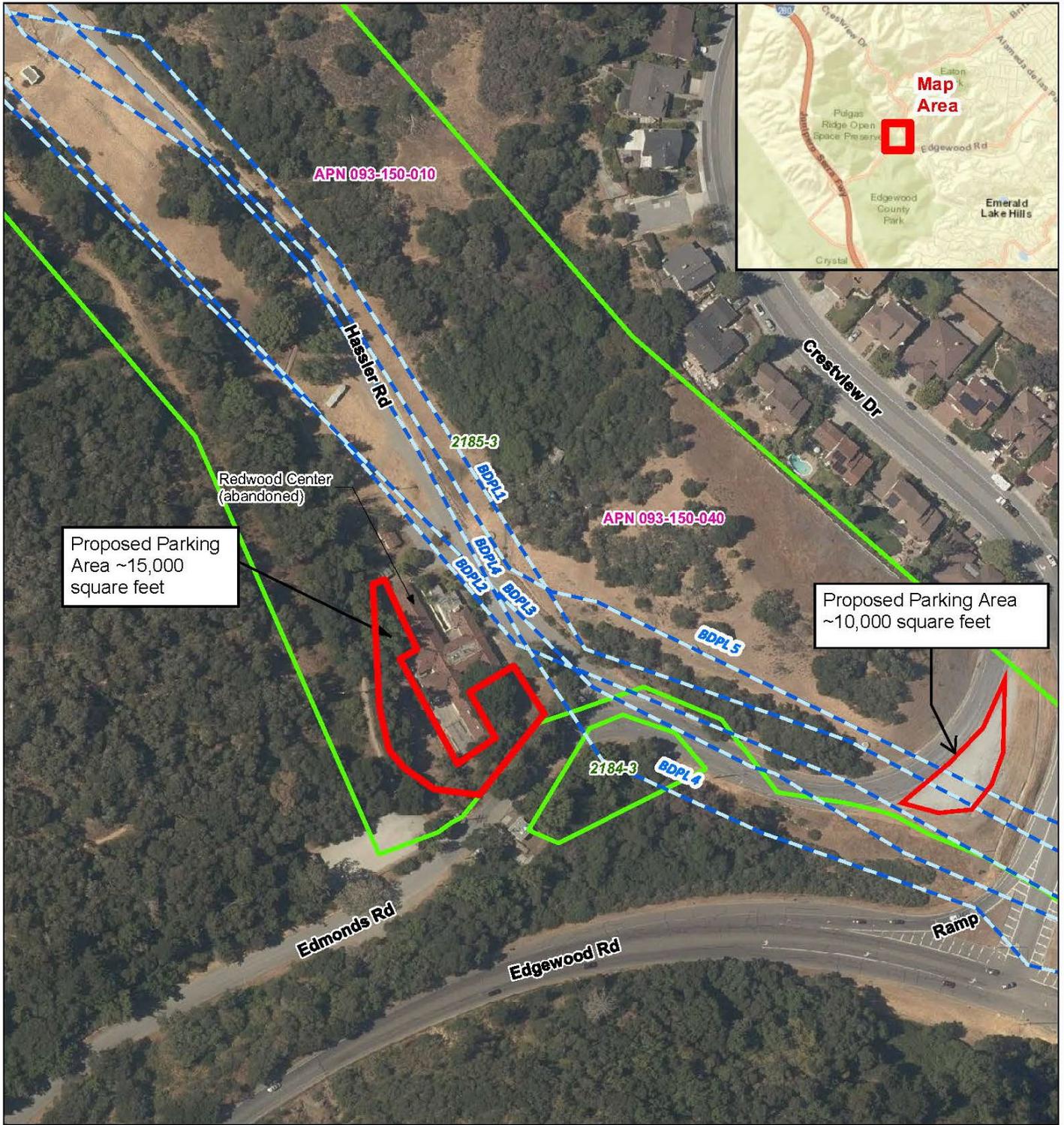
In accordance with CDFW comments, San Mateo County is considering a mitigation plan that may include incorporating a deed restriction on the property to protect higher quality habitat than the area being impacted by the project at a minimum of a 2:1 ratio. The potential deed restriction area under consideration occurs along the south tributary of Cordilleras Creek in the canyon behind the Canyon Oaks Youth Center as shown in Map 1. It is contiguous with the Pulgas Ridge Open Space Reserve. The deed restriction would cover 4.2 acres of high-quality bay laurel-oak woodland creek habitat (0.6 acres of Waters of the state, 1.8 acres of coast live oak-California bay laurel woodland, and 1.8 acres of mixed oak woodland habitat). The deed restriction shall prevent future development of this portion of the property in perpetuity and will allow access for habitat management and protection measures, if needed in the future.

2.2 CONSTRUCTION STAGING AND PARKING

San Mateo County is considering the lease of San Francisco Public Utilities Commission (SFPUC) property at the Redwood Center located at 100 Edmonds Road for trade parking during construction of the Cordilleras Health System Replacement Project. Hetch Hetchy water transmission pipelines run underneath the property adjacent to the Redwood Center. The County proposes to lease approximately 0.5 acres of the SFPUC property as shown in Map 2, which would accommodate approximately 40 to 50 vehicles. The property would be used for trade vehicle parking only. No vehicle parking would occur over the pipeline corridor. No material staging or use of heavy equipment would occur at the SFPUC property; all material and heavy equipment would be staged at the Cordilleras site. Parking would be limited to existing disturbed areas and temporary fencing would be installed to establish and maintain parking limits.

Temporary use of the SFPUC property requires SFPUC issuance of a revocable license, which is a discretionary action. The SFPUC is listed as a responsible agency in Draft EIR section 2.7.2. There are no environmental effects associated with use of the proposed area for trade parking. The proposed area is heavily disturbed and does not contain natural resources potentially impacted. The area proposed for use is located outside of the water transmission pipeline corridor and would not impact the pipelines or other utility infrastructure. The parking area would be fenced with signage marking the parking area limits and closed to public access.

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Map 2 Potential Construction Parking at SFPUC Property
Cordilleras Mental Health System Replacement Project

Chapter 3 PUBLIC COMMENT ON DRAFT EIR

This chapter contains written comments received on or related to the Draft EIR during the 45-day public review period from November 7 through December 23, 2019. The County received two comment letters during the Draft EIR review period pertaining to the contents of the Draft EIR, including one letter from a state agency (California Department of Fish and Wildlife) and one letter from a local agency (San Francisco Public Utilities Commission). No comment was received during the public hearing held by the San Mateo County Board of Supervisors on December 3, 2019. Each commenter was assigned a letter (i.e., “A”, “B”, etc.) and each specific comment was assigned an alphanumeric identification number as summarized in Table 2.

Table 2. Summary of Public Comments on the Draft EIR		
ID	Commenter	Comments
Comment Letters		
A	California Department of Fish and Wildlife	A1 – A6
B	San Francisco Public Utilities Commission	B1 – B11

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Gavin Newsom
Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

December 24, 2019

Sam Lin
San Mateo County
1402 Maple Street
Redwood City, CA 94063

Subject: Cordilleras Mental Health Center Replacement Project
SCH#: 2015072003

Dear Sam Lin:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 12/23/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2015072003/2>. Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly.**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

Comment Letter A: California Department of Fish and Wildlife



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



December 16, 2019

Mr. Adam Ely, Director
San Mateo County Manager's Office
Project Development Unit
1402 Maple Street
Redwood City, CA 94063
krodgers@smcgov.org

Subject: Cordilleras Mental Health Center Replacement Project, Draft Environmental Impact Report, SCH #2015072003, City of Redwood City, County of San Mateo

Dear Mr. Ely:

The California Department of Fish and Wildlife (CDFW) has reviewed the draft Environmental Impact Report (draft EIR) prepared by the County of San Mateo for the proposed Cordilleras Mental Health Center Replacement Project (Project) located in the County of San Mateo. CDFW is submitting comments on the draft EIR regarding potential impacts to biological resources associated with the proposed Project.

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA) §15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as approval under the California Endangered Species Act (CESA), the Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. Pursuant to our jurisdiction, CDFW offers the following comments and recommendations regarding the Project.

PROJECT DESCRIPTION AND LOCATION

The proposed Project includes the replacement of the Cordilleras Mental Health Center (CHMC) with a new facility to comply with current building safety standards, current psychiatric treatment practices, and to increase occupancy capacity. The proposed Project is located at 200 Edmonds Road, Redwood City, CA 94062 in the County of San Mateo.

ENVIRONMENTAL SETTING

The special-status species that are known to occur, or have the potential to occur in or near the Project site, include:

- California red-legged frog (*Rana draytonii*), federally listed as threatened under the federal Endangered Species Act (ESA) and a state species of special concern;
- Pallid bat (*Antrozous pallidus*), a state species of special concern;

- San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), a state species of special concern;
- San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), federally and state listed as endangered under ESA and CESA, respectively, and a state fully protected species;
- Townsend's big-eared bat (*Corynorhinus townsendii*), a state species of special concern; and
- Western pond turtle (*Emys marmorata*), a state species of special concern.

COMMENTS

A1 Comment 1: Alternatives

The draft EIR analyzes a No Project Alternative and a Reduced Project Size Alternative. CDFW recommends that the draft EIR analyze the environmental impacts of a Cordilleras Creek daylighting alternative and justify why such an alternative is considered to be infeasible.

Cordilleras Creek flows beneath CHMC through a series of culverts. The Project would create an open space area above the culverted channel, allowing adequate space to daylight the creek. Instead the Project proposes to construct a new system of larger culverts. Daylighting the creek would allow natural creek processes to reestablish and increase riparian habitat. Daylighting the creek may also be the environmentally superior alternative per CEQA Guidelines section 15126.6(e)(2).

A2 Comment 2: Landscaping Plan

In section 2.42.4, Landscaping Plan, the draft EIR states that the landscaping plan is designed to replace removed trees and habitat value as well as serving as a healing tool for CMHC occupants. In section 4.3.6, Loss of Woodlands, the draft EIR states that the landscape plan will restore 0.96 acres of woodland. However, it is unclear whether landscaped areas will be restored as natural habitats and allowed to develop naturally or if landscaped areas will be manicured and cleared of understory.

CDFW recommends that the draft EIR provide specific maintenance details of the landscaped areas so that their ecological value can be evaluated. Details should include, but are not limited to, irrigation regime, tree trimming, and leaf litter and woody debris (e.g., fallen tree limbs, fallen trees) maintenance.

CDFW recommends that landscape areas be returned to a natural state, which includes the accumulation of understory vegetation, woody debris, and leaf litter. Returning landscaped areas to a natural state will allow development of natural vegetation communities and habitat features that provide foraging, cover, and habitat for species (e.g., salamanders, San Francisco dusky-footed woodrats).

If the understory cannot be left to develop into a natural state, additional trees should be planted in areas where an understory can develop to mitigate for habitat impacted by the proposed Project.

A3 *Comment 3: San Francisco Garter Snake Status*

Section 4.2.4.4 of the draft EIR does not identify San Francisco garter snake as a fully protected species.

San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) is a fully protected species under Fish and Game Code. In section 4.2.4.4 of the draft EIR, please indicate that San Francisco garter snake is a fully protected species and that for the purposes of development projects, fully protected species cannot be taken or possessed at any time.

A4 *Comment 4: Section 4.3.63 Loss of Woodlands*

The draft EIR states that the proposed Project requires the removal of 2.3 acres of oak woodland and that the loss of oak or other non-timber woodlands in San Mateo County is considered a significant biological impact. However, the draft EIR does not explain whether defensible space management is considered in oak woodlands impacts.

CDFW recommends that the draft EIR fully explain the impacts of defensible space management to oak woodlands. CDFW also recommends that these impacts be appropriately mitigated, if not fully avoided.

Defensible space management typically decreases oak woodland understory habitat by clearing woody debris and leaf litter. CDFW views the understory of oak woodlands as habitat for species and as part of the overall oak woodland ecosystem. Therefore, not only should oak trees be retained, but the understory should be left intact.

A5 *Comment 5: Mitigation Measure Bio-2 Defensible Space Management Plan*

The draft EIR states that the Defensible Space Management Plan has not been completed but will include protective measures for San Francisco collinsia and oak-bay woodlands. Please provide an overview of the protective measures expected to be included in the Defensible Space Management Plan. Indicating that a plan will be prepared in the future to address project impacts does not allow for independent evaluation of the impact analysis or satisfy the disclosure requirements of CEQA (CEQA Guidelines section 15126.4).

CDFW strongly recommends that plan also include protective measures to retain oak woodland and oak-bay woodland understory. Protective measures can include but are not limited to the retention of accumulated leaf litter and wooded debris.

A6 *Comment 6: Mitigation Measure BIO-7 Habitat Mitigation and Monitoring Plan*

The draft EIR states that impacted habitat will be replaced at a minimum of a 1:1 ratio with restoration or enhancement of biological functions and values in the watershed within five years. Oak trees take decades to mature, and disturbed vegetation communities take many years to proceed through successional processes. It is unlikely that replacement of habitat will restore habitat function in the time frame indicated, particularly at a 1:1 ratio. In the meantime, the Project would result in a significant net habitat loss.

For oak woodland mitigation, CDFW strongly recommends that that the Project mitigate for oak woodland impacts by:

- 1) On-site plantings of a minimum of 15 oak trees for every large oak tree (15-inches diameter at breast height or greater) removed, for a minimum 15:1 ratio. On-site plantings of a minimum of 10 oak trees for 1 oak trees (15-inches diameter at breast height or less) removed, for a minimum 10:1 ratio. CDFW recommends using a higher planting ratio for large trees, as large oaks have slow growth rates and takes decades to reestablish.

The Project proposes to plant larger oak trees, in lieu of saplings. Mature oak trees are difficult to transplant, as transplanting severs mycorrhizal associations and requires removal of up to two-thirds of the mature root system. If planting of larger oak trees is done to mitigate for oak tree removal, planting areas should be maintained for at least 10 years, and dead or diseased oak trees should be replanted. If similarly sized oaks are not replanted, additional oak trees should be replanted to reestablish tree canopy and habitat as quickly as possible. Mature trees should not be taken from other wildland areas for replanting at the Project site, as this would result in off-site habitat impacts. Planting should be done in disturbed oak woodlands rather than converting intact grassland habitats.

- 2) Preservation of on-site oak woodland habitat of 2 acres for every 1 acre impacted into a conservation easement. Please note that the oak woodland habitat preserved in the conservation easement should be of equal or greater habitat value than the habitat impacted. If an off-site conservation easement is desired, the ratio should be higher than 2:1, since oak woodland protection would not be preserved within the property.

As recommended in the above comments, oak woodland understory should be maintained in the above mitigation options.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species [CEQA section 21001(c), 21083, and CEQA Guidelines section 15380, 15064, 15065]. Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration

Mr. Adam Ely
County of San Mateo
December 16, 2019
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(FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

Lake and Streambed Alteration Program

Notification is required, pursuant to CDFW's LSA Program (Fish and Game Code section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code section 711.4; Pub. Resources Code, section 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

Thank you for the opportunity to comment on the Project's draft EIR. If you have any questions, please contact Ms. Monica Oey, Environmental Scientist, at (707) 428-2088 or monica.oey@wildlife.ca.gov; or Ms. Randi Adair, Senior Environmental Scientist (Supervisory), at (707) 576-2786 or randi.adair@wildlife.ca.gov.

Sincerely,



Gregg Erickson
Regional Manager
Bay Delta Region

cc: State Clearinghouse #2015072003

Katerina Galacatos
U.S. Army Corps of Engineers
katerina.galacatos@usace.army.mil

Tahsa Sturgis
San Francisco Bay Regional Water Quality Control Board
tahsa.sturgis@waterboards.ca.gov



Natural Resources and Lands Management

December 19, 2019

Via Email to: krodgers@smcgov.org

Adam Ely, Director
San Mateo County Manager's Office,
Project Development Unit (PDU)
1402 Maple Street, Redwood City, CA 94063

Dear Mr. Ely,

The San Francisco Public Utilities Commission (SFPUC) received a notice of availability for the Cordilleras Health System Replacement Project (project) Draft Environmental Impact Report (DEIR). Thank you for providing the opportunity to review and provide comments on the contents of the DEIR. The SFPUC is providing the following:

- General comments including background information about the SFPUC and its rights-of-way (ROW);
- A summary of the project's past participation in the SFPUC Project Review Process;
- A table with specific, detailed comments about the contents of the DEIR; and
- Other attachments as referenced throughout this letter.

General Comments

The City and County of San Francisco, through the SFPUC, owns in fee or easement over 200-miles of water transmission pipeline ROW in the San Francisco Bay Area. The primary use of SFPUC property is for the reliable delivery of high quality water to the SFPUC's 2.7 million customers. Secondary uses of SFPUC property may be permitted if those proposed uses do not in any way interfere with, endanger, or damage existing or future operations or the security of SFPUC lands and infrastructure.

The project site, which includes Assessor Parcel Number (APN) 050-470-050, is located approximately 500 to 1,000 feet west of the SFPUC water transmission pipeline ROW. The SFPUC's Bay Division Pipelines (BDPLs)

London N. Breed
Mayor

Ann Moller Caen
President

Francesca Vietor
Vice President

Anson Moran
Commissioner

Sophie Maxwell
Commissioner

Tim Paulson
Commissioner

Harlan L. Kelly, Jr.
General Manager

Services of the San Francisco Public Utilities Commission

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.



Nos. 1, 2, 3, 4, and 5 are located within two nearby parcels owned in fee by the SFPUC (SFPUC Parcel No. 2185-3 and 2184-3). Portions of Edmonds Road, Crestview Drive, and Edgewood Road are located on/across various portions of SFPUC property and/or pipelines. For your reference, Attachment B is a GIS export showing the approximate location of the SFPUC's fee owned property, SFPUC leases/permits and easements adjacent to the project site. The proposed project design team can contact the SFPUC's Land Engineering staff in the Water Supply and Treatment Division regarding access to design drawings/maps of our facilities and water transmission lines (contact Stacie Feng, Senior Engineer, at sfeng@sfwater.org; and Sophia Chen, Technical Engineer, at schen@sfwater.org).

The sole ingress and egress to the project site is via the Edmonds Road public ROW, and access to the project site requires crossing SFPUC property and the five BDPLs. Given the required crossing of SFPUC property and infrastructure, it is important this is described in the EIR as part of the existing environmental setting near the project site. In addition, the SFPUC also requires access for planned maintenance or emergency repairs on the BDPLs which could impact/inhibit access to/from the project site, Canyon Oaks Youth Center, and San Mateo County Fire Station 18. The EIR should disclose this potential emergency access impact and discuss any alternate access to the project site to mitigate access impacts if Edmonds Road is ever blocked. Lastly, this project requires heavy construction equipment to cross over the BDPLs located across Edmonds Road, Crestview Drive, and/or Edgewood Road. The EIR should provide estimates of heavy truck load/weight. Additional protection measures may be necessary to protect these pipelines.

SFPUC Project Review Process

In June 2015, the lead agency (San Mateo County) attended a Project Review Committee meeting to present a proposal for temporary construction and staging uses, related to this project, on the nearby SFPUC property. Following this meeting, it was determined that the 2015 proposal conflicted with the SFPUC's ROW policy (please see Attachment C – June 26, 2015 Project Review Committee Summary – Project 3; and Attachment D SFPUC Correspondence on October 10, 2019 RE: San Mateo County Proposed Parking on SFPUC property - Hassler Road).

In 2019 the SFPUC reviewed an additional proposal from the lead agency for temporary construction and staging on SFPUC property. This proposal requested the use of 25 parking spaces and a staging area at Edmonds Road and Crestview Drive; and 140 parking spaces on Hassler Road. After internal review, SFPUC determined that it can consider a modified parking and staging area at Edmonds Road and Crestview Drive; however, the 140 parking spaces on Hassler Road conflict with the SFPUC's ROW policy (please see

Attachment D SFPUC Correspondence on October 10, 2019 RE: San Mateo County Proposed Parking on SFPUC property - Hassler Road).

If the lead agency remains interested in using SFPUC property at any location during construction for staging or parking, then they must complete the SFPUC's Project Review process and the project sponsor must obtain written authorization from the SFPUC (through a revocable license). A revocable license is considered a discretionary action requiring CEQA review and analysis. Therefore, the EIR should disclose any proposed uses on, potential impacts to, and mitigation measures for SFPUC property and infrastructure. To continue the review and consent process, the project sponsor does not need to submit a new Project Review application. Rather they should submit an updated project description and plan to projectreview@sfgov.org (also reference in "Next Steps – Completing the Project Review Process" that appears in Attachment D - SFPUC Correspondence on October 10, 2019 RE: San Mateo County Proposed Parking on SFPUC property - Hassler Road).

SFPUC ROW Policies

For your reference, attached are the following two SFPUC ROW policies:

- Interim Water Pipeline ROW Use Policy (please see Attachment E) – specifies uses allowed or prohibited within the SFPUC ROW (ex. land use, structures, utilities, etc.). Note: A project sponsor may not use SFPUC property to fulfill an open space, setback, emergency access, parking or other permitting/entitlement requirement; and
- Integrated Vegetation Management Policy (please see Attachment F) – see section 12.005 for vegetation height specifications allowed within the SFPUC ROW.

Projects on SFPUC property or near SFPUC infrastructure must be consistent with SFPUC-adopted policies and the SFPUC's primary mission as a water utility. This includes planning for SFPUC scheduled or emergency engineering, operations, or maintenance requirements/needs.

If you have any questions or need additional information, please contact Anna Fedman, Environmental Compliance Planner, in the SFPUC's Natural Resources and Lands Management Division at afedman@sfgov.org.

Thank you,



Tim Ramirez
Division Manager

Attachments:

- A. Specific DEIR Comments
- B. GIS Basemap of Project Site: 200 Edmonds Road, Redwood City, CA
- C. June 26, 2015 Project Review Committee Summary (see project no. 3)
- D. SFPUC Correspondence on October 10, 2019 RE: San Mateo County Proposed Parking on SFPUC property - Hassler Road
- E. SFPUC Interim Water Pipeline ROW Use Policy
- F. SFPUC Integrated Vegetation Management Policy

CC: *SFPUC / Natural Resources and Lands Management Division (NRLMD):*

Ellen Natesan, Planning and Regulatory Compliance Manager
Casey Sondgeroth, Senior Environmental and Regulatory Compliance Planner

Anna Fedman, Environmental and Regulatory Compliance Planner
YinLan Zhang, Environmental and Regulatory Compliance Planner
Emily Read, ROW Manager

Joanne Wilson, Senior Land and Resources Planner
Jonathan Mendoza, Associate Land and Resources Planner

Jessica Appel, Supervising Biologist
Carin Apperson, Supervising Biologist
Mia Ingolia, Biologist
Scott Simono, Biologist

SFPUC / Real Estate Services (RES):

Rosanna Russell, Real Estate Director
Dina Brasil, Acting Right-of-Way Manager
Christopher Wong, Principal Administrative Analyst
Heather Rodgers, Administrative Analyst

SFPUC / Water Supply and Treatment Division (WSTD):

Annie Li, Senior Engineer
Stacy Feng, Associate Engineer
Tracy Leung, Associate Engineer

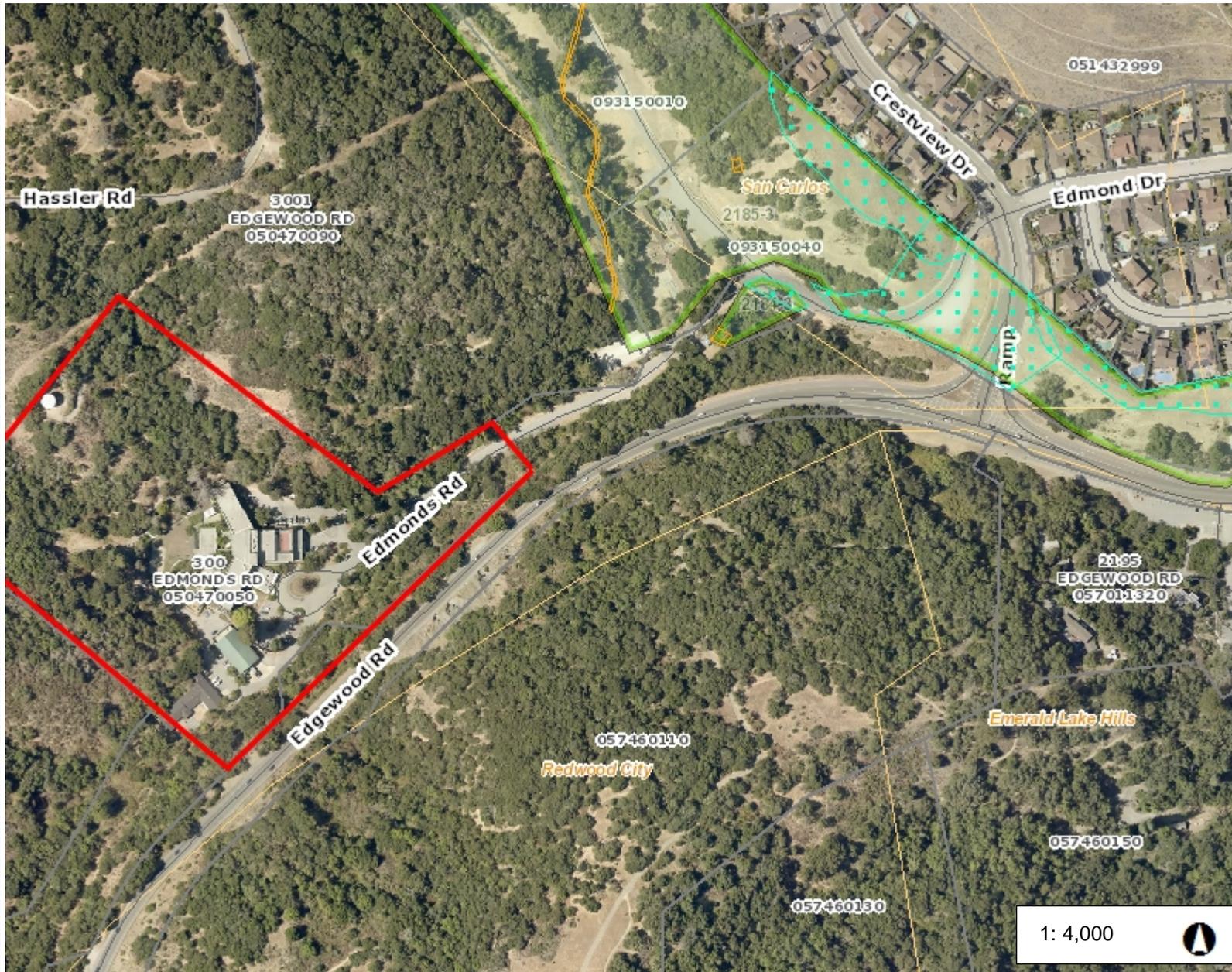
SFPUC / Bureau of Environmental Management (BEM):

Irina Torrey, Bureau Manager
Lindsay Revelli, Environmental Planner

Comment Number	DEIR Document Page Number	Section Number and Title	Beginning Text of Paragraph	Table or Figure Number (if applicable)	Comment
A1 1	Page S-13	S.5: Areas of Controversy and Issues to be Resolved	<i>A key issue to be resolved....</i>	N/A	A final paragraph should be added to this section to describe the need to resolve the issue of staging on SFPUC property in such a manner as to protect critical water transmission pipelines and other water utility infrastructure.
A2 2	Page 2-1	2.1 Location and Site Description	<i>The Cordilleras Mental Health Center..</i>	N/A	The SFPUC provides drinking water to 2.7 million people in the San Francisco Bay Area. The SFPUC's Bay Division Pipelines (BDPLs) Nos. 1, 2, 3, 4, and 5 are located within two nearby parcels owned in fee by the SFPUC (SFPUC Parcel No. 2185-3 and 2184-3). Portions of Edmonds Road, Crestview Drive, and Edgewood Road are located on/across various portions of SFPUC property and/or pipelines. This section of the EIR should include a description of SFPUC property and the project site's proximity.
A3 3	Page 2-10	2.4.3 Utility Improvements	<i>The Cordilleras property is served by...</i>	N/A	The lead agency should clarify if any utility work/installations (ex. water, sewer, joint trench, etc.) will occur on/over the SFPUC pipelines at Edmonds Road, Crestview Drive, and/or Edgewood Road. Any work or use on/over SFPUC property or pipelines would require SFPUC review and written authorization.
A4 4	Page 2-14	2.5.1 Construction Phasing and Patient Relocation	N/A	Table 2-3 Construction Activity and Phasing	Include a column for heavy equipment load/weight. The heavy equipment will be crossing the SFPUC pipelines located across Edmonds Road, Crestview Drive, and/or Edgewood Road. Depending on the equipment weight, the SFPUC may require additional protection measures during construction to distribute the heavy equipment load and protect the five SFPUC pipelines.
A5 5	Page 2-15	2.5.2 Construction Equipment and Staging	<i>Construction activity and equipment requirements...</i>	N/A	San Mateo County presented a temporary staging and parking proposal for this project to the SFPUC Project Review Committee on June 12, 2015. In November 2019, San Mateo County contacted the SFPUC again about potentially staging and parking on SFPUC property. If the County is proposing to use SFPUC property, then the lead agency should disclose the proposed use and analyze the potential impacts to SFPUC property. In addition, San Mateo County should resume participating in the SFPUC's Project Review process to complete the review process and receive written authorization for temporary use of SFPUC property. The SFPUC must also be listed as a responsible agency because any temporary use of SFPUC property would require issuing a revocable license (a discretionary action) by the SFPUC.
A6 6	Page 2-16	2.5.2 Construction Equipment and Staging	<i>"SamTrans turnout at Edmonds Road/Crestview Road. Valet-style stacked parking for County Health Services employees. Limited parking space may be provided for construction managers. Estimated capacity: 40 cars."</i>	N/A	The SFPUC owns in fee SFPUC Parcel No. 2185-3 which includes a portion of the land at the intersection of Edmonds Road and Crestview Drive. Please provide an exhibit/map showing all proposed construction staging and parking areas along with information about the owner of the property and whether San Mateo County has an existing land right (e.g. easement), or other permit, to park or stage at these proposed locations. In addition the project needs to describe how it would prevent biological impacts immediately, and adjacent to, the proposed staging and parking areas. These descriptions should include associated mitigation measures, regardless of who owns the property upon which staging is planned. Any work on or over SFPUC property or pipelines would require SFPUC review and written authorization.
A7 7	Page 2-16	2.5.4 Earthwork and Grading	<i>"Approximately 24,241 cubic yards of material would be removed from site. Approximately 33,834 cubic yards of fill would be brought in, with a net import total of roughly 9,414 cubic yards."</i>	N/A	Include an estimate of number of truck trips and heavy truck load/weight.

A8 8	Page 2-17	2.5.5 Site Access and Safety During Construction	<i>Access to the Canyon Oaks Youth Center...</i>	N/A	The EIR must disclose this potential emergency access impact and discuss any alternate access to the project site to mitigate access impacts if Edmonds Road is ever blocked.
A9 9	Page 2-20	2.7.2 Responsible Agencies	<i>San Francisco Public Utility District (SFPUD)</i>	N/A	"SFPUD" likely means San Francisco Public Utilities Commission (SFPUC). If the lead agency is interested in temporarily using SFPUC property during construction, then the temporary use of SFPUC property must be reviewed through the SFPUC's Project Review process and the project sponsor must obtain written authorization from the SFPUC (through a revocable license). A revocable license is considered a discretionary action requiring CEQA review and analysis. Therefore, the EIR should disclose any proposed uses on, potential impacts to, and mitigation measures for SFPUC property and infrastructure.
A10 10	Page 10-3	10.3 Environmental Setting	<i>Regional highway access to the project site is...</i>	N/A	From time to time, the SFPUC will need to complete planned maintenance or emergency repairs on the pipeline(s) which could impact/inhibit access to/from the project site, Canyon Oaks Youth Center, and San Mateo County Fire Station 18. The EIR must disclose this potential emergency access impact and discuss any alternate access to the project site to mitigate access impacts if Edmonds Road is ever blocked.
A11 11	Page 10-11	10.4.5 Emergency Access	<i>The project includes provisions...</i>	N/A	The EIR should disclose any alternate access to the project site if Edmonds Road is ever blocked for any reason.

200 Edmonds Road, Redwood City Cordilleras Health Replacement Project



- Legend**
- Easements to Others
 - SFPUC Leases and Permits (F SFPUC Parcels / Right of Way)
 - Other / Uncertain
 - Easement
 - Fee-owned
 - Raker Act
 - Access Roads
 - Assessor Parcels
 - Cities

1: 4,000



0.1 0 0.06 0.1 Miles

NAD_1983_StatePlane_California_III_FIPS_0403_Feet
Date Created 12/17/2019

The City does not guarantee that the information on this site is accurate or complete. The City is not responsible for any damages arising from the use of information on this site. Users should verify the information before making project commitments.

Notes



Hetch Hetchy Regional Water System

Services of the San Francisco Public Utilities Commission

Natural Resources and Lands Management Division

Date: June 26, 2015

To: **Project Review Committee:**

Natural Resources and Lands Management Division: Jim Avant, Dave Baker, Jason Bielski, Guido Ciardi, Rick Duffey, John Fournet, Jane Herman, Tim Koopmann, Krysten Laine, Diane Livia, Jeremy Lukins, Jonathan Mendoza, Joe Naras, Ellen Natesan, Emily Read, Lori Schectel, Casey Sondgeroth, Kathleen Swanson and Joanne Wilson

Water Supply and Treatment Division: Jonathan Chow, Colm Conefrey, Stacie Feng, Jim Heppert, Tony Mazzola, Chris Nelson, and Tracy Leung

Real Estate Services: Rosanna Russell, Tony Bardo, Tony Durkee, Shari Geller, Chester Huie, Janice Levy, Brian Morelli, Dina Brasil, Tim Brandon, Bem Andzenge and Jamin Barnes

Water Quality Bureau: Jackie Cho

Bureau of Environmental Management: Brett Becker, Kelly Capone, Sally Morgan, Barry Pearl, Matthew Weinand and YinLan Zhang

City Attorney's Office: Hazel Brandt, Josh Milstein, Carolyn Stein and Richard Handel

Cc: **SFPUC:** Robin Breuer, David Briggs, Chris Nelson, Debbie Craven-Green, Andrew DeGraca, Ed Forner, Craig Freeman, Karen Frye, Maria Garcia, Susan Hou, Annie Li, Greg Lyman, Alan Johanson, Scott MacPherson, Tasso Mavroudis, Gloria Ng, Joe Ortiz, Barry Pearl, Tim Ramirez, Brian Sak, Carla Schultheis, Bles Simon, Irina Torrey, Rizal Villareal, Ravi Krishnaiah, Mia Ingolia and Scott Simono

City Planning (Environmental Planning): Chris Kern

From: Joanne Wilson, Senior Land and Resources Planner
jwilson@sfgwater.org; (650) 652-3205

Subject: **June 12, 2015 Project Review Meeting Summary**
10:00 a.m. – 12:30 p.m.
1657 Rollins Road, Burlingame, Large Conference Room

Participants: Joanne Wilson, Joe Naras, Dave Baker, Jane Herman, and Jonathan Mendoza (SFPUC-NRLMD); Dina Brasil, Janice Levy, Tim Brandon and Bem Andzenge (SFPUC-RES); Jonathan Chow, Stacie Feng and Tracy Leung (SFPUC-WSTD Land Engineering); James Wilson (PG&E); Julie Waldron (City of Milpitas); Rob Kalkbrenner, Sunny Tong, Terry Wilcox-Rittgers, and Larry Funk (San Mateo County); Robert Chi (North Cove Properties); John Noori (NTerra) and Sachnell Patel (Hunter Properties)

Project Review Meeting Schedule for 2015

Meetings are usually held on the 4th Wednesday and 2nd Friday of each month and begin at 10:00 a.m. Meetings are generally located at 1657 Rollins Road, Burlingame (Large Conference Room).

June 24, 2015	September 11, 2015	November 6, 2015
July 10, 2015-Cancelled	September 30, 2015	November 18, 2015
July 29, 2015	October 9, 2015	December 4, 2015
August 14, 2015	October 21, 2015	December 16, 2015
August 26, 2015		

June 12, 2015 Project Review Meeting Summary
San Francisco Public Utilities Commission – Water Enterprise
Natural Resources and Lands Management Division

NOTE TO APPLICANTS SEEKING A REVOCABLE LICENSE, LEASE, OR OTHER SERVICE FROM SFPUC REAL ESTATE SERVICES: The SFPUC provides three essential 24/7 service utilities: water, wastewater and power to customers throughout the Bay Area. Our mission is to provide customers with the highest quality and effective service in a sustainable, professional and financially sound manner. Our service extends beyond the City and County of San Francisco and includes seven other counties.

Due to staffing issues in the Real Estate Services Division (RES), RES has constrained resources and is focusing on projects critical to our core infrastructure mission at the present time. Therefore, we appreciate your patience in our response to your company's project application.

1) Case No.	Project	Applicant/Project Manager
15.08-AL40.00	PG&E Tree Removals, Vallecitos Road, Sunol	James Wilson, Senior Consulting Utility Forester for PG&E)

The proposal is to remove trees and vegetation in an area south of Vallecitos Road located under two sets of PG&E power transmission lines in order to comply with State mandated safety clearances. A clearance of approximately 10 feet is required under the PG&E 115kV line and approximately 4 feet under the PG&E 60kV line. In addition, PG&E's best management practice is to remove trees in the transmission corridor to the extent feasible. The proposed project would consist of removing 17 oak trees of various species between 10- and 28-inches DBH (diameter at breast height) along with poison oak growing on some of the trees. The trees would be cut level with the ground, and debris lopped and scattered. Stumps would be treated with an herbicide to control re-sprouting.

The Committee discussed the removal of debris from the site whenever feasible to reduce fire hazard by preventing the accumulation of fuels.

Follow-up:

- 1) The project applicant will provide a copy of PG&E's easement or permit (or other authorization) for the two sets of power transmission lines located on SFPUC watershed land to SFPUC Real Estate Services (contact Dina Brasil, Principal Administrative Analyst, dbrasil@sfwater.org or (415) 934-3914). **[Update: A copy of the easement was provided on 6/18/15.]**
- 2) The project applicant will arrange for a PG&E biologist to pre-inspect the trees for nesting birds and assess the site for special status species. PG&E and/or its contractor will take appropriate steps to avoid impacts to birds and other special status species.
- 3) The project applicant will provide a description of PG&E's fire protection measures for the proposed project to the Watershed Forester (contact Dave Baker, Watershed Forester, at dbaker@sfwater.org or (650) 652-3202). If required to do so by the Watershed Forester, the PG&E contractor will provide 200 to 300 gallons of emergency water (pumper or water buffalo) on site.
- 4) The project applicant will provide a tree debris disposal plan for review and approval by the Watershed Forester to ensure that tree debris, to the extent feasible, is removed from the site contact Dave Baker, Watershed Forester, at dbaker@sfwater.org or (650) 652-3202).
- 5) The PG&E contractor performing the proposed project work will obtain an Access Permit approved by the Peninsula Watershed Manager, Joe Naras (contact Gloria Ng, Secretary, at gng@sfwater.org or (650) 652-3209).
- 6) The project sponsor and/or its contractor will contact the SFPUC NRLMD Watershed Forester 24 hours in advance of work to confirm that conditions are suitable for construction (contact Dave Baker, Watershed Forester, at dbaker@sfwater.org or (650) 652-3202). In addition, the project sponsor and/or its contractor

June 12, 2015 Project Review Meeting Summary
 San Francisco Public Utilities Commission – Water Enterprise
 Natural Resources and Lands Management Division

will submit fire prevention measures, particularly for any hot work (e.g. welding) to the NRLMD Watershed Forester for review and approval. During construction, the project sponsor and/or its contractor will contact the National Weather Service daily to confirm that local weather conditions are suitable for construction activity. The project sponsor and/or its contractor will cease all construction activities during red flag days (high fire hazard periods) or if directed to do so by the NRLMD Watershed Forester.

- 7) The project sponsor and/or its contractor will contact SFPUC Millbrae Dispatch at (650) 872-5900 at least 24 hours prior to commencing work.
- 8) The project sponsor will ensure that all work on SFPUC property complies with the San Francisco Pesticide Ordinance. For more information, please see the San Francisco Department of the Environment website at: <http://www.sfenvironment.org/article/city-staff/pest-management>

2) Case No.	Project	Applicant/Project Manager
15.06-RW23.00	City of Milpitas Fence Repair	Julie Waldron (City of Milpitas)

The proposal is to remove and replace approximately 72 linear feet of damaged wood retaining wall and fencing on the SFPUC ROW. These structures were damaged in the December 2014 winter storms. The existing wood retaining wall is approximately 3 feet high and the existing wood fence is approximately 6 feet high (for a total height of approximately 9 feet above grade). In 1972, the SFPUC granted a revocable permit to the City of Milpitas for the fence structure, irrigation, and an asphaltic-concrete path on the ROW (owned in fee by the SFPUC) which is used as the Oliver Jones Park. This portion of the SFPUC ROW contains Bay Division Pipeline Nos. 3 and 4.

The existing fence and retaining wall are located approximately 3 feet from the eastern ROW property line. There is an approximately 4-foot grade separation between the Oliver Jones Park and the adjacent residence at 807 De Anza Court. Approximately 3 feet of the adjacent residence’s side yard appears to be on SFPUC ROW property.

The proposed project would consist of replacing the existing retaining wall and fence with similar structures. Posts would be 4-inches by 6 feet pressure treated lumber placed at 4 feet on center and set in 12- by 36-inch concrete footings. Retaining wall wood boards would be 2- by 12-inches and bolted to the posts.

Follow-up:

- 1) The project sponsor will perform a boundary survey and provide an engineered drawing showing the property boundaries, existing and proposed structures, and the SFPUC water transmission pipelines to SFPUC-WSTD Land Engineering for review (contact Stacie Feng, Associate Engineer, at sfeng@sfgwater.org or (650) 871-2037). Land Engineering can also provide information about obtaining as-built drawings of the SFPUC’s water transmission pipelines at this location.
- 2) Once engineered drawings are provided by the City of Milpitas showing the items described above, SFPUC Real Estate Services and Land Engineering staff will work with the ROW Manager to determine compliance of the proposed project with SFPUC policy and ROW requirements (contact Jane Herman, ROW Manager, at jherman@sfgwater.org or (650) 652-3204).
- 3) The project sponsor will work with the SFPUC Real Estate Services to update the 1972 revocable permit (contact Janice Levy, Administrative Analyst, at jlevy@sfgwater.org or (415) 554-1821).

3) Case No.	Project	Applicant/Project Manager
15.06-RW46.00	Redwood Center SMCO Construction Staging Area	Rob Kalkbrenner (SMCO Public Works)

The proposal is to use areas around the Redwood Center as construction staging, including vehicle parking, a construction trailer with electrical hook up, storage container(s) and a portable toilet for 4 years (December 2015

June 12, 2015 Project Review Meeting Summary
 San Francisco Public Utilities Commission – Water Enterprise
 Natural Resources and Lands Management Division

through December 2019) by San Mateo County during the rebuilding of the nearby Cordilleras Mental Health facility. Temporary fencing would also be installed to secure the site. No vegetation removal is proposed, but the project sponsor proposes to spread gravel on the site.

The area proposed for a construction staging is approximately 14,700 square feet. San Mateo County is in the process of preparing an environmental review document pursuant to the California Environmental Quality Act (CEQA) and the Notice of Project (NOP) will be issued soon. Construction is anticipated to begin in late spring or early summer 2016.

The Committee discussed the SFPUC’s need to have access at all times to the site which contains the Pulgas Valve Lot and five SFPUC water transmission pipelines (Bay Division Pipeline (BDPL) Nos. 1 through 5). The ROW Manager expressed concern that it would be difficult to avoid removing some trees in the areas proposed for staging. In addition, Real Estate Services staff stated that there was recent interest from the San Francisco Public Health Department in using this property.

The Peninsula Watershed Manager noted that there is an SFPUC fee owned parcel on the southeast side of Edmonds Road (across from the Redwood Center) previously used by the SFPUC as a laydown yard. A large portion of this site does not have water transmission lines or other water utility infrastructure, and it is contiguous with a small parcel owned by San Mateo County. These areas combined could provide a suitable staging area for San Mateo County’s Cordilleras Mental Health facility project.

Follow-up:

- 1) SFPUC Natural Resources and Lands Management staff will check with the BDPL No. 5 Project Manager (Joe Ortiz) as to whether any portion of the Redwood Center/Pulgas Valve lot is a mitigation site (contact Joanne Wilson, Senior Land and Resources Planner, at jwilson@sfgwater.org or (650) 652-3205).
- 2) SFPUC Natural Resources and Lands Management staff will check with SFPUC WSTD operations to determine whether the former laydown yard on the southeast side of Edmonds Road is available for use by San Mateo County for the next 4+ years (contact Joanne Wilson, Senior Land and Resources Planner, at jwilson@sfgwater.org or (650) 652-3205).
- 3) If one of the two potential staging area sites proves to be a feasible option for the SFPUC, the project applicant will provide an engineered drawing showing the property boundaries, existing and proposed structures and uses, and the SFPUC water transmission pipelines to SFPUC-WSTD Land Engineering for review (contact Stacie Feng, Associate Engineer, at sfeng@sfgwater.org or (650) 871-2037). Land Engineering can also provide information about obtaining as-built drawings of the SFPUC’s water transmission pipelines at this location.
- 4) If one of the two potential staging area sites proves to be a feasible option for the SFPUC, the project applicant will work with SFPUC Real Estate Services to obtain a revocable license (contact Tim Brandon, Principal Administrative Analyst, at tbrandon@sfgwater.org or (415) 487-5211).
- 5) If one of the two potential staging area sites proves to be a feasible option and ultimately authorized for use as a staging area by the SFPUC, San Mateo County will restore the site to its pre-construction condition at the conclusion of the site use.
- 6) If one of the two potential staging area sites proves to be a feasible option and ultimately authorized for use as a staging area by the SFPUC, San Mateo County will contact SFPUC Millbrae Dispatch at (650) 872-5900 at least 24 hours prior to commencing work on SFPUC property.

2) Case No.	Project	Applicant/Project Manager
15.06-RW26.00	475 Redwood Avenue, Redwood City – Pool Removal Properties)	Robert Chi (North Cove

June 12, 2015 Project Review Meeting Summary
 San Francisco Public Utilities Commission – Water Enterprise
 Natural Resources and Lands Management Division

The proposal is to remove the existing in-ground swimming pool adjacent to the SFPUC ROW (demolition is underway with the pool drained and approximately half of the structure removed) and to demolish the existing concrete apron (located on the SFPUC ROW) and replace these structures with a paved parking area for 8-10 vehicles. In addition, the project applicant proposes to replace the existing fencing, add a gate across the driveway, re-landscape, and build a garbage can enclosure. The project applicant proposes to remove the swimming pool for safety reasons (misuse by trespassers) and to reduce water use.

Real Estate Services staff noted that in 2014, a letter of intent was drafted for a new lease with the project applicant, but the lease was not executed.

Follow-up:

- 1) The project applicant's contractor will access the site for demolition and construction purposes from Redwood Avenue to avoid crossing the SFPUC water transmission pipelines with heavy loads and equipment.
- 2) The project applicant will obtain a consent letter from SFPUC WSTD Land Engineering for potholing to determine the depth of the SFPUC water transmission pipelines (for more information and instructions, contact Stacie Feng, Associate Engineer, at sfeng@sfgwater.org or (650) 871-2037).
- 3) The project applicant will provide an engineered drawing showing the property boundaries, existing and proposed structures, and the SFPUC water transmission pipelines (and a detail showing the depth of these pipelines) to SFPUC-WSTD Land Engineering for review (contact Stacie Feng, Associate Engineer, at sfeng@sfgwater.org or (650) 871-2037). Land Engineering can also provide information about obtaining as-built drawings of the SFPUC's water transmission pipelines at this location.
- 4) The project applicant will provide a hard copy of the proposed landscaping plan to the ROW Manager for review and approval (contact Jane Herman, ROW Manager, at jherman@sfgwater.org or (650) 652-3204).
- 5) The project applicant will work with SFPUC Real Estate Services to obtain an updated lease for the proposed project (contact Tim Brandon, Principal Administrative Analyst, at tbrandon@sfgwater.org or (415) 487-5211).
- 6) After the new lease is approved, the project applicant will contact SFPUC Millbrae Dispatch at (650) 872-5900 at least 24 hours prior to commencing work on SFPUC property.

2) Case No.	Project	Applicant/Project Manager
14.10-RW38.01	133 Encinal Avenue, Menlo Park – Landscaping	John Noori (NTerra)

The proposal is to provide landscaping on the SFPUC ROW (easement on the project applicant's property for the 36-inch Palo Alto water transmission pipeline) as part of a 24-unit residential development (within seven buildings) on the former nursery site. The project sponsor has revised the proposal so that the required emergency vehicle access is located outside of the SFPUC ROW. In addition, a sound wall previously proposed on the SFPUC ROW has been eliminated, and instead, the project applicant will build units closest to the Southern Pacific Railroad corridor with sound-reducing materials.

Proposed landscaping plans presented at the meeting comply with the SFPUC vegetation policy according to the ROW Manager, Jane Herman.

Follow-up:

- 1) The project review coordinator will contact the City of Menlo Park to obtain a copy of the environmental review document (pursuant to the California Environmental Quality Act or CEQA) for the proposed project (contact Joanne Wilson, Senior Land and Resources Planner, at jwilson@sfgwater.org or (650) 652-3205).

June 12, 2015 Project Review Meeting Summary
San Francisco Public Utilities Commission – Water Enterprise
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- 2) The project applicant will provide a detail for the cobble-base (above grade) fence proposed on the SFPUC ROW easement to SFPUC WSTD Land Engineering for review (contact Stacie Feng, Associate Engineer, at sfeng@sfwater.org or (650) 871-2037).
- 3) The project applicant will provide construction drawings at the 95 percent design phase to SFPUC-WSTD Land Engineering for review (contact Stacie Feng, Associate Engineer, at sfeng@sfwater.org or (650) 871-2037). Then, the project applicant will address any comments from the SFPUC Land Engineer and provide construction drawings at the 100 percent design phase (incorporating any SFPUC required revisions) to SFPUC-WSTD Land Engineering for review. As with previous plans, the 95 and 100 percent construction plans must show the SFPUC easement boundaries. The SFPUC water transmission pipeline must also be shown and all proposed improvements must comply with the SFPUC's ROW policies and requirements (including placement of furniture at least 20 feet from the edge of the SFPUC water transmission pipeline).
- 4) The project applicant will obtain a consent letter authorizing the proposed work on the SFPUC easement from SFPUC WSTD Land Engineering (contact Stacie Feng, Associate Engineer, at sfeng@sfwater.org or (650) 871-2037).

From: Mendoza, Jonathan S
To: "ksporer@smcgov.org"; "lindsay.corotis@skanska.com"; "c_sgurley@smcgov.org"
Cc: [Kelly Jr, Harlan](#); [Ritchie, Steve](#); [Ramirez, Tim](#); [Natesan, Ellen](#); [Wilson, Joanne](#); [Fournet, John](#); [Read, Emily](#); [Carlin, Michael \(PUC\)](#); [Russell, Rosanna S](#); [Wong, Christopher J](#); [Rodgers, Heather](#); [Li, Annie \(PUC\)](#); [Feng, Stacie](#); [Leung, Tracy](#)
Subject: RE: San Mateo County Proposed Parking on SFPUC property - Hassler Road
Date: Thursday, October 10, 2019 3:30:05 PM
Attachments: [ProjRev_Summary_JUN_12_2015.pdf](#)
[New Requirements for Utility Information Request_2019.pdf](#)

Hello Kevin, Lindsay, and Scott:

SFPUC staff reviewed the SFPUC's Project Review records and determined that San Mateo County (County) started the SFPUC review process in 2015 for a temporary parking and staging proposal to support the Cordilleras Mental Health Facility construction project. I am following up to provide you with the following:

- 1) Background information about the County's 2015 proposal and SFPUC feedback;
- 2) Initial SFPUC feedback regarding the County's 2019 proposal; and
- 3) Next steps to complete the SFPUC review process of an updated 2019 proposal.

Background – 2015 San Mateo County Proposal and SFPUC Feedback

The County presented a proposal at the June 12, 2015 Project Review Committee meeting – please see project no. 3 in the attached 06/12/15 Project Review meeting summary. At the 06/12/15 meeting, SFPUC Water Supply and Treatment (WSTD) - Land Engineering staff and the Right-of-Way (ROW) Manager were concerned that the load from San Mateo County's staging area, directly over various SFPUC pipelines, could potentially harm critical infrastructure and prevent SFPUC crews from having immediate access. This is not allowed by our Commission's policy for ROW lands. The SFPUC may permit a secondary use, such as temporary staging and parking, on the ROW if it does not in any way interfere with, endanger, or damage the SFPUC's current or future operations, security or facilities. **The SFPUC's utmost priority is maintaining the safety and security of the five (5) major transmission pipelines that run underneath the ROW at the proposal site.**

SFPUC staff offered an alternative similar to your 2019 parking and staging area at Edmonds Road and Crestview Drive. Staff suggested that San Mateo County use a portion of the SFPUC fee-owned parcel on the southeast side of Edmonds Road (across from the Redwood Center) previously used by the SFPUC as a laydown area. However, the viable area for parking and staging uses has likely changed since the construction of the SFPUC's newest pipeline in the area (Bay Division Pipeline No. 5). My supervisor, Joanne Wilson, worked with Rob Kalkbrenner from San Mateo County Public Works on this concept and provided a map of the area. Rob told Joanne that San Mateo County would seek another site (not on SFPUC property) because San Mateo County expected (or perhaps received) objections from neighboring property owners about having such a visible staging area.

2019 San Mateo County Proposal – Initial SFPUC Feedback

We reviewed your 2019 proposal for 1) 25 parking spaces and staging area at Edmonds Road and Crestview Drive; and 2) 140 parking spaces on Hassler Road. In short, the SFPUC can consider a modified parking and staging area at Edmonds Road and Crestview Drive; however, **the 140 parking spaces on Hassler Road conflicts with the SFPUC's commission adopted ROW policy and is therefore not allowed.** The committee cannot consider a proposal that is not allowed under the Commission's policy because the Project Review Committee merely vets proposals for conformance with SFPUC plans and policies; it does not have the discretion to alter or disregard Commission policy. The Committee cannot recommend approval of the proposal for the 140 parking spaces on Hassler Road because it does not conform to SFPUC ROW policy.

The County should also be aware of other site conditions that could affect viable parking/staging areas at these locations, such as the following: site constraints (topography/slope, muddy conditions in wet weather, etc.), circulation constraints (vehicle ingress/egress on Edmonds Road and Hassler Road; pedestrians going to/from the Pulgas Ridge Preserve, etc.), biological constraints (vegetation pruning/removal, nesting bird impacts, etc.); security constraints (maintaining SFPUC vehicle gates locked).

Next Steps - Completing the Review Process

You do not need to submit a new Project Review application since your 2019 proposal is an update to your 2015 proposal and we have a Project Review application on file. **However, please provide current San Mateo County project manager information (name, address, email, phone, etc.) for the updated parking/staging proposal.**

If San Mateo County is interested in pursuing a modified/alternative parking and staging proposal on SFPUC property in areas **without** critical SFPUC infrastructure (e.g. 20-feet from the edges of the SFPUC pipelines), then no further Project Review **meeting** would be required. However, you must complete the following steps:

- 1) Request the SFPUC pipeline drawings and incorporate the SFPUC property boundaries and pipelines into your Engineering Plans. To request SFPUC infrastructure design drawings, please see the attached handout. **For more information, please contact Stacie Feng, Senior Engineer, at SFeng@sfgwater.org or (650) 871-2037.**
- 2) Pothole SFPUC pipelines to determine pipeline cover. **To request authorization to pothole SFPUC pipelines, please contact Tracy Leung, Associate Engineer, at tleung@sfgwater.org or (650) 871-3031.**
- 3) Complete a site visit with the ROW Manager, Emily Read, to refine your modified/alternative staging/parking proposal in area(s) without SFPUC pipelines or appurtenances. **For more information, please contact Emily Read, ROW Manager, ERead@sfgwater.org or (650) 652-3204.**
- 4) Complete the remaining "Follow-Up" requirements in the attached 06/12/2015 Project Review meeting summary – project no. 3.

Below is updated contact information for current SFPUC staff (which supersedes the 06/12/2015 meeting summary staff contact information):

- For surface land use/access review: Emily Read, ROW Manager, ERead@sfgwater.org or (650) 652-3204;
- For engineering/access review: Tracy Leung, Associate Engineer, TLeung@sfgwater.org or (650) 871-3031; and
- For real estate authorization: Chris Wong, Principal Administrative Analyst, CJWong@sfgwater.org or (415) 487-5211.

Please let me know if you have any questions or need additional information.

Best,

Jonathan S. Mendoza

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Hetch Hetchy Regional Water System

Services of the San Francisco Public Utilities Commission

SFPUC Interim Water Pipeline Right of Way Use Policy for San Mateo, Santa Clara, and Alameda Counties

Approved January 13, 2015

by

SFPUC Resolution No. 15-0014

as an amendment to the SFPUC Real Estate Guidelines

SFPUC Water Pipeline Right of Way Use Policy for San Mateo, Santa Clara, and Alameda Counties

As part of its utility system, the San Francisco Public Utilities Commission (SFPUC) operates and maintains hundreds of miles of water pipelines. The SFPUC provides for public use on its water pipeline property or right of way (ROW) throughout Alameda, Santa Clara, and San Mateo counties consistent with our existing plans and policies. The following controls will help inform how and in which instances the ROW can serve the needs of third parties—including public agencies, private parties, nonprofit organizations, and developers—seeking to provide recreational and other use opportunities to local communities.

Primarily, SFPUC land is used to deliver high quality, efficient and reliable water, power, and sewer services in a manner that is inclusive of environmental and community interests, and that sustains the resources entrusted to our care. The SFPUC's utmost priority is maintaining the safety and security of the pipelines that run underneath the ROW.

Through our formal Project Review and Land Use Application and Project Review process, we may permit a secondary use on the ROW if it benefits the SFPUC, is consistent with our mission and policies, and does not in any way interfere with, endanger, or damage the SFPUC's current or future operations, security or facilities.¹ No secondary use of SFPUC land is permitted without the SFPUC's consent.

These controls rely on and reference several existing SFPUC policies, which should be read when noted in the document. Being mindful of these policies while planning a proposed use and submitting an application will ease the process for both the applicant and the SFPUC. These controls are subject to change over time and additional requirements and restrictions may apply depending on the project.

The SFPUC typically issues five-year revocable licenses for use of our property, with a form of rent and insurance required upon signing.²

Note: The project proponent is referred to as the "Applicant" until the license agreement is signed, at which point the project proponent is referred to as the "Licensee."

¹ SFPUC Guidelines for the Real Estate Services Division, Section 2.0.

² SFPUC Guidelines for the Real Estate Services Division, Section 3.3.

I. ***Land Use, Structures, and Compliance with Law***

The following tenets govern the specifics of land use, structures, and accessibility for a project. Each proposal will still be subject to SFPUC approval on a case-by-case basis.

- A. SFPUC Policies. The Applicant's proposed use must conform to policies approved by the SFPUC's Commission, such as the SFPUC's Land Use Framework (<http://sfwater.org/index.aspx?page=586>).
- B. Americans with Disabilities Act Compliance. The Applicant must demonstrate that a Certified Access Specialist (CASP) has reviewed and approved its design and plans to confirm that they meet all applicable accessibility requirements.
- C. Environmental Regulations. The SFPUC's issuance of a revocable license for use of the ROW is subject to compliance with the California Environmental Quality Act (CEQA). The Applicant is responsible for assessing the potential environmental impacts under CEQA of its proposed use of the ROW. The SFPUC must be named as a Responsible Agency on any CEQA document prepared for the License Area. In addition, the Applicant shall provide to SFPUC a copy of the approved CEQA document prepared by the Applicant, the certification date, and documentation of the formal approval and adoption of CEQA findings by the CEQA lead agency. The SFPUC will not issue a license for the use of the ROW until CEQA review and approval is complete.
- D. Crossover and Other Reserved Rights. For a ROW parcel that bisects a third party's land, the Applicant's proposed use must not inhibit that party's ability to cross the ROW. The Applicant must demonstrate any adjoining owner with crossover or other reserved rights approves of the proposed recreational use and that the use does not impinge on any reserved rights.
- E. Width. The License Area must span the entire width of the ROW.
 - *For example, the SFPUC will not allow a 10-foot wide trail license on a ROW parcel that is 60 feet wide.*
- F. Structures. Structures on the ROW are generally prohibited. The Licensee shall not construct or place any structure or improvement in, on, under or about the entire License Area that requires excavation, bored footings or concrete pads that are greater than six inches deep.
 - i. Structures such as benches and picnic tables that require shallow (four to six inches deep) cement pads or footings are generally permitted on the ROW. No such structure may be placed directly on top of a pipeline or within 20 feet of the edge of a pipeline.
 - ii. The SFPUC will determine the permitted weight of structures on a case-by-case basis.

- *When the SFPUC performs maintenance on its pipelines, structures of significant weight and/or those that require footings deeper than six inches are very difficult and time-consuming to move and can pose a safety hazard to the pipelines. The longer it takes the SFPUC to reach the pipeline in an emergency, the more damage that can occur.*

- G. Paving Materials. Permitted trails or walkways should be paved with materials that both reduce erosion and stormwater runoff (e.g., permeable pavers).
- H. License Area Boundary Marking. The License Area's boundaries should be clearly marked by landscaping or fencing, with the aim to prevent encroachments.
- I. Fences and Gates. Any fence along the ROW boundary must be of chain-link or wooden construction with viewing access to the ROW. The fence must include a gate that allows SFPUC access to the ROW.³ Any gate must be of chain-link construction and at least 12 feet wide with a minimum 6-foot vertical clearance.

II. ***Types of Recreational Use***

Based on our past experience and research, the SFPUC will allow simple parks without play structures, community gardens and limited trails.

- A. Fulfilling an Open Space Requirement. An applicant may not use the ROW to fulfill a development's open space, setback, emergency access or other requirements.⁴ In cases where a public agency has received consideration for use of SFPUC land from a third party, such as a developer, the SFPUC may allow such recreational use if the public agency applicant pays full Fair Market Rent.
- B. Trail Segments. At this time, the SFPUC will consider trail proposals when a multi-jurisdictional entity presents a plan to incorporate specific ROW parcels into a fully connected trail. Licensed trail segments next to unlicensed parcels may create a trail corridor that poses liability to the SFPUC. The SFPUC will only consider trail proposals where the trail would not continue onto, or encourage entry onto, another ROW parcel without a trail and the trail otherwise meet all SFPUC license requirements.

III. ***Utilities***

- A. Costs. The Licensee is responsible for all costs associated with use of utilities on the License Area.

³ SFPUC Right of Way Requirements.

⁴ SFPUC Guidelines for the Real Estate Services Division, Section 2.0.

- B. Placement. No utilities may be installed on the ROW running parallel to the SFPUC's pipelines, above or below grade.⁵ With SFPUC approval, utilities may run perpendicular to the pipelines.
- C. Lights. The Licensee shall not install any light fixtures on the ROW that require electrical conduits running parallel to the pipelines. With SFPUC approval, conduits may run perpendicular to and/or across the pipelines.
- Any lighting shall have shielding to prevent spill over onto adjacent properties.
- D. Electricity. Licensees shall purchase all electricity from the SFPUC at the SFPUC's prevailing rates for comparable types of electrical load, so long as such electricity is reasonably available for the Licensee's needs.

IV. *Vegetation*

A. The Applicant shall refer to the SFPUC Integrated Vegetation Management Policy for the *minimum* requirements concerning types of vegetation and planting. (<http://www.sfwater.org/index.aspx?page=431>.) The Licensee is responsible for all vegetation maintenance and removal.

B. The Applicant shall submit a Planting Plan as part of its application.

(Community garden applicants should refer to Section VII.C for separate instructions.)

- i. The Planting Plan should include a layout of vegetation placement (grouped by hydrozone) and sources of irrigation, as well as a list of intended types of vegetation. The SFPUC will provide an area drawing including pipelines and facilities upon request.
- ii. The Applicant shall also identify the nursery(ies) supplying plant stock and provide evidence that each nursery supplier uses techniques to reduce the risk of plant pathogens, such as *Phytophthora ramorum*.

V. *Measures to Promote Water Efficiency*⁶

A. The Licensee shall maintain landscaping to ensure water use efficiency.

B. The Licensee shall choose and arrange plants in a manner best suited to the site's climate, soil, sun exposure, wildfire susceptibility and other factors. Plants with similar water needs must be grouped within an area controlled by a single irrigation valve

⁵ SFPUC Land Engineering Requirements.

⁶ SFPUC Rules and Regulations Governing Water Service to Customers, Section F.

- C. Turf is not allowed on slopes greater than 25 percent.
- D. The SFPUC encourages the use of local native plant species in order to reduce water use and promote wildlife habitat.
- E. Recycled Water. Irrigation systems shall use recycled water if recycled water meeting all public health codes and standards is available and will be available for the foreseeable future.
- F. Irrigation Water Runoff Prevention. For landscaped areas of any size, water runoff leaving the landscaped area due to low head drainage, overspray, broken irrigation hardware, or other similar conditions where water flows onto adjacent property, walks, roadways, parking lots, structures, or non-irrigated areas, is prohibited.

VI. ***Other Requirements***

- A. Financial Stability. The SFPUC requires municipalities or other established organizations with a stable fiscal history as Licensees.
 - i. Applicants must also demonstrate sufficient financial backing to pay rent, maintain the License Area, and fulfill other license obligations over the license term.
- B. Smaller, community-based organizations without 501(c)(3) classifications must partner with a 501(c)(3) classified organization or any other entity through which it can secure funding for the License Area over the license term. Maintenance. The Licensee must maintain the License Area in a clean and sightly condition at its sole cost.⁷ Maintenance includes, but is not limited to, regular weed abatement, mowing, and removing graffiti, dumping, and trash.
- C. Mitigation and Restoration. The Licensee will be responsible, at its sole cost, for removing and replacing any recreational improvements in order to accommodate planned or emergency maintenance, repairs, replacements, or projects done by or on behalf of the SFPUC. If the Licensee refuses to remove its improvements, SFPUC will remove the improvements I at the Licensee's sole expense without any obligation to replace them.
- D. Encroachments. The Licensee will be solely responsible for removing any encroachments on the License Area. An encroachment is any improvement on SFPUC property not approved by the SFPUC. Please read the SFPUC ROW Encroachment Policy for specific requirements. If the Licensee fails to remove encroachments, the SFPUC will remove them at Licensee's sole expense. The Licensee must regularly patrol the License Area to spot encroachments and remove them at an early stage.

⁷ SFPUC Framework for Land Management and Use.

- E. Point of Contact. The Licensee will identify a point of contact (name, position title, phone number, and address) to serve as the liaison between the Licensee, the local community, and the SFPUC regarding the License Agreement and the License Area. In the event that the point of contact changes, the Licensee shall immediately provide the SFPUC with the new contact information. Once the License Term commences, the point of contact shall inform local community members to direct any maintenance requests to him or her. In the event that local community members contact the SFPUC with such requests, the SFPUC will redirect any requests or complaints to the point of contact.
- F. Community Outreach.
- i. Following an initial intake conversation with the SFPUC, the Applicant shall provide a Community Outreach Plan for SFPUC approval. This Plan shall include the following information:
 1. Identification of key stakeholders to whom the Applicant will contact and/or ask for input, along with their contact information;
 2. A description of the Applicant's outreach strategy, tactics, and materials
 3. A timeline of outreach (emails/letters mailing date, meetings, etc.); and
 4. A description of how the Applicant will incorporate feedback into its proposal.
 - ii. The Applicant shall conduct outreach for the project at its sole cost and shall keep the SFPUC apprised of any issues arising during outreach.
 - iii. During outreach, the Applicant shall indicate that it in no way represents the SFPUC.
- G. Signage. The SFPUC will provide, at Licensee's cost, a small sign featuring the SFPUC logo and text indicating SFPUC ownership of the License Area at each entrance. In addition, the Licensee will install, at its sole cost, an accompanying sign at each entrance to the License Area notifying visitors to contact the organization's point of contact and provide a current telephone number in case the visitors have any issues. The SFPUC must approve the design and placement of the Licensee's sign.

VII. Community Gardens

The following requirements also apply to community garden sites. As with all projects, the details of the operation of a particular community garden are approved on a case-by-case basis.

- A. The Applicant must demonstrate stable funding. The Applicant must provide information about grants received, pending grants, and any ongoing foundational support.
- B. The Applicant must have an established history and experience in managing urban agriculture or community gardening projects. Alternatively, the Applicant may demonstrate a formal partnership with an organization or agency with an established history and experience in managing urban agriculture or community gardening projects
- C. During the Project Review process, the Applicant shall submit a Community Garden Planting Plan that depicts the proposed License Area with individual plot and planter box placements, landscaping, and a general list of crops that may be grown in the garden.
- D. The Applicant shall designate a Garden Manager to oversee day-to-day needs and serve as a liaison between the SFPUC and garden plot holders. The Garden Manager may be distinct from the point of contact, see Section VI.E.
- E. The Licensee must ensure that the Garden Manager informs plot holders about the potential for and responsibilities related to SFPUC repairs or emergency maintenance on the License Area. In such circumstances, the SFPUC is not liable for the removal and replacement of any features on the License Area or the costs associated with such removal and replacement.
- F. The Licensee must conduct all gardening within planter boxes with attached bottoms that allow for easy removal without damaging the crops.



Hetch Hetchy Regional Water System

Services of the San Francisco Public Utilities Commission

AMENDMENT TO THE RIGHT OF WAY INTEGRATED VEGETATION MANAGEMENT POLICY

Approved January 13, 2015

by

SFPUC Resolution No. 15-0014

12.000 RIGHT OF WAY INTEGRATED VEGETATION MANAGEMENT POLICY

12.001 General

The San Francisco Public Utilities Commission (“SFPUC”) is responsible for the delivery of potable water and the collection and treatment of wastewater for some 800,000 customers within the City of San Francisco; it is also responsible for the delivery of potable water to 26 other water retailers with a customer base of 1.8 million. **The following policy is established to manage vegetation on the transmission, distribution and collection systems within the SFPUC Right of Way (“ROW”) so that it does not pose a threat or hazard to the system’s integrity and infrastructure or impede utility maintenance and operations.**

The existence of large woody vegetation¹, hereinafter referred to as vegetation, and water transmission lines within the ROW are not compatible and, in fact, are mutually exclusive uses of the same space. Roots can impact transmission pipelines by causing corrosion. The existence of trees and other vegetation directly adjacent to pipelines makes emergency and annual maintenance very difficult, hazardous, and expensive, and increases concerns for public safety. The risk of fire within the ROW is always a concern and the reduction of fire ladder fuels within these corridors is another reason to modify the vegetation mosaic. In addition to managing vegetation in a timely manner to prevent any disruption in utility service, the SFPUC also manages vegetation on its ROW to comply with local fire ordinances enacted to protect public safety.

One of the other objectives of this policy is to reduce and eliminate as much as practicable the use of herbicides on vegetation within the ROW and to implement integrated pest management (IPM).

12.002 Woody Vegetation Management

1.0 Vegetation of any size or species will not be allowed to grow within certain critical portions of the ROW, pumping stations or other facilities as determined by a SFPUC qualified professional, and generally in accordance with the following guidelines.

1.1 Emergency Removal

SFPUC Management reserves the right to remove any vegetation without prior public notification that has been assessed by a SFPUC qualified professional as an immediate threat to transmission lines or other utility infrastructure, human life and property due to acts of God, insects, disease, or natural mortality.

1.2 Priority Removal

Vegetation that is within 15 feet of the edge of any pipe will be removed and the vegetative debris will be cut into short lengths and chipped whenever possible. Chips will be spread upon the site where the vegetation was removed. Material that cannot be chipped will be hauled away to a proper disposal site.

¹ Woody vegetation is defined as all brush, tree and ornamental shrub species planted in (or naturally occurring in) the native soil having a woody stem that at maturity exceeds 3 inches in diameter.

If vegetation along the ROW is grouped in contiguous stands², or populations, a systematic and staggered removal of that vegetation will be undertaken to replicate a natural appearance. Initial removal³ will be vegetation immediately above or within 15 feet of the pipeline edges; secondary vegetation⁴ within 15 to 25 feet from pipelines will then be removed.

1.3 Standard Removal

Vegetation that is more than 25 feet from the edge of a pipeline and up to the boundary of the ROW will be assessed by a SFPUC qualified professional for its age and condition, fire risk, and potential impact to the pipelines. Based on this assessment, the vegetation will be removed or retained.

1.4 Removal Standards

Each Operating Division will develop its own set of guidelines or follow established requirements in accordance with local needs.

2.0 All stems of vegetation will be cut flush with the ground and where deemed necessary or appropriate, roots will be removed. All trees identified for removal will be clearly marked with paint and/or a numbered aluminum tag.

3.0 Sprouting species of vegetation will be treated with herbicides where practicable, adhering to provisions of Chapter 3 of the San Francisco Environment Code.

4.0 Erosion control measures, where needed, will be completed before the work crew or contractors leave the work site or before October 15 of the calendar year.

5.0 Department personnel will remove in a timely manner any and all material that has been cut for maintenance purposes within any stream channel.

6.0 All vegetation removal work and consultation on vegetation retention will be reviewed and supervised by a SFPUC qualified professional. All vegetation removal work and/or treatment will be made on a case-by-case basis by a SFPUC qualified professional.

7.0 Notification process for areas of significant resource impact that are beyond regular and ongoing maintenance:

7.1 County/City Notification – The individual Operating Division will have sent to the affected county/city a map showing the sections of the ROW which will be worked, a written description of the work to be done, the appropriate removal time for the work crews, and a contact person for more information. This should be done approximately 10 days prior to start of work. Each Operating Division will develop its own set of guidelines in accordance with local need.

² A stand is defined as a community of trees possessing sufficient uniformity in composition, structure, age, arrangement, or condition to be distinguishable from adjacent forest communities to form a management unit.

³ Initial removal is defined as the vegetation removed during the base year or first year of cutting.

⁴ Secondary vegetation is defined as the vegetative growth during the second year following the base year for cutting.

7.2 Public Notification – The Operating Division will have notices posted at areas where the vegetation is to be removed with the same information as above also approximately 10 days prior to removal. Notices will also be sent to all property owners within 300 feet of the removal site. Posted notices will be 11- by 17-inches in size on colored paper and will be put up at each end of the project area and at crossover points through the ROW. Questions and complaints from the public will be handled through a designated contact person. Each Operating Division will develop its own set of guidelines in accordance with local needs.

12.003 Annual Grass and Weed Management

Annual grasses and weeds will be mowed, disked, sprayed or mulched along the ROW as appropriate to reduce vegetation and potential fire danger annually. This treatment should be completed before July 30 of each year. This date is targeted to allow the grasses, forbs and weeds to reach maturity and facilitate control for the season.

12.004 Segments of ROW that are covered by Agricultural deed rights

The only vegetation that may be planted within the ROW on those segments where an adjacent owner has Deeded Agricultural Rights will be: non-woody herbaceous plants such as grasses, flowers, bulbs, or vegetables.

12.005 Segments of ROW that are managed and maintained under a Lease or License

Special allowance may be made for these types of areas, as the vegetation will be maintained by the licensed user as per agreement with the City, and not allowed to grow unchecked. Only shallow rooted plants may be planted directly above the pipelines.

Within the above segments, the cost of vegetation maintenance and removal will be borne by the tenant or licensee exclusively. In a like fashion, when new vegetative encroachments are discovered they will be assessed by a SFPUC qualified professional on a case-by-case basis and either be permitted or proposed for removal.

The following is a guideline for the size at maturity of plants (small trees, shrubs, and groundcover) that may be permitted to be used as landscape materials. Note: All distance measurements are for mature trees and plants measured from the edge of the drip-line to the edge of the pipeline.

- Plants that may be permitted to be planted directly above existing and future pipelines: shallow rooted plants such as ground cover, grasses, flowers, and very low growing plants that grow to a maximum of one foot in height at maturity.
- Plants that may be permitted to be planted 15–25 feet from the edge of existing and future pipelines: shrubs and plants that grow to a maximum of five feet in height at maturity.
- Plants that may be permitted to be planted 25 feet or more from the edge of existing and future pipelines: small trees or shrubs that grow to a maximum of twenty feet in height and fifteen feet in canopy width.

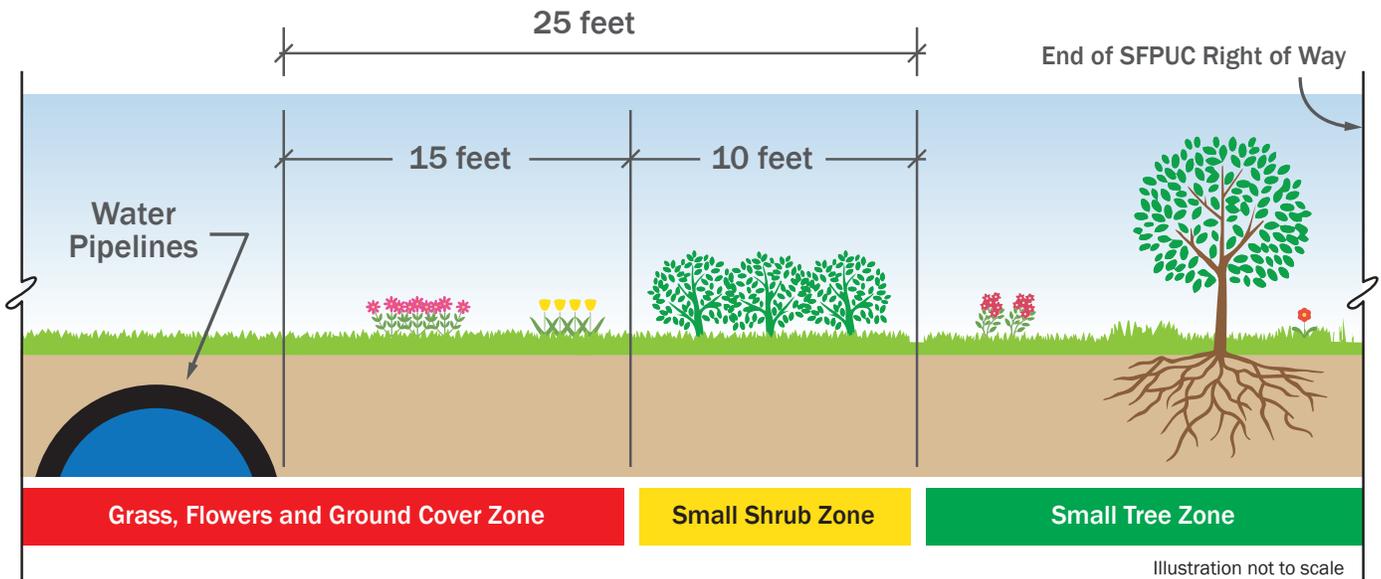
Trees and plants that exceed the maximum height and size limit (described above) may be permitted within a leased or licensed area provided they are in containers and are above ground. Container load and placement location(s) are subject to review and approval by the SFPUC.

Low water use plant species are encouraged and invasive plant species are not allowed.

All appurtenances, vaults, and facility infrastructure must remain visible and accessible at all times. All determinations of species acceptability will be made by a SFPUC qualified professional.

The above policy is for general application and for internal administration purposes only and may not be relied upon by any third party for any reason whatsoever. The SFPUC reserves the right at its sole discretion, to establish stricter policies in any particular situation and to revise and update the above policy at any time.

Right Of Way (ROW) Landscape Vegetation Guidelines



The following vegetation types are permitted on the ROW within the appropriate zones.

Plantings that may be permitted directly above existing and future pipelines:

Ground cover, grasses, flowers, and very low growing plants that reach no more than one foot in height at maturity.



Plantings that may be permitted 15–25 feet from the edge of existing and future pipelines:

Shrubs and plants that grow no more than five feet tall in height at maturity.



Plantings that may be permitted 25 feet or more from the edge of existing and future pipelines:

Small trees or shrubs that grow to a maximum of twenty feet in height and fifteen feet in canopy width or less.



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Chapter 4 RESPONSES TO COMMENTS ON DRAFT EIR

This chapter provides a written response by the County, as Lead Agency for the project, to each comment raising a significant environmental issue submitted on the Draft EIR. A brief summary of each comment is provided for reference. Each comment letter is presented in Chapter 3 and should be referred to for viewing the full text of the comment.

4.1 RESPONSE TO COMMENTS FROM CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Comment A1: Alternatives. The draft EIR analyzes a No Project Alternative and a Reduced Project Size Alternative. CDFW recommends that the draft EIR analyze the environmental impacts of a Cordilleras Creek daylighting alternative and justify why such an alternative is considered to be infeasible.

Cordilleras Creek flows beneath CHMC through a series of culverts. The Project would create an open space area above the culverted channel, allowing adequate space to daylight the creek. Instead the Project proposes to construct a new system of larger culverts. Daylighting the creek would allow natural creek processes to reestablish and increase riparian habitat. Daylighting the creek may also be the environmentally superior alternative per CEQA Guidelines section 15126.6(e)(2).

Response to Comment A1: A daylighted creek alternative was previously considered by the County as one of the design alternatives. The site is very constrained, so the most feasible daylighted creek alternative would require a bridge over Cordilleras Creek and a smaller central open space area featuring a fenced-off channel. The channel would be designed to accommodate a significant difference between up- and downstream elevations. This alternative failed the geomorphic stability screen test because it poses a high risk of downcutting due to the elevation difference between the upstream headwall/intake and the downstream channel. The rim elevations of the upstream drop structures are five feet above the invert elevations of the pipe network system that lead to the downstream mainstem Cordilleras Creek. Daylighting the channel would cause unknown amounts of downcutting upstream of the project that could further exacerbate already unstable conditions. This coupled with downstream incision could lead to increased fine sediment delivery. Daylighting the creek would likely require a heavily armored rock ramp chute that would not resemble a natural channel and was rejected as an alternative.

Additionally, this alternative would introduce safety and constructability concerns. The daylighted channel could be a fall hazard to clients at the facility. The creek would require significant fencing for safety liability reasons. Constructability would also be a challenge, as it would be infeasible to maintain the required fire road during construction and concurrent client residency and may not be approved by the fire agency.

Comment A2: Landscaping Plan. In section 2.4.2.4 Landscaping Plan, the draft EIR states that the landscaping plan is designed to replace removed trees and habitat value as well as serving as a healing tool for CMHC occupants. In section 4.3.6, Loss of Woodlands, the draft EIR states that the landscape plan will restore 0.96 acres of woodland. However, it is unclear whether landscaped areas will be restored as natural habitats and allowed to develop naturally or if landscaped areas will be manicured and cleared of understory.

CDFW recommends that the draft EIR provide specific maintenance details of the landscaped areas so that their ecological value can be evaluated. Details should include, but are not limited to, irrigation regime, tree trimming, and leaf litter and woody debris (e.g., Fallen tree limbs, fallen trees) maintenance.

CDFW recommends that landscape areas be returned to a natural state, which includes the accumulation of understory vegetation, woody debris, and leaf litter. Returning landscaped areas to a natural state will allow development of natural vegetation communities and habitat features that provide foraging, cover, and habitat for species (e.g., salamanders, San Francisco dusky-footed woodrats).

If the understory cannot be left to develop into a natural state, additional trees should be planted in areas where an understory can develop to mitigate for habitat impacted by the proposed Project.

Response to Comment A2: To clarify, the proposed landscaping for the project includes native oak woodland species that will provide cover and forage primarily for bird species. Because it is composed of native species that the birds have evolved with, it provides superior habitat to a landscape dominated by non-native species, and in that respect restores oak woodland value to areas disturbed by the project. It also restores oak woodland to the existing hospital yard, which has been predominantly lawn and non-native landscaping for decades. Due to the nature of the facility, it is expected that the normal amount of duff found in a natural oak woodland will not collect in the landscaped areas within the fenced yard. Therefore, additional oak woodland planting is proposed in areas surrounding the facility where oak woodland has been physically disturbed or the habitat value has been reduced by non-native species invasion. The project is subject to a Lake and Streambed Alteration Agreement with CDFW. A Habitat Mitigation and Monitoring Plan (HMMP) is in preparation. The HMMP includes the landscaping as part of the mitigation and allows a lower ratio (0.5:1) as habitat value. Therefore, Table 4-3 in the EIR is revised to reflect that fewer acres (0.48) would be functionally replaced and that there would be a net loss of 1.87 acres of mixed oak woodland (see Chapter 5, Errata and Revisions). The HMMP also includes restoration planting where feasible onsite, and establishment of a deed restriction over several acres of higher quality woodland habitat on the parcel, providing a 2:1 ratio conserved area to the oak woodland impact area. The HMMP is subject to CDFW review during the permit process.

Comment A3: San Francisco Garter Snake Status. Section 4.2.4.4 of the draft EIR does not identify San Francisco garter snake as a fully protected species. San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) is a fully protected species under Fish and Game Code. In section 4.2.4.4 of the draft EIR, please indicate that San Francisco garter snake is a fully protected species and that for the purposes of development projects, fully protected species cannot be taken or possessed at any time.

Response to Comment A3: Comment acknowledged. EIR text has been revised to state that the SFGS is a fully protected species under Fish and Game Code. Please see text amendment in Chapter 5, Errata and Revisions. SFGS is highly unlikely to occur onsite; however, the EIR includes pre-construction surveys and avoidance as mitigation (Mitigation Measure BIO-3).

Comment A4: Section 4.3.6. Loss of Woodlands. The draft EIR states that the proposed Project requires the removal of 2.3 acres of oak woodland and that the loss of oak or other non-timber woodlands in San Mateo County is considered a significant biological impact. However, the

draft EIR does not explain whether defensible space management is considered in oak woodlands impacts.

CDFW recommends that the draft EIR fully explain the impacts of defensible space management to oak woodlands. CDFW also recommends that these impacts be appropriately mitigated, if not fully avoided.

Defensible space management typically decreases oak woodland understory habitat by clearing woody debris and leaf litter. CDFW views the understory of oak woodlands as habitat for species and as part of the overall oak woodland ecosystem. Therefore, not only should oak trees be retained, but the understory should be left intact.

Response to Comment A4: The loss of 2.3 acres of oak woodland would occur from the development footprint and is not the result of defensible space management.

Defensible space management is primarily focused on the control of ladder fuels, and vegetation removal can be quite selective to minimize impacts to habitat values and to even protect or enhance habitat values. It does not require the complete removal of oak woodland, and it can be completed in a way that does not require the removal of healthy trees. The reason that a Defensible Space Management Plan (with a biologist's input and with worker training) is required as a mitigation measure in the EIR is to ensure vegetation management is completed in a way that protects the resources. However, the mitigation measure is focused on potential impacts to rare plants and plant communities because it is tailored to the response to a CEQA Checklist question. Therefore, Measure BIO-2 is revised as presented in Chapter 5, Errata and Revisions.

As discussed in EIR Chapter 12, the project site is located in a high wildfire hazard area. Mitigation Measure WFR-1 requires implementing a Defensible Space Management Plan in accordance with Cal Fire recommendations as identified in EIR section 12.1.4, which includes removing dead plants, leaf litter, and creating horizontal and vertical spacing between shrubs and trees. Implementation of Mitigation Measure WFR-1 is necessary in order to address the risks associated with wildland fire.

EIR text has been added to section 4.3.6 to clarify the impact of defensible space management on oak woodland. Please see Chapter 5, Errata and Revisions.

Comment A5: Mitigation Measure BIO-2 Defensible Space Management Plan. The draft EIR states that the Defensible Space Management Plan has not been completed but will include protective measures for San Francisco collinsia and oak-bay woodlands. Please provide an overview of the protective measures expected to be included in the Defensible Space Management Plan. Indicating that a plan will be prepared in the future to address project impacts does not allow for independent evaluation of the impact analysis or satisfy the disclosure requirements of CEQA (CEQA Guidelines section 15126.4).

CDFW strongly recommends that plan also include protective measures to retain oak woodland and oak-bay woodland understory. Protective measures can include but are not limited to the retention of accumulated leaf litter and wooded debris.

Response to Comment A5: Mitigation Measure BIO-2 identifies the following protection measures to reduce or avoid impacts during vegetation management activities: 1) surveying, mapping, and temporary fencing of San Francisco collinsia; and 2) worker training. Mitigation Measure BIO-2 has been revised to identify specific measures to reduce impacts to oak woodland. Please see Chapter 5, Errata and Revisions. Also see response to Comment A5 above.

Comment A6: Comment 6: Mitigation Measure BIO-7 Habitat Mitigation and Monitoring Plan. The draft EIR states that impacted habitat will be replaced at a minimum of a 1:1 ratio with restoration or enhancement of biological functions and values in the watershed within five years. Oak trees take decades to mature, and disturbed vegetation communities take many years to proceed through successional processes. It is unlikely that replacement of habitat will restore habitat function in the time frame indicated, particularly at a 1:1 ratio. In the meantime, the project would result in a significant net habitat loss.

For oak woodland mitigation, CDFW strongly recommends that that the Project mitigate for oak woodland impacts by:

1) On-site plantings of a minimum of 15 oak trees for every large oak tree (15-inches diameter at breast height or greater) removed, for a minimum 15:1 ratio. On-site plantings of a minimum of 10 oak trees for 1 oak trees (15-inches diameter at breast height or less) removed, for a minimum 10:1 ratio. CDFW recommends using a higher planting ratio for large trees, as large oaks have slow growth rates and takes decades to reestablish.

The Project proposes to plant larger oak trees, in lieu of saplings. Mature oak trees are difficult to transplant, as transplanting severs mycorrhizal associations and requires removal of up to two-thirds of the mature root system. If planting of larger oak trees is done to mitigate for oak tree removal, planting areas should be maintained for at least 10 years, and dead or diseased oak trees should be replanted. If similarly sized oaks are not replanted, additional oak trees should be replanted to reestablish tree canopy and habitat as quickly as possible. Mature trees should not be taken from other wildland areas for replanting at the Project site, as this would result in off-site habitat impacts. Planting should be done in disturbed oak woodlands rather than converting intact grassland habitats.

2) Preservation of on-site oak woodland habitat of 2 acres for every 1 acre impacted into a conservation easement. Please note that the oak woodland habitat preserved in the conservation easement should be of equal or greater habitat value than the habitat impacted. If an off-site conservation easement is desired, the ratio should be higher than 2:1, since oak woodland protection would not be preserved within the property.

As recommended in the above comments, oak woodland understory should be maintained in the above mitigation options.

Response to Comment A6: Mitigation Measure BIO-7 provides minimum requirements for the HMMP based on estimated impacts and based on possible mitigation options understood at the time. The HMMP will be submitted with the LSAA Notification and will be subject to agency review. At this time it includes onsite planting to restore oak woodland and creek habitats that have been disturbed, and a deed restriction over high quality bay laurel-oak woodland creek habitat, at a 2:1 ratio, to protect it from future development in perpetuity. At CDFW's recommendation, the HMMP will include a 10-year monitoring program for replanted areas, and remediation measures in the event success criteria are not met. The landscaping in the project area will be maintained throughout the life of the project. See Chapter 2, Additional Information for a description of the potential deed restriction and Chapter 5, Errata and Revisions for modification to Mitigation Measure BIO-7.

4.2 RESPONSE TO COMMENTS FROM SAN FRANCISCO PUBLIC UTILITIES COMMISSION

Comment B1: S.5: Areas of Controversy and Issues to be Resolved. A final paragraph should be added to this section to describe the need to resolve the issue of staging on SFPUC property in such a manner as to protect critical water transmission pipelines and other water utility infrastructure.

Response to Comment B1: Text and a map have been added to the EIR to provide additional information regarding the County's potential use of the SFPUC property as a construction trade parking area in Chapter 2, Additional Information.

Comment B2: 2.1 Location and Site Description. The SFPUC provides drinking water to 2.7 million people in the San Francisco Bay Area. The SFPUC's Bay Division Pipelines (BDPLs) Nos. 1, 2, 3, 4, and 5 are located within two nearby parcels owned in fee by the SFPUC (SFPUC Parcel No. 2185-3 and 2184-3). Portions of Edmonds Road, Crestview Drive, and Edgewood Road are located on/across various portions of SFPUC property and/or pipelines. This section of the EIR should include a description of SFPUC property and the project site's proximity.

Response to Comment B2: Text identifying the presence of the Hetch Hetchy water system pipelines has been added to EIR section 2.1. Please see Chapter 5, Errata and Revisions. The pipeline location near the property is presented in Map 2 in Chapter 2, Additional Information.

Comment B3: 2.4.3 Utility Improvements. The lead agency should clarify if any utility work/installations (ex. water, sewer, joint trench, etc.) will occur on/over the SFPUC pipelines at Edmonds Road, Crestview Drive, and/or Edgewood Road. Any work or use on/over SFPUC property or pipelines would require SFPUC review and written authorization.

Response to Comment B3: Proposed project activity is limited to the project site. No utility upgrades or trenching is proposed off site. No project work would occur over SFPUC pipelines at Edmonds Road, Crestview Drive, and/or Edgewood Road. This clarification has been added to the additional information text in Chapter 2.

Comment B4 2.5.1 Construction Phasing and Patient Relocation. Table 2-3 Construction Activity and Phasing. Include a column for heavy equipment load/weight. The heavy equipment will be crossing the SFPUC pipelines located across Edmonds Road, Crestview Drive, and/or Edgewood Road. Depending on the equipment weight, the SFPUC may require additional protection measures during construction to distribute the heavy equipment load and protect the five SFPUC pipelines.

Response to Comment B4: Heavy equipment and haul trucks traveling to the project site would cross the SFPUC pipelines at Crestview Drive and Edmonds Road as shown in Map 2 presented in Chapter 2. This is not a designated haul route and project use of this route for construction hauling purposes would be temporary. The construction equipment identified in EIR Table 2-3 such as bulldozers, tractor/loader/backhoes, and excavators. would be staged on the project site and would not be regularly traveling to and from the project site on Edmonds Road. The weight of this construction equipment is expected to be similar to the weight of fire emergency response vehicles located at County Fire Station 18 adjacent to the Cordilleras project site that routinely cross the SFPUC pipelines on Edmonds Road and Crestview Road. Maximum weight classifications for emergency response equipment ranges from 24,000 to 86,000 pounds according to the Fire Apparatus Manufacture's Association Emergency Vehicle Size and Weight Guide (https://www.fama.org/wp-content/uploads/2017/12/1514564588_5a466bec19c41.pdf).

The road structure is able to support the weight of the fire truck equipment and is expected to support the weight of construction vehicles without damage to the SFPUC pipelines crossing underneath the road.

Comment B5: 2.5.2 Construction Equipment and Staging. San Mateo County presented a temporary staging and parking proposal for this project to the SFPUC Project Review Committee on June 12, 2015. In November 2019, San Mateo County contacted the SFPUC again about potentially staging and parking on SFPUC property. If the County is proposing to use SFPUC property, then the lead agency should disclose the proposed use and analyze the potential impacts to SFPUC property. In addition, San Mateo County should resume participating in the SFPUC's Project Review process to complete the review process and receive written authorization for temporary use of SFPUC property. The SFPUC must also be listed as a responsible agency because any temporary use of SFPUC property would require issuing a revocable license (a discretionary action) by the SFPUC.

Response to Comment B5: The SFPUC is listed as a responsible agency in Draft EIR section 2.7.2. Text has been added to specifically identify the required discretionary action as a revocable permit. See Chapter 5, Errata and Revisions. Text has been added to Chapter 2, Additional Information discussing potential impacts to the SFPUC property.

Comment B6: 2.5.2 Construction Equipment and Staging. The SFPUC owns in fee SFPUC Parcel No. 2185-3 which includes a portion of the land at the intersection of Edmonds Road and Crestview Drive. Please provide an exhibit/map showing all proposed construction staging and parking areas along with information about the owner of the property and whether San Mateo County has an existing land right (e.g. easement), or other permit, to park or stage at these proposed locations. In addition, the project needs to describe how it would prevent biological impacts immediately, and adjacent to, the proposed staging and parking areas. These descriptions should include associated mitigation measures, regardless of who owns the property upon which staging is planned. Any work on or over SFPUC property or pipelines would require SFPUC review and written authorization.

Response to Comment B6: A map of the potential parking area and text has been added to the EIR to provide additional information regarding the location and potential use of the SFPUC property as a construction trade parking area. Protective fencing would be implemented to avoid impacting adjacent areas. Please see in Chapter 2, Additional Information.

Comment B7: 2.5.4 Earthwork and Grading. Include an estimate of number of truck trips and heavy truck load/weight.

Response to Comment B7: Estimated haul truck trips are 471 as identified in Draft EIR section 2.5.2. Estimated weight of a loaded 20-cubic yard truck is roughly 60,000 pounds.

Comment B8: 2.5.5 Site Access and Safety During Construction. The EIR must disclose this potential emergency access impact and discuss any alternate access to the project site to mitigate access impacts if Edmonds Road is ever blocked.

Response to Comment B7: As stated in the Draft EIR section 2.5.5, "Access to the Canyon Oaks Youth Center and the San Mateo County Fire Station 18 on the site would be maintained at all times during construction." The proposed construction trade parking at the proposed locations shown on Map 2 would not interfere with use of Edmonds Road as an emergency access route. Project construction does not require closure or temporary

blockage of Edmonds Road. Emergency access would not be impacted and alternative access to the project site is not required.

Comment B9: 2.7.2 Responsible Agencies. "SFPUD" likely means San Francisco Public Utilities Commission (SFPUC). If the lead agency is interested in temporarily using SFPUC property during construction, then the temporary use of SFPUC property must be reviewed through the SFPUC's Project Review process and the project sponsor must obtain written authorization from the SFPUC (through a revocable license). A revocable license is considered a discretionary action requiring CEQA review and analysis. Therefore, the EIR should disclose any proposed uses on, potential impacts to, and mitigation measures for SFPUC property and infrastructure.

Response to Comment B9: The reference to the SFPUC has been corrected as noted. Please see Chapter 5, Errata and Revisions. Information regarding the temporary use of SFPUC property for construction trade parking including the parking area boundaries, SFPUC review process, and potential environmental effects has been added to the EIR in Chapter 2, Additional Information. As shown in section 2.3 potential use of SFPUC property would be limited to existing disturbed areas as shown in Map 2. No significant environmental impacts have been identified with use of this property as a parking area.

Comment B10: 10.3 Environmental Setting. From time to time, the SFPUC will need to complete planned maintenance or emergency repairs on the pipeline(s) which could impact/inhibit access to/from the project site, Canyon Oaks Youth Center, and San Mateo County Fire Station 18. The EIR must disclose this potential emergency access impact and discuss any alternate access to the project site to mitigate access impacts if Edmonds Road is ever blocked.

Response to Comment B10: As state in response to Comment B8, the proposed project does not result in temporal closure or blockage of an emergency access route. Any planned maintenance or emergency repairs on the pipeline by the SFPUC that impacts or inhibits access to or from uses located on Edmonds Road would not be the result of proposed project. Any impacts to emergency access resulting from SFPUC actions are the sole responsibility of SFPUC and are independent of and separate from the proposed Cordilleras Health System Replacement Project and do not need to be assessed in this EIR.

Comment B11: 10.4.5 Emergency Access. The EIR should disclose any alternate access to the project site if Edmonds Road is ever blocked for any reason.

Response to Comment B11: See response to comment B8.

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Chapter 5 ERRATA AND REVISIONS

This chapter includes the changes to the Draft EIR needed to respond to comments and clarify or amplify the information provided in the Draft EIR. The changes correct inaccuracies and clarify the analysis in the EIR. Text removed from the EIR is marked with ~~strike-out~~. New text is indicated by underline.

Page S-3 and Page 4-31, Mitigation Measure BIO-2

Mitigation Measure BIO-2: *Defensible Space Management Plan.* Prepare a defensible space management plan. The plan shall be prepared by a wildland resources expert in coordination with a biologist/ecologist knowledgeable with the habitats. It shall identify the purpose of the Defensible Space Management Plan and shall focus on protection of biological resources while reducing ladder fuels and meeting defensible space requirements. It shall identify sensitive resources and how they will be protected. In particular, t~~The plan shall include protection~~ measures for San Francisco dusky-footed woodrat, San Francisco collinsia, creek and riparian habitat, and oak-bay woodland. It shall include a requirement to survey and map the current location of San Francisco collinsia within and adjacent to the defensible space management area prior to vegetation management in any given year. The survey shall be conducted during the bloom period, and prior to vegetation management activities. The management plan shall identify protection measures for sensitive resources such as temporary fencing ~~during vegetation management activities and worker training. to the workers conduction vegetation management.~~ Remove the f~~Fencing shall be removed~~ once vegetation management is completed to minimize ecological impacts ~~is complete so that the ecology of the plant is not disrupted.~~ The location of individual San Francisco collinsia plants and SFDW houses shall be mapped with GPS or other method that allows them to be searched for~~found~~ again in subsequent ~~the following~~ years. Surveys shall include areas both within and adjacent to the defensible space zone; ~~however,~~ every survey shall include transects (straight or wandering) through the defensible space to find each San Francisco collinsia plant.

Page S-5 and Page 4-34, Mitigation Measure BIO-7

Mitigation Measure BIO-7: A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared and implemented to ~~replace the habitats removed at a minimum 1:1 ratio and restore or enhance biological functions and values in the watershed within five years, including primarily at the project site, but also in other areas in the watershed suitable for restoration or enhancement.~~ The HMMP shall incorporate the proposed landscape plan and specify the methods to restore native habitat in areas around the perimeter of the project that are temporarily impacted during construction. It shall include monitoring and performance standards for plantings around the downstream outfall required under mitigation measure BIO-10. It shall include oak woodland restoration onsite wherever feasible. ~~It shall also include off-site restoration within or adjacent to the watershed, including at Edgewood Park and Natural Preserve, and Pulgas Ridge Open Space Preserve nearby. San Mateo County Parks has identified possible actions in Edgewood Park and Natural Preserve (N. Calderon, San Mateo County Parks Department, personal communication). Pulgas Ridge Open Space Preserve adjoins the Cordilleras project site and also has restoration opportunities (K. Lenington, Midpeninsula Regional Open Space District, personal communication).~~ and protect native habitats on the project parcel. The ultimate goal of the HMMP is to ensure mitigation for impacts to 2.3 acres of oak woodland, 0.07 acre of grassland, 0.63 acre of California sagebrush scrub, and 0.1 acre of creek habitat is successfully

implemented. Onsite restoration shall be prioritized over off-site restoration and can include restoration planting that achieves 1:1 replacement, deed restriction to protect higher value habitat at a 2:1 ratio, or a combination of these methods. Specific recommendations are provided below.

The HMP will address both on and off site mitigation. It shall:

- Identify the responsible parties;
- Describe project impacts to habitat types and functions and values;
- Identify specific sites (i.e., North Tributary, downstream of the mainstem outfall, upstream woodland clearing, and project landscaping) for restoration and identify the amount and type of habitat restored in each site;
- Set goals and performance standards for the restoration, including achieving 80% cover within 10 years;
- Set goals and performance standards for the control of invasive weeds with a California Invasive Plant Council Inventory rating of moderate or high;
- Provide a detailed implementation plan, including a schedule for completing and monitoring the restoration, financial assurances, construction drawings for a planting/restoration plan, an irrigation plan if appropriate, and maintenance requirements;
- Specify monitoring requirements and a minimum monitoring period of ~~five~~ten years, with annual reports; and
- Identify contingency and adaptive management measures if restoration is not meeting performance standards.
- Any impacted habitat that is not replaced at 1:1 onsite shall be mitigated by the County by placing a deed restriction over the higher quality bay laurel-oak woodland and creek habitat located in the south tributary of Cordilleras Creek, in the canyon behind the Canyon Oaks Youth Center. The area of the deed restriction shall provide a 2:1 ratio for remaining unrestored habitat (2 acres preserved for each 1 acre disturbed). The deed restriction shall prevent future development of this portion of the property in perpetuity and will allow access for habitat management and protection measures, if needed in the future.

The HMMP is required to be included permit applications to the Regional Water Quality Control Board, California Department of Fish and Wildlife, and US Army Corps of Engineers, and the ultimate details will be refined pending agency comments. Permit requirements related to the HMMP shall be incorporated into the final HMMP that is implemented.

Page S-9 and Page 8-16, Mitigation Measure HYD-1, first sentence

Mitigation Measure HYD-1: Over the life of the project, the County or its Contractor shall maintain the Cordilleras Creek drainage lines to continuously provide flow capacity for a 100-year, ~~6-hour~~ 2-hour storm event.

Page S-10 and Page 9-14, Mitigation Measure NOI-1, last bullet point

- Take actions to reduce construction noise and vibration levels if staff from the Canyon Oaks Youth Center or CMHC observe repeated adverse patient reactions to construction noise and vibration levels that interferes with mental health service operations or operating goals. Such actions may include:

- Construction activity management techniques, such as phasing activities to take advantage of shielding/attenuation provided by topographic features or buildings, or coordinating with mental health staff to conduct most impactful noise generating construction activities at times that may be less intrusive;
- Additional construction equipment controls such as use of electric equipment instead of combustion equipment when feasible;
- ~~Use of temporary sound barriers (equipment enclosures, berms, walls, blankets, or other devices) to reduce noise levels at impacted patient care areas; or~~
- Monitoring of actual construction levels to verify sound levels and potential noise attenuation benefits of any of the above measures.

Page S-12, last paragraph

A key issue to be resolved is the appropriate replacement of habitat values lost through removal of 2.3 acres of oak woodland including 160 native trees 4 inches in diameter (DBH) or greater. The proposed restoration plan would plant 176 trees on campus ranging in size from 15-gallon to 36-inch box resulting in restoration of ~~0.96~~0.48 acres of woodland.

Page 1-1, section 1.3, first sentence

A Notice of Preparation (NOP) for the EIR was published on July 1, 2015 (~~Error! Reference source not found.~~Appendix A) to invite comment on the scope and content of the environmental review; the comment period closed on July 31, 2015.

Page 2-1, section 2.1, second paragraph, last sentence

The Hetch Hetchy water system transmission pipelines run through nearby parcels owned by the San Francisco Public Utilities Commission (SFPUC).

Page 2-12, section 2.4.3.3, last paragraph

The on-site detention and Cordilleras Creek realignment backbone storm drainpipes would be designed to provide flood protection based on a 100-year reoccurrence in a ~~62~~48-hour rainfall event. The Cordilleras Creek backbone storm drainpipes would be ~~60-inch~~up to 48 inches in diameter in order to provide the adequate flood protection to the new campus. The on-site storm drainage collection system would be sized to meet the 10-year reoccurrence in a 1-hour rainfall event discharging into realigned Cordilleras Creek backbone system.

Page 2-16, section 2.5.2, new text after bullet points

Additionally, the County may consider leasing San Francisco Public Utilities Commission (SFPUC) property at the Redwood Center located at 100 Edmonds Road for construction trade parking for 40 to 50 vehicles.

Page 2-17, section 2.5.4, last paragraph

In addition to site grading, a debris catchment system is proposed on the north tributary to Cordilleras Creek as recommended by the geotechnical analysis for the project (ENGE0 2019). The system would be designed to contain a potential landslide deposit of ~~1,100~~1,000 cubic yards of rock and soil from flowing down a steep ravine towards two MHRC buildings. ~~The debris catchment system may involve anchoring fencing in two locations across the tributary channel—one above and one below the existing headwall—(Appendix B; Sheets C0704 and C0705). An~~

~~alternate design concept is to fill in the ravine and create three step pools to slow the channel flows to a continuous trickle.~~ The final debris catchment system design would be subject to review and permitting by USACE, RWQCB, and CDFW and may be modified during the permit process.

Page 2-20, section 2.7.2, fifth paragraph

San Francisco Public ~~Utility District (SFPUD)~~ Utilities Commission (SFPUC). Approval of a lease agreement for use of ~~SFPUD~~SFPUC land for ~~project construction equipment staging~~construction trade parking.

Page 4-17, section 4.2.4.4, first sentence

~~Historically, the federally and state listed endangered~~ The San Francisco garter snake (SFGS) is federally and state listed endangered and is a fully protected species under Fish and Game Code. Historically, SFGS occurred in scattered wetland areas on the San Francisco Peninsula from approximately the San Francisco County line south along the eastern and western bases of the Santa Cruz Mountains, at least to the Upper Crystal Springs Reservoir, and along the coast south to Año Nuevo Point, San Mateo County, and Waddell Creek, Santa Cruz County.

Page 4-24, section 4.3.4, second paragraph

The proposed project would increase impervious surfaces within the project site by 0.96 acre, replace and realign a culvert that carries Cordilleras Creek flow beneath the existing project site, replace and redirect a culvert that carries flow from the northern tributary, and assure that the culvert system can handle flows from a 100-year, ~~6-hour~~2-hour storm event. The general drainage pattern would be similar to existing conditions.

Page 4-26, section 4.3.6, new second paragraph

Site development requires removal of 2.3 acre of oak woodland, including 160 native trees 4 inches DBH or greater (Table 4-2). The loss of oak or other non-timber woodlands in San Mateo County is considered a significant biological impact per San Mateo County's CEQA Checklist. The project will also impact 0.075 acre of grassland, 0.63 acre of California sagebrush scrub, 0.1 acre of creek habitat, and 3.7 acres of developed habitat.

Defensible space management will also impact oak woodland and California sagebrush scrub. There are two defensible space zones: 30-foot and 100-foot. More vegetation is typically removed from the 30-foot zone than the 100-foot zone, and the 100-foot zone can be managed with less ecological impacts. Approximately 0.1 acre of oak woodland and 0.1 acre of coastal sage scrub occur in the 30-foot zone; and 1.2 acre of oak woodland and 0.2 acre of California sagebrush scrub occur between 30 and 100 feet of project structures. Due to the sensitivity of habitats around Mitigation Measure BIO-2 requires implementation of a Defensible Space Management Plan that is overseen by a fire ecologist and a biologist. Defensible space outside of property lines is not planned to be managed.

Page 4-27, third paragraph, third sentence

In total, the landscape plan will restore ~~0.96~~0.48 acre of woodland and 0.61 acre of grassland/coastal scrub habitat (Table 4-2).

Page 4-27, Table 4-3

Table 4-1 Vegetation Impacts and Replacement				
Vegetation Type	Acres Impacted	Acres Functionally Replaced by Proposed Landscaping	Temporary Impacted Area to be Restored	Net Amount
Grassland	0.075	0.65 (hydroseed meadow mix)	0.31 (perimeter hydroseeding)	0.88 ac added
California sagebrush scrub	0.63	0.45 (low water use planting)	0.3	0.12 ac added
Creek	0.1	0	0.07	0.03 ac permanent impacts
Mixed oak woodland	2.35	0.96 0.48 (trees and shrubs)	0	1.39 1.87 ac net loss
Total (not including Developed)	3.15	2.06 1.58	0.68	0.41 0.89 ac habitat loss

Page 5-18, section 5.3.4, first paragraph

The project property is owned by San Mateo County and designated as Resource Management by the County General Plan and Zoning. The project would not result in loss or conversion of forest land. As described in EIR section ~~Error! Reference source not found.~~4.3.6, the project would result in the net loss of ~~0.96~~ 1.87 acres of non-timber oak woodland.

Page 8-8, second paragraph, second sentence

The upgraded infrastructure has been sized to accommodate the 100-year storm based on a ~~6-hour~~2-hour rainfall event.

Page 8-14, section 8.3.5 first sentence

As discussed previously, the on-site drainage system (separate from the Cordilleras Creek culvert) would be sized to accommodate a 10-year 1-hour rainfall event, in compliance with San Mateo County’s design standards, and the mainline storm drain underneath the site would be sized to accommodate the 100-year, ~~6-hour~~2-hour rainfall event, reducing the potential for flooding at the project site relative to existing conditions.

Page 10-4, section 10.3.4, second paragraph

The results of the intersection level of service analysis (see Table 10-2~~Error! Reference source not found.~~) show that the southbound left-turn at the Crestview Drive/Edgewood Road intersection operates at LOS F during the PM peak hour.

Page 10-6, Trip Generation, third sentence

The proposed project trip generation estimates are presented on Table 10-3~~Error! Reference source not found.~~.

Appendix B, Sheets C0704 and C0705

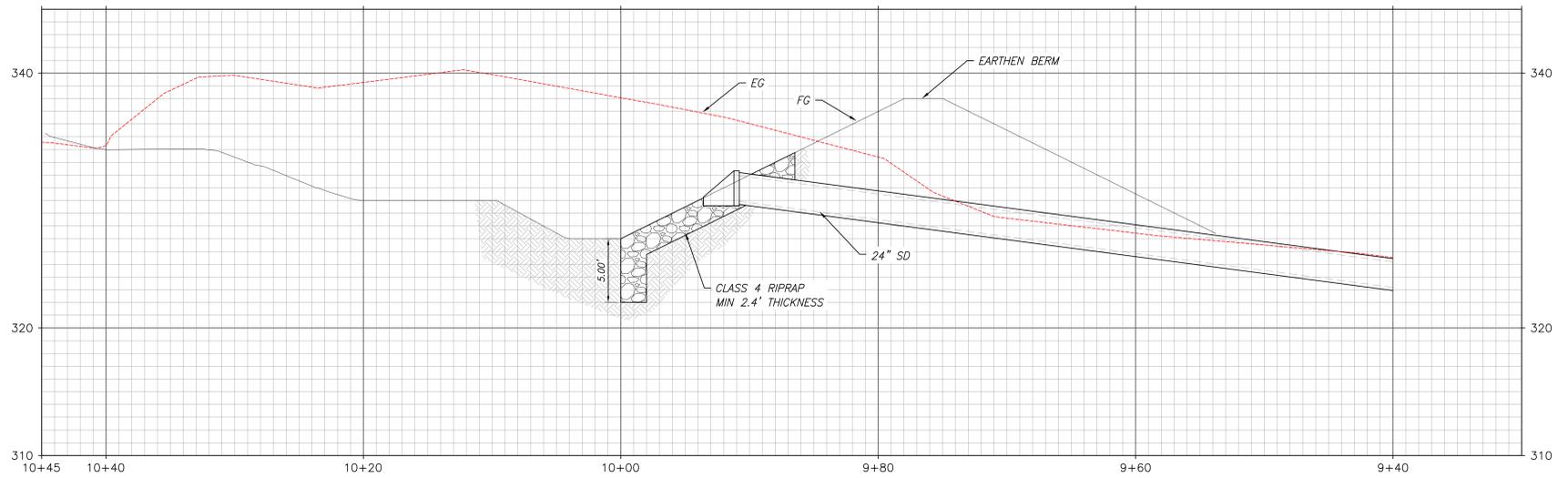
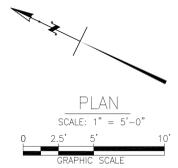
Sheets replaced. See attached.

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LEGEND:

- PROPERTY LINE
- LIMITS OF DISTURBANCE
- EROSION CONTROL FABRIC. SEE DETAIL [2] - SHEET [C0705]
- ROCK SLOPE PROTECTION - CLASS 4
- DEBRIS CATCHMENT SYSTEM. SEE DETAIL [5] - SHEET [C0705]
- COIR BIOLÓG STAKING. SEE DETAIL [3] - SHEET [C0705]
- 1.5 TON ANCHOR BOULDER STACKED AND KEYED INTO CHANNEL BED
- TAGGED TREES. SEE LANDSCAPE PLANS FOR DIRECTION.



CD NORTH TRIBUTARY HEADWALL
 HORIZONTAL SCALE: 1"=10'
 VERTICAL SCALE: 1"=10'

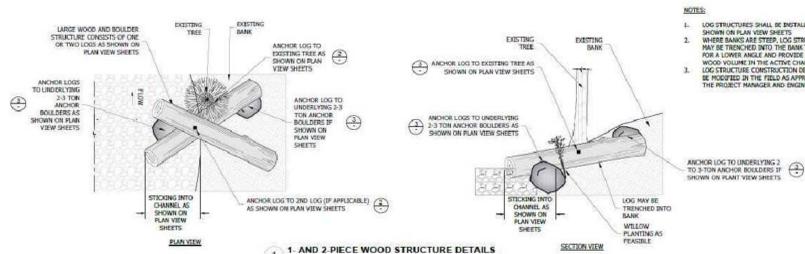


**NOT FOR
 CONSTRUCTION**

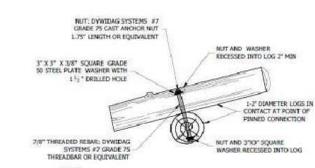
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100%	DESIGN DEVELOPMENT	19 JULY 2019
20%	CONSTRUCTION	11 OCT 2019
	DOCUMENT	
50%	CONSTRUCTION	22 NOV 2019
	DOCUMENT	
75%	QA/QC SET	10 JAN 2020

No.	Description	Date
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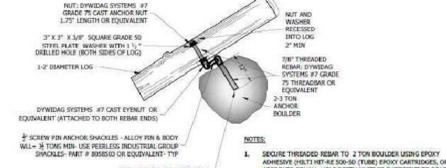
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1. AND 2 PIECE WOOD STRUCTURE DETAILS
N.T.S.



2. LOG-LOG OR LOG-TREE ANCHORING
N.T.S.

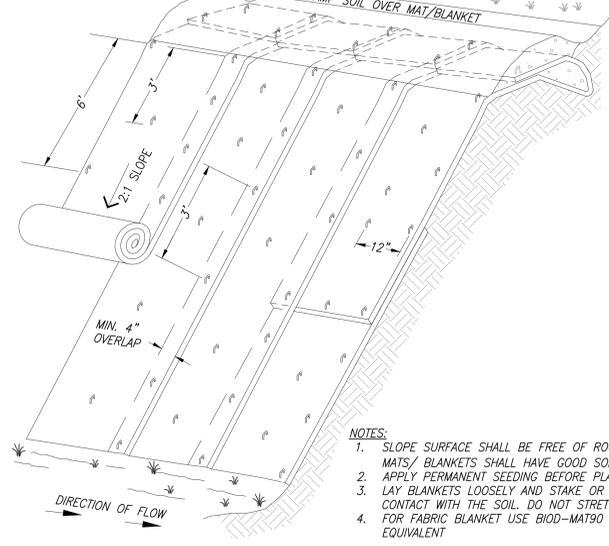


3. LOG-BOULDER ANCHORING
N.T.S.

LOG AND BOULDER ANCHORING DETAIL
N.T.S.

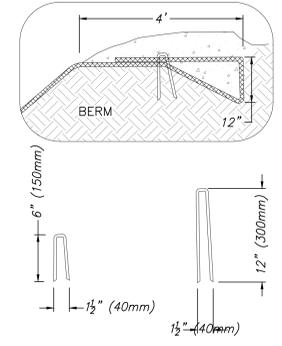
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EROSION BLANKETS SHOULD BE INSTALLED VERTICALLY DOWNSLOPE.



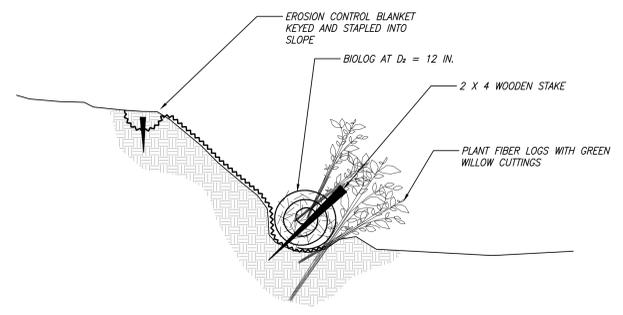
EROSION CONTROL FABRIC DETAIL
N.T.S.

2



COIR BIOLOG STAKING
N.T.S.

3



NOT USED
N.T.S.

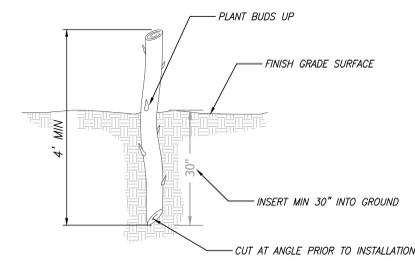
4

NOT USED
N.T.S.

5

WILLOW STAKE PLANTING
N.T.S.

6



- NOTES:
1. WILLOW STAKE SPECIES SHALL BE A MIX OF SPECIES PRESENT AT AND ADJACENT TO THE WORK SITE.
 2. EACH STAKE SHALL BE 1.5" - 3" THICK AT THE BOTTOM TO FACILITATE ROOT GROWTH AFTER TREATMENT WITH ROOTING HORMONE.
 3. INSERT MIN 30" INTO GROUND.
 4. INSTALL STAKES CONCURRENTLY WITH ROCK AND LOG STRUCTURES AND THEN BACKFILL WITH NATIVE SOIL TO PROMOTE ROOTING.



NOT FOR CONSTRUCTION

50% DESIGN DEVELOPMENT	14 JUNE 2019
100% DESIGN DEVELOPMENT	19 JULY 2019
20% CONSTRUCTION	11 OCT 2019
DOCUMENT	
50% CONSTRUCTION	22 NOV 2019
DOCUMENT	
75% QA/QC SET	10 JAN 2020

No.	Description	Date
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Chapter 6 MITIGATION MONITORING AND REPORTING PROGRAM

This proposed Mitigation Monitoring and Reporting Plan (MMRP) has been prepared pursuant to the CEQA Guidelines, which state:

In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency [the County of San Mateo] shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. (§15097(a))

The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. “Reporting” generally consists of a written compliance review that is presented to the decision-making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. “Monitoring” is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both. (§15097 (c))

Table 1, below, lists the potentially significant impacts and mitigation measures identified in the EIR. Table 1 also describes the timing of and responsibility for implementing the mitigation measures related to the Cordilleras Health System Replacement Project. The mitigation measures listed here will be implemented by the County of San Mateo, or by its appointee.

According to CEQA Guidelines Section 15126.4 (a)(2), “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.” Therefore, the County of San Mateo will consider whether to adopt the mitigation measures when it considers whether to approve the project.

Environmental Protection Measures Incorporated into the Project

The Draft EIR identifies Best Management Practices (BMPs) related to air quality, cultural resources, storm water drainage, and noise (Section 2.6). These BMPs are part of the project, not mitigation measures, and are therefore not subject to the monitoring requirements of CEQA Guidelines Section 15097(a); however, the BMPs incorporated into the project are nonetheless listed in Table 2 below to provide a consolidated, complete reference to all the measures that will be implemented to avoid or reduce the project’s potential adverse environmental effects to less than significant levels.

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Table 1: Impacts, Mitigation Measures, and Timing of and Responsibility for Implementing the Mitigation Measures

Impact	Mitigation Measure	Implementation Responsibility/Timing	Monitoring Responsibility	Verified Implementation
AIR QUALITY				
<p>Impact AIR-1: Project construction could generate emissions of diesel particulate matter (DPM) that could pose an adverse health risk to on-site receptors housed in the existing Cordilleras Mental Health Center and Canyon Oaks Youth Center.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure AIR-1: To reduce potential adverse health risks associated with exposure to PM2.5 emissions including DPM emissions, generated during project construction activities, the County and/or its designated contractors, contractor’s representatives, or other appropriate personnel shall apply the following construction equipment restrictions to the proposed project:</p> <ul style="list-style-type: none"> Utilize on-site electrical hook-ups instead of diesel-powered equipment (e.g., diesel generators)) to the maximum extent feasible. All construction equipment with a rated power-output of 50 horsepower or greater shall meet U.S. EPA Tier III Emissions Standards. 	<p>Implementation: The County shall incorporate this air quality mitigation measure into all appropriate engineering and site plan (e.g., building, grading, etc.) documents.</p> <p>Timing: Prior to any demolition and/or ground-disturbing activities, unless otherwise specified.</p>	<p>Monitoring: The County shall review all engineering and site plan documents for inclusion of emissions control measures and contractor’s evidence / verification that equipment complies with the control requirements.</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion</p> <p>Initials: _____</p> <p>Date: _____</p>
BIOLOGY				
<p>Impact BIO-1: Construction activities could impact sensitive habitat in adjacent areas.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure BIO-1: <i>Worker Education and Installation of Environmentally Sensitive Habitat Fencing.</i></p> <p>Mitigation Measure BIO-1a: A biologist knowledgeable about site habitats, species and mitigation requirements shall provide environmental training to construction workers prior to the start of vegetation removal in Phase 1, prior to foundation construction in Phase 2, and prior to landscape installation in Phase 3-4. The training will include:</p> <ul style="list-style-type: none"> a brief presentation to explain biological resources concerns to contractors, their employees, and any other personnel involved in project construction 	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Prior to the start of onsite activities that have the potential to impact vegetation.</p>	<p>Monitoring: The biologist shall provide a copy of the sign in sheets for PDU files. The contractor shall prepare an as-built drawing of the environmentally sensitive area fencing.</p>	<p>Training Session</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Surveys</p> <p>Initials: _____</p>

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Impact	Mitigation Measure	Implementation Responsibility/Timing	Monitoring Responsibility	Verified Implementation
	<ul style="list-style-type: none"> • a description of relevant special-status species, nesting birds, and bats along with their habitat needs as they pertain to the project; • a report of the occurrence of these species in the project vicinity, as applicable; • an explanation of the status of these species and their protection under the federal and state regulations; • a list of measures being taken to reduce potential impacts to natural resources during project construction and implementation; and • instructions if a special-status species is found onsite. <p>A fact sheet conveying this information will be prepared suitable for posting and distribution to the above-mentioned people and anyone else who may enter the construction area. Upon completion of training, employees will sign a form stating that they attended the training and agree to all the conservation and protection measures.</p> <p>The worker education program shall be repeated as necessary when new construction crews initiate work at the site.</p> <p>Mitigation Measure BIO-1b: Environmentally sensitive habitat outside of the construction zone shall be demarcated with orange plastic fencing in the field under the guidance of a biologist familiar with the habitats after the initial worker training and before site work, including grading, grubbing, vegetation removal, fence installation, etc.</p>			<p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>

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Impact	Mitigation Measure	Implementation Responsibility/Timing	Monitoring Responsibility	Verified Implementation
<p>Impact BIO-2: Vegetation management in the Wildland Urban Interface could impact special-status San Francisco collinsia and oak-bay woodland, a sensitive natural community.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure BIO-2: <i>Defensible Space Management Plan</i>. The plan shall be prepared by a wildland resources expert in coordination with a biologist/ecologist knowledgeable with the habitats. It shall identify the purpose of the Defensible Space Management Plan and shall focus on protection of biological resources while reducing ladder fuels and meeting defensible space requirements. It shall identify sensitive resources and how they will be protected. In particular, the plan shall include protection measures for San Francisco dusky-footed woodrat, San Francisco collinsia, creek and riparian habitat, and oak-bay woodland. It shall include a requirement to survey and map the current location of San Francisco collinsia within and adjacent to the defensible space management area prior to vegetation management in any given year. The survey shall be conducted during the bloom period, and prior to vegetation management activities. The management plan shall identify protection measures for sensitive resources such as temporary fencing and worker training. Fencing shall be removed once vegetation management is completed to minimize ecological impacts. The location of individual San Francisco collinsia plants and SFDW houses shall be mapped with GPS or other method that allows them to be searched for again in subsequent years. Surveys shall include areas both within and adjacent to the defensible space zone.</p>	<p>Implementation: Prepare a defensible space management plan and incorporate this requirement into it.</p> <p>Timing: Surveys should be conducted during the bloom period, which may differ in the future. Currently the bloom period is March through May.</p>	<p>Monitoring: Brief annual reports of the results of the survey shall be prepared. Survey requirements shall be included in a defensible space management plan.</p>	<p>Surveys</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>

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Impact	Mitigation Measure	Implementation Responsibility/Timing	Monitoring Responsibility	Verified Implementation
<p>Impact BIO-3: Although there is a low likelihood of occurrence, project construction could impact special-status amphibian and reptile species.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure BIO-3: <i>Pre-construction surveys for Special-status Amphibian and Reptile Species.</i> A qualified biologist shall conduct pre-construction surveys for special-status amphibian and reptile species immediately before initiation of any vegetation removal or ground disturbing activities in Phase 1. This survey will be conducted prior to all new ground disturbing work if ground disturbance is phased. When landscaping is being installed during phases 3 and 4 a biologist shall make a morning sweep to inspect for species as noted in measure BIO-9.</p> <p>Surveys will include walking transects through the project disturbance area and a 100-foot buffer to detect species presence. If species are detected, then a wildlife exclusion fence (such as Ertec) shall be installed to prevent species from entering the site, and it shall be fitted with exit funnels so any species in the project work area can escape. If species are detected the project site shall be monitored regularly in a schedule determined by the biologist in consultation with the US Fish and Wildlife Service and/or California Department of Fish and Wildlife, depending on the species.</p> <p>If special-status amphibian or reptile species are found during the surveys work shall be stopped in that area and the appropriate wildlife agency shall be contacted for direction. The species will be left alone and allowed to move out of the area unless the wildlife agencies specifically allow its removal to a safer location.</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Prior to the start of onsite activities, and periodically as needed.</p>	<p>Monitoring: The biologist shall prepare a written record of survey results and any follow up that was required.</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>Impact BIO-4: Stick houses of San Francisco dusky-footed woodrat could be damaged by construction activities.</p> <p>Significance of Impact Before Mitigation:</p>	<p>Mitigation Measure BIO-4. San Francisco Dusky-footed Woodrat Protection Measures. This measure is divided into part a) pre-construction survey and part b) protection or relocation of woodrat houses.</p> <p>Measure BIO-4a. <i>Pre-construction survey for Woodrat Houses within and adjacent to the grading footprint.</i> Within 30 days prior to the start of construction activities,</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Pre-construction survey no more than 30</p>	<p>Monitoring: The biologist shall prepare a written record of survey results and relocation if implemented.</p>	<p>Surveys</p> <p>Initials: _____</p> <p>Date: _____</p>

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<p>Potentially Significant Significance of Impact After Mitigation: Less than Significant</p>	<p>a qualified biologist will map all San Francisco dusky-footed woodrat houses within a 25-foot buffer around the project footprint. The environmentally sensitive habitat fencing required in Measure BIO-1 will be placed to protect the houses with a minimum 25-foot buffer. If a 25-foot buffer is not feasible, a smaller buffer may be allowable based on advice from a qualified biologist with knowledge of woodrat ecology and behavior, or Measure BIO-3b may be implemented.</p> <p>Measure BIO-4b. Relocation of woodrat houses. Woodrat houses that require relocation will be assessed for obvious signs of current occupation, other house locations within 200 feet, and possible relocation sites. If the house is clearly unoccupied, plans will be made to dismantle it onto a tarp and move it to another location within 200 feet. If there is any doubt about occupancy, plans will be made to relocate the rats and house to a location within 200 feet of the existing location using live trapping, dismantling, reconstruction, and repopulating techniques outside of the breeding season. This type of relocation is limited to late summer months of July and August.</p>	<p>days in advance of the start of construction.</p>		<p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>Impact BIO-5: Project construction activities during the nesting bird season (February 1- September 15) could result in the violation of state and federal laws protecting nesting birds if they are present in the trees and shrubs to be removed or in the adjacent area.</p> <p>Significance of Impact Before Mitigation:</p>	<p>Mitigation Measure BIO-5a. Nesting Bird Survey. To avoid impacts to nesting birds and violation of state and federal laws pertaining to birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (generally prior to February 1 or after September 15). If construction and construction noise occurs within the avian nesting season, all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot buffer (passerines), 500-foot buffer (small raptors, such as accipiters), and 1,000-foot buffer (large raptors, such as buteos) around these areas shall be</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: February 1 through September 15, no more than five days in advance of the start of project construction.</p>	<p>Monitoring: The biologist shall prepare a written record of survey results and implementation of any avoidance/minimization measures to be kept on file at the San Mateo County Manager's Office, Project Development Unit office. The biologist shall monitor any active nests to determine when young</p>	<p>Surveys</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p>

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<p>Potentially Significant Significance of Impact After Mitigation: Less than Significant</p>	<p>thoroughly surveyed, as feasible, for the presence of active nests by a qualified biologist no more than ten days before commencement of any site disturbance activities and equipment mobilization in Phase 1. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed.</p> <p>Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented. If it is determined that birds are actively nesting within the survey area, Mitigation Measure BIO-4b shall apply. Conversely, if the survey area is found to be absent of nesting birds, Mitigation Measure BIO-4b is not required.</p> <p>Measure BIO-5b. Nesting Bird Protection. If pre-construction nesting bird surveys result in the discovery of active nests, no site disturbance or mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests, 500-feet of small raptor nests, and 1,000 feet of large raptor nests, or a distance determined by a qualified biologist in consultation with CDFW, until the chicks have fledged. Monitoring shall be required to ensure compliance with the MBTA and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.</p>		<p>have matured sufficiently to have fledged.</p>	<p>Date: _____</p>
<p>Impact BIO-6: Stick houses of San Francisco dusky-footed woodrat could be damaged by construction activities.</p> <p>Significance of Impact Before Mitigation:</p>	<p>Mitigation Measure BIO-6. Tree removal and/or demolition of the existing buildings could result in the removal or disturbance of bat roost habitat and may result in significant impacts to bat populations if an occupied or perennial (but unoccupied) maternity or colony roost is disturbed or removed.</p> <p>Measure BIO-6a. Bat Pre-construction Survey: To avoid impacting breeding, roosting, or hibernating bats</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Year-round, no more than 48 hours in</p>	<p>Monitoring: The biologist shall prepare a written record of survey results and implementation of any avoidance/minimization measures to be kept on file at the San Mateo</p>	<p>Surveys</p> <p>Initials: _____</p> <p>Date: _____</p>

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<p>Potentially Significant</p> <p>Significance of Impact After Mitigation:</p> <p>Less than Significant</p>	<p>protected by California Fish and Game Code, pre-construction surveys of potential bat roost habitat for evidence of maternal or colony bat roosts (e.g., guano accumulation, acoustic, or visual detections) will be performed in all trees and buildings subject to removal or demolition and within a 50-foot buffer within 48 hours prior to project disturbance. Potential sites can be identified and checked in advance but should be re-checked within the 48-hour window.</p> <p>Measure BIO-6b. Bat Protection. If an occupied maternity or colony roost is detected or evidence of bat occupancy is found, CDFW will be consulted to determine the appropriate mitigation measures, which may include exclusion prior to removal if the roost cannot be avoided, a buffer zone, seasonal restrictions on construction work, and/or construction noise reduction measures.</p>	<p>advance of the start of project construction.</p>	<p>County Manager’s Office, Project Development Unit office. The biologist shall coordinate with CDFW to determine the appropriate mitigation and monitoring if a roost is found.</p>	<p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>Impact BIO-7: The project will result in a net removal of approximately 0.5 acre of native habitat.</p> <p>Significance of Impact Before Mitigation:</p> <p>Potentially Significant</p> <p>Significance of Impact After Mitigation:</p> <p>Less than Significant</p>	<p>Mitigation Measure BIO-7. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared and implemented to replace and protect native habitats on the project parcel. The ultimate goal of the HMMP is to ensure mitigation for impacts to 2.3 acres of oak woodland, 0.07 acre of grassland, 0.63 acre of California sagebrush scrub, and 0.1 acre of creek habitat is successfully implemented. Onsite restoration shall be prioritized over off-site restoration and can include restoration planting that achieves 1:1 replacement, deed restriction to protect higher value habitat at a 2;1 ratio, or a combination of these methods. Specific recommendations are provided below.</p> <p>The HMMP shall:</p> <ul style="list-style-type: none"> • Identify the responsible parties; • Describe project impacts to habitat types and functions and values; 	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: The HMMP shall be prepared in the final design stage and prior to the issuance of bid documents. Specifications reflecting the HMMP shall be included in the bid package/project specifications, as appropriate.</p>	<p>Monitoring: An annual report documenting the progress of the HMMP shall be prepared by a biologist/restoration ecologist for a minimum of five years and provided to the San Mateo County Manager’s office PDU.</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>

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	<ul style="list-style-type: none"> • Identify specific sites (i.e., North Tributary, downstream of the mainstem outfall, upstream woodland clearing, and project landscaping) for restoration and identify the amount and type of habitat restored in each site; • Set goals and performance standards for the restoration, including achieving 80% cover within 10 years; • Set goals and performance standards for the control of invasive weeds with a California Invasive Plant Council Inventory rating of moderate or high; • Provide a detailed implementation plan, including a schedule for completing and monitoring the restoration, financial assurances, a planting/restoration plan, an irrigation plan if appropriate, and maintenance requirements; • Specify monitoring requirements and a minimum monitoring period of five years, with annual reports; and • Any impacted habitat that is not replaced at 1:1 onsite shall be mitigated by the County by placing a deed restriction over the higher quality bay laurel-oak woodland and creek habitat located in the south tributary of Cordilleras Creek, in the canyon behind the Canyon Oaks Youth Center. The area of the deed restriction shall provide a 2:1 ratio for remaining unrestored habitat (2 acres preserved for each 1 acre disturbed). The deed restriction shall prevent future development of this portion of the property in perpetuity and will allow access for habitat management and protection measures, if needed in the future. 			

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	<p>The HMMP is required to be included permit applications to the Regional Water Quality Control Board, California Department of Fish and Wildlife, and US Army Corps of Engineers, and the ultimate details will be refined pending agency comments. Permit requirements related to the HMMP shall be incorporated into the final HMMP that is implemented.</p>			
<p>Impact BIO-8: Construction could inadvertently impact trees close to the grading footprint, but not slated for removal, due to impacts within the tree dripline.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure BIO-8. Tree Protection Plan. A tree protection plan shall be prepared by a qualified professional (forester, arborist, landscape architect, or restoration ecologist) to identify protection measures for all preserved trees adjacent to the development footprint which could be impact by construction activity. The tree protection plan shall be included in the project specifications and/or bid documents and shall be implemented prior to the start of construction. It can be phased if construction impacts are phased.</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Any time prior to site construction activities that may impact tree root zones.</p>	<p>Monitoring: The qualified professional shall prepare a written record of survey results and implementation</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>Impact BIO-9: Daily construction practices may entrap wildlife.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure BIO-9. Housekeeping Measures to Protect Wildlife. The following measures shall be followed:</p> <ul style="list-style-type: none"> • Monofilament plastic netting, including in temporary and permanent erosion control measures (such as straw wattles) shall not be used. • All holes greater than 2 feet deep shall be covered overnight to prevent the entrapment of wildlife. Where holes or trenches cannot be covered, each one shall be inspected daily, 	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: As part of daily construction practices.</p>	<p>Monitoring: The information will be included in the worker education handout. The biologist shall prepare a written record of wildlife that has been relocated during the project construction period.</p>	<p>Plans Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p>

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	<p>shortly before work starts, for trapped wildlife, and the wildlife identified and removed by a qualified biologist. Where feasible, materials shall be designed and positioned in trenches such that entrapped wildlife can escape. This may include ramps, jute netting, or similar methods.</p> <ul style="list-style-type: none"> • Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. • Any pipes or similar structures stored in the project site overnight shall be inspected before they are subsequently moved, capped and/or buried. Entrapped animals shall be identified and removed by a biologist. Special-status species shall be relocated by a biologist with the appropriate scientific collecting permit or authorization under the appropriate wildlife agency. 			<p>Initials: _____</p> <p>Date: _____</p>
<p>Impact BIO-10: The outfall area downstream of the project does not include restoration planting.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure BIO-10. Riparian Restoration Plan. A detailed mitigation planting plan to restore oak woodland or riparian species in this location shall be developed for the outfall. The replanting plan shall be incorporated into the HMMP developed under Mitigation Measure BIO-7.</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Prior to outfall construction.</p>	<p>Monitoring: See Mitigation Measure BIO-7.</p>	<p>Plans Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p> <p>Date: _____</p>

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GEOLOGY AND SOILS				
<p>Impact GEO-1: Project construction could be impacted by seismic shaking and expansive soils, could destabilize project soils, and exacerbate potential for erosion, landslides, and soil liquefaction.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure GEO-1: The County shall implement all recommendations identified in the project specific geotechnical report (ENGEO 2019) during the project design and construction phases. Project design shall be consistent with the California Building Code requirements.</p>	<p>Implementation: San Mateo County or its contractor.</p> <p>Timing: During the design phase and throughout project construction.</p>	<p>Monitoring: San Mateo County</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p>
HAZARDS AND HAZARDOUS MATERIALS				
<p>Impact HAZ-1: Demolition, removal, and transport of building materials containing lead, asbestos containing material, PCBs, mercury, and any project soils containing elevated levels of soluble lead could result in airborne emissions of lead resulting in exposure of workers or the environment to a hazardous material.</p> <p>Significance of Impact Before Mitigation:</p>	<p>Mitigation Measure HAZ-1a: The County or its Contractor shall develop and implement a demolition debris management and disposal plan for the non-RCRA hazardous materials that are to be removed from the project site. The plan shall be designed to prevent releases of hazardous materials in quantities that could pose a risk to human health and the environment, as determined using appropriate BAAQMD, RWQCB, DTSC, and/or other appropriate agency screening thresholds.</p> <p>The plan shall identify the receiving qualified landfill and present proof of waste acceptance. The plan shall specify measures to minimize airborne dust during building deconstruction and soil movement to protect construction workers and neighboring residents from exposure to hazardous material emissions. The plan</p>	<p>Implementation: San Mateo County or its Contractor</p> <p>Timing: Plans addressing management of all hazardous materials shall be submitted to the County PDU prior to construction activities beginning on the site.</p>	<p>Monitoring: County shall review hazardous waste management plan prior to issuance of grading permit. The County or its Contractor shall submit written documentation of landfill acceptance of hazardous waste and implementation of worker and site occupant protective measures taken during site deconstruction. Copies of all documentation shall</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Avoidance / Minimization Measures</p> <p>Initials: _____</p>

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<p>Potentially Significant Significance of Impact After Mitigation: Less than Significant</p>	<p>shall address protection of worker exposure to airborne lead paint particulates through use of personal protective gear, clear identification of the location of hazardous materials, and removal by properly trained/certified workers, and proper cover and transport of hazardous materials, etc.</p> <p>Mitigation Measure HAZ-1b: Consistent with the Hazardous Materials Investigation prepared for the project (SCA Environmental 2014), a coring contractor shall be retained prior to demolition of the structures to perform the following:</p> <ul style="list-style-type: none"> • Core sampling and analysis to determine asbestos content on all roof decks where lightweight concrete is present. • Core sampling and analysis to determine asbestos content of all layers of concrete for the various building systems. • Core sampling under restrooms, under the concrete foundation slab, as well as the subgrade walls to verify the presence of a vapor barrier system. If present, the material shall be tested to verify asbestos content. If the material is found to contain asbestos, the demolition contractor shall possess asbestos-registration and proper training, and such concrete shall not be recycled. • Destructive testing of all other materials assumed to contain asbestos in the Hazardous Materials Investigation (see table in Attachment A of Appendix E). <p>If any of the above-listed materials are found to contain asbestos, such materials shall be abated in accordance with applicable federal, state and local regulations regarding worker safety and the safe removal and disposal of ACMs.</p>		<p>be kept on file at the County PDU.</p>	<p>Date: _____</p>

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Impact	Mitigation Measure	Implementation Responsibility/Timing	Monitoring Responsibility	Verified Implementation
	<p>Mitigation Measure HAZ-1c: Consistent with the Hazardous Materials Investigation prepared for the project (SCA Environmental 2014):</p> <ul style="list-style-type: none"> • Destructive sampling of the lead sheeting in the E. Offices Area on the 2nd Floor of the existing CMHC building shall be performed prior to renovation or demolition of the building to determine the presence and lead content of this material. • For the purpose of complying with the Cal/OSHA regulation of lead in construction (8 CCR 1532.1), all coated surfaces in the existing CMHC building shall be considered to contain some lead and require demolition dust control procedures for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1. The aforementioned regulation contains requirements for lead air monitoring, work practices, respiratory protection, etc., that are triggered by the presence of even very low levels of lead. • Based on the California Total Threshold Level Concentration (TTLC) hazardous waste standard, the paints may be classified as hazardous wastes. The County or its Contractor shall perform additional sampling and analysis for leachable lead content during demolition to determine waste characterization. <p>Mitigation Measure HAZ-1d: PCBs and mercury-containing materials in the existing CMHC building shall be disposed of in accordance with Cal/EPA regulations prior to building demolition. Disposal methods may include those suggested in the Hazardous Materials Investigation (Appendix E):</p>			

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HYDROLOGY AND WATER QUALITY				
<p>Impact HYD-1: The new Cordilleras Creek drainage system conveying creek flows through the project site and detention basins proposed to control stormwater runoff from new impervious surfaces on the project site could contribute to on or off-site flooding if not properly maintained.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure HYD-1: Over the life of the project, the County or its Contractor shall maintain the Cordilleras Creek drainage lines to continuously provide flow capacity for a 100-year, 2-hour storm event. All detention facilities shall be maintained to continuously provide the required volume storage in a 10-year, 1-hour storm event, and shall include a financing mechanism to ensure that the required maintenance will be performed. The maintenance plan shall specify how frequently the facilities shall be inspected, and shall include stormwater detention basins, the debris rack(s) upstream of the project site, and the mainline culvert that carries Cordilleras Creek flow beneath the project site.</p>	<p>Implementation: San Mateo County or its Contractor.</p> <p>Timing: Final drainage plan shall be submitted to County Department of Public Works for approval prior to County issuance of grading permit.</p>	<p>Monitoring: County Department of Public Works shall review and approve final drainage plans prior to issuance of grading permit. The County Department of Public Works shall establish a maintenance plan prior to project occupancy.</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion</p> <p>Initials: _____</p> <p>Date: _____</p>

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NOISE				
<p>Impact NOI-1: Project construction activities would occur in close proximity to the occupied mental health facility (CMHC) and could generate noise and vibration levels that interfere with mental health service operations and/or patient care and well-being.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure NOI-1: To reduce potential construction noise and vibration impacts on mental health service operations, the County shall require the construction contractor to:</p> <ul style="list-style-type: none"> • Apply noise attenuation materials to windows of existing CMHC building windows to reduce construction noise in the building interior used for patient care. • Provide CMHC and Canyon Oaks Youth Center contacts a three-week look ahead schedule to keep the Canyon Oaks Youth Center and CMHC informed of potential construction activities and noise levels. • Regularly (i.e., on a daily or weekly basis) coordinate with staff from the Canyon Oaks Youth Center and CMHC on staff observations regarding patient care, response to construction noise and vibration effects, and overall well-being. • Take actions to reduce construction noise and vibration levels if staff from the Canyon Oaks Youth Center or CMHC observe repeated adverse patient reactions to construction noise and vibration levels that interferes with mental health service operations or operating goals. Such actions may include: <ul style="list-style-type: none"> ○ Construction activity management techniques, such as phasing activities to take advantage of shielding/attenuation provided by topographic features or buildings, or coordinating with mental health staff to conduct most impactful noise 	<p>Implementation: The County shall incorporate this mitigation measure into all appropriate engineering and site plan (e.g., building, grading, etc.) documents.</p> <p>Timing: During construction activities.</p>	<p>Monitoring: The County shall review all engineering and site plan documents for inclusion of this requirement.</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion</p> <p>Initials: _____</p> <p>Date: _____</p>

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	<p>generating construction activities at times that may be less intrusive;</p> <ul style="list-style-type: none"> ○ Additional construction equipment controls such as use of electric equipment instead of combustion equipment when feasible; or ○ Monitoring of actual construction levels to verify sound levels and potential noise attenuation benefits of any of the above measures. 			
TRANSPORTATION				
<p>Impact TRA-1: The proposed project would add 18 new employees to an area of the County where VMT per worker (30.96) exceeds the MTC regional daily average VMT for the Bay Area workers (21.80). As a result, the new employees at Cordilleras project would generate VMT at a rate that exceeds the County's significance threshold, which is 15% less than the daily regional average VMT (18.53 miles per worker).</p> <p>Impact is Significant and Unavoidable</p>	<p>There are no feasible mitigation measures to reduce the project VMT from 30.96 to 18.53 (a 40 percent reduction) given the shift nature of CMHC employees, the CMHC distance from urban centers, and the absence of high-quality major mass transit stops. The increase in VMT above the regional average is significant and unavoidable.</p>			<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion:</p> <p>Initials: _____</p> <p>Date: _____</p>
UTILITIES				
<p>Impact UT-1: Construction of water tank and service line requires hillside cuts and trenching. Potential impacts to</p>	<p>Mitigation Measure: The impact is mitigated by Measure GEO-1 (EIR section 6.5) and Measures BIO-3, BIO-4a and 4b, BIO-5a and 5b, BIO-6, BIO-7a and 7b,</p>			

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vegetation and wildlife could occur. Significance of Impact Before Mitigation: Potentially Significant Significance of Impact After Mitigation: Less than Significant	and BIO-9 (EIR section 4.5). No additional mitigation is required.			
Impact UT-2: Construction of stormwater drainage could impact creek habitat upstream and downstream of the project and impact water quality. Significance of Impact Before Mitigation: Potentially Significant Significance of Impact After Mitigation: Less than Significant	Mitigation Measure: The impact is mitigated by Measures BIO-6, BIO-8, HYD-1, and HYD-2 (EIR sections 4.5 and 8.5). No additional mitigation is required.			

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WILDFIRE				
<p>Impact WFR-1: The project would exacerbate existing wildfire risks by reducing soil moisture through tree removal, installing the anti-debris barriers that could accumulate flammable material thereby increasing the fuel load as well as funneling fires into the project area, and constructing buildings adjacent to steep slopes, which could make firefighting more difficult.</p> <p>Impact is Significant and Unavoidable</p>	<p>Mitigation Measure WFR-1: The County shall prepare a Defensible Space Management Plan to identify specific site treatment activities designed to reduce fuel load. The plan shall identify actions specific to 30-foot and 100-foot defensible space zones pursuant to Cal Fire recommendations. Actions within the defensible space are expected to include, but not be limited to, removal of ground and ladder fuels, regular clearing of debris barriers, and general maintenance of the defensible space zone. The Plan shall specify the frequency of site inspections and vegetation management activities as well as the responsible party for conducting these activities.</p>	<p>Implementation: San Mateo County Public Works Department</p> <p>Timing: Prior to project occupancy</p>	<p>Monitoring: County PDU shall submit Defensible Space Management Plan to Cal Fire for review and approval. County Public Works Department shall be responsible for implementing fuel reduction treatments.</p>	<p>Plan Submittal</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion:</p> <p>Initials: _____</p> <p>Date: _____</p>

Table 1: Impacts, Mitigation Measures, and Timing of and Responsibility for Implementing the Mitigation Measures

Impact	Mitigation Measure	Implementation Responsibility/Timing	Monitoring Responsibility	Verified Implementation
<p>Impact WFR-2: The slope surrounding the project could suffer from post fire instability due to loss of vegetation and soil structure.</p> <p>Significance of Impact Before Mitigation: Potentially Significant</p> <p>Significance of Impact After Mitigation: Less than Significant</p>	<p>Mitigation Measure WFR-2: In the event of a wildfire on the project parcel, a geotechnical engineer will examine the slopes for potential instability. The inspection shall occur as soon as feasible after the fire and before any rain events. A report shall be prepared by the geotechnical engineer, and the County shall implement recommendations to reduce the potential of slope instability.</p>	<p>Implementation: San Mateo County</p> <p>Timing: Post-fire event inspection</p>	<p>Monitoring: Post fire slope inspections shall be addressed in the Defensible Space Management Plan prepared in response to Measure WFR-1. County PDU shall submit Defensible Space Management Plan to Cal Fire for review and approval. County Public Works Department shall be responsible for site inspections.</p>	<p>Completion</p> <p>Initials: _____</p> <p>Date: _____</p> <p>Monitoring Completion:</p> <p>Initials: _____</p> <p>Date: _____</p>

Table 2: Environmental Protection Measures Incorporated into the Project	
Air Quality BMPs	<p>The County and/or its contractor shall implement the following BAAQMD Basic Construction Mitigation Measures during project construction:</p> <ol style="list-style-type: none"> 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3) 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. 4) All vehicle speeds on unpaved roads shall be limited to 15 mph. 5) 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. 6) 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. 7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specification. All equipment shall be checked by a certified visible emissions evaluator. 8) Post a publicly visible sign with the telephone number and person to contact at the County Department of Public Works regarding dust complaints. The Department of Public Works or its contractor shall respond and take corrective action within 48 hours. The publicly visible sign shall also include the contact phone number for the Bay Area Air Quality Management District to ensure compliance with applicable regulations.
Cultural Resources BMPs	<p>The County and/or its contractor shall implement the following Best Management Practices during project construction to avoid potential impacts on unanticipated and previously unknown cultural resources:</p> <ol style="list-style-type: none"> 1) In the event that any archaeological or paleontological resources are encountered at any time during construction, it will be the responsibility of the construction/project manager to stop work within 50 feet of any discovery and contact a qualified archaeologist. Work in the area shall be suspended until the archaeologist prepares a plan for the evaluation of the resource and the plan is submitted to the County for approval. 2) Pursuant to Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code of the State of California, in the event of the discovery of human remains during construction, the construction manager shall stop work and notify the San Mateo County Coroner. If the Coroner determines that the remains are not subject to his/her authority, he/she shall notify the Native American Heritage Commission (NAHC) who shall attempt to identify descendants of the deceased.
Storm Water and Drainage Control BMPs	<p>The County and/or its contractor shall prepare and implement a stormwater and drainage control plan in compliance with the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), Provision C.3 of the County’s Municipal Regional Stormwater NPDES Permit and any other County required provisions. The plan shall specify best management practices for the control and prevention of stormwater pollution. The plan shall address both construction-phase and post-construction pollutant impacts from development.</p> <p>Construction-phase measures shall include: erosion control measures such as installing fiber rolls, silt fences, gravel bags, or other erosion control devices around and/or downslope of work areas and around storm drains prior to earthwork and before the onset of any anticipated storm events; monitoring and maintaining all erosion and sediment control devices; designating a location away from storm drains when</p>

Table 2: Environmental Protection Measures Incorporated into the Project	
	<p>refueling or maintaining equipment; scheduling grading and excavation during dry weather; and removing vegetation only when absolutely necessary.</p> <p>Post-construction drainage controls shall be specified to capture and treat storm water onsite.</p>
Noise Control BMPs (Construction)	<p>The construction contractor shall implement measures to reduce the noise levels generated by construction equipment operating at the project site during project grading and construction phases. The construction contractor shall include in construction contracts the following requirements or measures shown in the sole discretion of the Community Development Director to be equally effective:</p> <ol style="list-style-type: none"> 1) Hours of construction activity shall be limited to Monday to Friday, from 7:00 AM to 6:00 PM, and Saturdays 9:00 AM to 5:00 PM in accordance with the County of San Mateo Ordinance Code. 2) All construction equipment shall be equipped where feasible with improved noise muffling, and maintain the manufacturers' recommended noise abatement measures, such as mufflers, engine covers, and engine isolators in good working condition. 3) Stationary construction equipment that generates noise levels in excess of 65 dBA Leq shall be located as far away from existing residential areas as possible. 4) Heavy-duty vehicle storage and start-up areas shall be located as far away from occupied residences where feasible. 5) All equipment shall be turned off if not in use for more than five minutes. 6) Drilled piles or the use of sonic or vibratory pile drivers shall be used instead of impact pile drivers. 7) Prior to the commencement of grading or construction at the project site, an information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. The County and/or its contractor shall rectify all received complaints regarding non-compliant noise activities within 24 hours of their receipt.

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